

Safeguarding Policy

1. Purpose

This document sets out St Pauls Cathedral's Safeguarding Policy. This policy makes clear how the Cathedral will protect children and vulnerable adults, seek to minimise the risk of abuse to them and the action to be taken in the event of a safeguarding concern being identified. The detailed procedures are contained in the appendices. The St Pauls Cathedral policy complements and is compliant with the Church of England's safeguarding policy statement for children, young people and adults 'Promoting a Safer Church' (2017) and its six overarching commitments:

- Promoting a safer environment and culture
- Safely recruiting and supporting all those with any responsibility related to children, young people and vulnerable adults within the Church
- Responding promptly to every safeguarding concern or incident
- Caring pastorally for victims/survivors of abuse and other affected persons
- Caring pastorally for those who are the subject of concerns or reports of abuse and other affected persons
- Responding to those that may pose a present risk to others.

Where relevant, the following Cathedral documents should be referenced –

- Anti-Bribery Policy
- Anti-Slavery Policy
- Bullying and Harassment at Work Policy
- Complaints and Compliments Policy
- Digital Learning Risk Assessment
- GDPR/Data Protection Policy
- Health and Safety Policy
- Outreach Policy
- Pastoral Care Policy
- Photography Policy
- Service Level Agreement between the Cathedral and the Diocese of London
- Social Media Policy
- Whistleblowing Policy
- Work Experience Policy and Procedures

2. Scope

This policy applies to all St Pauls Cathedral staff, volunteers and contractors, without exception, and covers their work on and offsite. This policy safeguards worshippers, visitors, staff, clergy, volunteers and contractors.

3. Policy Principles

As the Governing Body, the Chapter of St Pauls Cathedral recognise that all staff (paid or volunteers) have a duty to protect children and vulnerable adults from abuse, harm, neglect and exploitation in the Cathedral, its precincts and other buildings and when staff are working/performing off-site. Chapter also recognises that staff and volunteers may be vulnerable and may need to be safeguarded. Chapter is committed to welfare and protection and this sits at the heart of our mission, policy and procedures. Chapter is mindful of national legislation and Church of England guidance which safeguards the welfare of children and vulnerable adults who are at risk from harm.

In order to create and develop a safeguarding culture, Chapter

- Has appointed one of its members, the Precentor, to have oversight of all safeguarding matters. Chapter has also appointed the most senior member of staff, the Registrar, as the Cathedral Safeguarding Lead
- Has appointed a safeguarding professional who is the Cathedral Safeguarding Advisor and who has autonomy with regard to safeguarding cases
- Has established a process for safeguarding concerns to be properly reported and addressed
- Will support all staff who make a safeguarding report, even in the event of the safeguarding concern subsequently being unfounded, unless the report is found to be intentionally vexatious
- Will ensure the Cathedral follows safer recruitment practice
- Will ensure that safeguarding training and awareness form part of staff induction
- Will ensure that all staff and volunteers complete the Church of England's refresher safeguarding training at an appropriate level and as per the Church's stipulated three-year cycle and that new staff complete the training at the level specified in the Church of England's National Safeguarding Training Framework
- Will ensure that all staff and volunteers have knowledge of and understand the Cathedral's local safeguarding arrangements, that is to say, how to recognise and report a safeguarding concern and to whom
- Will ensure that safeguarding concerns about church officers are reported to the Diocesan Safeguarding Advisor in line with the Service Level Agreement (SLA) between the Cathedral and the Diocese of London

4. Key Definitions

4.1 The Children Act 1989 defines a child as any person under 18yrs, e.g. 17yrs or under.

The Care Act 2014 defines an adult at risk as:

A person aged 18 or above who is unable to look after their own wellbeing, property, rights, or other interests, and is at risk of harm (either from another person's behaviour or their own behaviour) because they have a disability, mental disorder, illness, or physical or mental infirmity. An adult at risk is more vulnerable to being harmed than other adults. Additionally, The Care Act also states that specific adult safeguarding duties apply to any adult who:

- Has care and support needs
- Is experiencing, or is at risk of abuse or neglect
- Is unable to protect themselves because of their care and support needs

The Cathedral recognises that some adults may experience life events or illnesses that render them vulnerable for specific periods of time and during those times may require the application of a safeguarding duty.

4.2 Categories of abuse (for a full list, with signs of abuse, please see appendix i)

- Grooming: a precursor to abuse, building a relationship with a child or vulnerable adult in order to gain trust and acceptance with the aim of exploiting that relationship to facilitate abuse. May include, for example, giving presents, money, helping with chores/homework, taking on trips/holidays
- Physical abuse: physical violence, including burning, scalding, drowning
Child specific: physical chastisement that leaves a bruise or mark e.g. a hand print, or using an implement even without leaving a mark
- Sexual abuse: an adult using a child or vulnerable adult (who cannot give consent) to satisfy their sexual needs/urges, either directly through rape, sex acts, or inappropriate touching; or via non-contact methods, for example. showing pornography, sexting, requesting or sending explicit photographs, voyeurism
- Neglect: failing to seek medical or physical care as needed, failing to feed, keep clean or supervise appropriately, also facilitating or not addressing self-neglect
- Emotional abuse: persistent denigration, derogatory remarks, also exposing a child or vulnerable person to aggression or violence against another person, for example a child witnessing domestic violence between their parents.

5. Responsibilities

5.1 Safeguarding is everyone's responsibility. All staff and volunteers should call 999 in the event of understanding there to be a safeguarding emergency, including if an individual is threatening immediate suicide. All staff and volunteers should take advice and report in the event of perceiving or witnessing a safeguarding incident or concern. No staff member or volunteer is expected to address a safeguarding concern by themselves. Staff will be supported in keeping the Cathedral open beyond closing time to facilitate the resolution of a safeguarding concern. Staff (including contractors) and volunteers at St Paul's Cathedral will seek, where reasonable*, to reduce risk to children and vulnerable adults from abuse, harm or exploitation during their time at St Paul's Cathedral, its precincts or other buildings.. This will involve vigilance towards these individuals who have entered the Cathedral or its churchyard, or where St Paul's Cathedral is leading outreach work offsite; it will also include vigilance towards colleagues and volunteers. The duty of vigilance extends to contact with children or vulnerable adults via social media, for example, via email, twitter, telephone, or online meeting platforms, e.g. zoom or Microsoft teams. Outside of an emergency situation, individual staff/volunteers at St Paul's Cathedral are not responsible for resolving safeguarding matters themselves, but are under an obligation to refer matters of concern as set out in this policy.

** The term **reasonable** is a generic and relative one and applies to that which is appropriate for a particular situation.*

5.2 The Dean

The role of the Dean is to provide leadership concerning safeguarding, and to encourage everyone to 'Promote a Safer Church'. Specifically, the responsibilities are to:

- Have an oversight of the activities that are the responsibility of Chapter, particularly involving children and vulnerable adults
- Inform and work in co-operation with the Diocese Safeguarding Advisor (DSA) in the event of reports, suspicions or disclosures of abuse alleged against any church officer, and to ensure that those who may present a risk to children; young people and vulnerable adults are effectively managed
- Encourage a culture of safety and vigilance
- Provide an annual report to the Bishop, subject to checking, on safeguarding policy, procedures, practice and review in the Cathedral

5.3 The Chapter

The Chapter will:

- Enact its duty of care to 'Promote a Safer Church' for all in the Cathedral community, and ensure there is a safeguarding strategy in place
- Create and promote an environment which is welcoming, respectful and safe from abuse, and enables and encourages concerns to be raised and responded to openly, promptly and consistently
- Adopt and implement House of Bishops safeguarding policy and practice guidance
- Provide a structure for managing safeguarding in the Cathedral with clear lines of accountability
- Appoint and monitor the efficiency of a Cathedral Safeguarding Advisor (CSA) (and possibly a deputy if required) to work with the Dean, Chapter and Cathedral staff to implement House of Bishops policy and guidance. This person should be a paid safeguarding professional
- Make arrangements to ensure appropriate support, supervision and training is provided for these officers
- Appoint a lead member of Chapter to attend the Diocesan Safeguarding Advisory Panel
- Collaborate and liaise where required with the statutory and voluntary agencies
- Ensure secure, central storage of records in accordance with Data Protection Act and General Data Protection Regulations (GDPR)
- Liaise with the Diocesan Safeguarding Advisor (DSA) to ensure all safeguarding responsibilities are met within the life of the Cathedral
- Ensure that all safeguarding incidents or concerns in relation to a church officer are reported to the DSA in line with the House of Bishops guidance and as detailed in the SLA between the Cathedral and the Diocese of London
- Ensure suitable training is provided for church officers in line with the National Safeguarding Team's (NST) training and development and training framework and also as in line with the Cathedral's training framework
- Provide appropriate insurance cover for all activities undertaken in the name of the Cathedral
- Ensure appropriate Disclosure and Barring Services (DBS) processes are in place
- Provide a complaints and whistleblowing procedure which can be used for those who wish to complain about the handling of safeguarding issues
- Complete national safeguarding self-assessments as required
- Ensure, in liaison with any affiliated schools, that Chapter fulfils its statutory responsibilities and that a progress review forms part of the annual safeguarding review. It is important that there is a clear agreement in place between the Cathedral and the School that clearly defines where the safeguarding responsibilities of each party begins and ends

- Review progress regularly, including a bi-annual review of the Cathedral policy, practices and procedures.

5.4 The Cathedral Safeguarding Lead (Registrar)

The Cathedral Safeguarding Lead will:

- Take advice from the Cathedral Safeguarding Advisor and/or Diocese of London in order to inform the provision of support, advice and expertise within the Cathedral, including the monitoring of procedures
- Decide, on receipt of a Safeguarding report, the best course of action to take and the priorities for doing so, or check that urgent intervention has already been taken
- Support the Cathedral Safeguarding Advisor in making referrals to statutory services, as appropriate
- Ensure that all staff have access to and have understood the Cathedral's policy and procedures for safeguarding
- Ensure that all staff and volunteers have regular training appropriate to their role, and ensure the keeping of records detailing such training
- Keep written records of all concerns in respect of safeguarding incidents in one secure location
- Report quarterly to the Safeguarding Advisory Group on safeguarding activity in the Cathedral

5.5 The Cathedral Safeguarding Advisor

The Cathedral Safeguarding Advisor will:

- Provide effective safeguarding support to senior Church officers through the efficient management of the Safeguarding Advisory Group and any core groups
- Refer cases to statutory and other services as appropriate, or support other staff in doing so
- Carry out relevant safeguarding and administrative actions from the Safeguarding Advisory Group, maintaining the Safeguarding Risk Register and action logs, supporting others to complete actions and chasing/resolving when necessary
- Ensure regular review of the Cathedral Safeguarding Policy, related processes and procedures
- Maintain the safeguarding database, files and records in accordance with GDPR legislation and other best practice
- Carry out individual risk assessments of staff in liaison with the Diocese of London as necessary.
- Manage cases of blemished disclosures, carrying out DBS risk assessments and supporting managers in monitoring risk assessment actions
- Write, plan and deliver training where required

- Provide back-up support to Human Resources on recruitment procedures including DBS checks

5.6 Safeguarding Advisory Group

The Safeguarding Advisory Group will:

- Meet as a group to be chaired by an independent specialist with experience of safeguarding appointed by Chapter, who will offer external scrutiny of safeguarding matters and advise accordingly
- Make sure that safeguarding policies and processes are in place and are being implemented
- Monitor and audit policy and practice across the wider Cathedral community, working in partnership with St Pauls Cathedral School to ensure that School and Cathedral policies are harmonious. and ensuring that St Paul's Cathedral School (SPCS) have their own safeguarding processes in place
- Assess and manage risk through the Risk Register
- Manage and monitor agreed actions through the Action Plan
- Develop and monitor key performance indicators of activity
- Share best practice with SPCS, the Diocese and other relevant safeguarding bodies

(Terms of reference for the Safeguarding Advisory Group can be found at Appendix ii)

5.7 Staff and Volunteers

Staff and volunteers will:

- Raise any safeguarding concerns about a child or vulnerable adult
- Behave professionally at all times in their communication with children and vulnerable adults
- Ensure professional boundaries are maintained
- Only communicate electronically with children and vulnerable adults via St Pauls Cathedral electronic platforms: email, phone and all social media, e.g. twitter and facebook
- Ensure they are familiar with St Pauls Cathedral safeguarding policy and procedures, particularly how to take advice and report safeguarding concerns
- Attend all mandatory safeguarding training

5.8 The Role of the London Diocese Safeguarding Team

St Paul's Cathedral Chapter will work with the Diocese of London Safeguarding Team to ensure the sharing of information as set out in the Service Level Agreement (SLA) between St Pauls Cathedral and the Diocese of London. (A copy of the SLA can be found in Appendix iii)

6. Policy

6.1 Promoting a safer environment and culture

The Chapter will, by delegation, plan the work of the Cathedral and the Cathedral School so as to minimise the risk of abusive situations arising.

The Head of Schools & Family Learning is responsible for planning the work of the Schools & Family Learning Department. (Details of the particular additional arrangements are to be found in Appendix iv)

The Director of Music is responsible for planning in terms of the operations of the Music Department. (Details of the particular additional arrangements are to be found in Appendix v of this document.)

The Head of Human Resources is responsible for recruitment and running programmes for work experience students. (Details of the arrangements are to be found in Appendix vi of this document.)

The Governing Body of the Cathedral School is responsible for overseeing Safeguarding arrangements within the School and details of the specific arrangements can be found on the School's website.

All staff and volunteers will adhere to the Lost and Missing Children Procedure found in Appendix vii.

6.2 Unaccompanied/Lone Children in the Cathedral

St Pauls Cathedral welcomes all children to the Cathedral, whether that be to worship, attend an event, or visit. Unaccompanied children are not turned away from the Cathedral in acknowledgement that they may be seeking sanctuary or fleeing risk of harm. In acknowledgement of this, staff and volunteers should approach lone children – preferably in pairs – to ascertain the child's welfare and the reason for their lone presentation; active safeguarding steps should then be taken and the police called and Security updated if the matter is urgent or the child refuses to provide information.

If a child who is alone is visiting the Cathedral with a parent or carer, the Lost and Missing Children Procedure should be followed (appendix viii).

Children holding a child's ticket (age 6-17yrs) will not be permitted into the Galleries without any accompanying adults (a person of 18yrs or older).

6.3 Safely recruiting and supporting all those with any responsibility related to children, young people and vulnerable adults within the Church

St Paul's Cathedral safely recruits staff and volunteers applying for any post which involves frequent and unsupervised access to children or vulnerable adults in the Cathedral and its precincts or those involved in outreach work. Contractors working in the Cathedral whose duties involve frequent and unsupervised access to children and vulnerable adults will be required to have an appropriate DBS certificate and adhere to the Cathedral's safeguarding policy whilst on Cathedral premises; further, the Human Resources team will request a copy of the contractor's company's safeguarding policy. The Human Resources team at St Pauls Cathedral will oversee and direct on all recruitment of both paid staff and volunteers.

(Please see Appendix viii for safer recruitment and staff retention procedures)

6.4 Training

Chapter will facilitate and require all staff and volunteers to attend the National Safeguarding Team's (NST) safeguarding training at the relevant level and to refresh this training every three years, as per the current guidance provided by the NST. Chapter will also facilitate and require all staff and volunteers to attend the Cathedral's in-house safeguarding training at an appropriate level and other safeguarding training as relevant. Chapter will facilitate and/or provide Safer Recruitment training for all HR staff and recruiting managers.

6.5 Responding promptly to every safeguarding concern or allegation

If a staff member or volunteer has concern that a child or vulnerable adult is at risk they must take immediate emergency action if necessary, in the way they would for any emergency situation; they must bring all safeguarding concerns to the attention of the Cathedral's Registrar as soon as possible and in any event within 24 hours. Clarity and advice can be sought from the Registrar, the Safeguarding Advisor, the Chaplain, or the Honorary Chaplain: the Virgers will have relevant telephone contact details; the Chaplains can be phoned or emailed directly, as can the Safeguarding Advisor. Once the safeguarding concern has been addressed and the subject of the concern has been safeguarded, the safeguarding form should be completed and sent to the Registrar and the Safeguarding Advisor. The electronic form is found in the 's' drive under 'safeguarding'; paper copies of the form are held in the Virgers' office or the Security office. The form should record as much detail as possible: time and date; details of the concern; names and contacts details of staff, visitors, or worshippers involved and the reference number or contact details if a referral is made to the police or other services.

6.6 Dealing with disclosures and /or reports or concerns about a staff member (including volunteers)

Anyone receiving a disclosure, allegation, or report of concern that relates to a staff member acting as an alleged abuser is charged with reporting it to the Registrar for the Cathedral; if the Registrar is unavailable, the concern should be reported to the Precentor or Canon in Residence; if those persons are unavailable or cannot be swiftly contacted, the concern may be reported to the Safeguarding Advisor, or the Chaplain. A clear indication that there is an immediate risk to someone else from an alleged perpetrator should also be reported straight to the police, in the same way as any other emergency would be. In line with the Cathedral's Service Level Agreement with the Diocese, allegations against Church Officers will also be reported to the Diocesan Safeguarding Advisor. Upon receiving the report of concern, the Registrar, or another senior manager, will carry out a full risk assessment, identifying any urgent actions; this may include a referral into statutory services and suspension of the alleged perpetrator. The meeting will also address

support for all parties involved and any necessary communications strategies. If appropriate, the risk assessment will be shared with the subject of the assessment.

6.7 Caring pastorally for victims/survivors of abuse and other affected persons

Through careful and considerate ministry St Pauls Cathedral will seek to support all known survivors of abuse. This may be through the support of the Chaplain, Honorary Chaplain or another Minister; alternatively, the Cathedral will help the victim/survivor to identify appropriate, external, professional support if required.

6.8 Caring pastorally for those who are the subject of concerns or allegations of abuse and other affected persons

As detailed in the Service Level Agreement between St Pauls Cathedral and the Diocese of London, all matters of safeguarding concerns or allegations against a church officer will be referred to the Safeguarding Advisor at the Diocese of London. Pastoral support and the implementation thereof will be identified as part of the initial risk assessment. The subject of the assessment may also be offered a Link Person via the Diocese of London.

6.9 Responding to those who may pose a present risk to others.

As detailed in the Service Level Agreement between St Pauls Cathedral and the Diocese of London, all concerns or allegations against a church officer will be referred to the Safeguarding Advisor at the Diocese of London, who will work jointly with the Cathedral to draw up a plan for managing the concerns. This may involve the person against whom there is an allegation agreeing to a Safeguarding Plan. Due to the unique nature of St Pauls Cathedral, worshippers subject to such plans are supported in finding another church to attend, where a consistent congregation can support and monitor the implementation of the Plan.

6.10 Photographs within the Cathedral

The Cathedral is a public place and therefore visitors may be inadvertently captured in other visitors' images. This is not illegal and the Cathedral has no control over this. However, in the unlikely event of staff noticing a visitor deliberately photographing a child or groups of children with whom that visitor has no connection, staff may intervene and ask for that photograph to be deleted. ***Please note that the Cathedral has no power to force the individual to delete the photograph.*** In the event of the same visitor being seen to be habitually taking photos of children unrelated to them, the police should be called for advice.

6.11 Using Track and Trace information (temporary addition) May 2021

Currently, the Cathedral is collecting visitor and worshipper information for the NHS purposes of Track and Trace. (It should be noted that the data about only some visitors/worshippers is collected manually by the Cathedral, because some individuals choose to check in via the NHS app.) Personal data should only be used for the purposes for which it is collected. However, Government guidance allows for

data protection regulations to be superseded in the event of data being required to prevent the commission of crime, or to progress a safeguarding concern. Therefore, staff may access Trace and Trace information to progress a safeguarding query *if that information cannot be accessed in any other way*. Staff should collect the minimum amount of data required and should clearly state on the safeguarding form why that data has been collected and what that data is. This temporary addition to this policy will be removed once the pandemic has ended and track and trace information is no longer being kept.

Reviewed June 2021

Appendices

- i Categories of abuse
- ii Safeguarding Advisory Group Terms of Reference
- iii Service Level Agreement between St Pauls Cathedral and the Diocese of London
- iv Schools and Family Learning Department Safeguarding Procedures
- v Music Department Safeguarding Procedures
- vi Music Outreach Safeguarding Procedures
- vii Work Experience Policy
- viii Lost and Missing Children and Vulnerable Persons Procedures
- viii Safer Recruitment Procedures

