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Parish Giving Scheme Safeguarding Policy

Policy Statement

The Church of England's national safeguarding policy statement 'Promoting a Safer Church' outlines the Church's commitment to promoting a safe environment and culture across all Church bodies for children, young people and vulnerable adults.

Safeguarding is the action taken to positively promote a safer culture and encourage safer behaviours. The Trustees and Senior Leadership of the Parish Giving Scheme (PGS) fully support and endorse PGS's Safeguarding Policy and will lead and communicate the policy in both example and commitment.

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Purpose

The purpose of this policy is to ensure that through its work and behaviours Parish Giving Scheme demonstrates its commitment to protecting the rights of people to live in safety, free from abuse and neglect. Everybody has the right to be safe no matter who they are or what their circumstances are. Through safeguarding, Parish Giving Scheme (PGS) will promote the well-being and welfare of people within the organisation and all those whom it comes into contact with, which includes beneficiaries, givers, diocesan staff, staff, volunteers and other stakeholders and that everyone at the PGS understands their role in promoting a safe culture.

Scope

This policy applies to permanent, fixed term, full or part time employees, those working on consultancy agreements or engaged as contractors, agency workers, trustees, volunteers, at PGS.

As wholly owned by the Church of England Central Services, this policy has due regard for the House of Bishops [Safeguarding Policy and Practice Guidance](#) and the operational safeguarding policy of the National Church Institutions (where applicable) but also highlights areas of particular importance to PGS. It should be viewed alongside the NCIs safeguarding policy in Appendix A.

Safeguarding Commitments

To fulfil its safeguarding commitments PGS is committed to ensuring that all staff, volunteers, beneficiaries, and other stakeholders are safeguarded from harm and from situations in which they feel vulnerable. All of Parish Giving Scheme's policies and procedures support this commitment.

This policy outlines PGS's commitment to safeguarding: procedures to protect people, including safer recruitment, risk assessments and training, and how to raise concerns, the process for handling allegations promptly and involving relevant authorities when required. PGS will provide adequate resources to ensure that all staff and stakeholders are aware of this policy and committed to its effective implementation.

Definitions

Please refer to Section 2 of the House of Bishops Safeguarding Children, Young People and Vulnerable Adults Guidance which sets out definitions and signs of abuse.

In the context of Parish Giving Scheme and its work, safeguarding protection issues include (but are not limited to):

- sexual abuse
- financial abuse
- spiritual abuse
- discrimination and bullying
- physical or emotional abuse
- extremism.

The Department of Health defines a vulnerable adult as a person aged 18 or over who may need community care services because of a disability (mental or other), age or illness. A person is also considered vulnerable if they are unable to look after themselves, protect themselves from harm or exploitation or are unable to report abuse.

In supporting a person in vulnerable circumstances, we must do so with compassion and in a way that maintains dignity. An adult cannot be labelled as 'vulnerable' in the same way as a child may be regarded as such. Childhood is absolute: someone who is not yet 18 years of age is, in the eyes of the law, a child. Adult vulnerability is not absolute in this way. For the purpose of church policy and guidance, the definition of 'vulnerable adult' is contained in the Safeguarding and Clergy Discipline Measure 2016 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".

This policy refers to safeguarding concerns, allegations and disclosures. PGS seeks to adhere to safer working good practice (The Code of Safer Working Practice) and our approach to health and safety, bullying, harassment or sexual harassment are contained

in our Employee Handbook. It should not be used to raise concerns such as grievances, whistleblowing or disciplinary matters which are covered in other policies.

Safer Recruitment & People Management

PGS is committed to safely recruiting and supporting all those who are employed and through their work have any responsibility related to children, young people and vulnerable adults. For all roles, the House of Bishops Safer Recruitment and People Management Guidance will be followed. The Safeguarding Lead at PGS is the Head of Operations, the Deputy Safeguarding Lead is the Chief Executive. This creates an accountability framework for the staff and CEO.

All Parish Giving Scheme roles are assessed to establish and define the level and nature of contact with children, young people and/or vulnerable adults (if any). Any particular requirements (e.g. DBS) must be reflected in the job description/person specification. This assessment will determine whether a safer recruitment process should be followed and what pre-appointment checks, as well as ongoing support, are required for the role.

For all roles requiring an Enhanced DBS (with/without barred list/s check), a DBS re-check must be carried out every 3 years as a minimum. This will be monitored by the Safeguarding Lead and reminders issued within appropriate periods.

As part of the DBS check/recheck process, individuals should be encouraged to subscribe to the annual DBS Update service in order that this can be accessed for any future rechecks, rather than a full application being repeated again

Currently, all staff will complete Safeguarding Level 1, Dementia Awareness and Vulnerable Adults training with iHasco within the first three months of employment. Refresher training should be provided at least every three years, or in response to UK law or policy changes require.

Over the next year, PGS will be reassessing this training and current training plans and including Church of England courses to ensure all team members receive regular training on safeguarding at a level commensurate with their role within the organisation and any specific training required for their role e.g. Dementia Awareness and Vulnerable Adults training, Leadership training. In addition, the training will be appropriate to the context of the Parish Giving Scheme operating within a faith-based environment. This will be based on the House of Bishops Safeguarding Learning & Development Framework. The Safeguarding Lead maintains the training records and progress should be reported to the Trustees on an annual basis.

Risk assessment and management

Under usual circumstances, PGS will risk-assess any situations that involve children, young people and/or vulnerable adults in order to identify any potential dangers and how

they will be mitigated. The risk assessment is prepared by the Chief Executive and included in the risk register presented regularly to the Audit and Risk committee and reviewed on an annual basis by the Trustee Board to ensure they remain up-to-date and relevant.

Parish Giving Scheme will ensure that trustees, staff and volunteers learn about protection issues and their responsibilities in line with statutory guidance.

Reporting Safeguarding concerns or allegations

Members of staff and work colleagues

All members of staff, and especially managers, must be alert to signs of safeguarding concerns in relation to other members of staff or colleagues. A safeguarding concern may relate to you or to the way someone else is being treated. If you have a safeguarding concern (including non-recent concerns/allegations) about a colleague or another member of staff, you should do the following:

1. First, raise any concerns with the Safeguarding Lead as soon as possible.
2. If the concern involves the Safeguarding Lead, go to the Chief Executive or the nominated trustee for safeguarding
3. If there is any other conflict of interest, go to the most appropriate person, such as the Chair of the Board, or any of the Trustees
4. Please state (See Appendix C for a template form)
 5. Who is making the report.
 6. When the report was made.
 7. What the concern is (using the 'who, what, where, when' method).
 8. Why you are concerned
- If requested, your identity will be kept confidential for as long as possible, provided that this does not prejudice the enquiry. Anonymous complaints may be investigated if the person receiving the complaint believes it to be appropriate, having considered the seriousness of the issue, the complaint's credibility, the ability to investigate an anonymous complaint and fairness to any individual mentioned in the complaint.

Confidentiality is maintained when dealing with all safeguarding matters. If requested, your identity will be kept confidential for as long as possible, provided that this does not prejudice the enquiry. Anonymous complaints may be investigated if the person receiving the complaint believes it to be appropriate, having considered the seriousness of the issue, the complaint's credibility, the ability to investigate an anonymous complaint and fairness to any individual mentioned in the complaint.

This policy only applies in a work context. If a member of staff has safeguarding concerns about a child, young person and/or vulnerable adult outside of their PGS work context then they should follow the policy and process for the relevant organisation or contact the appropriate local council children's social care team or local authority adult care

team. If the concern relates to a member of staff's own church context then the national Church of England guidance on reporting abuse or raising a concern must be followed.

Safeguarding concerns about a giver / beneficiary

A safeguarding concern may relate to someone you are dealing with on the phone or by other correspondence in relation to the giving or receiving of funds via PGS. If you have a safeguarding concern about a giver or beneficiary, you should do the following:

1. First, raise any concerns with the Safeguarding Lead and inform the line manager
 2. If you believe the giver should not be giving money, you should pause setting up the financial transaction and report to your line manager and Safeguarding Lead immediately.
 3. If your concern is with the Chief Executive you can contact the nominated trustee for Safeguarding or the chair of the board of trustees.
 4. If your concern involves a trustee, go to the Chief Executive.
 5. If there is any other conflict of interest, go to the most appropriate person, such as the Chair of the Board, or any of the Trustees, Safeguarding Lead, CEO
 6. Please state (See Appendix C for a template form)
 - a. Who is making the report.
 - b. When the report was made.
 - c. What the concern is (using the 'who, what, where, when' method).
 - d. Why you are concerned
- If requested, your identity will be kept confidential for as long as possible, provided that this does not prejudice the enquiry. Anonymous complaints may be investigated if the person receiving the complaint believes it to be appropriate, having considered the seriousness of the issue, the complaint's credibility, the ability to investigate an anonymous complaint and fairness to any individual mentioned in the complaint.

If any member of staff believes that a child, young person, vulnerable adult and/or another member of staff or colleague is in immediate danger of significant or serious harm or requires urgent medical attention, they should contact the relevant emergency service/s on 999.

Safeguarding And Fundraising

PGS will ensure that we comply with the Code of Fundraising Practice, including the specific standards relating to vulnerability.

- Staff and volunteers will be made aware of the Institute of Fundraising guidance on keeping fundraising safe and treating donors fairly and the NCVO Guidance on people who need safeguarding while fundraising
- Our information material is accessible, clear and ethical, including not placing any undue pressure on individuals to donate.

- PGS has a specific procedure and training on Givers with Power of Attorney (See Appendix B)
- We do not either solicit nor accept donations from anyone whom we know or think may not be competent to make their own decisions.
- We provide training regarding personal data and information that is held on or about any donor
- We are sensitive to any particular need that a donor may have
- If a translation service is required, the translator should be registered with [NRPST - National Register of Public Service Translators](#). If the call handler determines that the translation is not from a reputable source, they should not continue with the registration of the giver.

We will follow the guidance from the Charity Commission – Operating online. We will identify and manage online risks by ensuring:

- Volunteers, staff and trustees understand how to keep themselves safe online. For example all staff complete cyber security training
- The online services we provide are suitable for our users. For example, we offer password protection to help keep people safe
- Protect people's personal data and follow GDPR legislation
- We have permission to display any images on our website or social media accounts
- We clearly explain how users can report online concerns on the website. Concerns may be reported using this policy, or direct to a social media provider using their reporting process.
- Display in Parish Giving Scheme premises and on the website the details of who to contact if there are safeguarding concerns or support needs.

Safeguarding concerns response

PGS will follow the guidance in the Church of England safeguarding e-manual: "Responding well to all victims and survivors" and the practice guidance "Responding to Safeguarding Concerns or Allegations that relate to Children, Young People and Vulnerable Adults." Either the Safeguarding Lead or a nominated investigating officer will investigate all concerns.

Key principles include:

- handling and recording in a secure and responsible way
- acting quickly, ensuring further harm or damage is minimised or stopped
- reporting to all relevant agencies

As appropriate and where possible, the Safeguarding Lead will explain what you have to do and what to tell the person involved or the person informing of the abuse. The Safeguarding Lead will ensure that all parties are kept informed about what will happen next, so all can be reassured about what to expect.

Parish Giving Scheme will take steps to minimise any difficulties which you might experience as a result of raising a concern. For instance, if you are required to give

evidence in criminal or disciplinary proceedings, it will make arrangements for you to receive advice about the procedure and appropriate support. Parish Giving Scheme will ensure that there is no detriment at all to your career if you report a safeguarding concern in good faith.

If your concern is not substantiated, you should not take any subsequent action or make any disclosure to anyone other than those referred to in this policy. The exception is disclosure within the parameters of the Parish Giving Scheme's Whistleblowing Policy if you feel that is required.

Engagement with Diocesan Safeguarding Teams

When a safeguarding concern is raised, the Safeguarding Lead will report this to the appropriate Diocesan Safeguarding Teams and work with them to take appropriate action.

Incident investigation

Parish Giving Scheme will report and investigate allegations and concerns to improve its safeguarding processes. It will use any lessons learned from such events to take corrective action to prevent recurrences.

Where there are alleged incidents of abuse, the police are responsible for investigating whether a criminal offence may have been committed. Parish Giving Scheme will report a suspected crime (e.g. assault or indecency) to the police.

Confidentiality

It is essential that confidentiality is maintained when dealing with safeguarding matters. All concerns and allegations must be dealt with in accordance with the NCI's Data Protection Policy and Information and Records Management Policy.

Trustees' responsibilities

Safeguarding is a key governance priority for PGS Trustees. Trustees must take reasonable steps to protect staff, volunteers and those who comes into contact with PGS from harm.

All Trustees should ensure that they are familiar with the Charity Commission's guidance: Safeguarding and protecting people for charities and trustees - GOV.UK

The board will appoint a Lead Trustee for Safeguarding. This role is to support the trustees in training and monitoring, working with the Lead Safeguarding Officer to implement the policy.

The Safeguarding Lead will inform trustees immediately when they become aware of a safeguarding issue and advise of the action being taken.

Trustees are responsible for making reports, where necessary, to the police, social services and other agencies, and, where the criteria are met, sending a serious incident report to the charity regulator. This must be done in accordance with the NCI's Reporting Serious Incidents to the Charity Commission Policy for the Archbishops Council.

Version & Review

We are committed to reviewing our policy and best practice regularly. The board of trustees will review this policy at least annually, when there is a change in UK law and/or best practice, or when an incident occurs that highlights a need for change (whichever occurs first).

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Next Review date: March 2026

Related Policies

Employment Handbook containing Grievance Procedure, Disciplinary and Dismissal Procedure and Whistleblowing Policy, External Complaints Procedure.

The NCIs safeguarding policy
Givers with Power of Attorney
Template reporting a concern form