

# CITY ON A HILL

## Safeguarding children and adults at risk of harm policy

v1

### Document Management

#### Revision History

The purpose of this section is to provide the reader with a historical record of the revisions made to this document.

Date	Author(s)	Revisions	Version Number
Jan - May 2022	Jodie Hope, Safeguarding Team (CoaH) and Lynda Stoddart (GLGS HR Solutions)	Creation	v0.1
July 2022	Jodie Hope (CoaH)	Revisions from Trustees – document management, church details, aims, definitions, designated Safeguarding Team, safer recruitment, raising awareness of the policy, responding to a disclosure or concern, detailed procedures, Pastoral care and the inclusion of Safeguarding Trustee responsibilities	v0.2
November 2022	Jodie Hope (CoaH)	Revisions from Thirtyone:eight – added page numbers and changed font, changed adults at risk definition, added in code of conduct and complaints policy, changed photo permissions in privacy policy, changed the order of some content	v0.3

#### PLEASE NOTE

All versions will be signed off by the Executive Pastor and the Trustees. A version of the out of date copies will be saved by the organisation. All other out of date copies of the policy should be destroyed once the updated copy has been distributed.

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## 1 Contact details

### 1.1 Church contact details

Name: City on a Hill

Lead Pastor: Peter Anderson

Membership of organisation: Evangelical Alliance

Church phone: 0131 510 6130

Safeguarding email: [safeguardingofficer@cityonahill.org.uk](mailto:safeguardingofficer@cityonahill.org.uk)

Lead Safeguarding Officer: Dan Everett

Safeguarding Officers: Sammy Ewan, Sarah McGreehin

### 1.2 Statutory authorities contact details

The Safeguarding Officer should contact the appropriate agency, or they may first ring the Thirtyone:eight helpline for advice. They should then contact the relevant Social Services department in the area the child or adult lives.

Police	24 hours	Emergency: 999 Non-emergency: 101
Ambulance	24 hours	Emergency: 999 Non-emergency: 111
Thirtyone:eight	Monday to Friday 9am to 5pm (out of hours available for urgent calls)	0303 003 1111
Edinburgh social care for children and adults	Monday to Thursday 8.30am to 5pm Friday 8.30am to 3.55pm	0131 200 2324
	Out of hours	0800 731 6969
	Domestic abuse helpline	0800 027 1234
	Webpage	<a href="https://www.edinburgh.gov.uk/get-care-support/contact-crisis">https://www.edinburgh.gov.uk/get-care-support/contact-crisis</a>
Midlothian social care for children	Monday to Thursday 9am to 5pm Friday 9am to 3.30pm	0131 271 3413
	Out of hours	0800 731 6969
	Webpage	<a href="https://www.midlothian.gov.uk/info/670/have_your_say/315/contact_us">https://www.midlothian.gov.uk/info/670/have_your_say/315/contact_us</a>

Midlothian social care for adults	Monday to Thursday 9am to 5pm Friday 9am to 3.30pm	0131 271 3900
	Out of hours	0800 731 6969
	Webpage	<a href="https://www.midlothian.gov.uk/info/670/have_your_say/315/contact_us">https://www.midlothian.gov.uk/info/670/have_your_say/315/contact_us</a>
West Lothian social care for children	Monday to Friday 8am to 5pm	01506 284 440
	Out of hours	01506 281028 or 01506 281029
	Webpage	<a href="https://www.westlothian.gov.uk/article/50756/Social-Care-Updates">https://www.westlothian.gov.uk/article/50756/Social-Care-Updates</a>
West Lothian social care for adults	Monday to Friday 8am to 5pm	01506 284 848
	Out of hours	01506 281028 or 01506 281029
	Domestic abuse	01506 281055
	Webpage	<a href="https://www.westlothian.gov.uk/article/50756/Social-Care-Updates">https://www.westlothian.gov.uk/article/50756/Social-Care-Updates</a>
East Lothian social care for children and adults	Monday to Friday 8am to 5pm	01875 824309
	Out of hours	0800 731 6969
	Webpage	<a href="https://www.eastlothian.gov.uk/info/210558/social_care_and_health">https://www.eastlothian.gov.uk/info/210558/social_care_and_health</a>

## 2 Introduction

### Our commitment

In all areas of church life we recognise the need to provide a safe and caring environment for children, young people and adults, and we aim to establish an atmosphere of mutual respect, trust, safety and co-operation whilst learning and having fun at the same time. We acknowledge that anyone can be the victim of physical, emotional, sexual, spiritual and financial abuse or neglect. We aim to adopt the highest possible standards and take all reasonable steps in relation to people's safety and welfare, in accordance with statutory guidance, and are committed to build constructive links with statutory and voluntary agencies involved in safeguarding.

Our safeguarding policy and procedures are based on the [ten safeguarding standards](#) published by Thirtyone:eight, an independent Christian charity which we are members of. Thirtyone:eight help individuals, organisations, charities, faith and community groups to protect people from harm, and

can be used by the members of all teams in City on a Hill who have responsibility for children or adults at risk of harm.

### 3 Aim

The policy aims to:

- Be a working policy document that sets the standards and expectations that City on a Hill has around safeguarding.
- Provide understanding of types of abuse, and how to spot them.
- Promote good governance as this helps us prevent harm and means we can respond quickly and with integrity when concerns arise.
- Promote good culture, as having a safe and open culture creates good attitudes towards safeguarding and ensures it is taken seriously by all.
- Promote safer recruitment, as our employees and volunteers create a barrier of safety to prevent those who may pose a risk from getting access to vulnerable groups.
- Promote training and awareness, as raising awareness of safeguarding equips employees, volunteers and anyone associated with the church to identify, prevent and respond to people being harmed.
- Promote a safe working environment for all by agreeing and communicating ways to work safely, helping people keep themselves and others safe.
- Promote the appropriate appointment, supervision, training and support of employees and volunteers, and raising awareness of the *CoaH Code of conduct*.
- Promote working well in partnership with other organisations, making sure we are working to the same standards of safeguarding practice.
- Ensure we know how to respond well to disclosures, allegations and concerns, as responding well means people can be protected from harm and action can be taken to stop abuse from happening.
- Ensure we stay a safe place open to all, that can support and work safely with those who may pose a risk.

### 4 Scope

All personnel – employees, sub-contractors, work placement personnel, volunteers, anyone associated with the church and third-party clients.

### 5 Policy

#### 5.1 Definitions

**Safeguarding:** actions taken to protect people from harm.

**Child:** a person aged 0 – 18 years old.

**Adult at risk of harm:** The Adult Support and Protection (Scotland) Act 2007 defines an adult at risk as someone who is: (a) unable to safeguard their own well-being, property, rights or other interests, (b) are at risk of harm, and (c) because they are affected by disability, mental disorder, illness or

physical or mental infirmity, are more vulnerable to being harmed than adults who are not so affected.

An adult is at risk of harm for the purposes of subsection (1) if— (a) another person’s conduct is causing (or is likely to cause) the adult to be harmed, or (b) the adult is engaging (or is likely to engage) in conduct which causes (or is likely to cause) self-harm.

Adults in Scotland are generally considered to be over 18, however, depending on the legal circumstances there are some cases where an adult is considered to be over 16. Furthermore, there are cases where a person may be aged 16-18 (and considered an adult) but their care is rolled out through a Child’s Plan.

## 5.2 Understanding harm

Defining harm can be complex, and the words “harm” and “abuse” may be used interchangeably throughout this policy. Abuse is a form of maltreatment, and a person may cause harm by inflicting or failing to prevent abuse. This may happen within a private home, an institution or in a community setting. Very often the person inflicting harm is known by, or in a trusted relationship with, the individual being harmed, but they also may not know the person at all. Harm may also be caused online, or technology may be used to facilitate harm offline.

In order to safeguard those in our church we adhere to the UN Convention on the Rights of the Child and have as our starting point as a definition of abuse, Article 19 which states:

1. Parties shall take all appropriate legislative, administrative, social and educational measures to protect the child from all forms of physical or mental violence, injury or abuse, neglect or negligent treatment, maltreatment or exploitation, including sexual abuse, while in the care of parent(s), legal guardian(s) or any other person who has the care of the child.
2. Such protective measures should, as appropriate, include effective procedures for the establishment of social programmes to provide necessary support for the child and for those who have the care of the child, as well as for other forms of prevention and for identification, reporting, referral, investigation, treatment and follow-up of instances of child maltreatment described heretofore, and, as appropriate, for judicial involvement.

Also, for adults the UN Universal Declaration of Human Rights with particular reference to Article 5 which states:

1. No one shall be subjected to torture or to cruel, inhuman or degrading treatment or punishment.
2. Detailed definitions, and signs and indicators of abuse, as well as how to respond to a disclosure of abuse, are included here in our policy.

For Types of abuse and recognising abuse see [Appendix 1](#).

## 5.3 Designated Safeguarding Team

City on a Hill’s Lead Safeguarding Officer is the Executive Pastor, who leads a team of Safeguarding Officers. Whilst the activities of the Lead Safeguarding Officer can be delegated to other appropriately trained Safeguarding Officers, the ultimate responsibility for safeguarding at City on a Hill remains with the Executive Pastor. The Lead Safeguarding Officer should always be available to

discuss any urgent safeguarding concerns. In the event that the Lead Safeguarding Officer is unavailable, other Officers will be identified to ensure a continuous provision of safeguarding oversight.

All Safeguarding Officers should undergo training to provide them with the knowledge and skills required to carry out their role. The training should be updated at least every two years. In addition to their formal training, their knowledge and skills should be updated (for example via e-bulletins, meeting other Safeguarding Officers or taking time to read and digest safeguarding developments) at regular intervals to keep up with any developments relevant to their role.

The Safeguarding Team is responsible for:

- Acting as an advocate (i.e. someone who speaks for and on behalf of children and adults at risk of harm)
- Promoting and overseeing the implementation of the Safeguarding children and adults at risk of harm policy and all relevant procedures
- Leading the review and update of the policy document and all relevant procedures on an annual basis
- Dealing with any reported disclosures, allegations or concerns within the organisation
- Ensuring that appropriate records are kept in relation to the reporting of any safeguarding incidents
- Acting in reporting concerns of abuse to the statutory authorities, for example children or adult's Social Care (formerly Social Services) or the Police in all cases of suspected abuse
- Conducting risk assessments for people who pose a risk, and implementing and reviewing contracts where appropriate
- Conducting risk assessments for employee and volunteer roles, and supply specific safeguarding guidance depending on the role
- Ensuring the safe recruitment of employees and volunteers

For more see the *CoaH Safeguarding Officer role profile* ([Appendix 2](#)).

## 5.4 Safer recruitment

### 5.4.1 Safeguarding team responsibilities

The Safeguarding Team will ensure all employees and volunteers will be appointed, supervised, trained and supported in accordance with government guidance on safe recruitment. This includes ensuring that:

- There is a written role profile for the post, including Safeguarding requirements
- Those applying have completed an application and self-declaration form on ChurchSuite
- Those applying have an onboarding meeting where Safeguarding is discussed
- Written references have been obtained, and followed up where appropriate
- A relevant disclosure check has been completed (we will comply with Code of Practice requirements concerning the fair treatment of applicants and the handling of information)
- Qualifications, where relevant, have been verified
- A suitable training programme is provided

- The applicant has been given a copy of the organisation's Safeguarding policy and knows how to report concerns
- All workers will be issued with a *CoaH Code of conduct* ([Appendix 3](#)).

#### 5.4.2 Disclosure checks

City on a Hill is a registered body with Volunteer Scotland Disclosure Services (VSDS). Registered bodies are entitled in law to apply for a standard or enhanced disclosure check for employees and volunteers through VSDS, only where the activity is 'regulated' and meets the relevant criteria.

**Standard disclosure check** - contains details of all spent and unspent convictions, cautions, reprimands and warnings held on the Police National Computer (PNC) that are not 'protected'. Protected convictions and cautions are normally old and minor; they are filtered by Disclosure Scotland so they are not disclosed and they must not be taken into account by employers.

**Enhanced disclosure check** - contains the same information as the standard check but also any relevant and proportionate information held by the local police forces. In addition, where the role is eligible, registered bodies can request a check on whether a person is barred from working with children or adults in regulated activity (particular types of work with children and adults).

For more see the *CoaH Volunteer application for regulated work and the PVG application procedure* ([Appendix 4](#)).

#### 5.4.3 Ongoing support and training

The Safeguarding Team are committed to supporting all employees and volunteers and ensuring they receive ongoing support and supervision by:

- Ensuring training and development opportunities for all employees and volunteers
- Developing a culture of awareness of safeguarding issues to help protect everyone

All our employees and volunteers will receive induction training and undertake recognised safeguarding training as per the *CoaH Safeguarding training plan* ([Appendix 5](#)).

#### 5.4.4 Working with offenders and those who may pose a risk

When someone attending City on a Hill is known to have abused children, is under investigation, or is known to be a risk to adults with care and support needs, a Safeguarding Officer, along with the individual's Community Pastor, will supervise the individual concerned and offer pastoral care; but in accordance with their safeguarding commitment to the protection of children and adults with care and support needs, set boundaries with and for that person, which they will be expected to keep. These boundaries will be based on an appropriate risk assessment and through consultation with appropriate parties, and a Safeguarding Contract will be put in place and reviewed at least annually. For more see the *CoaH Safeguarding contract policy & procedure* ([Appendix 6](#)).



## 5.5 Raising awareness of the policy

City on a Hill will ensure that all new employees and volunteers doing regulated work are given this Safeguarding policy, that they are given time to read it during their induction period, and that a record is kept on ChurchSuite of those who have read and accepted the policy. The CoaH Safeguarding policy will be readily available for staff and volunteers and available on the church website, with further policies and procedures available on request.

## 5.6 Individual responsibility

Anyone working with children and adults at risk of harm within City on a Hill must ensure they are familiar with this policy and how to respond to a disclosure or concern. In addition, they must, wherever possible, conduct themselves professionally and positively.

## 5.7 Responding to disclosures or concerns

Under no circumstances should an employee or volunteer carry out their own investigation into a disclosure or concern of harm being caused, but instead follow the procedures as outlined in this document.

### 5.7.1 When someone makes a disclosure

If someone discloses something to you, remember to listen carefully and reassure the person disclosing that they have done the right thing by telling someone. One question that is very useful to ask is “Does anyone else know?”

Never promise not to tell anyone or keep it a secret, but do maintain confidentiality where appropriate. Let the person know that any information will only be shared on a need-to-know basis, and that you are going to share it with your team leader and a Safeguarding Officer as the next step.

### 5.7.2 Reporting a disclosure or concern

The person in receipt of a disclosure of abuse, or who has a safeguarding concern, should report as soon as possible using the *CoaH Safeguarding concern and incident report form* ([Appendix 7](#)) using the person’s own words to describe the abuse. This form can be found and completed via the Safeguarding concern and incident report form on ChurchSuite, or can be downloaded from the church website and emailed to the Safeguarding Team at [safeguardingofficer@cityonahill.org.uk](mailto:safeguardingofficer@cityonahill.org.uk)

A Safeguarding Officer will deal with the disclosure, including referring the matter on to the statutory authorities where necessary (see section 1.2).

If the disclosure in any way involves a Safeguarding Officer or the Senior Pastor, then the report should be made to the Lead Safeguarding Officer, who is the Executive Pastor, and the Designated Trustee for Safeguarding.

If the disclosure in any way involves the Lead Safeguarding Officer, then the report should be made to the Designated Trustee for Safeguarding and the Senior Pastor.

In the absence of all Safeguarding Officers and the Designated Trustee for Safeguarding, then the report should be made in the first instance to:

**Thirtyone:eight**

PO Box 133,  
Swanley,  
Kent,  
BR8 7UQ  
Tel: 0303 003 1111

Alternatively contact Social Services or the police.

### 5.7.3 When others need to know

The Lead Safeguarding Officer may need to inform others depending on the circumstances and/or nature of the concern for example:

- The Designated Trustee for Safeguarding who may need to liaise with the insurance company or the Office of the Scottish Charity Regulator to report a serious incident.
- Report to Disclosure Scotland if the concern or disclosure meets the criteria outlined for a volunteer working with a child or adult at risk of harm. See *CoaH Policy on making a referral to Disclosure Scotland* ([Appendix 8](#)).

Disclosures must not be discussed with anyone other than those nominated above. The written record of the disclosure should be made in accordance with these procedures and kept in a secure place by the Safeguarding Officers.

The church leadership will support the Safeguarding Officers in their roles and accept that any information they may have in their possession will be shared in a strictly limited way on a need to know basis only.

It is, of course, the right of any individual as a citizen to make a direct referral to the safeguarding agencies or seek advice from Thirtyone:eight, although we hope that members of City on a Hill will use this procedure. If, however, the individual with the concern feels that the Safeguarding Officer/Trustee has not responded appropriately, or, where they have a disagreement as to the appropriateness of a referral, they are able to make a complaint via the *CoaH Complaints policy* ([Appendix 12](#)) and/or contact an outside agency directly (see section 1.2). We hope by making this statement that the Safeguarding Team demonstrates its commitment to effective safeguarding and the protection of all those at City on a Hill.

## 5.8 Detailed procedures

### 5.8.1 Detailed procedures where there is a disclosure or concern about a child

#### Disclosures or concerns of physical injury, neglect or emotional abuse

If a child has a physical injury, a symptom of neglect or where there are concerns about emotional abuse, **the Safeguarding Officer will:**

- Seek advice from Thirtyone:eight, who will confirm their advice in writing.
- Contact Children’s Social Services for advice in cases of deliberate injury, if concerned about a child's safety or if a child is afraid to return home.
- Not tell the parents or carers unless advised to do so, having contacted Children’s Social Services.
- Seek medical help if needed urgently, informing the doctor of any suspicions.
- For lesser concerns, (e.g. poor parenting), encourage parent/carer to seek help, but not if this places the child at risk of significant harm.
- Where the parent/carer is unwilling to seek help, offer to accompany them. In cases of real concern, if they still fail to act, contact Children’s Social Services direct for advice.

### **Disclosures or concerns of sexual abuse**

In the event of concerns or disclosures of sexual abuse, **the Safeguarding Officer will:**

- Seek advice from Thirtyone:eight, who will confirm their advice in writing.
- Contact the Children’s Social Services Department Duty Social Worker for children and families or Police Child Protection Team direct. The Safeguarding Officer will NOT speak to the parent/carer or anyone else.

### **5.8.2 Detailed procedures where there is a disclosure or concern about an adult**

#### **Disclosures or concerns of abuse or harm**

Including; physical, sexual, organisational, financial, discriminatory, neglect, self-neglect, forced marriage, modern slavery and domestic abuse.

If there is a disclosure or a concern about any of the above, **the Safeguarding Officer will:**

- Seek advice from Thirtyone:eight, who will confirm their advice in writing.
- Contact the Adult Social Care Team who have legal responsibility to investigate allegations of abuse.
- If the adult is in immediate danger or has sustained a serious injury contact the Emergency Services, informing them of any suspicions.

If there is a disclosure or concern regarding spiritual abuse, the Safeguarding Officer will:

- Seek advice from Thirtyone:eight and in discussion with them consider appropriate action with regards to the scale of the concern. Thirtyone:eight will confirm their advice in writing.
- Identify support services for the victim i.e. counselling or other pastoral support.

### **Disclosures or concerns of harm by a person who works with children**

If an accusation is made against an employee or a volunteer whilst following the procedure outlined above, the Safeguarding Officer will, in accordance with Local Health and Social Care Partnership procedures:

- Seek advice from Thirtyone:eight, who will confirm their advice in writing.
- Refer the matter to Children’s Social services who will investigate the concerns and pass on information to Disclosure Scotland in relation to the worker.
- Where applicable make a referral to Disclosure Scotland ([Appendix 8](#)) for consideration of the person being placed on the barred list for working with children or adults with additional care and support needs. A referral must be made within 3 months of the organisation’s disciplinary actions or the organisation will find themselves criminally liable.

### **Disclosures or concerns of harm by a person who works with adults at risk of harm**

The Safeguarding Officer will:

- Seek advice from Thirtyone:eight, who will confirm their advice in writing.
- Liaise with Adult Social Services to discuss concerns and where appropriate with Disclosure Scotland in regards the suspension of the worker.
- Where applicable, make a referral to the Disclosure Scotland ([Appendix 8](#)) .A referral must be made within 3 months of any disciplinary measures.

The Adult Support and Protection (Scotland) Act 2007 and the Code of Practice April 2014 places the duty upon Adult Services to investigate situations of harm to adults with care and support needs. This may result in a range of options including action against the person or organisation causing the harm, increasing the support for the carers or no further action if the adult with care and support needs chooses for no further action and they have the capacity to communicate their decision. However, this is a decision for Adult Social Services to decide not the Safeguarding Officers or church leadership.

## **5.9 Pastoral Care**

### **Supporting those affected by abuse**

The Safeguarding Team is committed to offering or signposting for pastoral care and support or counselling, and working with the statutory authorities as appropriate, for all those who have been abused or affected by the harm caused – including the family of the abused - who have contact with or are part of City on a Hill. See *CoaH Pastoral care and support policy* for those affected by abuse ([Appendix 9](#)).

## **6 Management of safeguarding information**

Careful attention is paid to the storage, use and sharing of data held by the church relating to other people. The General Data Protection Regulation (2018) and Data Protection Act (2018) outline the rights of individuals regarding information that is held and used by organisations. Everyone that processes data within the church should understand their responsibilities under GDPR and comply

with its requirements. Our *CoaH Privacy policy* outlines how we safeguard any personal data that we gather, and can be found on our website. All Safeguarding related data and documents are stored digitally on a laptop with two-factor authentication, in password protected folders and only accessible by the relevant Safeguarding Officers. See *CoaH Privacy policy* ([Appendix 10](#)).

## 7 Safeguarding for Trustees

At City on a Hill, our Trustees have a collective responsibility for Safeguarding even if certain aspects of the work are delegated to staff. A designated Trustee for Safeguarding will co-ordinate these responsibilities as outlined in our *CoaH Safeguarding for Trustees* document ([Appendix 11](#)).

## 8 Adoption of the policy

This policy was agreed by the leadership and will be reviewed annually on: 15 / 03 / 2023

Signed by:  Position: Lead Safeguarding Officer

Signed by:  Position: Designated Trustee for Safeguarding

Date: 15 / 03 / 2023

A copy of this policy is also lodged with: Thirtyone:eight

## 9 References

### 9.1 Internal reference

See [Appendices](#)

### 9.2 External reference

Thirtyone:eight model safeguarding policy

Rehabilitation of Offenders Act 1974

Health and Safety at Work Act 1974

Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975

Children's Act 1989

Adult Support and Protection (Scotland) Act 2007

The Police Act 1997

Protection of Children Act 1999

Management of Health and Safety at Work Regulations 1999

The Human Rights Act 1998

Sexual Offences Act 2003

The Children Act 2004

Safeguarding Vulnerable Groups Act 2006

Equality Act 2010

Protection of Freedoms Act 2012

General Data Protection Regulation 2018

The Protection of Freedoms Act 2012 is of particular importance to this policy document as all decisions made to bar individuals from working with children or adults are made by the Disclosure Scotland via this legislation.

## 10 Appendices

[Appendix 1](#): Types of abuse and recognising abuse

[Appendix 2](#): CoaH Safeguarding Officer role profile

[Appendix 3](#): CoaH Code of conduct

[Appendix 4](#): CoaH Volunteer application for regulated work and the PVG application procedure

[Appendix 5](#): CoaH Safeguarding training plan

[Appendix 6](#): CoaH Safeguarding contract policy and procedure

[Appendix 7](#): CoaH Safeguarding concern and incident report form

[Appendix 8](#): CoaH Policy on making a referral to Disclosure Scotland

[Appendix 9](#): CoaH Pastoral care and support policy

[Appendix 10](#): CoaH Privacy policy

[Appendix 11](#): CoaH Safeguarding for Trustees

[Appendix 12](#): CoaH Complaints policy

## Appendix 1

### Types of abuse and recognising abuse

#### Types of abuse

Here we will outline various types of abuse and how they cause harm, and **where reference is made to a child, such reference is also applicable to an adult at risk of harm in all cases.**

**Physical abuse:** may involve actual or likely injury by hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, deliberately inducing illness or otherwise causing physical harm. Physical abuse may also occur when a child's Parent/Carer fakes the symptoms of, or deliberately causes illness or ill health in a child. Injuries caused by accidents such as trips and falls are not uncommon, especially in children, but these usually occur on bony or prominent areas such as knees, shins and elbows. Abusive injuries tend to involve softer areas that are harder to damage accidentally e.g. upper arms, forearms, chest, back, abdomen and thighs.

**Emotional abuse:** the persistent emotional maltreatment or rejection of a child, such as to cause severe and adverse effects on the child's emotional and behavioural development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

**Sexual abuse:** any behaviour perceived to be of a sexual nature which is unwanted or takes place without consent or understanding. The abuse may involve physical contact and touching or non-contact activities. It may involve forcing or enticing a child to take part in sexual activities, whether or not the child is aware of what is happening, and does not necessarily involve a high level of violence. The activities may involve physical contact, including assault by penetration, or non-penetrative acts. 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 stalking or grooming a child in preparation for abuse.

**Spiritual abuse:** coercion and control of one individual by another in a spiritual context. The target experiences spiritual abuse as a deeply emotional personal attack. This abuse may include: manipulation and exploitation, enforced accountability, censorship of decision making, requirements for secrecy and silence, pressure to conform, misuse of scripture or using the pulpit to control behaviour, requirement of obedience to the abuser, the suggestion that the abuser has a 'divine' position, isolation from others, especially those external to the abusive context.

**Financial abuse (or Material abuse):** is the attempted or actual misappropriation or misuse of a person's money, property, benefits, or other assets, by means of intimidation, coercion, deception, or other ways to which the person does not or cannot consent to. Financial abuse includes having



money or other property stolen, being defrauded or put under pressure in relation to money or other property, and having money or other property misused.

**Neglect:** the failure to meet a person's basic physical or emotional needs which is likely to have a serious negative impact on their health or development. It happens when a person deliberately withholds, or fails to provide an appropriate level of care and support which is needed by another person. It can involve a Parent/Carer and can also happen during pregnancy e.g. as a result of maternal substance abuse. Neglect may happen because of a lack of knowledge or awareness, or through a failure to take reasonable action whether deliberate or not. In its extreme form, neglect can be a significant risk as it can lead to serious long-term effects and even be life-threatening. Neglect is the most common form of child abuse in the UK. Neglect can include: not providing adequate food, clothing, or assistance with personal hygiene, not providing adequate shelter and heating, failing to protect someone from harm or danger, not ensuring appropriate supervision (including the use of inadequate care-givers), failing to give prescribed medication or provide access to appropriate health care or treatment, failing to provide access to educational services, ignoring a person's basic emotional needs, failing to take action when a person is taking unnecessary risk (especially when the person lacks capacity to properly assess risk).

## Recognising abuse

Anyone who suffers abuse may behave in a variety of ways. The following may be signs of someone being harmed:

**Physical abuse:** getting injured often, unexplained falls or injuries that do not fit within normal injuries for a person of that age, injuries that have received no medical attention e.g. bruising or cuts, failing to get medical attention or changing doctors often, subdued or changed behaviour.

**Emotional abuse:** person may be isolated, lacking confidence and self-esteem, demanding and attention seeking, poor communication skills, withdrawn and anxious, uncontrolled or outbursts of temper, depression, self-harm and eating disorders, reluctance to be alone with a particular person.

**Sexual abuse:** sexual knowledge inappropriate for their age, withdrawn, sullen significant change in normal behaviour, sexualised behaviour, play or drawings, physical injuries and bruising, particularly to the thighs, buttocks, upper arms and neck, bleeding, pain or itching in the genital area or when walking or sitting, pregnancy in a woman who is unable to consent to sex, excessive fear/apprehension of, or withdrawal from relationships or being alone with a particular person, self-harming.

**Spiritual abuse:** disabling fear of God, or of the perpetrator, unreasonable guilt or shame.

**Financial abuse:** unusual financial activity such as making an unexpected change to a will, a sudden sale or transfer of a property, or unusual activity in a bank account, someone who is reluctant or anxious when discussing their finances, a sudden interest by a relative or other third party in the welfare of the person, bills remaining unpaid, complaints that personal property is missing.

**Neglect:** someone who is malnourished, unkempt, dirty and generally uncared for and lacking in energy, living in an unsuitable home environment e.g. having no heating, inappropriate or inadequate clothing, body issues such as sores, skin complaints, poor muscle tone or prominent joints, poor language or social skills, self-soothing behaviours such a drug or alcohol misuse and self-harm, poor school attendance or performance.

## Appendix 2

### CoaH Safeguarding Officer role profile

Everyone has a responsibility to help safeguard children and adults at risk of harm, but in church we appoint Safeguarding Officers as churches are open to all and can therefore be a particularly more vulnerable place for children and adults at risk of harm.

At City on a Hill, we operate with a Safeguarding Team, which includes our Lead Safeguarding Officer and a team of Safeguarding Officers. This means discussions, decisions and actions do not have to fall on the shoulders of one person. We are also a member of Thirtyone:eight, an independent Christian organisation that help and support churches with safeguarding, and they can be contacted at any time for guidance, support and training.

Our team of Safeguarding Officers will be made up of people in managerial or leadership positions at City on a Hill, who hold a current PVG and are able to provide 2 references for their suitability to hold the position of Safeguarding Officer. Our Safeguarding Officers will have good active listening and people skills, and the ability to stay calm and focused, work well under pressure and be sensitive and understanding.

All Safeguarding Officers must be aware of the *CoaH Safeguarding children and adults at risk of harm policy* and must be willing to follow it and never try to deal with safeguarding issues independently. All Safeguarding Officers must also complete the following training through Thirtyone:eight:

- Safeguarding training for Coordinators and Leads
- Safeguarding for children and young people
- Safeguarding adults at risk of harm
- Domestic abuse
- Assessing and managing risk
- Pastoral care

All refreshers on policies will be completed annually through the HR portal.

The church leadership will give the safeguarding team their full support, although the detail of any situations that arise should be shared on a 'need to know' basis only.

#### **The Safeguarding Team is responsible for:**

- Acting as an advocate (i.e. someone who speaks for and on behalf of children or adults at risk of harm)
- Promoting and overseeing the implementation of the Safeguarding children and adults at risk of harm policy and all relevant procedures
- Leading the review and update of the policy document and all relevant procedures on an annual basis
- Dealing with any reported disclosures, allegations or concerns within the organisation
- Ensuring that appropriate records are kept in relation to the reporting of any safeguarding incidents
- Acting in reporting concerns of abuse to the statutory authorities, for example children or adult's Social Care (formerly Social Services) or the Police in all cases of suspected abuse

- Conducting risk assessments for people who pose a risk, and implementing and reviewing contracts where appropriate
- Conducting risk assessments for employee and volunteer roles, and supply specific safeguarding guidance depending on the role
- Ensuring the safe recruitment of employees and volunteers

## Advocate for children and adults at risk of harm

Safeguarding Officers and all those working with children and adults at risk of harm need to know how to respond appropriately if approached by someone wanting to share a safeguarding concern. Concerns or incidents may be expressed to a volunteer or directly to a Safeguarding Officer by the child or adult at risk of harm. The task is to get alongside the person concerned and try to establish what is troubling them. This should be done through sensitive listening, reassurance and acceptance of what they are saying. Do not ask leading questions and keep an open mind. Once the facts have been gathered, a Safeguarding concern and incident report form should be completed and sent to one of the Safeguarding Officer's as soon as possible. The individual disclosing a concern or incident should not be further questioned. As Safeguarding Officer, your job is to initiate the action required by our Safeguarding policy by referring to the statutory authorities or by taking advice from Thirtyone:eight.

## Reporting concerns and incidents

The Safeguarding children and adults at risk of harm policy needs to be followed, but remember that where there are concerns of child abuse, the following actions are essential:

- If the deliberate injury is suspected, if there is a concern for a child's immediate safety or they are afraid to return home, Children's Social Care should be contacted.
- Don't discuss with parents/carers – it could jeopardise an official investigation.
- Seek medical help if needed urgently, advising doctor of suspicions.
- If a child isn't at immediate risk (e.g. poor child care), encourage parent/carer to seek help themselves, but monitor the situation.
- Make careful notes of conversations and/or concerns as they may be required in an investigation.
- Where sexual abuse is suspected or disclosed always contact Children's Social Care or the Police immediately. Don't discuss with parents or carers for the reasons stated above.

## Making a referral

If you are not sure whether the information you have is sufficiently serious to be passed on as a referral you can always ask for advice from the Thirtyone:eight Helpline. Concerns for a child's welfare that fall short of safeguarding concerns, for example, poor child care, can also be referred to Children's Social Care so that early help and support to the family can be organised. This is often referred to as a 'child in need' referral or a referral for 'early help'.

The most important thing, however, is that if a child appears to be at risk of harm, then these safeguarding concerns should be passed on without delay. Some Children's Social Care departments have specific forms to complete and it is good practice to follow up a telephone conversation with a written referral requesting confirmation of the action that will be taken. Government guidance, 'What to do when you're worried a child's being abused' (2015) states that a Social Worker should give you a response to your referral within one day.

When safeguarding concerns relate to an adult at risk of harm, the same principles apply although the referral should be made to Adult Social Care. When dealing with adults, their wishes, feelings and mental capacity must be taken into account and people should be supported to make their own decisions and encouraged to give informed consent when possible. As the Safeguarding Officer, you are not expected to be an expert in assessing mental capacity and, when in doubt, always seek advice. Thirtyone:eight's Helpline is also available to help with issues around safeguarding adults.

## What happens next?

Sometimes, following a referral to Children's Social Care/ Police Child Protection, you or a member of the leadership may be asked to attend meetings to give support to a child or family member. This may include a child protection conference. The conference brings together family members, the child where appropriate, supporters/advocates and those professionally involved with the child and family, to share information and decide what action is needed to safeguard the child and promote their welfare.

There may be instances when it is appropriate and/or helpful for a child or adult at risk to be accompanied to interviews at a police station. This doesn't have to be the safeguarding officer, it could be someone who has pastoral responsibilities. Either way, the leadership needs to support all those involved, particularly on the rare occasion a case goes to court.

If any adult discloses past abuse it is important to ensure pastoral care is available to them. There may also be considerations to do with reporting non-recent abuse that you would need to take into account.

## Teamwork

There may be an expectation that we inform the regional or national oversight of any allegation/concern. We may also be required, as a condition of our insurance policy, to inform our insurers of any serious safeguarding concerns, particularly if an allegation has been made that could result in litigation involving the church.

Safeguarding concerns within church can be emotionally and spiritually demanding. Whilst confidentiality is important, it is equally important that Safeguarding Officers receive support. This is something that the City on a Hill leadership understand and agree to facilitate, with counselling offered.

## Good practice

As a Safeguarding Officer, consider:

- Getting to really know *CoaH Safeguarding children and adults at risk of harm policy* and procedures, ensuring it is followed and regularly reviewed
- Establishing contact with your local Children's and Adult Social Care services and finding out about the procedures of the relevant safeguarding boards. This will give you confidence in reporting any concerns.
- Maintaining accurate records relating to child/adult protection concerns. That means ensuring that volunteers write a full account of any safeguarding concerns or issues that arise and the report is stored in a secure place for future reference.

- Being part of an interview panel in the volunteer onboarding process to explain the responsibilities they would carry for passing on safeguarding concerns or incidents to you, giving assurances that appropriate training will be provided.
- Occasionally attending activities and meetings with volunteers so that you become a familiar face to the children and adults at risk of harm and volunteers alike. It may then be easier for them to come to you with any concerns.

Keeping the leadership informed on good practice is also important. This may include making leaders aware of any person attending who could pose a risk. An appointed Safeguarding Officer should be liaising with probation and/or police when a sexual or violent offender is part of the congregation. This will involve helping to establish clear boundaries for the offender through a written Safeguarding contract, in line with our Safeguarding Contract policy and procedure.

It is important to remember that as a Safeguarding Officer you are not expected to be an expert in child or adult protection – leave that to the statutory agencies and use Thirtyone:eight for help and advice. By being vigilant, however, having policies and procedures in place, and ensuring that only suitable people are allowed to work with these groups, you will be instrumental in making City on a Hill a safer environment for all.

## External reference

<https://thirtyoneeight.org/get-help/resources/help-guides/help/im-a-safeguarding-coordinator/>

## Appendix 3

### CoaH Code of conduct

City on a Hill behaviour code for working with children and adults at risk of harm

#### Purpose

This behaviour code outlines the conduct expected of all “workers” (staff and volunteers). The code of conduct aims to help protect adults at risk of harm, children and young people from abuse and inappropriate behaviour from those in positions of trust, and to reduce the risk of unfounded allegations of abuse being made.

#### The role of workers

When working with children and young people or protected adults, you are acting in a position of trust for City on a Hill. You will be seen as a role model and must act appropriately.

#### Good practice

- Treat everyone with dignity, respect and fairness, and have proper regard for individuals’ interests, rights, safety and welfare
- Work in a responsible, transparent and accountable way
- Be prepared to challenge unacceptable behaviour and to be challenged
- Listen carefully to those you are supporting
- Avoid any behaviour that could be perceived as bullying, emotional abuse, harassment, physical abuse, spiritual abuse or sexual abuse (including inappropriate physical contact such as rough play and inappropriate language or gestures)
- Seek advice from someone with greater experience when necessary
- Work in an open environment – avoid private or unobserved situations
- Follow policies, procedures and guidelines and report all disclosures, concerns, allegations, and suspicions to the safeguarding co-ordinator
  - Don’t make inappropriate promises particularly in relation to confidentiality
  - Do explain to the individual what you intend to do and don’t delay taking action

#### Unacceptable behaviour

- Not reporting concerns or delaying reporting concerns
- Taking unnecessary risks
- Any behaviour that is or may be perceived as threatening or abusive in any way
- Passing on your personal and/or social media contact details and any contact that breaches City on a Hill’s social media policy

- Developing inappropriate relationships
- Smoking and consuming alcohol or illegal substances
- Favouritism/exclusion – all people should be equally supported and encouraged

### Breaching the Code of Conduct

If you have behaved inappropriately you will be subject to disciplinary procedures (particularly in the case of paid staff where the line manager will consult the safeguarding coordinator as appropriate). Depending on the seriousness of the situation, you may be asked to leave City on a Hill. We may also make a referral to statutory agencies such as the police and/or the local authority children's or adult's social care departments or Disclosure Scotland. If you become aware of a breach of this code, you should escalate your concerns to the safeguarding coordinator or line manager (in the case of a paid staff member).

### Declaration

I agree to abide by the expectations outlined in this document and confirm that I have read the relevant policies that assist my work with vulnerable groups.

Name:

Signature:

Date:

## Appendix 4

# CoaH Volunteer application for regulated work and the PVG application procedure

## Volunteer application for regulated work

Note: [pvg@cityonahill.org.uk](mailto:pvg@cityonahill.org.uk) will be used for all correspondence regarding volunteering for regulated work with City on a Hill.

When someone requests to join a team, there will first be contact from the ministry team leader to start the process, and communication between the ministry leader and the PVG Lead Signatory so they know to start the application process. The potential volunteer will be asked to:

- Read a role profile for the position they are applying for
- Read and accept the contents of the *CoaH Safeguarding children and adults at risk of harm policy*
- Fill out an application form on ChurchSuite including reference requests and a signed declaration
- Watch a safeguarding video relevant to their work

Once the potential volunteer has returned the application form, the PVG Lead Signatory will request the references and a PVG for them.

## Storage

There is a Dropbox folder for each category of regulated work (outlined below), and the volunteer application forms and completed reference requests will be stored in these. The PVG Lead Signatory and the pastoral, kids, youth and community action ministry leaders will have access to the folder relevant to their involvement.

## PVG application process

It is the role of the PVG Lead Signatory to oversee the PVG application process. PVGs will be requested from Disclosure Scotland via Volunteer Scotland Disclosure Services (VSDS) for the volunteers undertaking regulated work in the following categories:

### Pastoral staff and Pastoral volunteer

This category comprises of both paid staff and volunteers including pastors, elders, cluster leaders, small group leaders and the prayer team. They will require a PVG for working with adults at risk of harm and children.



## Kids' worker and Kids' worker volunteer

This category comprises of both paid staff and volunteers. They will require a PVG for working with children.

## Youth worker and Youth worker volunteer

This category comprises of both paid staff and volunteers. They will require a PVG for working with children.

## Befrienders

Where regulated work occurs in any Community Action team, the volunteers will come under the befriending category, and require a PVG for working with adults at risk of harm. Role profiles for each service provided can be sent to VSDS to ascertain whether a PVG check is needed.

Applications for PVGs can now be made online, and the process is as follows.

### 1. Complete the Online Application Request Form

- Copy a version of the document "TEMPLATE Online application request form" and remove the word "TEMPLATE".
- City on a Hill's organisation details should already be completed at the top (as in screenshot below).
- Complete the Online Application Request Form with the applicant's information. There is an example of how to fill this out properly (in red in screenshot below).

Organisation Name: City on a Hill

Signatory Name: Jodie Hope

Enrolled Body Code: AA9740

Signatory Code: 27113

Digital (Typed) Signature: Jodie Hope

Signature Date: |

SRJ - App to join our team - Fast form	Title Applicants Name*				D.O.B	Applicants Email Address*		Applicants Current Address - Home Address	Recruiting Organisation	Position Applied For	Regulated Work Group (C) Child, Adult, Both	Will the Work Be Done at the Home of the Applicant Y/N	Volunteer Y/N	ID Verification 1 x Photo ID Or 3 x address ID if photo ID not available
	Title	First name	Middle name	Surname		First name	Surname							
SRJ	Mrs	Claire		Jones	16/08/1999	Claire.Jones@volunteerscotland.org.uk		32 The Street Ayr Ayrshire KA4 1AB	Smarties Playgroup	Childcare Play leader	Children	N	Y	Photo DL, Bank Statement and Passport

### 2. Submit the Online Application Request Form to [disclosures@volunteerscotland.org.uk](mailto:disclosures@volunteerscotland.org.uk)

- Paid and volunteer applications should be submitted on separate request forms
- The email subject must be completed with **Online Application(s) X 1**
- The number at the end of the email subject must reflect how many applicants are on the request form e.g Online Applications X 7
- Only 1 request form per email with max 10 applicants per form

### 3. Once Disclosure Scotland have received the request form, they will email a link directly to the applicants to complete within 7 days. A reminder will be sent from Disclosure Scotland on day 5. Emails will come from [disclosurescotland@notifications.service.gov.scot](mailto:disclosurescotland@notifications.service.gov.scot)

4. Members of staff require a paid PVG and payment will be requested whilst filling out the online application. Reimbursement can be requested via the usual method. Volunteers do not require paid PVGs, and will not be asked for payment at any point in the process.
5. If the link sent to the applicant expires, a new Online Application Request Form must be submitted. You can have up to 10 expired applicants on the new request form, but not a mixture of new and expired applicants. The email subject must be completed with **Expired Link X 1** - with the number at the end of the email subject reflecting how many expired applicants are on the request form.
6. If a new link is required because any of the information on the link is incorrect, a new Online Application Request Form must be submitted, with the email subject **New Link Required X 1**. Clearly state in the body of the email what information is incorrect. If there is more than 1 link required, this should be stated in the subject of the email and all incorrect information clearly included in the body of the email.
7. A paper copy of the PVG will be received by the applicant and by City on a Hill. The PVG Lead Signatory log all relevant information and shred the paper copy of the PVG in accordance with the *CoaH Policy for the secure handling, use, storage, destruction and retention of disclosure information*.
8. If there are any flags on a PVG, the Lead Safeguarding Officer will be notified, and where necessary the relevant pastor and/or ministry leader made aware, risk assessment carried out and the individual concerned notified of the outcome.

## Training

Further to the initial volunteer application process, for those doing regulated work with children, thirtyone:eight's "Safeguarding children and young people" training should be completed and refreshed every 3 years. For those doing regulated work with adults at risk of harm, thirtyone:eight's "Safeguarding adults at risk of harm" training should be completed and refreshed every 3 years.

Any other training specific to the volunteer's team will be provided or organised by the team leaders.

## Contacts

City on a Hill's Lead Safeguarding Officer Dan Everett can be contacted with any safeguarding queries **Email:** [daneverett@cityonahill.org.uk](mailto:daneverett@cityonahill.org.uk)

For any queries regarding the volunteer application for regulated work or the PVG application process queries **Email:** [pvg@cityonahill.org.uk](mailto:pvg@cityonahill.org.uk)

Liz Morrison at Disclosure Scotland can also be contacted with any queries regarding the PVG process **Phone:** 01786 849 777 Option 1 **Email:** [liz.morrison@volunteerscotland.org.uk](mailto:liz.morrison@volunteerscotland.org.uk)

## Appendix 5

### CoaH Safeguarding training plan

	Safeguarding Lead	Safeguarding Officers	Trustees	Elders / Pastors	SG leaders	Kids Team	Youth Team	Community Action team	General volunteers (non-regulated work)
Safeguarding Children & Young People	Y	Y		Y		Y	Y		
Safeguarding adults at risk of harm	Y	Y		Y	Y			Y	
Safeguarding for Coordinators and Leads	Y	Y							
Safeguarding for Trustees	Y		Y						
Domestic Abuse	Y	Y		Y					
Assessing and managing risk	Y	Y							
Pastoral Care	Y	Y		Y					
International Context	Y			Church Online					
Safer recruitment	Y	Y							
Spiritual Abuse	Y	Y		Y					
Safeguarding for spiritual directors	Y			Y					
Basic Safeguarding Awareness									Y

## Appendix 6

# CoaH Safeguarding contract policy and procedure

### What are Safeguarding Contracts?

A Safeguarding contract is a written agreement between an individual who may pose a risk to children, adults at risk of harm, or anyone else within a church, and an appointed safeguarding group, outlining conditions under which they can attend church services and activities and be part of church life.

### Why are these contracts important?

Contracts help to safeguard everyone involved in church life, especially those who are vulnerable. A contract also keeps those who are subject to it safe by ensuring that they have strong, supportive, and accountable relationships within the church. These accountable relationships help minimise the risk of them reoffending or behaving inappropriately.

### When does a contract need to be put in place?

- When an individual is under investigation after an allegation of inappropriate or abusive behaviour towards children or adults at risk of harm has been made
- When an individual is convicted of offences relating to harm caused to children or adults at risk of harm
- When an individual is cautioned for offences relating to harm caused to children or adults at risk of harm
- When the church receives information from the statutory authorities that they have concerns about the behaviour of an individual in relation to children or adults at risk of harm

### Who needs to be involved in putting a contract in place?

A small safeguarding group will be put in place to write, implement and oversee the contract and support the individual in church life. All members of the appointed safeguarding group agree to keep all details relating to the contract confidential (except in exceptional circumstances where they are required by law to release information), and ensure that they are aware of CoaH's Safeguarding policies, procedures and guidance and the relevant legislation to the management of personal and criminal data including the Data Protection Act 2018 and UK General Data Protection Regulation (GDPR).

The group will usually include:

- One of the Safeguarding Officers
- The individual's Pastor

The appointed group are responsible for:

- Holding the individual in prayer and providing them with the appropriate pastoral support

- Putting the contract in place
- Ensuring that the contract is implemented and that the individual abides by the conditions
- Engage actively in the group by providing support and oversight of the individual's involvement with CoaH
- Work effectively in partnership with statutory agencies (where applicable) to manage safeguarding risks
- Where appropriate provide support for the family of the individual
- Review the agreement at least annually

The contract will be reviewed at least annually to check that it is being adhered to and that the individual remains accountable to the appointed group. A regular review will also ensure that the contract contains all the relevant points and that any updates in the case (eg the individual being charged by the police or found guilty by the court) are reflected within it.

## What is the process for putting a contract in place?

The appointed group should conduct a "Person who poses a risk Risk Assessment," which will inform the nature and the wording of the contract.

There is a Safeguarding Contract template that should be used as the basis from which the individual's contract will be formed. There are several example conditions to choose from and wording can be adapted so it is appropriate for the individual's specific situation.

If anyone from the statutory authorities (*police, social services, probation service*) has been in contact with CoaH about the individual, or we know that the statutory authorities are involved, we will show the contract to them to check that they are happy with the suggested wording.

Once the contract wording has been finalised by the appointed group, a meeting should be arranged with the subject of the contract and the appointed group so that it can be talked through. Both the appointed Safeguarding Officer and the individual's Pastor should attend this meeting.

## What happens at the meeting?

The process for agreeing a contract can invoke strong emotions and the individual may feel nervous or angry and may be upset or defensive about the process in hand. It is suggested that the meeting starts with a time of prayer. It is also helpful to outline at an early stage the ways in which the church can support the individual and they should be reminded that they are a valued part of the church family.

It is important to clearly explain the process being followed and the reason for the contract being put in place in the first place in a way that the individual can understand. It can also be helpful to provide reassurance that this procedure is consistently followed with any individual in similar circumstances and is nothing personal.

Once the individual and the appointed group have talked through the specific contract wording and clarified any questions that may have arisen, the contract needs to be signed and dated both by the

individual and the appointed group monitoring it. A review date should be agreed and recorded on the contract.

Following the meeting a copy of the contract should be kept and stored securely by the Lead Safeguarding Officer that only they have access to, and by any relevant person within the statutory authorities that are involved. The individual subject to the contract should also receive a copy.

### **What if the individual refuses to sign the contract?**

If the individual won't sign the contract, then the church is left in a position of potentially unmanaged risk. It is crucial that church is as safe a place as possible for the sake of everyone involved in church life. It is strongly advised that the individual is not allowed to attend church unless a signed contract is put in place.

### **What if the individual breaches the terms of the contract?**

This will need to be addressed on a case-by-case basis. It may be that as a result of the breach the individual is asked to stop attending CoaH, as the church is no longer in a position where potential risks are being well managed. Depending on the nature of the breach, it may also be that the situation is reported to the statutory authorities. If in doubt, always seek advice from the statutory authorities.

### **What if the individual moves to a new church?**

If the individual moves to a new church the appointed group are responsible for ensuring that the new church's Lead Safeguarding Officer (or equivalent) is aware there are safeguarding concerns. The appointed group should also talk to the individual that is moving on, encourage them to speak to the new leadership or safeguarding officer, and inform the individual we will also speak to them and let them know there is a safeguarding concern.

### **How many people can City on a Hill have on a contract?**

CoaH can have 1 person on a contract per community. If a community is already managing someone on a contract, we will need to assess whether we have the capacity to safely manage and monitor any additional individuals. The safest solution is for any additional individuals to attend another CoaH community or another church, ensuring that the new church is aware of the safeguards needed and that they are equipped to put them in place.

### **What support is there for the people that are managing the contract?**

It is important that those people who are responsible for managing the contract also receive support. The circumstances leading to a contract being put in place often illicit a strong emotional response. It might also be that the individual who is subject to the contract has been in the church for a long time or is a well-known and liked member. Sometimes this makes it difficult to believe that they could be a risk to others within the church; particularly if they have not yet been convicted or been to Court. The subject of the contract might also be giving explanations for their past behaviour

or deny that the behaviour took place. People involved in offending are usually very plausible and can groom those around them. The people managing the contract are just as vulnerable to grooming as other members of the congregation.

Whilst it is important that confidentiality is maintained (including not sharing information about the contract for prayer purposes) the people involved in this contract should feel able to talk and reflect on their thoughts and feelings in a safe, confidential, and supportive environment. It is important that this support is offered outside of the immediate church environment to maintain confidentiality, and to ensure some objectivity in the discussions.

#### External reference

<https://www.gov.scot/policies/reducing-reoffending/public-protection-multi-agency-public-protection-arrangements-mappa/>

## Appendix 7

### CoaH Safeguarding concern and incident report form

The individual raising this concern should inform the leader for the group/activity, and initiate any immediate action required. This form should be completed in as much detail as possible, as soon as possible after any safeguarding concern is raised, or any safeguarding incident occurs.

This form should be emailed to one of the following Safeguarding Officers:

Dan Everett [daneverett@cityonahill.org.uk](mailto:daneverett@cityonahill.org.uk)

Sammy Ewan [samuelewan@cityonahill.org.uk](mailto:samuelewan@cityonahill.org.uk)

Sarah McGreehin [sarahmcgreehin@cityonahill.org.uk](mailto:sarahmcgreehin@cityonahill.org.uk)

Day, date and time of the incident:

Names, addresses and ages of those involved in the incident:

Where did this incident take place?

Name of place of worship/organisation:

Name of the group:

Who is normally responsible for group? (Name and phone number)

Who was responsible for the group at the time of the incident, if different from the above?  
(Name and phone number)



Which other workers were supervising the group at the time of the incident? (Names and phone numbers)

Who witnessed the incident? Normally only two witnesses would be needed (Names, phone numbers and ages if under 16) *\*short explanation*

Describe the incident/injuries (include if any first aid or medical treatment given) *\*describe concern/incident*

What action have you taken to prevent a recurrence of the incident?

Have you informed anyone else?

If so, when? Give detail of conversation.

Was there any communication/involvement with any local authorities e.g. police/social work YES NO (Please circle/highlight)

If yes, please give details.

**Signature of person raising concern/reporting incident**

Signed:

Print Name:

Date:

**For Safeguarding Officer use only**

Form received by:

Signed:

Print Name:

Date:

**Agreed next actions**

Which Safeguarding Officer is responsible for follow up?

Has concern/incident been documented in incident log?

Is the site or premises still safe for the group to use?

What are the next steps and timeframe for action:

## Appendix 8

# CoaH Policy on making a referral to Disclosure Scotland

### Introduction

The PVG Scheme requires organisations to make referrals to the Protection Unit at Disclosure Scotland in certain circumstances. If an organisation or employer has employees or volunteers doing 'regulated work', they have a duty to report any harmful behaviour that might affect whether the person is allowed to work with children or adults at risk of harm. This applies whether the person is a member of the PVG Scheme or not.

By law, employers must report harmful behaviour even if it takes place outside of work, or the employer only finds out about it after the employee or volunteer has left.

Disclosure Scotland will then use this information to help them decide if someone remains suitable to continue to do regulated work (with children/adults/both) or if they should be removed from regulated work.

### Aim

To properly refer to the Protection Unit at Disclosure Scotland.

### Scope

This policy is relevant to all those involved in making recruitment/disciplinary decisions in our organisation.

### Policy

#### Person responsible for making referrals

The person responsible for making referrals to Disclosure Scotland on behalf of City on a Hill is the Lead Safeguarding Officer, who is also the Executive Pastor. Other Safeguarding Officers at City on a Hill can also refer to Disclosure Scotland in the absence of the Lead Safeguarding Officer.

#### When to make a referral

When a volunteer or member of staff is permanently removed from a regulated work position with City on a Hill, there are certain circumstances where our organisation must notify the Protection Unit at Disclosure Scotland that this has happened. If we would have permanently removed the individual, the actions detailed in this policy will continue to apply, even if a member of staff or volunteer leaves their regulated work position prior to any action being taken, irrespective of the reason that they leave.

#### Conditions for referral

Two conditions must be met before we let Disclosure Scotland know that something has happened.

### Condition 1:

A person has been permanently removed/removed themselves from regulated work

### Condition 2:

At least 1 of the following 5 grounds apply:

- Caused harm to a child or adult at risk of harm
- Placed someone at risk of harm
- Engaged in inappropriate conduct involving pornography
- Engaged in inappropriate sexual conduct
- Given inappropriate medical treatment

### Types of harm

There are a number of different ways 'harm' can be defined. It's also important to bear in mind that people can cause a risk of harm without actually doing anything directly.

Examples of harm include:

- physical harm (like inappropriate physical restraint or assault)
- psychological harm (like emotional abuse)
- theft (like embezzlement)

Examples of behaviour which lead to a risk of harm include:

- attempting to harm (even if they don't succeed)
- trying to make someone else cause harm
- encouraging someone to self-harm
- reckless behaviour or incompetence that may cause someone to be harmed as a result, even if they didn't mean it to

**Making a referral is not optional. It is a legal requirement to report circumstances where both conditions are met. This should be done within 3 months of the permanent removal of the individual.**

### Historical allegation of harm

Where there is an historical allegation of harm or inappropriate behaviour about someone who is no longer in regulated work with us but which we believe would, in all probability, have led to the 2 conditions being met, we will consider whether we want to make a referral but the legal responsibility applies only after 28 February 2011 when PVG was first introduced.

### Referral process

Where it is necessary to make a referral, this process will be carried out by the Executive Pastor. In their absence, the referral process will be carried out by one of the other Safeguarding Officers. Failure to make a referral where required, may result in our organisation being prosecuted. It is therefore essential that those involved in carrying out disciplinary action notify the Executive Pastor or Safeguarding Officers when both conditions for making a referral have been met.

The form for making a referral can be found on Disclosure Scotland's website ([here](#)), along with instructions for completing the form and the Protection Unit can be contacted on 03000 2000 40 if help is needed. It can also be found in the CoaH Safeguarding policy and procedures folder.

The form asks for:

- proof of the person's identity (name, address, date of birth, national insurance number)
- details of the type of regulated work they're employed to do
- the person's PVG scheme number, if they have one (can be found on ChurchSuite profile)
- information on the harmful behaviour
- details and documentation of the employer's investigation and outcome

You should not identify any children or adults at risk of harm by name. Use a coded reference instead, like "child A - age 12, male, victim".

When the details have been filled in, email the referral form to [pucorrespondence@assured.systems.gov.scot](mailto:pucorrespondence@assured.systems.gov.scot) or print it out and post it to the address on the form.

## External references

Source: [www.mygov.scot/pvg-referrals](http://www.mygov.scot/pvg-referrals)

## Appendix 9

# CoaH Pastoral care and support policy

## Introduction

City on a Hill (CoaH) recognise that for many churches traditional pastoral care models no longer work, and there is a difficulty in meeting the growing need of issues facing church members. We are responding to this need by developing a strong safeguarding culture and practises that underpin all aspects of our ministry.

## Aim

To provide those doing pastoral work in the church with a framework for pastoral care and support, including the support of those who have been abused.

## Scope

Pastoral workers and Pastoral volunteers – and anyone who works with adults at CoaH - including Pastors, Elders, Core teams, Cluster leaders, Small group leaders, Church Online leaders, Worship leaders, Team leaders and those in Prayer ministry.

## Policy

### Good practise framework for pastoral care

#### What is different about Christian pastoral care?

It may involve:

- Supporting people through prolonged difficulty or immediate need
- Enabling people to be guided by their own convictions
- Considering the process of reconciliation between God, self and others
- Offering guidance about other resources
- Enabling different perspectives to identify solutions

**A pastoral carer** is someone who either formally, as part of a pastoral team, group or network, or informally, as part of their fellowship group or everyday relationships in the community, offers care and support to another, in the knowledge of being loved themselves by God and in the hope of sharing that love with others.

### The “all, some, few” model

The “all, some, few” model is taken from thirtyone:eight, and explains how churches today operate in the area of pastoral care. The model works on the basis that:

#### All

- ALL Christians have the God given responsibility to care for others

- The emphasis is upon growing and maintaining a Christ centred loving relationship with others
- The ALL help to grow pastoral churches and communities

### **Some**

- SOME Christians may be gifted and called by God to provide pastoral care in a more focused way
- This may include offering or providing pastoral care in more planned or formal ways
- It may involve the pastoral carer undertaking training
- The SOME use their gifts to the good of the whole

### **Few**

- A FEW Christians may be called and gifted to resource, lead or co-ordinate the work of pastoral care
- The FEW may have specialist knowledge, experience and skills to enable, encourage and equip the pastoral care work of “the all” and “the some”

At CoaH, pastoral care and support is provided through Pastors, Elders, Core teams, Cluster leaders, Small group leaders and Church Online leaders, some of whom may be employed by CoaH. The Prayer ministry, Worship leaders and other Team leaders will also give pastoral care and support in some form in their roles, and are therefore included in our pastoral framework.

## **The challenges for the church**

### **Pastoral relationships and safer boundaries**

It is essential for anyone working in a pastoral capacity to set boundaries within relationships. Healthy boundaries in pastoral relationships are characterised by:

- Respecting, valuing and nurturing each person
- Guiding behaviour but respecting choices
- Encouraging reflection through biblical teaching
- Healthy accountability to others
- Recognising complex pastoral needs and the need to signpost to others

### **Care vs Co-dependency**

The bible teaches that we are to be interdependent on one another. Co-dependency describes a relationship in which one person is perpetually needy and the other person is perpetually rescuing. The rescuer often takes on the role of the martyr. The rescuer enables the needy to become even more dependent.

### **When care becomes coercive:**

- Co-dependency becomes part of the culture and remains unchallenged
- The rescuer assumes the authority of God or a higher source
- The rescuer exerts increasing control over all areas of another individuals life
- The individual becomes fearful of displeasing the rescuer

- The individual loses all autonomy and is disempowered

### Abuse of trust

The abuse of trust is where someone in a position of trust – for example a Pastor - has an imbalance of power and influence, or evokes strong emotions or transference of emotions, in relationships with people in their care, as defined in the Sexual Offences Act of 2003. Anyone in a position of trust must recognise when pastoral relationships become unhealthy and take appropriate steps for change in consultation with the Safeguarding Team.

### Enabling self-care

It is important for anyone working with adults at CoaH to provide support and accountability that enables people to look after themselves. City on a Hill also has a duty to provide support, accountability, care, training and supervision for anyone who works or volunteers for the organisation.

### Supporting those who have been abused

For those that have been abused, many will refer to the term “survivor” rather than “victim” as they feel it credits them with the control and frees them from being defined by the actions of their abuser. However, for many, the failure of others to hear their stories and acknowledge that they were not to blame can trap them as victims rather than survivors.

### In order to respond well to survivors of past abuse:

- Hear their story and their struggle
- Walk alongside them and allow time for them to process and heal
- Signpost to professional help
- Break down barriers through teaching and preaching
- Model what it means to be honest and vulnerable

### Responding well to a disclosure of past or present abuse

In the event of someone disclosing abuse, whether past or present, the usual practise for disclosure – which can be found in the *CoaH Safeguarding children and adults at risk of harm policy* – should be followed. Do not be tempted to investigate concerns yourself, but instead:

- Ensure the person feels safe and the environment is suitable
- Ensure the person knows the disclosure is being taken seriously
- Be an active listener, show acceptance and stay calm
- Write detailed notes as soon as possible and pass on if appropriate, with consent

If there is a need to pass on information but the individual does not give consent for you to share, consider:

- Is anyone else at risk?
- Has a serious crime been/will be committed?
- Does the person appear to understand the implications of not doing anything?
- How likely is it that the individual or someone else will come to serious harm?



- Can you provide them with more information to help them understand the risk and are there any other services that could help?

See the *CoaH Safeguarding children and adults at risk of harm policy* for more information on what abuse is, how to spot it, and all things related to Safeguarding at CoaH.

### Forgiveness

Forgiveness may not be easy and it may be a gradual process. The person inflicting harm may accept responsibility for what they have done, and there is always potential for reconciliation, but we aim to mitigate against spiritual abuse and accept that someone cannot be forced to forgive and that reconciliation may not always be possible.

### Support in many forms

You may be the only person someone trusts, so it is important to show understanding of the issues. Be there for the person, encourage them, and listening might be enough to help someone initially. It is important to make sure justice is being pursued if the person inflicting harm is still at large as they pose a potential risk to others, so make sure situations are reported on and information is shared where necessary. It is important to signpost to professional counselling as well so that the individual can get the help that they need.

### Healthy pastoral care and safer practise

People may have meetings or seek help in all sorts of places, from coffee shops to team meetings, whilst serving on teams or on social media. All roles at City on a Hill, including those that may involve any kind of pastoral care where people seek help and support, will have a role profile along with a code of conduct, and all activities will be risk assessed.

The code of conduct sets out expectations for behaviour, clarifies safer boundaries for working, models safe boundaries for children and young people, safeguards the children and adults at risk of harm as well as safeguarding workers and volunteers themselves.

In order to promote safer practise in the church, it is important that we give it a platform in Sunday services and create clear pathways for pastoral care. Safeguarding Team contact details, including photos and emails, are displayed on the website and in church, and the *CoaH Safeguarding children and adults at risk of harm policy* is available on the website. The Safeguarding Team will conduct risk assessments and manage risk, and have attended training to increase their competency in this. Staff and volunteers should abide by the *CoaH Code of conduct*. Anyone giving pastoral care should be trained and receive regular supervision, with a clear understanding of boundaries and their competency limits. Whilst lone working, the *CoaH Lone working policy* should be followed.

### Example of safe practise

#### Prayer ministry

Ways of working:

- Designated prayer team
- Careful selection, training and supervision of people
- Work in pairs, preferably mixed gender, in reach of others

- Ask permission before touching or laying on of hands
- Referral pathways if there are concerns

Things to be aware of:

- Issues of confidentiality
- Some adults may be at risk
- Be sensitive to personal space
- It is a time to ask God to minister, not to preach or counsel
- Prayer should never be coercive or blaming

## Internal reference

CoaH Safeguarding policy

CoaH Lone working policy

## External reference

Thirtyone:eight training materials for the course “Pastoral care and supporting survivors”

## Appendix 10

### CoaH Privacy policy

We, City on a Hill (CoaH), take your privacy very seriously and are committed to safeguarding any personal data that we gather. In processing data, we comply with General Data Protection Regulation (GDPR), taking seriously the right of individuals to keep their personal data private. CoaH are known as the “data controller”, which means that we are responsible for how your personal data is processed and for what purposes it is processed.

#### What is your personal data?

Your personal data is any information by which you may be identified, such as personal information (e.g. name, telephone number, address, email address, gender and date of birth) or any information about you which is gathered by the church (e.g. your involvement in teams, small groups, giving).

#### What is data processing?

Data processing covers anything we do with or to your data. This includes collecting appropriate amounts of data for legitimate purposes, keeping your data up to date, storing and deleting data securely and not keeping data for any longer than is necessary. Your data will be processed fairly, lawfully and in a transparent manner, and in a way that protects your data from loss, misuse or unauthorised access or disclosure.

#### We will process your data on the basis of at least one of the following:

Consent – if you give us permission to do so (parental consent is needed for children under 18)  
Legitimate interest - in a manner consistent with your degree of involvement with us (e.g. we will contact parents regarding services relevant to their children, volunteers about their serving, the whole church about matters likely to be of relevance to everyone)  
Legal contracts – for example an employment contract if you are an employee of CoaH  
Legal obligations – for example we are required to hold data relating to Gift Aid and safeguarding

#### How will we use your data?

If you are simply signing up for something specific (e.g. an event or Gift Aid giving), we will only use your data in relation to this.

If you are signing up to our church database, we will use your data to contact you and to help keep you up to date and connect with any services, groups, teams or activities that may interest you. We will also use your data to provide pastoral care and support, and to keep you up to date with any matters pertaining to the life of the church and highlights relating to Go Global churches. We will not use your personal data for any other purposes or share it outside the church without your consent, unless the law requires us to do so.

#### What about my privacy?

Your personal data will be treated as strictly confidential and will only be shared with other members of the church where necessary to facilitate your involvement with us, and only with your consent (e.g. if you join small group, we will share your contact information with the leader of that group with your consent).

## How will data be collected and kept up to date?

Data will principally be collected and updated by you personally using an online form or app connected directly to our database. Any personal data which you provide by another means may also be added to our database as appropriate. When collecting data, we will ensure that you understand clearly why the data is being collected, how the data will be used, and by whom. If any of the above were to change you would be notified in advance and given the option to opt-out. The consequences of opting-out should be made clear at the time.

## How long do you keep my personal data for?

How long we keep your data will depend on the nature of your engagement with CoaH. If you are involved in church life, for example attending services, we will keep your data as long as you continue to be involved. Should your involvement cease, we will retain your data for a maximum of 12 months in case you choose to reconnect with CoaH.

## Who sees my information?

Our data processors are competent and demonstrate the appropriate levels of knowledge in handling your information. Training has been given to each along with written instructions and a record that such has been given will be kept. Processors will not sub-contract their responsibilities without prior consent, but where the processor does sub-contract responsibility – they too must be made aware and show compliance of all of the above. All data will be returned or deleted after the processor has finished with it.

## Children and adults at risk of harm

Children and adults at risk of harm merit specific protection with regard to their personal data, as they may be less aware of the risks, consequences and safeguarding concerns, and their rights in relation to the processing of personal data. Extra care and protection will apply to the use of personal data of children and adults at risk of harm for the purposes of creating profiles, marketing and the collection of personal data with regard to children when using services offered directly to a child.

## Photographs and filming

Since the introduction of the Data Protection Act in 1998, and stricter regulations with the implementation of the General Data Protection Regulations (GDPR 2018), organisations must be careful if they want to take photographs or film footage of people, and how images are used. This does not mean that photographs should not be taken or that filming is prohibited, but there are certain protocols that must be followed to comply with data protection legislation as well as to ensure that children and adults at risk of harm are kept safe.

Permission must be obtained of both children and adults before a photograph is taken or film footage recorded. In addition to this:

- It must be made clear why the image(s) or film is being used, what it will be used for and who might want to look at the pictures.
- When using photographs of children and young people, ideally use group pictures and never identify them by name or other personal details. These details include e-mail, social media profile, postal addresses or telephone numbers.

- Obtain written and specific consent from parents or carers before using photographs on a website.
- Please be aware of those children who are on a child protection plan, are looked after children or are adopted.

All individuals have the right to privacy and anyone can request not to be photographed or filmed at any of our events by emailing [contact@cityonahill.org.uk](mailto:contact@cityonahill.org.uk)

## Requesting access to your personal data

Under Data Protection legislation, you have the right to request access to information about you that we hold.

You also have the right to:

- Request that your personal data is updated if inaccurate or out of date
- Request that we do not process your personal data for the purposes of informing you of services, groups, teams or activities
- Withdraw your consent for your data being processed by us at any time
- Request that information held about you is deleted
- Lodge a complaint with the Independent Commissioner's Office (ICO)

To make a request for your personal information email [contact@cityonahill.org.uk](mailto:contact@cityonahill.org.uk)

## Appendix 11


# CoaH Safeguarding for Trustees

### Introduction

City on a Hill (CoaH) Trustees have a legal duty to act in the interests of the organisation and in particular to act with care and diligence. Trustees should ensure mechanisms are in place to create a safe environment for staff, beneficiaries and volunteers. Trustees have a collective responsibility for safeguarding even if certain aspects of the work are delegated to staff. Ultimately, the Trustees are accountable for all that happens within City on a Hill.











Safeguarding vulnerable beneficiaries is a key governance priority. Any failure by the Trustees to manage safeguarding risks adequately can be a failure in Trustee duties and would be of serious regulatory concern to OSCR, and may be considered misconduct in the administration of the organisation.

Trustees need to be aware of and alert to the risk that City on a Hill may be targeted by those who want to gain access to children or adults at risk of harm. While the risks may never fully disappear, having the correct procedures and adequate checks in place will mean that if things do go wrong City on a Hill is best placed to deal with it.



### TOP TEN

Practical Safeguarding Steps

Know your duties in terms of charity law 	Know your other statutory duties 	Be appropriately trained in safeguarding 	Manage the charity's risks 	Have adequate policies and procedures 
Properly implement policies and procedures 	Embed safeguarding in your culture 	Have clear concern raising procedures 	Deal with concerns correctly 	Learn and reflect from incidents 

Charity Trustees should take these practical safeguarding steps:

1. Know your duties in terms of charity law: read the OSCR **Guidance and Good Practice for Charity Trustees**.

2. Know what specific statutory duties City on a Hill have to comply with because of the nature of the organisation's activities, including where necessary carrying out Disclosure checks.
3. Make sure Trustees are appropriately trained in safeguarding so that they're able to make informed decisions that affect vulnerable beneficiaries.
4. Be alert to the possibility of City on a Hill being targeted as an access point to children or adults at risk of harm and the ways you can manage those risks.
5. Have adequate safeguarding policies and procedures appropriate for City on a Hill's activities, that reflect both the law and best practice. Be involved in reviewing and assessing safeguarding risks and policies regularly, particularly where there are changes in circumstances or activities.
6. Make sure safeguarding policies and procedures are properly implemented. All staff and volunteers should receive safeguarding training and go on regular refresher courses and be clear about:
  - What abuse is
  - How to spot it
  - How to respond to concerns about and from vulnerable beneficiaries
  - Who to report concerns to
7. Make sure the principal themes of safeguarding are embedded in the culture of City on a Hill, encouraging a safe environment so that anyone who has a concern feels able to report it as soon as abuse is identified or suspected.
8. Ensure procedures are in place for City on a Hill staff, volunteers and beneficiaries to raise concerns with clear lines of accountability, systems for reporting and actions to be taken.
9. Make sure all concerns reported are appropriately and sensitively investigated and promptly acted on.
10. If incidents do occur, reflect and learn from them. This may include making changes to the Safeguarding policy if needed, seeking feedback from beneficiaries and showing commitment to safeguarding by publishing the Safeguarding policy.

## Sharing information with other agencies

Trustees should liaise and work with other organisations to prevent individuals who actively target charities in order to harm children and adults at risk of harm, from doing so. This may include sharing information or making referrals to social services or other relevant agencies and also the prompt reporting of incidents to Police Scotland.

**Making a referral to Disclosure Scotland:** as City on a Hill has employees and volunteers doing regulated work, we have a duty to report any harmful behaviour that might affect whether the person is allowed to work with children or adults at risk of harm. This applies whether the person is a member of the PVG Scheme or not. This is called making a referral.

Making appropriate referrals is one of the ways the Trustees can demonstrate that they are complying with the duty to act with care and diligence.

## Safe recruitment

Trustees must ensure there are safe recruitment practices within City on a Hill to make sure that only suitable people, both staff and volunteers, have contact with vulnerable beneficiaries.

City on a Hill is registered with Volunteer Scotland and apply for PVGs for people in regulated work. In addition to the PVG scheme, Trustees should consider if City on a Hill's recruitment policy and procedures are robust and meet best practice – see the **Safer recruitment through better recruitment guidance**.

## Working with partners overseas, in Scotland or elsewhere in the UK

City on a Hill may engage in work overseas, in Scotland or elsewhere in the UK with some of the poorest and most vulnerable people. Trustees should be alert to the fact that some individuals may exploit weaknesses in safeguarding practices, particularly in the face of immense pressure to deliver aid and save lives.

In working with partner organisations both in Scotland, elsewhere in the UK or overseas, Trustees should ensure that:

- Those organisations have appropriate safeguarding policies in place for the nature of the work and the area they operate in
- That these policies are properly implemented in practice and regularly reviewed
- When giving grants to overseas organisations appropriate due diligence checks are made on the recipient body

Trustees also need to be aware that vulnerable beneficiaries overseas can face different or additional risks of harm or exploitation and safeguarding policies and procedures should take account of any additional factors that are necessary in the circumstances.

Note: the PVG scheme applies where charities send individuals to other countries to do regulated work. This is set out in an amendment to section 73 of the PVG Act – the Protection of Vulnerable Groups (Scotland) Act 2007 (Prescribed Purposes for Consideration of Suitability) Regulations 2010/381.

In terms of international safeguarding issues, OSCR has no direct regulatory remit over charities' overseas partners or not-for-profit organisations. Where a charity registered in Scotland supports, or works closely with overseas partners, they will hold the charity to account over the suitability and management of that relationship, including its supervision of safeguarding risks.

## City on a Hill's Safeguarding policy

City on a Hill's Safeguarding policy should be:

- Agreed by the Trustees
- Regularly updated
- Reflect statutory guidance and national and local practice
- Supported by an implementation plan

The policy should be publicly available, to provide reassurance and enable constructive feedback from beneficiaries and other stakeholders.



## Reporting Safeguarding incidents to OSCR under the Notifiable Events Regime

**OSCR's notifiable events scheme** requires Trustees to report events that are likely to have a significant impact on City on a Hill. When there has been a significant incident involving a child or an adult at risk of harm, then this should be reported to OSCR.

Reporting demonstrates that Trustees have identified a serious risk to City on a Hill and that they are taking appropriate action to deal with it and protect City on a Hill from further harm.

When reporting, Trustees should be as transparent as possible about the facts of the case and the actions being taken. This will allow OSCR to assess if the appropriate actions are being taken in any given case.

There is no legal requirement to report a notifiable event. However, it is an important way for Trustees to reassure OSCR that they are on top of the issues they are facing. Ultimately, OSCR may become concerned if there has been a matter that has not been reported to them; especially if it goes on to have a negative impact on City on a Hill or the wider charity sector. Where something significant has happened within City on a Hill and this has not been reported to OSCR in full, they will take it into account if they have to open an inquiry. Ultimately, this could be considered to be misconduct.

Reporting a notifiable event helps OSCR to assess the volume and impact of safeguarding incidents within charities and to understand the risks facing the sector as a whole. This helps OSCR to decide how they can better support charities through their guidance and assess where they need to focus their activities.

Trustees can email OSCR at [notifiable@oscr.org.uk](mailto:notifiable@oscr.org.uk) outlining the following:

- What the event is and how it has (or may have) a serious impact on the City on a Hill. OSCR need enough details to understand the event, but don't worry about having a final polished report. If the information is clear and gives OSCR what they need, they are not worried about the format. They will ask for more information if they need it.
- What action (if any) has already been taken?
- What further plans the Trustees have in place to deal with the event?
- What plans the Trustees have in place to mitigate similar things happening in the future.

If you are not sure whether to report something as a notifiable event, **contact OSCR**.

## Appendix 12

# CoaH Complaints policy

## Introduction

### What is a complaint or grievance?

These terms are used interchangeably but mean the same for the purposes of this document. A complaint or grievance is a written or verbal expression of dissatisfaction about an action including a statement or a lack of action by any person including volunteers, leaders or office holders within the church setting. The complaint or grievance may also be that a person has behaved in an upsetting or unacceptable way.

### What does discipline mean in this document?

If the allegation is very serious and contravenes an employed person's contract of employment, the procedure may lead to discipline procedures being initiated to look in detail at the situation and may result in dismissal or further supervision for the person. The discipline measures may begin at the end of the complaints procedure or may start straight away depending on the circumstances. This procedure may be implemented regarding a person's conduct outside the church but where there is concern about the impact upon their employment or may bring the church into disrepute.

## Aim

To provide a clear process for complaints and grievances at City on a Hill, and what will happen in the case of gross misconduct, suspension and appeals.

## Scope

All personnel – employees, sub-contractors, work placement personnel, volunteers, anyone associated with the church and third-party clients.

## Policy

### Beginning the process for complaints and grievances

#### Stage One

The aim is to resolve the situation by reconciliation of those involved and therefore needs to be instigated as soon as possible within 3-5 days. The resolution may take place by discussion, negotiation or mediation.

It is likely that this may resolve the situation without minimising or ignoring the concerns expressed. It may be that there has been a misunderstanding which can be quickly resolved.

**It is important to say that if the complaint or concern or allegation is related to potential harm or risk of harm to a child under 18 or adult at risk, this policy/procedure is not appropriate. Please follow the policy and procedure regarding potential abuse of vulnerable groups. See *CoaH Safeguarding children and adults at risk of harm policy*.**

### Stage two

If the complaint or grievance is not resolved at the informal stage, the complainant needs to put their concern into writing and send/give to the line manager of the person concerned. The written document needs to not be abusive or inflammatory. The line manager may be a church leader. If the concern is regarding the line manager, the document needs to be given to another person of equivalent responsibility within the church. A meeting needs to take place within 14 days to which the complainant may bring a supporter on the basis that the person needs to understand their role of passive support and that the situation is confidential.

The manager/leader then sends the decision, conclusions and findings in writing to the complainant within 7 days.

### Stage three

If this does not resolve the situation, the complainant can put their concern in writing within 7 days to the Trustee responsible for complaints for the church or a more senior church leader. That person(s) needs to consider all the notes/documentation, meet the complainant and their supporter and make a decision within one month. The decision at that stage will be final. All the notes taken throughout the process need to be stored in a secure place.

### Discipline policy and procedure

The aim of any church or faith organisation is to encourage improvement and confidence in individual conduct or performance. This procedure sets out the action which will be taken when disciplinary rules are breached or where performance is unsatisfactory. Therefore, each employee needs to have a job description and contract which sets out clearly, any expectations about their conduct and behaviour within the organization.

a) The procedure is designed to establish the facts quickly and to deal consistently with disciplinary and performance issues. No action will be taken until the matter has been fully investigated.

b) At every stage employees will be informed in writing of what is alleged and have the opportunity to state their case at a disciplinary meeting. The employee has a right to be accompanied, if they wish, by a trade union representative or a work colleague. The

representative has the right to explain and sum up the employee's case and to respond to any views expressed at any hearing or investigatory meeting. He or she may not answer questions on the employee's behalf.

c) The employee is expected to make every effort to attend a disciplinary hearing or investigatory meeting. Failure to do so without good reason may result in the hearing being held without the employee being present.

d) An employee has the right to appeal against any disciplinary penalty.

This policy does not apply in such a formal way in respect of volunteers although we recommend that a volunteer should also be clear about the expectations of the agreement they are committing to and what they can expect in return. If these expectations are breached, a meeting needs to take place to discuss the situation and a decision made about whether the volunteer can continue or whether the situation is so serious that the volunteer cannot continue in their role.

**If the contract or agreement for an employee is brought to an end, and where the role has required a criminal records check, Disclosure Scotland/the relevant authority need to be informed about the dismissal/ending of the agreement but only if the issue is one of safeguarding. In these circumstances, Disclosure Scotland/relevant authority need to be informed as soon as the situation arises and even if the person has resigned.**

The procedure

#### Stage 1 – First warning

If conduct or performance is unsatisfactory, the employee will be given a written warning or performance note. Such warnings will be recorded, but disregarded after 6 months of satisfactory service. The employee will also be informed that a final written warning may be considered if there is no sustained improvement or satisfactory change in conduct or performance. Where the first offence is sufficiently serious, for example because it is having, or is likely to have, a serious harmful effect on the Church, it may be justifiable to move directly to a final written warning.

#### Stage 2 – Final written warning

If the offence is serious, or there is no improvement in standards or performance or a similar offence occurs, a final written warning will be given which will include the reason for the warning and that the situation will be monitored for six months.

#### Stage 3 – Dismissal or other actions

If the conduct of the employee does not improve or of there is a reoccurrence of the original event, the employee may be dismissed. Alternatively, there may be a demotion or transfer to another role where the contract will be changed/amended.

### Gross Misconduct – what does this mean?

If at any stage during the investigation, it transpires that an employee has been found to have committed gross misconduct, the employee may need to be dismissed immediately without notice or payment in lieu of notice. Although not an exhaustive list, examples of this might be;

- Theft, damage, fraud within or outside of work
- Being under the influence of alcohol or drugs
- Bullying, harassment, discrimination or intimidation
- Bringing the church into disrepute
- Unauthorised absence from work
- Serious breach of confidentiality

### Suspension

While the alleged gross misconduct is being investigated, the employee may be suspended at any stage during the procedure. While suspended the employee will be paid their normal pay and will be required to be available to attend meetings during normal working hours. A decision to suspend may be made by the Executive Pastor or the appointed Trustee for complaints. While suspended an employee may not normally visit church premises or discuss the process with anyone within the church. The church will arrange for appropriate pastoral support for employees during any period of suspension. The church may request that an employee does not attend services at church until matters are resolved. Suspension is not a penalty but a precautionary measure and will not prejudice any disciplinary meeting. The church may appoint a member of the leadership team to undertake the investigation or an independent investigator or external advisor to assist them. The church will use its best endeavours to minimise the length of suspension period. Any decision to dismiss will be taken by the employer only after full investigation has taken place and the employee has had the opportunity to state their case. Where the employee falls sick during suspension or the disciplinary process the sickness procedure will apply.

### Appeals

An employee who wishes to appeal against any disciplinary decision must do so in writing to the Executive Pastor within five working days. Appeals will, so far as is reasonably practicable, be held within 10 working days of receiving the appeal notification. Given the size and resources available to the church it may be necessary for the same people to hear an appeal as were involved in the original disciplinary decision. The church will hear the appeal and decide the case as impartially as possible.

## References

### Internal reference

CoaH Safeguarding children and adults at risk of harm policy

### External reference

Thirtyone:eight model complaints policy

Title	Safeguarding policy to be signed
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## Document history



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Sent for signature to Dan Everett (daneverett@cityonahill.org.uk) and Steve Tigar (steve@loveelectric.cars) from daneverett@cityonahill.org.uk  
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