

It isn't possible to guard against every eventuality, but churches can do their best to provide a safe environment by making sure they follow good working practice in every area of church life.

This applies to activities organised by the church, both on and off church premises, including:

- regular groups run by the church (eg junior church, Pilots, fellowship groups, Messy Church, lunch clubs) on church premises
- regular groups for children or adults at risk run by the church which take place on other premises (eg house groups in people's homes)
- pastoral visits in homes or hospitals
- occasional events (eg holiday clubs and outings, including events hosted in private dwellings
- residential events (eg youth camps, all-age church weekends away)
- other work among children or adults at risk offered by the church (eg mentoring, detached youth work, prayer ministry)
- groups which include adults and children when children attend without parental supervision (eg all-age choir, music group or craft group).

## **Key practice points**

- Good practice in relation to 'safer culture' (eg safer recruitment, training, codes of conduct) provides a foundation for safer activities
- Health and Safety overlaps with safeguarding but needs to be considered separately
- Some general principles apply to activities with any age group (eg risk assessments, obtaining consent)
- Some guidelines are specific to particular activities with children or adults at risk
- Data protection requirements will be relevant in a number of ways such as safe storage of registration and consent forms, use of images, storage of notes from home visits.

## Key responsibilities

Local Church / Synod / Denomination:

- Ensure appropriate insurance is in place for buildings and activities
- Consider the implications of data protection and health and safety requirements for specific activities
- · Carry out risk assessments for relevant activities or events
- Ensure adequate staffing for activities and that leaders have suitable training, are aware of relevant guidance, and agree to follow relevant *Codes of Conduct*.

#### Local church:

- The Hirer's agreement sets out the procedures to follow to ensure robust safeguarding practice when other organisations use church premises
- Seek advice from SSO for complex or sensitive risks.

#### Synod:

SSOs to provide advice on managing complex or sensitive risks.

#### DSL / Denomination:

Obtain legal advice where necessary on legal and regulatory requirements.

# Safer locations, buildings and facilities

# 3.1 Health and safety

Churches have a responsibility to provide a safe environment all who use their building(s), and so should take reasonable measures to minimise the chance of people getting hurt by ensuring appropriate Health and Safety processes are in place.

Health and Safety overlaps with safeguarding but those with specific responsibilities in safeguarding (eg Church Safeguarding Coordinator, Synod Safeguarding Officer) will not generally be responsible for Health and Safety matters so this is an area that needs to be considered separately.

Advice and guidance on Health and Safety matters is now provided separately on the URC website.

# 3.2 Lettings

Many local churches allow other organisations to use their premises. Those hiring the premises are responsible for ensuring that when children or adults at risk are present, appropriate legislation and best practice in connection with their supervision and safety is observed. They must also notify the Church Safeguarding Coordinator if any concerns arise relating to people or activities for which they are responsible. Further details are found in the Hirer's agreement (available from synods), which applies to all cases where premises are hired out to any individual or organisation.

If the hiring organisation is required to register with an inspection body such as Ofsted or the Care Inspectorate Wales (for example, if it is a nursery, pre-school or out-of-school-hours childcare), then the church should ask to see the registration certificate, and record that it has been seen.

All lettings should be reviewed annually. Your synod or Synod Trust may be able to offer advice or information about leasing and hiring of premises responsibilities.

Please note: Groups which are sponsored by local churches (such as Scouts and Guides) will follow the safeguarding policy of their organisations. Partner groups (such as Boys' or Girls' Brigade and Pilots) will follow denominational policy while also ensuring compliance with their own organisational procedures.

# 3.3 Church activities in private dwellings

The use of private dwellings can raise particular issues in relation to safeguarding, for example the presence of bedrooms and bathrooms, the potential for individuals to use private spaces within the

venue unobserved, and the presence of other people not part of the activity. Any church activities hosted in private dwellings come under the safeguarding policy of the church. See www.urc.org.uk/safeguarding/guidance-for-urc-local-church-activities-in-private-dwellings/.



This section outlines some key guidelines relevant to a range of activities with different groups. More specific details for particular activities are then provided in sections 3.8-3.22 below.

#### 3.4 Risk assessments

While it is not possible to avoid all risks when working with children or adults at risk, it is possible to try and minimise those risks. This can be achieved through careful planning and preparation and by providing a written record of the thought processes and actions taken. Risk assessments should be undertaken by the activity leader(s) before any activity takes place and retained in case they need to be seen at a later date, for example as a result of an accident taking place.

These are not onerous, and can be broken down into five easy steps:

- 1. Identify the risks / hazards
- 2. Decide who might be harmed, and how
- 3. Evaluate the risks (likelihood and impact) and decide on precautions / actions
- 4. Record findings
- 5. Regularly review and update.

In an activity risk assessment, it is important to take into account:

- the type of activity
- the space and setting being used
- the ages, abilities and special needs of participants in the group
- staff ratios
- levels of experience of staff
- contingency or emergency planning, such as what happens if a leader doesn't turn up, or if there is an accident and someone needs to be taken home or to hospital.

For more information and guidance on completing an activity risk assessment, see *Resource SA1:* Risk assessment template (with guidance).

#### 3.5 Insurance

Insurance cover is required to protect property, staff, volunteers and participants. The level and range of cover must be adequate, and should be reviewed annually. Insurance policies require the insured to take all reasonable steps to prevent injury, loss or damage occurring, and to follow legal, statutory and Charity Commission requirements and guidelines. Failure to take such precautions may impact the insurance arrangements, and therefore it is recommended for the insured to adopt the guidelines set out in this *Good Practice* 6 document.

URC insurance is in place for Assembly-appointed staff to organise and lead nationally arranged events. However, this does not cover synod or local area events, which require their own insurance. All local churches should have their own insurance cover. Church policies should include public and employer's liability cover as standard but additional insurance will be required for specific events such as international trips or events involving higher-risk activities / sports.

It is recommended that all synods have indemnity insurance to cover them for any claims that might be made against them, including claims arising from the actions of their Safeguarding Officer, providing they have acted legally and responsibly.

The URC record retention schedule indicates that records documenting the arrangement and renewal of insurance policies should be kept permanently (given the potential for historic claims).<sup>23</sup>

# 3.6 Registration and consent forms

Where the church is running a dedicated service for children or adults at risk, good practice would be for all activities to have:

- i) a registration form
- ii) an attendance register.

All personal details and consent forms (either paper-based or digital) must be stored securely and not shared unless it is legally permissible to do so.

#### **Registration form**

Registration forms should be updated annually, and include:

- name and address
- date of birth
- parent/carer contact details (or emergency contact details if different)
- medical information
- details of any additional needs, including any activities the individual cannot take part in
- any other information relevant to the activities, such as dietary requirements, or who is allowed to collect a child at the end of the activity
- consent for emergency medical treatment if a parent/carer cannot be contacted
- consent for photographs or videos
- consent for online communication between workers and children where relevant.

Separate consent should be obtained for one-off events or activities, including any outings or trips.

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#### Consent

It is good practice to ask children who have the maturity and mental capacity to make their own decisions about whether they want to be involved in an activity or whether their images can be shared. Most young people over 12 are likely to come into this category, although an assessment must be made based on their individual needs.

Note: Consent from young people is not a replacement for parental consent. It's a way for the child or young person to be involved in the decision-making process.

The following guidelines are suggested by the NSPCC:

Age of child or young person	Consent required
0-15 years	Parent or carer.
16-17 years, living at home	Parent or carer in most cases.
16-17 years, living independently or estranged from parents	Young person and social worker, youth worker or appropriate adult.

It is recognised that many 16-17 years olds have significant responsibility for key decisions in their lives. However, in most circumstances, parents have legal responsibility for their children up to the age of 18 and their consent will therefore be required. If it is felt that there are particular circumstances in which it may not be appropriate for consent to be requested of parents (when the child is still living with them), this should be discussed with a Synod Safeguarding Officer.

See also Resource SA2: Information and consent form.

#### **Attendance registers**

Where possible, it is best practice to keep a record of the children and adults in attendance for groups and activities organised by the church. A register of attendance might include:

- the name and type of group or activity
- the date, time and venue of the group or activity
- a list of children present (ages may also be helpful)
- a list of adults present.

Please note: URC guidelines on record retention indicate that records of children's activities and events (eg registers, risk assessments, consent forms, health and safety records) should be kept for 25 years after the date of the activity / event. www.bit.ly/3rPd6Hp.

# 3.7 Insufficient workers for an activity

Ideally, there will be a pool of workers who have undergone safer recruitment procedures, and who can be called upon at short notice if other workers are suddenly unavailable. However, if no other safely recruited workers are available to stand in, the leaders who are present should carry out a dynamic risk assessment of the activity to decide if it is safe to continue with the number of leaders available. This might result in changing the planned activities to reduce risks. Decisions and reasons for any such alterations should be recorded. If there are adults willing to help who have not completed the safer recruitment process, they can assist alongside other workers but must not be left alone with children and must always be supervised by someone who has been

safely recruited. If it is decided that the risks to the participants' safety are unacceptable, then the activity should be cancelled.

Please note: Under no circumstances should the church run children's groups with only one leader available.



# Safer ways of working

This part of the guidance covers some specific aspects of church life relevant for all age groups. Sections 3.16-3.22 go on to look at particular topics for children and adults at risk.

# 3.8 Photography and filming

For convenience, this section uses 'images' to include still photographs, digital images or films. Images count as sensitive personal data under the Data Protection Act 2018 and the General Data Protection Regulation (GDPR) and should only be used with the consent of the person in the image.

#### Images taken by church workers / for church purposes

#### Purpose and storage

- It must be made clear why images are being made, what they will be used for, who might see them and where they will be stored
- All images should be appropriate and respectful of the subject(s)
- Images should be stored in a secure location, ideally on a church computer. If this is not
  possible, it is important to record where the images are being stored.

#### Consent

- Consent forms should contain a section covering consent for use of images. This should specify how images will be used and options to give / withhold consent for different types of use eg some parents may be happy for images of children to be included in a resource used within the church but not on social media.
- If an adult lacks capacity to consent, do not use their image
- Permission should be obtained from parents / carers before images are taken
- Where age appropriate to do so, children should be asked if they want to be filmed or photographed (see table in 3.6 above for suggested age boundaries).

#### **Privacy and protection**

- Use group photographs of children where possible to ensure that individuals cannot be identified by any personal details such as their name, school badge, age or address
- Take particular care in cases where children may not wish to be photographed or filmed or where it may place them at additional risk (for example, where there has been domestic abuse or where they are living away from their family for their own safety).



#### Images taken by attendees / participants / church members

The use of smartphones and the ability to easily edit images digitally means that additional care needs to be taken regarding photos or videos taken 'informally' by church members or attendees of an event.

#### Images taken by parents / carers / other attendees

Clarify and promote the photography guidelines for the event to all participants:

- Advise parents / attendees that there can be negative consequences to sharing images linked to information about their own or other people's children on social media
- Advise that care should be taken about 'tagging' other people / their children online
- Make sure there are procedures to respond to and manage any concerns arising, including a named person for attendees to contact with any concerns about inappropriate or intrusive photography.

This can be achieved in various ways eg pre-event information, event programmes, signage around the venue, announcements during an event.

#### Images taken by participants themselves, eg young people

For young people, you may wish to consider a discussion within the group regarding how they wish the images they take of each other to be used, and what restrictions they feel should be observed. This will be more meaningful and effective than a set of rules imposed by adult leaders.

# 3.9 Recording or livestreaming services

As with photographs and images on websites / social media, some church members or visitors may not feel comfortable appearing in recorded or live services and for others it may compromise their safety.

#### Key points to note:

- Adults appearing in livestream or recorded video must give their permission
- Consent from parents / carers will be needed for any video involving children
- Create a space in the building where people may sit and know they will not be included in any video ('image free zones')
- Ensure people know the service is being recorded and give them an opportunity to move to the designated part of the building where they will be out of camera shot
- Avoid singling out any individual in the congregation, use group shots in passing instead.

Further guidance will be added to the online Resources page as practice develops in light of changing technology.

# 3.10 Online safety and safe use of technology

A policy statement about online safety, including the expectations of workers in their electronic communications with children and adults at risk, should be included in either the main safeguarding policy document for a local church or in a separate online safety policy.

The Codes of Conduct for working with children and adults at risk (see Resources C1 and C2) contain provisions relating to online communication. See also Resource P3: Model church online safety policy.

The URC Digital Charter also highlights the importance of social media and the internet being as safe a place as possible for everyone (www.bit.ly/urcsocialmediaguidelines).

# 3.11 Video conferencing

Guidelines for maintaining safety when using Zoom or other video conferencing platforms include:

- Use subscription versions of platforms which contain more security measures than the free versions
- If a meeting is infiltrated by uninvited visitors it should be terminated immediately. If the meeting
  organisers feel that the breach poses any risk to participants, this should be reported to a
  safeguarding officer
- When using breakout rooms, ensure there are at least three people in each group
- For youth groups or other online meetings for children:
  - there must be a minimum of two leaders per breakout room
  - prevent participants from sending each other private chats.

See also Resource P3: Model church online safety policy and further guidance will be added to the online Resources page as practice develops in light of changing technology.

# 3.12 Driving

The safety of people being transported to and from church activities is the responsibility of whoever makes the transport arrangements. If parents / carers make those arrangements themselves, then they are responsible for ensuring the safety of those being transported. If the church makes the arrangements, safety becomes the responsibility of the church. Driving can also put someone in a position of power over others which could be misused by those seeking to cause harm. Appropriate procedures therefore need to be followed.

Where the church is making travel arrangements:

- Details of travel arrangements need to be in the consent form for any activity or event
- Safer recruitment procedures (section 2.4) must be followed for drivers who are not already children's / adult's workers
- Ensure drivers are aware that they will need appropriate insurance for their car, tax and MOT (Resource SA4: volunteer driver agreement gives an optional template that could be used)
- Those driving a minibus must have the appropriate D1 licence.

Additional options for promoting safe practice could include:

An annual licence check can be undertaken for all drivers via the website below. The driver
can obtain a check code, which can be passed to the church to check the licence. The code is
valid for one single use within 21 days. Further information can be obtained from:
www.gov.uk/check-driving-information.

# 3.13 Guidelines on touch

Church groups and activities should provide a warm, nurturing environment for children and adults, while avoiding any inappropriate behaviour, or the risk of allegations being made.

- All physical contact should be an appropriate response to the needs of the child or adult at risk, and not the worker
- Keep everything public. Giving someone a hug in the context of a group is very different from a hug behind closed doors
- Be sensitive to the individual's reaction to touch. If someone is not happy with physical contact, respect this and find another way of conveying your concern for them
- Touch with children should be age-appropriate, and initiated by the child (unless there are exceptional circumstances eg they need medical attention)
- As far as possible, be aware of the individual's culture, and the meaning touch has to them
- Workers should be able to monitor each other's behaviour with regard to touch and physical
  contact. They should feel safe and confident to check out issues, discuss any concerns and to
  challenge anything constructively which could be misunderstood or misconstrued.

#### Healing ministry and laying on of hands

When prayer with the laying on of hands is ministered this should be done with the recipient's consent and understanding of what is being offered. Touch must be appropriate, and it is usually inappropriate to lay hands on the affected part. Hands laid on the head acknowledge the Lord's healing touch in body, mind, and spirit for the whole person including the affected part.

#### www.bit.ly/urchealingministry

# 3.14 Supporting those with additional needs

Churches should be sensitive to any additional needs, to enable all to participate as fully as possible. This includes being aware of:

- accessibility issues
- special educational needs and disabilities (SEND)
- dementia and memory issues
- mental health needs
- which children and adults at risk are carrying and taking medication themselves.

Group leaders / activity organisers need to know:

- who is required to administer medication, where medication is stored and who has access
- who on the team has appropriate knowledge and training to deal with medical issues
- circumstances in which participants may take non-prescription medicines such as painkillers
- emergency procedures, including the appropriate response for allergies, epilepsy or diabetes
- any specific instructions from parents/carers about a child's or adult's medical needs.

See also Resource SA3: Request to administer medication form.

# 3.15 Overnight stays

When organising overnight stays and residential events, it is important that:

- there is a nominated safeguarding person(s), and all participants and leaders know who it is
- there is a qualified first aider in attendance
- a risk assessment of the venue and activities has been completed beforehand
- adequate insurance cover is arranged for any activities and the premises used
- participants provide emergency contact details, and have been given contact details of the leader or an identified worker
- all church workers have completed safeguarding training, and have sufficient disclosure and barring checks prior to the event
- all medical information and emergency contact numbers are easily accessible



• if using an established residential centre, confirmation is made that it has a suitable safeguarding policy, carries out training and criminal records checks on workers, and has full risk assessments for health and safety.

In the specific case of overnight stays with children, ensure that:

- consent forms have been completed, with medical requirements, travel and collection arrangements, sleeping arrangements, dietary requirements
- workers do not sleep in the same room as children, unless there are exceptional circumstances where children require supervision (eg medical needs)
- · appropriate nightwear is worn
- changing and showering facilities are separate for children and adults. If there are limited facilities, timetables are used to ensure separate access times for children and adults.

Additional guidance on organising residential trips, including further guidance on issues of gender, sleeping arrangements and access to bathrooms, will be made available online.



# Safer working with children

Resource C1 'Code of Conduct for working with children (Under 18s)' underpins all work with children, including group activities, 1-1 interaction and online contact.

### 3.16 Ratios of leaders to children

The following adult-to-child ratios are required as the minimum numbers to help keep children safe (source: NSPCC):

Age of child	Ratio	
0-2 years	1:3	one adult to three children
2-3 years	1:4	one adult to four children
4-8 years	1:6	one adult to six children
9-12 years	1:8	one adult to eight children
13-18 years	1:10	one adult to ten children

- There must be at least two adults present, even with smaller groups
- Where possible, at least one female and one male leader should be present for mixed-gender groups. This is essential in the context of overnight stays
- Adults who assist on one or two occasions must be responsible to an appointed worker who
  has completed safer recruitment processes. If they start to help more regularly, they will need
  to complete appropriate training and safer recruitment processes themselves
- If there are young people helping to supervise younger children, only those aged 18 or over should be included as adults when calculating adult-to-child ratios.



These ratios are a minimum and may need to be increased to take into account the nature of the group, such as if children with additional needs will be present, the type of activities and the venue – activities spread across a number of rooms, outings and residential events, will require more adults.

Please note: It is important to make sure parents and carers are clear about when the responsibility for the care of their children returns to them following the activities or events.

The reality of church life is that getting enough people to help can be challenging. The guidance provided here is recommended 'best practice'. On individual occasions eg a Sunday in the summer holidays) it may not always be possible to meet all of the requirements outlined above but this should be the exception rather than the rule. However, the requirement to always have at least two adults present should always be followed without exception.

If only one adult is available to lead the activity, it should be postponed until an appropriate number of adult leaders are available. If it is consistently impossible to meet the recommended ratios, Elders will need to consider the sustainability of the children's work being offered and whether a different model could be used.

#### International trips

The recommended ratio for international trips is:

Up to ten children	three adults
1–10 additional children	one additional adult: for example, 30 children would require a minimum of five adults

More detailed advice can be obtained from the International Relations department at Church House.

# 3.17 Young leaders

Although the age of 18 marks the legal division between children and adults, it is recommended that a minimum three-year difference is required between the age of young workers and the age of the children they supervise.

The Police, Crime, Sentencing and Courts Act 2022 expanded the definition of 'positions of trust' to include those involved in teaching, training, supervising or instructing in a religion on a regular basis. It is illegal for an adult in a position of trust to be involved in sexual activity with a 16- or 17-year-old (even though they are over the age of consent). This may have implications for some young leaders and their relationships with people in their peer group or social circle. Please speak with the Church Safeguarding Coordinator or Synod Safeguarding Officer for advice if needed.

# 3.18 Lone working with children

It is not advised that workers meet with children alone. However, if such a situation arises, such as a child wanting to discuss a personal matter with a worker, the worker should:

- inform the leader or a co-worker about the contact beforehand
- if possible and safe to do so, obtain the agreement of a parent / carer, but remember that telling a parent / carer might put the child at risk, depending upon what they wish to disclose

- meet in a public place, such as a room with an open door with other people present close by in the building. Avoid meetings in remote, secluded areas
- carefully consider the needs and circumstances of the child
- record and report to the leader any situation where a child becomes distressed or angry
- inform the leader or a co-worker when the lone working starts and finishes.

If a situation arises 'out of the blue' and is unavoidable, the group leader and / or Church Safeguarding Coordinator should be notified promptly afterwards.

# 3.19 Registration of some children's activities with regulatory bodies

Churches in England which provide groups for children under the age of eight who attend regularly for more than two hours at a time, or for 14 days or more in any period of 12 months, will need to register these with Ofsted unless an exemption applies.

See www.gov.uk/guidance/childminders-and-childcare-providers-register-with-Ofsted.

If registration is not required, a church may still choose to join the voluntary part of the Childcare Register in some instances (for example, because being registered with Ofsted may help parents qualify for free childcare).

In Wales, similar registration processes apply in relation to provision for children under the age of 12. See www.careinspectorate.wales/register-childcare-and-play-service.



Resource C2 'Code of Conduct for working with adults (over 18s)' underpins all contact with adults at risk, including group activities and 1-1 contact. As noted in the Code of Conduct, key principles for working with adults at risk include promoting empowerment and supporting people to make their own choices and decisions whenever possible.

# 3.20 Visiting adults at home

This guidance applies to 'formal' pastoral visiting done in the name of the church (rather than informal, neighbourly contact). Care must be taken to protect both those being visited and those doing the visiting. There should be accountability and transparency in the way in which church workers engage in lone working or home visits. The following guidelines are recommended good practice.

**Good Practice 6** 

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#### **Arranging visits**

- Ideally let people know in advance that you are coming, particularly if it is your first visit
- If there are any concerns or risks known before a visit is made, visiting in pairs may be advisable, especially if you do not know the person
- Carry some identification on the first visit and be proactive in letting the person see it
- Carry a mobile phone and let someone know where you are and when you expect to return

**Key principles for** 

empowerment...

working with adults at

risk include promoting

• Ask the person whether they would like repeat visits, whether and how they would like to be contacted again, and so on. Leave them feeling fully in control of your contact with them.

#### **Providing care and support**

- Be clear about what support you can offer and the purpose and limitations of any pastoral care / support that is available
- Do not make referrals to any agency that could provide help without the adult's permission, and ideally encourage them to set up the contact, unless there are safeguarding concerns
- Never offer 'over-the-counter' remedies to people on visits or administer prescribed medicines, even if asked to do so
- If you are asked to make any purchases, always retain receipts and return both them and any change to the person immediately. Keep a record of any transactions and the reason for them
- Take care regarding accepting any gifts other than token items, to avoid misunderstandings or subsequent accusations from the person or their family. If courtesy demands that you accept a small gift, declare it to someone at church, for instance an Elder or the treasurer, to ensure transparency. If someone wants to make a donation to the church, put it in an envelope, mark it on the outside as a donation and obtain a receipt from the treasurer.

#### After a visit

- Make a note of the visit and store it in accordance with data protection requirements
- Notify the Church Safeguarding Coordinator of any concerns arising from a visit.

## 3.21 Financial matters

It is important to be aware of the possibility of financial abuse occurring within a church setting. If an adult at risk wishes to name a church worker as the executor of their will or asks them to take on power of attorney, this should be discussed with the Synod Safeguarding Officer. The worker may also wish to seek their own legal advice. Similar care should be taken when an adult at risk is considering a bequest to a church worker or a church and this should be referred to the Synod Safeguarding Officer for advice.

# 3.22 Support plans

In cases where it would be helpful to provide a written record of the support that a church can provide for an adult at risk, *Resource SA5: Template for a support plan* provides a suggested format for recording this.



