

Safeguarding Policy

1. Purpose

This document sets out St Paul's Cathedral 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 Paul's Cathedral policy is compliant with the House of Bishop's safeguarding Code of Practice and Guidance. In particular, it is underpinned by 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
- Statement of Delegated Authorities
- Whistleblowing Policy
- Work Placement Policy and Procedures

2. Scope

This policy applies to all St Paul's Cathedral staff, ministers, volunteers and contractors, without exception, and covers their work on and offsite. This policy safeguards worshippers, visitors, choristers, staff, ministers, volunteers and contractors.

This policy is particularly mindful of the children and vulnerable adults regularly engaged by the work of the Cathedral and the particular safeguarding presentations in this context.

Those children and vulnerable adults include, non-exhaustively:

- All Children, comprising of:
 - Probationers and Choristers of St Paul's Cathedral Choir
 - Pupils of St Paul's Cathedral School
 - Children engaged with Hackney Choral
 - Children engaged in offsite music outreach
 - Children visiting the Cathedral who become lost and missing
 - Children on school visits and tours
- Adult visitors experiencing mental health issues
- Victims/Survivors of abuse

3. Policy Principles

As the Governing Body, the Chapter of St Paul's Cathedral recognise that all staff, ministers, volunteers and contractors 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 working/performing off-site. Chapter also recognises that staff, ministers, volunteers and contractors 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 the House of Bishops' safeguarding Code of Practice and Guidance, which safeguards the welfare of children and vulnerable adults.

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, ministers, volunteers and contractors 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 (including regular contractors), ministers 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 Safeguarding Learning and Development Framework

- Will ensure that all staff (including contractors), ministers 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
- Will ensure that any safeguarding Serious Incidents are reported to the Charity Commission promptly.

4. Legislative Framework

The key legislative framework supporting St Paul's Cathedral Safeguarding Policy include:

- Safeguarding and Clergy Discipline Measure 2016
- Cathedrals Measure 2021
- Care Act 2014
- Children Act 1989 and 2004
- Charities Commission Regulations
- Data Protection Act 2018
- Domestic Abuse Act 2021
- Equality Act 2010
- Human Rights Act 1998
- Mental Capacity Act 2005
- United Nations Convention on the Rights of the Child
- Working Together to Safeguard Children 2023

Statutory guidance, which set a benchmark for good safeguarding practice, are sought to be reflected in this policy. These include:

- Care and Support Statutory Guidance 2025
- Keeping Children Safe in Education 2024

Under section 5 of the Safeguarding and Clergy Discipline Measure 2016, the Chapter of St Paul's Cathedral and all Cathedral staff who work directly with children and vulnerable adults have a 'duty to comply' with the House of Bishops' safeguarding Code of Practice and must have 'due regard' to all safeguarding Guidance (including both policy and practice guidance) issued by the House of Bishops. These are available on the Church of England's website under the safeguarding e-manual. This policy is compliant with the House of Bishops' safeguarding Code of Practice and Guidance.

5. Key Definitions

5.1 Definition of 'child'

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

Statutory guidance applicable to St Paul's Cathedral, *Working Together to Safeguard Children* (2023), emphasises that a child is defined as anyone who has not yet reached their 18th birthday. 'Children' therefore means 'children and young people' and is understood this way throughout this policy.

5.2 Definition of 'vulnerable adult'

The Safeguarding and Clergy Discipline Measure 2016 defines a vulnerable adult as:

A person aged 18 or over whose ability to protect himself or herself from violence, abuse, neglect or exploitation is significantly impaired through physical or mental disability or illness, old age, emotional fragility or distress, or otherwise; and for that purpose, the reference to being impaired is to being temporarily or indefinitely impaired.

Vulnerable adult is the term in church law with regards to safeguarding adults. This is different to 'adult at risk' as defined in the Care Act 2014 and used by statutory services. The definition of a 'vulnerable adult' is different to statutory guidelines in order to take into account the unique position of the Church. This definition of 'vulnerable adult' means that someone can be classified as vulnerable even if they do not meet the statutory threshold. It encompasses the possibility that the ability of people to keep themselves safe can depend on the context they find themselves in, as well as on their own personal characteristics or abilities. For example, an individual who is experiencing, or has experienced domestic abuse, could be a vulnerable person in a Church context, as the nature of domestic abuse puts them in a position where they may be 'significantly impaired through...emotional fragility or distress'. The same argument would apply to someone who is experiencing or has experienced spiritual abuse.

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. The Cathedral also recognises that vulnerability is not an inherent characteristic of an individual and stresses that the use of the term vulnerable should not locate the cause of the risk of abuse with the individual but with the actions or omissions of others. Therefore, the safeguarding duty serves to mitigate the risk of abuse or exploitation from others.

5.3 Categories of abuse (for a full list, with signs of abuse, please see Appendix I).

The following categories are relevant for both children and vulnerable adults. The statutory definition of child abuse is included, all other categories of abuse are still pertinent to children.

- **Abuse:** takes many forms, including physical abuse, emotional abuse (including spiritual abuse), sexual abuse or neglect or a combination of these
- **Child Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or 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.

Categories of abuse for both children and vulnerable adults:

- **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 handprint, 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 an vulnerable adult to aggression or violence against another person, for example a child witnessing domestic abuse between their parents
- **Spiritual abuse:** a form of emotional and psychological abuse which is characterised by a systematic pattern of coercive and controlling behaviour in a religious context. For example, use of scripture to justify abusive behaviour or manipulate a person into acts they would not wish to consent to. For a full list of signs please see Appendix I.

6 Responsibilities

6.1 Safeguarding is Everyone's Responsibility

Safeguarding is everyone's responsibility. All staff (including contractors), ministers 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 (including contractors), ministers and volunteers should take advice and report in the event of perceiving or witnessing a safeguarding incident or concern. No staff member (including contractors), minister or volunteer is expected to address a safeguarding concern by themselves. All will be supported in keeping the Cathedral open beyond closing time to facilitate the resolution of a safeguarding concern. Staff (including contractors), ministers and volunteers at St Paul's Cathedral will seek, where reasonable*, to reduce risk to children and vulnerable adult 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, its precincts or other buildings, 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, X (formerly Twitter), telephone, or online meeting platforms, e.g., Zoom or Microsoft Teams. Outside of an emergency situation, individual staff (including contractors), ministers and 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.*

6.2 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:

- Provide leadership on matters relating to the safeguarding of any children or vulnerable adults
- 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 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, and vulnerable adults 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.

6.3 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 Code of Practice and 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, Cathedral staff, ministers, volunteers and contractors to implement House of Bishops' safeguarding Code of Practice 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
- Appoint an independent specialist as Chair of the Safeguarding Advisory Group who will offer external scrutiny of safeguarding matters and advise accordingly
- Ensure that Chapter regularly discusses safeguarding at Chapter meetings, with safeguarding as a standing order, and receives an annual safeguarding report from the Independent Safeguarding Chair
- 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' safeguarding Code of Practice and 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 Church of England's Safeguarding Learning 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.

6.4 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
- Support the Cathedral Safeguarding Officer in making referrals to statutory services, as appropriate
- Ensure that all staff (including contractors), ministers and volunteers have access to the Cathedral's safeguarding policy and procedures in an easily accessible format
- Ensure that all staff (including regular contractors), ministers 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
- In the absence of the Cathedral Safeguarding Officer, 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.

6.5 The Cathedral Deputy Safeguarding Lead (Chief Operating Officer)

The Cathedral Deputy Safeguarding Lead will:

- Report any safeguarding Serious Incidents to the Charity Commission (delegated to the Chief Financial Officer in the absence of the COO)
- Ensure that Chapter is informed about any safeguarding Serious Incidents reports made to the Charity Commission and any decision not to report when incidents were considered to be a borderline case in line with the Statement of Delegated Authorities
- 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.

6.6 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
- 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
- Refer cases to statutory and other services as appropriate, or support other staff, ministers, volunteers and contractors 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 safeguarding risk assessments of staff, ministers, volunteers and contractors 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.

6.7 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
- Produce an annual report for Chapter, written by the Independent Chair
- Share best practice with SPCS, the Diocese and other relevant safeguarding bodies
- Establish Safeguarding Case Management Groups as required.

(Terms of reference for the Safeguarding Advisory Group can be found at Appendix 2)

6.8 Staff, Ministers and Volunteers

Staff (including contractors), ministers 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, in exceptional cases and where their role necessitates it. They will only communicate electronically through St Paul's Cathedral electronic platforms: email, phone and all social media, e.g., X (formerly 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

6.9 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).

7 Policy

7.1 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 abuse occurring.
- 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 (including contractors), ministers and volunteers will adhere to the Lost and Missing Children and Vulnerable Adults Procedure found in Appendix 7.

7.2 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 (including contractors), ministers 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 Vulnerable Adults 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).

7.3 Safely recruiting and supporting all those with any responsibility related to children and vulnerable adults within the Church

St Paul’s Cathedral is committed to Safer Recruitment for all staff (including contractors), ministers and volunteers applying for any post which involves frequent and unsupervised access to, or work with, children or vulnerable adults in the Cathedral and its precincts and ensures Safer Recruitment of staff involved in outreach work. Ministers are appointed by the Bishop’s Office who the Cathedral work closely with to ensure Safer Recruitment.

Contractors working in the Cathedral whose duties involve frequent and unsupervised access to, or work with, 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 or completing outreach work offsite. 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)

7.4 Training

Chapter will facilitate and require all staff, ministers, volunteers and regular contractors to attend the Church of England’s National Safeguarding Team’s (NST) safeguarding training at the relevant level, completed wherever possible within three months of an individual taking up a post, and to refresh this training every three years, as per the House of Bishops’ safeguarding Code in the Safeguarding Learning and Development Framework. Chapter will also facilitate and require all staff, ministers 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 which is refreshed at the beginning of each calendar year.

Chapter will facilitate and/or provide Safer Recruitment training for all HR staff and recruiting managers and ensure that this training is refreshed every three years.

7.5 Responding promptly to every safeguarding concern or allegation

If a staff member (including contractors), minister or volunteer has concern that an vulnerable adult 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/or 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.

7.6 Dealing with disclosures and /or reports or concerns about a staff member (including ministers, volunteers and contractors)

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.

7.7 Responding to concerns which do not qualify as a safeguarding concern

All staff (including contractors), ministers, and volunteers are encouraged to report a concern they think might be a safeguarding matter. Occasionally, those reports may not qualify as a safeguarding concern at the point of reporting. Whether these qualify as a safeguarding concern falls to the professional judgement of the Cathedral Safeguarding Officer. For those non-safeguarding concerns, such reports will be held in a secure folder accessible to the Safeguarding Officer, Chaplain, and Canon Steward. If the matter has not re-presented after three months, the reports will be deleted. Where these are not judged

to be safeguarding concerns, they might also be passed to the Chaplain, for pastoral concerns, or to Human Resources, the Canon Steward or the COO as appropriate.

7.8 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.

7.9 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.

7.10 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.

7.11 Safeguarding/Behaviour Management Agreements

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

7.12 Photographs within the Cathedral

The Cathedral is a public place and therefore visitors, staff, ministers and volunteers may be inadvertently captured in other visitors' images. This is not illegal. 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, and the police should be called. After this, the procedure for promptly reporting safeguarding concerns should be followed. ***Please note that the Cathedral has no power to force the individual to delete the photograph.***

7.13 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.

Reviewed November 2024

Reviewed May 2025 (ELT approved subject to Chapter approval)

Appendices

- I. Categories of Abuse
- II. Safeguarding Advisory Group Terms of Reference
- III. Memorandum of Understanding between St Paul's 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 Placement Policy
- VIII. Lost and Missing Children and Vulnerable Persons Procedures
- IX. Safer Recruitment Procedures
- X. Belltower, Visiting Choirs and Events Safeguarding Procedures
- XI. Chorister Chaperones Safeguarding Procedures

