

# Safeguarding Policy

## **The Family Trust**

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Registered Charity No: 1162296

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**Inspiring the next generation to explore Christianity.**

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# Child Protection and Safeguarding Statement

This policy aims to ensure that The Family Trust is responsible in its care of children and young people and those who work with them and is committed to good practice in that work.

The Family Trust has a growing children's and young people's ministry. The Trustees and the team recognise the importance of our ministry and take seriously their responsibility to protect and safeguard the welfare of children and young people entrusted to their care.

*"Safeguarding is not just about protecting children from deliberate harm. It includes a wide range of issues relating to pupil's welfare, health and safety."  
Ofsted, September 2016*

Everyone within the organisation has a responsibility for the day-to-day implementation of this policy. They should aim to continually assess the work and implement such changes as are deemed necessary to make existing practice consistent with this policy.

All Schools Workers, Volunteers and other visitors working within The Family Trust team will be given clear indication of their roles and responsibilities and will be informed of available training which may help them to implement this policy to minimise unsafe situations. They will be aware of the guidelines for good practice and the action that must be taken in the event of disclosure discovery, observation or suspicion of abuse outlined in this policy.

# Safeguarding Principles

The Family Trust is committed to:

- Providing a safe and caring environment for children and young people in all our activities.
- Valuing, listening to and respecting children and young people as well as promoting their welfare and protection.
- Safe recruitment, supervision, and training for all staff/volunteers.
- Providing annual training updates for all staff and volunteers.
- Adopting a procedure for dealing with concerns about possible abuse.
- Maintaining good links with the statutory childcare authorities and other relevant organisations.

## **Ethos of partnership**

Our commitment is to continually develop relationships of trust and partnership with schools and staff and develop a positive working relationship with the school. In all our involvement with staff and students we are committed to excellence in communicating in honest, enjoyable, interesting, and relevant ways. We always aim to be sensitive to the needs and experiences of the school community.

When working on school premises, our staff/volunteers will adhere to the school's safeguarding guidelines in addition to our own. In the event of a disclosure being made on school premises, staff/volunteers will liaise with the school's Designated Safeguarding Lead (DSL) as well as The Family Trust's Designated Safeguarding Lead.

The Family Trust teams consist of approved school's workers with occasional invited visitors. To be approved by The Family Trust, schools' workers complete an application process which includes the seeking of professional and character references. They agree to comply with our safeguarding policy and have been checked through an Enhanced Disclosure procedure with the Disclosure and Barring Service (DBS). Schools workers (staff and volunteers) all receive regular supervision and annual training. Extra/Occasional visitors are vetted by approved workers and always work in a supervised setting as part of the team.

# Indicators of Abuse and Neglect

The following definitions of child abuse are taken from The Department For Education's publication 'Keeping Children Safe in Education'

All staff should be aware that abuse, neglect, exploitation and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

## **What is abuse?**

*Abuse is a form of maltreatment of a child. Somebody may abuse, neglect, or exploit a child by inflicting harm or by failing to act to prevent harm. Children may be abused or exploited in a family, in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.*

- **Physical abuse** - *A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.*
- **Emotional abuse** - *The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional 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 seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.*
- **Sexual abuse** - *Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as child-on-child abuse) and all staff should be aware of it and of the policy and procedures for dealing with it.*
- **Child-on-child abuse** - *It is essential that all staff understand the importance of challenging inappropriate behaviours between peers, many of which are listed below, that are abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as 'just banter', 'just having a laugh', 'part of growing up' or 'boys being boys' can lead to a culture of unacceptable behaviours, an unsafe environment for children and*

*in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.*

*Child-on-child abuse is most likely to include, but may not be limited to:*

- *bullying (including cyberbullying, prejudice-based and discriminatory bullying).*
  - *abuse in intimate personal relationships between children, (sometimes known as teenage relationship abuse).*
  - *physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse).*
  - *sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence).*
  - *sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse.*
  - *causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.*
  - *consensual and non-consensual sharing of nudes and semi-nude images and or videos (also known as sexting or youth produced sexual imagery).*
  - *upskirting - which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.*
  - *initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).*
- **Neglect** - *The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.*

### **Further definitions of abuse and safeguarding risks**

*Child abuse is never acceptable wherever it occurs and whatever form it takes. Abuse linked to belief, including belief in witchcraft or possession, is a horrific crime which is condemned by people of all cultures, communities and faiths. The Family Trust applauds the work being done in communities to tackle this form of abuse and to stand up to the perpetrators. (National Action plan to tackle child abuse linked to faith or belief.)*

- **Spiritual abuse** - *Due to the faith-based nature of our work with children and young people, spiritual abuse (closely linked to emotional abuse) is an important consideration for The Family Trust to guard against. Spiritual Abuse is defined as: 'Coercion and control of one individual by another in a spiritual context... 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 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.' (Oakley and Kinmond 2013)*

- *It is important to realise that there is no evidence that its proponents necessarily intend to harm others. Instead, controlling and unhelpful ways of behaving might develop unwittingly and, once a pattern is established, it continues. (Thirtyone:eight, 2015)*
- *Some indicators of spiritual abuse might be a leader who is intimidating and imposes his/her will on other people, perhaps threatening dire consequences or the wrath of God if disobeyed. He or she might say that God has revealed certain things to them and so they know what is right. Those under their leadership are fearful to challenge or disagree believing they will lose the leader's (or more seriously God's) acceptance and approval.*
- *Misused or misinterpreted scripture can pressurise individuals to behave in a particular way or to make a particular decision. A warning sign of spiritual abuse is when scripture is used to support an individual's personal agenda. Instead, it should focus on the needs of others and encourage people to consider and choose their responses for themselves. (Thirtyone:eight, 2015)*
- *Spiritual abuse can be prevented in settings where workers and volunteers are accountable to each other, receive effective supervision and training that develops safer operating practices and builds awareness of the potential for spiritual abuse; healthy spiritual contexts encourage people to develop as individuals who can think for themselves and are able to express disagreement or concern. (Thirtyone:eight, 2015)*
- ***Fabricated or Induced Illness (FII)*** - *Fabricated or induced illness (FII) is a rare form of child abuse. It occurs when a parent or carer, usually the child's biological mother, exaggerates or deliberately causes symptoms of illness in the child. (NHS, 2017)*  
*Behaviours in FII include a mother or other carer who:*  
*Persuades healthcare professionals that their child is ill when they're perfectly healthy.*  
*Exaggerates or lies about their child's symptoms, manipulates test results to suggest the presence of illness – for example, by putting glucose in urine samples to suggest the child has diabetes.*  
*Deliberately induces symptoms of illness – for example, by poisoning her child with unnecessary medication or other substances.*
- ***Significant harm*** - *This relates to the degree of harm that triggers statutory action to protect a child. It is based on the individual child's health or development compared to that which could reasonably be expected of a similar child, e.g. severity of ill treatment, degree and extent of physical harm, duration and frequency of abuse and neglect, premeditation. Department of Health guidance suggests that 'significant' means 'considerable, noteworthy or important.'*
- ***Domestic violence*** - *Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.*
- ***Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)*** - *Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The*

*abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual, and it should be noted exploitation as well as being physical can be facilitated and/or take place online.*

- **Preventing radicalisation**

*Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk is part of our safeguarding approach.*

- *Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to: Negate or destroy the fundamental rights and freedoms of others; or undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or intentionally create a permissive environment for others to achieve this.*
- *Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.*
- *Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.*
- *There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).*

- **Gangs**

*The NSPCC report 'Teenagers At Risk' (2009) acknowledges that there is not a universal way in which the term 'gangs' is understood in the UK context and it can cover everything from groups of young people 'hanging around' together in public through to high level organised criminal activity. The risk posed to children & young people is obviously much more serious at the latter end of that scale. Vulnerable children and young people are at risk of coercion into criminal activity through the lure of material gifts, interest and seemingly sincere acts of kindness from the perpetrators. Once the perpetrators have gained the child's trust, they convince them to engage in criminal activity on their behalf exposing them to all the risks of the criminal subculture of 21st century Britain. 'County lines' is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other forms of 'deal line'. This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.*

- **Online Safety**

*The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk:*

- **content:** *being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.*

- **contact:** *being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.*
- **conduct:** *online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying, and*
- **commerce:** *risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>).*

# Recognising Possible Signs of Abuse

The following may or may not be indicators that abuse has taken place, but the possibility should be considered:-

## Physical abuse

- Any injuries not consistent with the explanation given for them.
- Injuries to the body in places which are not normally exposed to falls, rough games, etc.
- Injuries which have not received medical attention.
- Neglect – under nourishment, failure to grow, constant hunger, stealing or gorging food, untreated illnesses, inadequate care etc.
- Reluctance to change for, or participate in, games or swimming.
- Repeated urinary infections or unexplained stomach pains.
- Bruises, bites, burns, fractures etc. which do not have an accidental explanation.
- Cuts/scratches/substance abuse.

## Emotional abuse

- Changes or regression in mood or behaviour, particularly where a child withdraws or becomes clingy. Also, depression, aggression, extreme anxiety.
- Nervousness, frozen watchfulness.
- Obsessions or phobias.
- Sudden under-achievement or lack of concentration.
- Inappropriate relationships with peers and/or adults.
- Attention-seeking behaviour.
- Persistent tiredness.
- Running away/stealing/lying.

## Sexual abuse

- Any allegations made by a child concerning sexual abuse.
- Child with excessive preoccupation with sexual matters and detailed knowledge of adult sexual behaviour, or who regularly engages in age-inappropriate sexual play.
- Sexual activity through words, play or drawing.
- Child who is sexually provocative or seductive with adults.
- Inappropriate bed-sharing arrangements at home.
- Severe sleep disturbances with fears, phobias, vivid dreams or nightmares, sometimes with overt or veiled sexual connotations.
- Secretive relationships with children or adults.
- Eating disorders – anorexia, bulimia. (These signs may indicate the possibility that a child or young person is self-harming, mostly by cutting, burning, self-poisoning).

## Neglect

- General unhappiness.
- Being withdrawn or aggressive.
- Having on-going health problems or long-term injuries.
- Witnessing domestic abuse.
- Dishevelled or unkempt appearance.

## Spiritual abuse

- Intimidating leader(s) who impose their will on others.
- Children are fearful of losing their leader &/or God's approval.
- Children display an unusual sense of blame or guilt.
- Regular misquoting of religious scripture or taking scripture out of context.

## Online Abuse

- General distress after using devices.
- Being secretive or withdrawn about online activity.
- Sudden changes in mood or behaviour.
- Avoiding specific platforms or contacts.
- Use of sexualised or aggressive language.
- Receiving gifts or money from unknown sources.
- Disclosures of inappropriate online contact.

## Contextual Considerations

### **Race, culture and religion**

Crucial to any assessment is a knowledge of and sensitivity to racial, cultural and religious aspects. Remember also that differences exist not only between ethnic groups but also within the same ethnic group and between different neighbourhoods and social classes. A difference in child-rearing does not justify child abuse. While different practices must be taken into account, it is also important to remember that all children have basic human rights.

### **Children with disabilities**

As an organisation, we need to be aware that children and young people who have physical or learning disabilities can be at greater risk of abuse.

Some considerations around children and young people with disabilities:

- Children with disabilities tend to have more physical contact than those without disabilities (i.e. therapists, care workers) and may require higher levels of personal care.
- Blind or deaf children may be less aware of their surroundings and are therefore more vulnerable. They may be reliant on physical contact for communication.
- The definition of what constitutes abuse is wider for children with disabilities. (This can include force-feeding, financial abuse, over-medication and segregation.)
- Attitudes can play a part, e.g. the belief that a child or young person with a disability can't be sexually abused because they are seen as asexual.
- It can be hard to know if a child with a disability has been abused because of communication difficulties.
- Children may not fully understand what is said to them or may not be able to express themselves in ways that can be easily understood.

Children may be more vulnerable to suggestion or eager to please the youth or children's worker, relinquishing their autonomy.

# Responding to Allegations of Abuse

Under no circumstances should a member of The Family Trust team carry out their own investigation into suspicions of abuse. When you suspect possible abuse based on your own observations or conversations, do not try to 'solve' the problem yourself. If you have any suspicions, however slight, follow the outlined procedure. You do not need to be convinced that abuse is taking place before you take action. The person in receipt of allegations or suspicions of abuse will do the following:

1. In situations of suspected or alleged abuse, contact the Designated Safeguarding Lead or Deputy Safeguarding Lead who will decide on the next course of action. In circumstances where there are allegations of abuse within the school context, the school's DSL (unless the allegation is about them in which case it will be the Head Teacher or Chair of Governors) should also be notified. In these instances, the Designated Safeguarding Lead will consult with the Head Teacher/DSL. (Although we are providing provision, in a school context the school remains responsible for the safeguarding of its pupils).
2. The Designated Safeguarding Lead or Deputy Safeguarding Lead will then seek advice from Thirtyone:eight and follow their instructions.
3. Under no circumstances will members of The Family Trust team attempt to carry out any investigation into the allegation or suspicions of abuse. The role of the Designated Safeguarding Lead is to collect and clarify the precise details of the allegation or suspicion and to provide this information to Thirtyone:eight and any other agencies whom they advise should be notified.
4. Whilst allegations or suspicions of abuse will normally be reported to the Designated Safeguarding Lead, in the absence of the Designated Safeguarding Lead or Deputy, the Charity Manager or Trustees should be contacted who will then contact Thirtyone:eight and follow their instructions. The Charity Manager or Trustees may need to inform the relevant insurance company.
5. Should the staff member be unhappy with the advice they have received (see the Whistle Blowing Procedure in Appendix 5) or if the people above cannot be contacted promptly and/or the school's safeguarding lead - the staff member receiving the disclosure has a responsibility to inform the social services at the earliest opportunity if they have serious and immediate concerns over the child's welfare. The NSPCC's Whistle Blowing Advice Line (0800 028 0285) offers free advice for anyone worried about a child.
6. The Family Trust will support the Designated Safeguarding Lead or Deputy in their role and accept that any information they may have in their possession will be shared in a strictly limited way and on a need-to-know basis.
7. At no point should the allegation be discussed with anyone other than the individuals mentioned in the above guidance.

If the suspicion or allegation relates to the Designated Safeguarding Lead, the report should be made to the Deputy. If it relates to both the Designated Safeguarding Lead and Deputy, the report should be made the Charity Manager or Trustees. Ensure that the Designated Safeguarding Lead/Deputy is removed from the situation at the earliest possible time to ensure no further compromise or risk. If you feel that there is no-one in the organisation whom you can safely report the incident to, contact Thirtyone:Eight directly (0303 003 1111) and refer to The Family Trust Whistle Blowing Procedure located in Appendix 5.

# Guidance for Handling Disclosures

## How to respond to a child wanting to talk about abuse

### General points

- Above everything else, listen, listen, listen.
- Show acceptance of what the child says and reassure them (however unlikely the story may sound). Do not pass judgment.
- Keep calm.
- Look at the child directly.
- Be honest.
- Tell the child you will need to let someone else know (name the specific person and their role) – don't promise secrecy.
- Even when a child has broken a rule, they are not to blame for the abuse.
- Be aware that the child may have been threatened or bribed not to tell.
- Never push for information. Authorities may discount information if it is thought that you asked a leading question. If a child decides not to tell you after all, then accept that, and let them know that you are always ready to listen.
- As soon as possible write down what has been shared (preferably on a Safeguarding Report Form – Appendix 2 - or a school's own report form).
- You will be advised by the Designated Safeguarding Lead on what to do next.

### Helpful responses

- You have done the right thing in telling.
- That must have been really difficult.
- I am glad you told me.
- It's not your fault.

### Don't say

- Why didn't you tell anyone before?
- I can't believe it!
- Are you sure this is true?
- Why? How? When? Who? Where? Asking the child questions could contaminate evidence for possible criminal proceedings.
- Never make false promises.
- Never make statements such as, "I am shocked, don't tell anyone else."

### Concluding

- Again, reassure the child that they were right to tell you and show acceptance.
- Let the child know what you are going to do next and that you will let them know what happens (you might have to consider referring to the Social Services or the Police to prevent a child or young person returning home if you consider them to be seriously at risk of further abuse).
- Contact the Designated Safeguarding Lead at The Family Trust responsible for handling child protection concerns or contact an agency such as Thirtyone:eight (0303 003 1111) for advice. Consider your own feelings and seek pastoral support if needed.

### Making notes

Make handwritten notes straight away, or as soon as possible preferably within one hour of the child talking to you (use a Family Trust Safeguarding Report Form or the school's disclosure report form if possible – see Appendix 2). Write down exactly what the child said and when he/she said it, what you said in reply and what was happening immediately beforehand (e.g. a description of

the activity). Record dates and times of these events and when you made the record. Keep all hand-written notes, even if subsequently typed. Such records should be kept for an indefinite period in a secure place (kept by The Family Trust Designated Safeguarding Lead along with a record and rationale for any decision made).

# **Appointment, Support, Supervision and Training of Staff and Volunteers**

The Family Trust leadership will ensure that all staff/volunteers will be appointed, trained, supported and supervised in accordance with the principles set out in government guidelines 'Keeping Children Safe in Education' as well as specific guidelines for Christian organisations offered by Thirtyone:eight and general guidelines from the National Society for the Prevention of Cruelty to Children (NSPCC).

All staff and volunteers will undergo a Disclosure & Barring Service (DBS) check (repeated every three years), attend an interview involving a senior member of staff (Charity Manager or Trustee) and will only start working with us upon receipt of two satisfactory references. We will inform candidates that online searches may be carried out as part of online recruitment checks.

## **Supervision of group/children's activities**

The Family Trust leadership will provide details of the supervision for each activity in The Family Trust guidelines, 'Guidelines for Good Practice in all Activities', on pages 19 – 21.

## **Working with offenders**

As a Christian organisation, we believe strongly in the redemptive power of the Holy Spirit and as such do not consider past criminal convictions as a prohibitive factor when wishing to work or volunteer for The Family Trust. However, we will not accept applications from ex-offenders whose convictions pose a safeguarding risk to children and/or vulnerable adults. Risk assessments will be carried out on any individual with a criminal record.

# Handling of DBS Disclosure Information

## **Storage and access**

Disclosure information must never be kept on an applicant's personal file. It must be stored separately in a secure, lockable, non-portable cabinet, with access strictly controlled and limited to those who are entitled to see it as part of their duties (DSL and Deputy DSL).

## **Handling**

In accordance with section 124 of the Police Act 1997, disclosure information is only passed to those who are authorised to receive it in the course of their duties. A record should be kept of all those to whom disclosures or disclosure information has been revealed and it is a criminal offence to pass this information to anyone who is not entitled to receive it.

## **Usage**

Disclosure information must only be used for the specific purpose for which it was requested and for which the applicant's full consent has been given. A Privacy Policy statement is signed, upon completing a DBS check, by all applicants.

## **Retention**

Once a recruitment (or other relevant) decision has been made, disclosure information should not be kept for any longer than is absolutely necessary. This is generally for a period of up to six months, to allow for the consideration and resolution of any disputes or complaints. If, in very exceptional circumstances, it is considered necessary to keep disclosure information for longer than six months, consultation should be made with the registered umbrella body (Thirtyone:eight) and/or DBS. Advice can then be given to the data protection and human rights of the individual. The above conditions regarding safe storage and strictly controlled access would still apply in these circumstances.

## **Disposal**

Once the retention period has lapsed, disclosure information must be destroyed by secure means, i.e. shredding, pulping or burning. Whilst awaiting destruction, disclosure information must not be kept in any insecure receptacle (e.g. waste bin or confidential waste sack). No copies of the disclosure information may be kept, in any form. However, a record can be kept of the date of the issue of a disclosure, the name of the subject, the type of disclosure requested, the position for which the disclosure was requested, the unique reference number of the disclosure and the details of the recruitment decision taken.

# Communication Principles

The introduction of modern technologies (e.g. text messaging, email, online messaging and social media) has revolutionized communication systems throughout the world and if used in the right way is an excellent resource for children, young people and workers alike.

It is therefore important for organisations to adopt policies and good practice in these areas to ensure these modern technologies are used safely and responsibly by all, thereby protecting children and young people and safeguarding the integrity of workers.

## **Workers' Communication with young people**

As an organisation, The Family Trust provide services to children and young people primarily in an educational setting (i.e. schools & colleges). For this reason, there should be no need for The Family Trust staff or volunteers to make direct contact with children or young people outside of organised Family Trust activities.

### **Exceptions to this include:**

- When The Family Trust is acting as a facilitator for inter-church youth or children's events and young people are part of the organising group. In this situation, staff should communicate via group emails/messages so that one to one communication is limited.
- On occasions, one-to-one communication may be appropriate (e.g. arranging for pastoral support of young people involved in inter-church youth projects). In this situation, staff should make their line manager aware of the situation and never delete the messages exchanged. One-to-one meetings must take place in a public place and not behind closed doors.
- Communicating with young people who wish to volunteer at Chequer Tree Camp. In this instance (as above) written logs should be kept and workers should not communicate one-to-one with young people under the age of 15.
- Workers should use their Family Trust email address for all communication.
- Video or Voice messenger should be done in public so that other people are aware of what you are doing and to whom you are speaking.

## **Social media**

The Family Trust operate various social media accounts in order to communicate with members of the public. Children and young people may on occasion follow these accounts and engage with them. The Family Trust staff and volunteers will follow the below protocol around social media:

- You agree not to 'follow' or 'friend' users under the age of 16 (allowing for appropriate engagement with young volunteers under the age of 18).
- Clear and unambiguous language should be used in all communications. Avoid abbreviations that could be mis-interpreted.
- You may engage with children/young people known to The Family Trust under the age of 16 providing you already knew them outside of the work context and their parents are aware (e.g. family members, children of friends).
- You must not engage with children or young people with whom you have not had 'face to face' interaction.
- You must respect social networking site's age restrictions (e.g. not connecting with anyone under the age of 13 on Facebook).

# Activities Involving the Transportation of Children

These guidelines should apply to all drivers involved in the transportation of children and young people, organised by or on behalf of The Family Trust. They do not apply to private arrangements for transportation made, for example, between parties with parental responsibility.

Our guidelines on transporting children are as follows:

- Only those who have gone through The Family Trust recruitment procedures for staff/volunteers should transport children.
- All drivers should have read the Safeguarding Policy of The Family Trust and agree to abide by it.
- Parental consent should be given, and all journeys should be carried out with the knowledge of the leadership of The Family Trust.
- Any motor vehicle adapted to carry more than eight passengers for hire or reward is regarded in law as a Public Service Vehicle (PSV). A small bus permit is therefore required for all minibuses used to carry between 6 and 16 passengers. All minibuses used to transport children should therefore have a small bus permit, the necessary insurance, a driver with a valid driving licence that entitles them to drive a minibus.
- If a church uses a minibus and the children/young people are asked to make a contribution towards the trip, there is a legal requirement to obtain a Section 9 permit from the Department of the Environment, Transport & The Regions.
- Employees may drive a minibus as part of their usual duties at The Family Trust providing the following criteria are met:
  - You are 21 or older.
  - You have had your driving licence for at least 2 years.
  - You meet the 'Group 2' medical standards if you are over 70 - check with your GP if you're not sure you meet the standards.
  - You are driving on a voluntary basis and the minibus is used for social purposes by a non-commercial body.
  - The maximum weight of the minibus is not more than 3.5 tonnes - or 4.25 tonnes including specialist equipment for disabled passengers, for example a wheelchair ramp.
  - You are not towing a trailer.
- The driver must hold a full driving licence, have adequate business use insurance and the vehicle must be road worthy.
- Do not transport children alone except in cases of emergency. Always place children in the back seats of the car. However, two workers in a car does not in itself guarantee protection for a child. You must consider the safety and safeguarding of children in your care at all times.
- Drivers should not spend unnecessary time alone in a car with a child. If a child wants to talk to a driver about something and has waited until other children have been dropped off, the driver should explain that it isn't convenient to talk there and then but arrange to meet

the child/young person at a location where there are other adults around. (Remember a child/young person may want to talk to the driver about an abusive situation).

- When travelling in groups with more than one vehicle it is good practice to insist children stay in the same groups on the out-going and return journey. This will avoid the confusion over whether a child has been transported home or at worst left behind.
- If travelling in convoy with cars and minibuses, please note that the maximum speed for a minibus is 50 mph on single carriageway roads, 60 mph on dual carriageway roads, and 70 mph on motorways.

# **Guidelines for Good Practice in all Activities**

In all activities, staff/volunteers/associates/visitors will:

- avoid being left alone with an individual child/young person. The team should be vigilant of this issue and support each other at all times.
- seek to ensure that there is a minimum of two adults present with any group of children/young people.
- abide by the schools' agreed policies on all issues including child protection, behaviour management, discipline, bullying etc.
- aim to avoid any inappropriate physical contact with the children/young people.
- always report situations which they regard as unsafe and any suspected abuse or bullying, even when it is felt that the school may already be aware of the issues and people involved. This should be reported to the School's DSL & The Family Trust's Designated Safeguarding Lead.

Safeguarding and the welfare of young people, staff, volunteers, associates and visitors is everybody's responsibility. The Senior Leadership team and the trustees have overall responsibility in ensuring that effective safeguarding procedures are in place.

All approved staff/volunteers/associates will attend team meetings and other occasions for further development and training. The team will meet to review and plan activities and receive training. This will form part of ongoing supervision and quality assurance.

## **Guidelines on Touch for Working with Children**

- Keep everything in public. A hug in the context of a group is very different from a hug behind closed doors.
- Touch should be related to the child's needs, not the workers.
- Touch should be age appropriate and always initiated by the child rather than the worker.
- Avoid any physical activity which is, or could be construed as, sexually stimulating to the adult or the child.
- Children are entitled to determine the degree of physical contact with others except in certain circumstances, i.e. when they need medical attention.
- Staff/volunteers should take responsibility for monitoring one another in the area of physical contact. They should be free to constructively challenge a colleague if necessary. If they feel nervous or unsure about challenging a colleague directly, then confidential advice or support could be sought from their line manager/supervisor and/or The Family Trust Safeguarding Lead/s.

# Arrangements for Supervision of Children's/Young People's Activities

## General Arrangements

- It is the responsibility of the leader in charge to ensure that there is appropriate adult supervision to ensure the health, welfare and safeguarding of the children in their care. Leaders should be mindful that children of a younger age will require further or additional supervision.
- As far as possible, ensure that a worker is not alone with a child. In circumstances where this would be necessary or helpful, ensure that the door to the room is left open.
- Where confidentiality is important, (e.g. counselling) and a child is being seen on their own, ensure that others know that the interview is taking place and that someone else is in the building.
- No person under 16 years of age should be left in charge of any children of any age; nor should children or young people attending a group be left alone at any time.
- A register of children attending a club or activity should be kept, and a register of helpers. This should include times of arrival and departure if any individual is not attending the whole session, and there are others in the building at the time.
- Staff/Volunteers should keep a record of any unusual behaviour, events or comments made by the children (See Safeguarding Report Form, Appendix 2). If these continue, you may have to take the action set out in the paragraph, "Responding to allegations of abuse." Any record made should be kept confidential.
- Physical contact between adults and children can be quite healthy and acceptable in public places but discouraged in circumstances where adult/child is on his/her own. (Please see previous 'Guidelines on Touch for Working with Children'.)
- Do not transport a child on your own. In cases where transport by car is absolutely essential, (e.g. after an accident) ensure that another leader is present, and that the child occupies the rear seat. Inform another adult when you leave and when you arrive. All those giving lifts to children on behalf of The Family Trust will be vetted and approved by the Trust, and the lift will be given with the knowledge of the parents and The Family Trust.
- Make sure your Safeguarding Training is up to date and make your most recent certificate, Family Trust's Safeguarding Policy and your DBS certificate available to be viewed by the office manager of the site of your provision. If further assurance/information is required, refer the office manager to Family Trust's DSL or Deputy DSL. (This is to comply with KCSIE, which requires governing bodies to ensure that any external organisation providing services or activities on school premises has its own safeguarding policies and procedures in place, and that clear arrangements exist for sharing child protection concerns with the school.)

## The Family Trust Kids Club and CU groups

Each Kids Club/CU group will have a minimum of 2-4 leaders (depending on the size of the group). There will be one leader who is overall in charge of the group. Names of leaders are available in The Family Trust office.

## **Chequer Tree Camp**

This is run by members of the team with volunteer helpers. A record of the names of these volunteers is available in The Family Trust office.

### **Other issues relating to camp:**

#### **Camp safety**

- It is the responsibility of all workers to know the whereabouts of all children in their care who are on camp.
- The ratio of workers to children throughout the age range (9-12) is eight children to each volunteer. (*see Recommended adult to child ratios for working with children / NSPCC Learning*)
- Each dorm will have a minimum of two volunteers.
- Everyone on camp should be warned of the danger of fire. If the camp is in a building, then everyone will be made aware of the fire exits. A fire drill will be practiced on the first full day of camp.
- All workers will follow lockdown procedures as outlined in the school policy. (A copy of the policy document is kept in the admin box at camp.)

#### **Positions of Trust**

As an organisation we occasionally work with young people who are 16 or 17 years of age, for example younger volunteers at Chequer Tree Camp. Any employee or volunteer of The Family Trust who holds a 'position of trust' should be aware that it is illegal to be involved in sexual activity with a person who is 16 or 17 years of age. This is in accordance with sections 16 to 19 the Sexual Offences Act 2003 as updated on 28 June 2022.

A 'position of trust' is defined as any adult who has authority or responsibility over another person, this may include teaching, training, supervising, or instructing any person under their care.

#### **Parental consent**

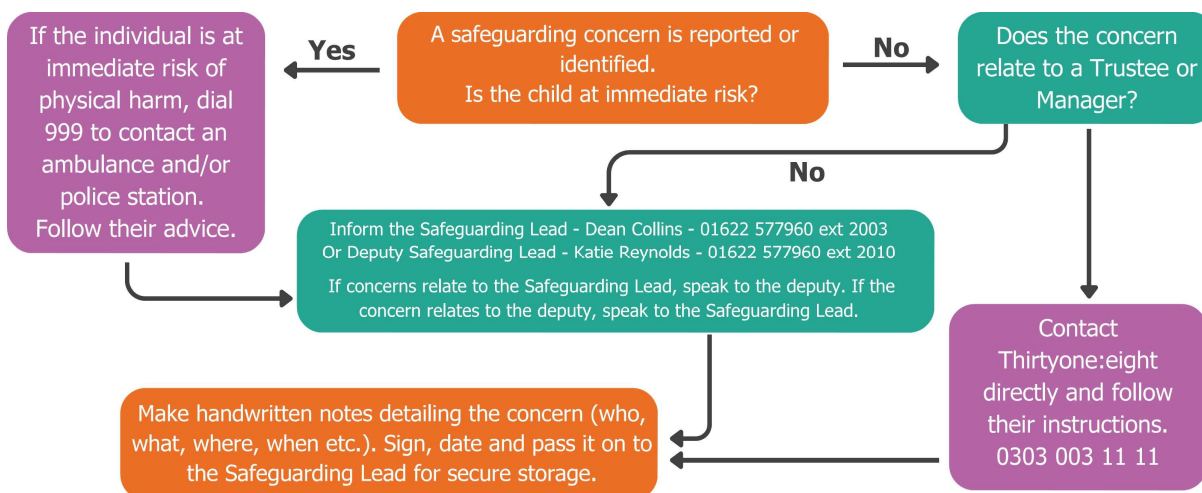
- No children should be allowed to participate in any activity without the written consent of their parent/guardian.
- All children on camp should have completed a Health Information and Consent Form.

#### **First aid**

Each week of camp there will be two appointed workers qualified in First Aid through a course run by St. John Ambulance or similar. The First Aiders will ensure that on the camp:

- The First Aid box is available, and its location known.
- The First Aid kit contains as a minimum those items recommended by St. John Ambulance.
- The location and telephone numbers of the nearest doctor and hospital are readily available. (See Heads of Camp Guidance Notes, produced each year.)
- The First Aider should record all accidents and injuries.

## Appendix I: Safeguarding - What to do and when



If for any reason you believe the concerns you have reported are being handled inappropriately, or you feel that you cannot report your concerns to the Safeguarding Lead or Deputy Safeguarding Lead, contact Thirtyone:eight on 0303 003 11 11 for independent advice.

# Safeguarding report form

Everyone has a responsibility for being aware of all children. Please look and listen and pass on the information appropriately to the relevant school Safeguarding Lead and/or The Family Trust's DSL (Dean Collins) or the Deputy DSL (Katie Reynolds).

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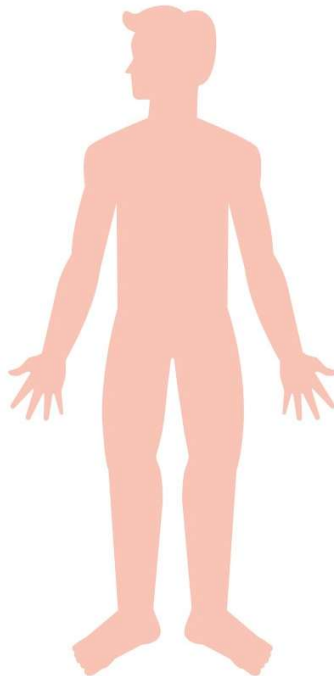
23

(Report continued)

**Your full name and role:**

**Signature and date:**

Body Map: please indicate with an asterisk where injuries were noticed if appropriate.



## Appendix 3: Behaviour Management Guidelines for Leaders/Volunteers

Discipline is the education of a person's character. It includes nurturing, training, instruction, chastisement, verbal rebuke, teaching and encouragement. It brings security, produces character, prepares for life and is an expression of God's love for an individual. (Hebrews 12:5-12 and Proverbs 22:6)

- Ask God for wisdom, discernment and understanding for the children in your care.
- Work on each individual child's positives, do not compare a child with another, but encourage and affirm them, giving them responsibility for simple tasks.
- Build healthy relationships with children and be a good role model by setting an example. You can't expect children to observe the ground rules if you break them yourself.
- Take care to give quieter and well-behaved children attention and resist allowing demanding children to take all your time and energy.
- Be consistent in what you say and ensure that other team members know what you have said. This avoids manipulation.
- If children are bored, they often misbehave, so review your programme regularly. Remember, all behaviour is a form of communication. Ask yourself what the child is trying to tell you?
- NEVER smack or hit a child.
- Change voice tone if necessary. Discipline out of love, NEVER in anger. Strong teams seek help from each other to manage children's behaviour and wellbeing. Confident team members know to step back and let a colleague take-over when they are feeling angry with a situation or a child.
- Lay down ground rules, e.g. no swearing, racism, or calling each other names, respect for property, and make sure the children understand what action will be taken if rules are not kept.
- Every child is unique and will respond in different ways to different forms of discipline. It follows therefore, that each child should be dealt with individually.
- Children may be disruptive in a group. Give them a chance, warn them and only separate them as a last resort. Agree a behaviour policy with the team. Ensure the children know what this is. This could be - warning (first instance). A second warning (2nd instance). A time out (third instance). A phone call home (fourth instance).
- If a child is exhibiting challenging behaviour, why not have them sit right in front of you or get a helper to sit next to them.
- Be pro-active and encourage helpers to be pro-active rather than waiting to be told to deal with a situation.
- Take a disruptive child to one side and engage with them, challenging them to change, whilst encouraging their strengths.

- Remedial action can be taken against a constantly disruptive child. They can be warned that you may speak to their parents/carers about their behaviour, they may be sent to the back of the room for a time or outside the room (under supervision), or, in an extreme case and after advising the parent/carer, be banned from attending the group for a period of time.
- If a child's behaviour continues to be disruptive despite the measures taken above, seek advice and guidance from The Family Trust.
- Pray with the other leaders before the session and take time to debrief before you leave.

## Appendix 4: Safer recruitment procedure for staff, associates and volunteers

This procedure sets out what we will do when recruiting staff, associates and volunteers. It aligns with Safer Recruitment practices in KCSIE and the DfE guidance for after-school clubs, community activities and tuition.

### Scope and decision-making

- Trustees hold overall accountability.
- Schools' workers are appointed by the Charity Manager after a completed application and a formal interview.
- Safeguarding-sensitive volunteers and associates (including camp volunteers) are approved by the DSL or Deputy DSL.
- Kids Club volunteers are appointed by the club leader with Family Trust oversight, or by the Family Trust team directly.
- Mentors are appointed by the staff responsible for mentoring after completion of a six-week training course and a suitability interview.

### Recruitment stages

#### 1. Role definition

A role description, person specification, safeguarding responsibilities, supervision level and whether the role is regulated activity will be created prior to advertising.

#### 2. Advertising and application

Adverts will include safer recruitment statements. Applicants will complete our standard application form with full history (and explanations for gaps), experience with children, Christian background, and two referees (one a current/most recent employer or responsible church leader).

#### 3. Shortlisting

We will apply objective criteria and record shortlisting decisions and reasons.

#### 4. References (requested pre-interview where possible)

We will obtain two written references, ask explicitly about suitability to work with children and any safeguarding concerns, verify referee identity, and follow up by phone where needed.

#### 5. Interviews

We will conduct at least one structured interview (face-to-face or live video) including safeguarding questions and scenarios,

- Camp volunteers, whether new applicants or those who have previously served, will be interviewed by the DSL, Deputy DSL or a senior leader/trustee with assessment of residential safeguarding and leadership.
- Associates and volunteers may be observed in practice followed by an informal interview with a team leader.
- Mentors will complete a six-week training course prior to the suitability interview.

### Pre-appointment vetting

We will complete and record the following checks before confirming appointments and before any unsupervised contact with children:

- **Identity;** *We will check original identity documents and confirm the applicant's current address to verify who they are before appointment.*

- **Right to work:** *For staff roles we will verify legal entitlement to work in the UK and retain evidence of the check on file.*
- **DBS:** *We will obtain an enhanced DBS check for all roles involving contact with children and a barred list check where the role is regulated activity; checks will be renewed every three years or monitored via the DBS Update Service.*
- **Employment history:** *We will obtain a full employment and volunteering history, follow up unexplained gaps or inconsistencies, and record satisfactory explanations before appointment.*
- **Overseas checks:** *Where applicants have lived or worked abroad for relevant periods, we will seek appropriate overseas criminal record or professional conduct checks as available.*
- **Qualifications:** *We will verify any qualifications that are essential to the role by checking original certificates or validated electronic records.*
- **Online due diligence:** *We will carry out proportionate checks of publicly available online information for shortlisted candidates to identify any safeguarding concerns;*
- **Applicant disclosure:** *At conditional offer stage we will ask applicants to disclose any unspent convictions or relevant disciplinary findings; disclosures will be handled confidentially and only used for safeguarding decisions.*

**Risk assessment:** *Any concerning information or disclosures will trigger a documented safeguarding risk assessment led by the DSL, with Trustee involvement where required, and clear control measures recorded.*

### **Appointment and onboarding**

- Conditional offers will be issued subject to satisfactory checks and completion of safeguarding induction.
- Staff will receive fixed-term contracts with six weeks' mutual notice.
- Volunteers and associates will receive a role agreement clearly setting out expectations and conduct.
- We will issue the Safeguarding Policy and obtain a signed declaration to abide by it.
- A safeguarding induction (code of conduct, reporting routes, low-level concerns, whistleblowing, online safety, how to report a concern) will be completed before starting.

### **Training, supervision and ongoing checks**

- Induction and annual safeguarding refresher training will be provided; additional modules will be delivered for camp volunteers and mentoring.
- Line managers will provide regular supervision that includes safeguarding discussion.
- Suitability and conduct will be reviewed; concerns will be addressed promptly.
- DBS checks will be renewed every three years or via the Update Service with annual status checks recorded.
- Checks will be re-verified if concerns arise or roles change materially.
- We will brief workers on updates to relevant safeguarding guidance and record attendance.

### **Camp volunteers additional requirements**

- Residential suitability will be explicitly assessed (overnight supervision, boundaries, safeguarding in dorms, managing disclosures at camp, fire and lockdown procedures).
- Adult-to-child ratios, dorm leadership (minimum two leaders per dorm), and supervision plans will be confirmed.
- Pre-camp briefings will cover risk assessments, arrival/collection procedures, missing child protocols, medication/first aid, and information-sharing with parents/carers.

### **Visitors and short-term providers**

- All occasional visitors will be informally interviewed by an approved school's worker to ascertain their suitability for the work, the nature and level of their experience and skills and their commitment to preventing abuse.

- Family Trust visitors will always work in a supervised setting as part of the team.
- A safeguarding briefing and reporting routes will be provided.

### **Record-keeping**

- We will maintain a single central record of recruitment and vetting checks.
- All records, decisions, risk assessments and supervision measures will be stored securely and retained for appropriate periods.

### **Managing concerns during recruitment**

- Recruitment will be paused or withdrawn if information indicates risk.
- Concerns will be escalated to the DSL and Trustees, with consultation with the LADO where appropriate.
- Practice will remain consistent with KCSIE and DfE guidance for out-of-school settings.

## Appendix 5: Whistle Blowing Procedure

*This is a simplified summary of our whistleblowing procedure. The full version is available in the Team Handbook.*

The Family Trust aims to deal with people and organisations with the utmost respect and professionalism. However, it recognises that it is not immune from the potential for employees to act illegally, dangerously or inappropriately. Therefore, The Family Trust encourages any employee or volunteer to follow the whistleblowing procedure if they notice anything about which they are concerned.

### **Types of practice The Family Trust discourage include:**

- Inappropriate use of The Family Trust money.
- Inappropriate sharing of confidential information.
- Persistent failure to comply with health and safety practices.
- Inability to appropriately safeguard children and young people.

Employees should inform their line manager immediately if they become aware that any staff member is, has or is about to act inappropriately.

In cases where the malpractice is being carried out by the employee's Line Manager, the employee should inform the Charity Manager, or in the case of the Charity Manager, the Chair of Trustees.

An employee can ask for their concerns to be treated in confidence and their request will be respected to the extent possible in the circumstances. Employees will not be penalised for informing management about any malpractice.

When a manager is notified of a concern, they should ensure that the concern is investigated properly and objectively. The employee reporting the concern should be kept aware of the progress of the investigation. The manager who receives the concern is responsible for ensuring the necessary action is taken to report the concern.

If the concern is about inappropriate behaviour of a staff member or volunteer towards a child or young person, the advice in the Safeguarding Policy should be followed.

It is, of course, the right of any individual as a citizen to make direct referrals to the child protection agencies or seek advice from Thirtyone:eight (0303 003 1111). If the individual with the concern feels that the Designated Safeguarding Lead, Deputy or Charity Manager has not responded appropriately to your concerns, or where they have a disagreement with the Designated Safeguarding Lead as to the appropriateness of a referral, then they are free to contact an outside agency directly.