

Safeguarding Policy

1. Purpose

This document sets out St Paul's Cathedral Safeguarding Policy. This policy makes clear how the Cathedral will protect children, young people and adults at risk (adults at risk are sometimes termed '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 Paul's 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 who may pose a present risk to others.

Where relevant, the following Cathedral documents should be referenced –

- Bullying and Harassment at Work Policy
- Code of Conduct for Staff and Volunteers
- Complaints and Compliments Policy
- Digital Learning Risk Assessment
- GDPR/Data Protection Policy
- Health and Safety Policy
- Memorandum of Understanding between the Cathedral and Diocese of London
- Social Media Policy
- Whistleblowing Policy
- Work Placement Policy and Procedures

2. Scope

This policy applies to all St Paul's 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 Paul's Cathedral recognise that all staff (paid or volunteers) have a duty to protect children and adults at risk 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 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 adults at risk.

In order to create and develop a safeguarding culture, Chapter

- Has appointed one of its members (currently the Canon Steward), to have oversight of all safeguarding matters.
- Has appointed a safeguarding professional who is the Cathedral Safeguarding Officer 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 Cathedral Church Officers, as defined in the Memorandum of Understanding (MoU) between the Cathedral and the Diocese of London, are reported to the London Diocesan Head of Safeguarding in line with the Memorandum of Understanding

4. Key Definitions

4.1 The Children Act 1989 defines a child as any person under 18years, e.g., 17years 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, or intermittently, 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 1)

- Grooming: a precursor to abuse, building a relationship with a child or adult at risk 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 handprint, or using an implement even without leaving a mark
- Sexual abuse: an adult using a child or adult at risk (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 an adult at risk to aggression or violence against another person, for example a child witnessing domestic abuse 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 adults at risk from abuse, harm or exploitation during their time

at St Paul's Cathedral, or in its precincts or other buildings. This will involve vigilance towards 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 adults at risk 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 adults at risk
- Inform and work in co-operation with the London Diocesan Head of Safeguarding in the event of reports, suspicions or disclosures of abuse alleged against any Cathedral Officer, as defined in the Memorandum of Understanding, and to ensure that those who may present a risk to children; young people and adults at risk are effectively managed
- Encourage a culture of safety and vigilance
- Provide an annual report to the Bishop addressing 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 Officer (CSO) (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 this officer
- Appoint a Cathedral Safeguarding Lead who will 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 London Diocesan Head of Safeguarding to ensure all safeguarding responsibilities are met within the life of the Cathedral
- Ensure that all safeguarding incidents or concerns in relation to a Cathedral Officer, as defined in the Memorandum of Understanding, are reported to the London Diocesan Head of Safeguarding in line with the House of Bishops guidance and as detailed in the Memorandum of Understanding between the Cathedral and the Diocese of London
- Ensure suitable training is provided for Cathedral Officers in line with the National Safeguarding Team's (NST) training and development 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. Ensure that there is a clear agreement in place between the Cathedral and the School that 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 (Canon Steward)

The Cathedral Safeguarding Lead will:

- Take advice from the Cathedral Safeguarding Officer 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 necessary urgent intervention has already been taken
- Support the Cathedral Safeguarding Officer in making referrals to statutory services, as appropriate
- Ensure that all staff have access to the Cathedral's safeguarding policy and procedures in an easily accessible format
- Ensure that all staff and volunteers have regular training appropriate to their role, and ensure the keeping of records detailing such training
- Support the Safeguarding Officer in keeping 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 Deputy Safeguarding Lead (Chief Operating Officer)

The Cathedral Deputy Safeguarding Lead will:

- Deputise for the Safeguarding Lead in all day-to-day safeguarding matters as defined above
- Deputise for the Safeguarding Lead in supporting the broader safeguarding work of the Cathedral in the long-term absence of the Safeguarding Lead

5.6 The Cathedral Safeguarding Officer

The Cathedral Safeguarding Officer will:

- Provide effective safeguarding support to senior Cathedral 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 in completing actions, following up and resolving as 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

5.7 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 Paul's Cathedral School (SPCS) to ensure that School and Cathedral policies are harmonious. and ensuring that SPCS have their own safeguarding processes in place
- Assess and monitor risk via the safeguarding 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 2)

5.8 Staff and Volunteers

Staff and volunteers will:

- Raise any safeguarding concerns about a child or adult at risk
- 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 Paul's Cathedral electronic platforms: email, phone and all social media, e.g., twitter and facebook
- Ensure they are familiar with St Paul's Cathedral safeguarding policy and procedures, particularly how to take advice and report safeguarding concerns
- Attend all mandatory safeguarding training

5.9 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 Memorandum of Understanding between St Paul's Cathedral and the Diocese of London. (A copy of the Memorandum can be found in Appendix 3).

6. Policy

6.1 Promoting a safer environment and culture

The Chapter will, by delegation, promote a safe environment and culture within the Cathedral and the Cathedral School to minimise the risk of abusive situations arising. The Head of Schools & Family Learning is responsible for promoting a safe environment and culture within the Schools & Family Learning Department. (Details of the particular additional arrangements are to be found in Appendix 4.)

The Director of Music is responsible for promoting a safe environment and culture within the Music Department. (Details of the particular additional arrangements are to be found in Appendix 5 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 and Adults at Risk Procedure found in Appendix 7.

6.2 Unaccompanied/Lone Children in the Cathedral

St Paul's 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, or school group, the Lost and Missing Children and Adults at Risk Procedure should be followed (appendix 8).

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 is committed to Safer Recruitment for all staff and volunteers applying for any post which involves frequent and unsupervised access to, or work with, children or adults at risk in the Cathedral and its precincts and ensures Safer Recruitment of staff involved in outreach work. Contractors working in the Cathedral whose duties involve frequent and unsupervised access to, or work with, children and adults at risk will be required to have an appropriate DBS certificate and adhere to the Cathedral's safeguarding policy whilst on Cathedral premises. All contractors who work permanently or regularly for the Cathedral and are based on site will undertake the Church of England's safeguarding training in line with their role. Infrequent or irregular contractors will be required to read the site rules, as issued by the Health and Safety Officer, which advises that infrequent or irregular contractors must immediately report to a permanent member of staff in the event of witnessing or hearing about any matter that may be a safeguarding concern. The Human

Resources team at St Paul's Cathedral will oversee and direct on all recruitment of both paid staff and volunteers.

(Please see Appendix 8 for safer recruitment and staff retention procedures)

6.4 Training

Chapter will facilitate and require all staff and volunteers and regular contractors 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 any further training as recommended by the NST. The Duty Pastoral volunteers will undertake the Cathedral's in-house safeguarding training. 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 an adult at risk or child is at risk of harm or abuse, 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 Canon Steward and Safeguarding Officer as soon as possible and in any event within 24 hours. Clarity and advice can be sought from the Canon Steward, the Safeguarding Officer, the Chaplain, Chief Operating Officer, Canon in Residence, or Human Resources. The Chaplain can be phoned or emailed directly, as can the Safeguarding Officer; the Virgers will have all contact details if necessary. 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 safeguarding inbox (safeguarding@stpaulscathedral.org.uk). The form should record as much detail as possible: time and date; details of the concern; a description of relevant persons; 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 Canon Steward for the Cathedral. In the event of the Canon Steward being unavailable, the concern should be reported to the Chief Operating Officer, or Canon in Residence; if those persons are unavailable or cannot be swiftly contacted, the concern may be reported to the Safeguarding Officer, or to the Chaplain, or to Human Resources. 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 Memorandum of

Understanding with the Diocese, allegations against Cathedral Officers as defined in the Memorandum of Understanding will also be reported to the London Diocesan Head of Safeguarding. Upon receiving the report of concern, the Canon Steward, or another senior manager, will carry out a full risk assessment, identifying any urgent actions in conjunction with Human Resources - this may include a referral into statutory services and suspension of the alleged perpetrator. The assessment 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 Paul's Cathedral will seek to support all known victims/survivors of abuse. This may be through the support of the 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 Memorandum of Understanding between St Paul's Cathedral and the Diocese of London, all matters of safeguarding concerns or allegations against a Cathedral Officer as defined in the Memorandum of Understanding will be referred to the London Diocesan Head of Safeguarding. 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 Memorandum of Understanding between St Paul's Cathedral and the Diocese of London, all concerns or allegations against a senior Cathedral Officer will be referred to the Head of Safeguarding at the Diocese of London, who will work jointly with the Cathedral to draw up a plan for managing the concerns.

6.10 Safeguarding Agreements

Occasionally, the Cathedral may receive a request to attend a Service from worshippers who need a safeguarding agreement. In such situations, the matter will be assessed on a case-by-case basis.

6.11 Photographs within the Cathedral

The Cathedral is a public place and therefore visitors, staff and volunteers 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.

6.12 Responding to communication from members of the public

Safeguarding at St Paul's Cathedral is a team-based approach; therefore, we do not commit authorised Ministers to meeting and supporting specific individuals, however, very occasionally, worshippers and visitors who may be vulnerable seek to form relationships with particular authorised Ministers. To avoid giving the impression that such attachments are sustainable, we may communicate with the relevant worshipper or visitor using a neutral email address; generally, this will be the Business Support Team inbox, although if appropriate, it may be the safeguarding email inbox.

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Appendices

1. Categories of abuse
2. Safeguarding Advisory Group Terms of Reference.
3. Memorandum of Understanding between St Paul's Cathedral and the Diocese of London.
4. Schools and Family Learning Department Safeguarding Procedures.
5. Music Department Safeguarding Procedures.
6. Music Outreach Safeguarding Procedures
7. Work Placement Policy
8. Lost and Missing Children and Vulnerable Persons Procedures
9. Safer Recruitment Procedures
10. Belltower, Visiting Choirs and Events Safeguarding Procedures

