

# Safeguarding Policy and Procedures

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UCCF is a Christian mission agency seeking to share the good news of Jesus Christ with the student population in Universities throughout the UK. UCCF is committed to the core truths of the gospel, as outlined in its Doctrinal Basis (DB) (see Appendix 1), which govern the direction and working principles of the organisation.

UCCF takes seriously the issue of safeguarding and is committed to taking reasonable steps to protect:

- its workforce (staff members; volunteers, including Relay Workers; trustees; and anyone working on behalf of UCCF);
- its beneficiaries (the students it works with), including adults at risk and children;
- other people who come into contact with the charity through its work (e.g. people who attend a UCCF event who do not fall into the above two categories);

from all forms of abuse, including physical, emotional, sexual, and spiritual harm. Definitions and possible signs of these different forms of abuse can be found in Appendices 5 and 6.

## Purpose and scope

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The purpose of this policy is to outline the procedures in place for promoting safeguarding; preventing abuse; and protecting all parties outlined above. This includes practices adopted to prevent abuse and clear procedures for reporting and recording any safeguarding concerns or incidences. (See Appendix 3 for UCCF's full *Safeguarding Policy Statement*). The policy should be read in its entirety.

The policy has been approved by UCCF's Trust Board and applies to all of UCCF's workforce. It is reviewed on an annual basis by the Safeguarding Team (see further below under "Safeguarding responsibilities" heading) and amended as required. It is submitted to the Trust Board every two years for review.

### Safeguarding responsibilities

In UCCF, many people have responsibilities about preventing abuse and safeguarding, including the Trust Board, leadership and the entire workforce. In particular there is a team responsible for day-to-day handling of safeguarding matters, which consists of Designated Safeguarding Officers (DSOs) who respond to safeguarding concerns and a Designated Safeguarding Administrator (DSA) who is responsible for recording and reporting safeguarding issues. We also have designated Trust Board member(s) who take a lead on safeguarding. At present these people are:

DSOs:

JP Sivertsen-Wright (Central Field Team Leader)  
Esther Dickson (Scotland Field Team Leader)

DSA:

Alison Bush (HR Advisor)

Designated Trustee(s) with lead for safeguarding:

Jenny Brown and James MacKenzie

The names of the current role holders and their contact details can be found on the UCCF *Staff Resources Site*.

## **UCCF's work with adults**

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UCCF works with young adults (students), typically aged 18 years and above. While the student population is not a group traditionally considered to be at risk (see Appendix 2 for definition of 'adults at risk'), it is recognised that in the context of relational ministry such as UCCF undertakes, consideration must be given to potential imbalances of power and influence and the risks inherent in these contexts. Adults who would not normally be categorised as 'vulnerable' in a regulatory or legal content may therefore still be at risk of abuse in relationships formed as part of the ministry of UCCF.

As a Christian mission agency, the category of 'spiritual' work is essential to UCCF and we place a high value on relational ministry as staff and volunteers help students grow in their own Christian faith and share it with others. UCCF also recognises the real dangers of spiritual abuse and works hard to safeguard all of its student beneficiaries, staff, and volunteers and to promote healthy discipleship practices. UCCF has articulated how it seeks to maintain a culture of healthy working relationships in the context of our ministry in a document called *Discipleship Best Practice*.

UCCF's workforce does not carry out 'regulated activity (adults)' (see Appendix 2) with the adults that they encounter in their various roles e.g. personal care or health care activities. Nevertheless, all of UCCF's workforce is expected to apply the duty of care requirements, as set out in this policy, where vulnerability is discerned.

## **UCCF's work with children**

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Some of UCCF's workforce may come into contact with individuals under 18 years old when working with university students, since there is usually a small proportion of students in any university cohort who are young in their year group and reach 18 during their first year. Additionally, some roles within UCCF may involve contact with children which is not purely incidental, for example where working with students in a further education college. In such cases, individuals may carry out teaching, training, or instruction with these groups on a frequent basis (once a week or more), four or more days in a 30-day period, or overnight, and this would count as 'regulated activity'. Staff and volunteers have a particular duty of care to those who are defined by law as "children" and must be mindful of UCCF's Code of Conduct for working with children (see Appendix 4).

Some of UCCF's workforce may also come into contact with young children who accompany individuals to UCCF conferences, events, or team days. In such instances, no member of UCCF's workforce (with whom the child is not attending/in the care of) would engage in any regulated activity with the child/children. UCCF requires that the child/children remain in the presence of the adult with whom they are attending the conference/event/team day, and the adult must take responsibility for the welfare of the child/children.

## **Confidentiality**

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UCCF seeks to uphold confidentiality wherever possible in relation to its workforce and beneficiaries, except where doing so would place an individual at risk of harm. It is important, therefore, that members of UCCF's workforce do not promise confidentiality in matters of safeguarding to any individual they interact with through their work.

Where an individual makes a disclosure/allegation of abuse, the member of UCCF's workforce to whom it is made should inform the individual that:

- A written record will be taken following their conversation and this will be stored securely by UCCF in a central electronic 'Safeguarding Records' folder.
- If necessary, the record will be passed on to external bodies (e.g. University Services, local Social Services, the Police).
- The record will be retained in line with the relevant retention period (see Appendix 9).
- The record will be confidentially and securely destroyed after the retention period has passed.

## What is abuse and how can it be recognised?

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It is important to understand exactly what UCCF is seeking to protect individuals from, and for UCCF's workforce to be alert and aware, at all times, to the possibility of abuse towards its beneficiaries. The definitions of abuse in relation to children and adults, as well as signs of possible abuse, are outlined in Appendices 5 and 6. It is important to note that the signs of abuse listed are only *possible* signs of abuse, and there could be alternative innocent explanations for such behaviours/signs. Nevertheless, they are a helpful guide in identifying whether one or more forms of abuse could provide a potential explanation for a child's/adult's behaviour, symptoms and/or injuries.

## Preventing abuse

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### Recruitment and selection

When seeking to appoint individuals to UCCF's workforce, specifically to staff and volunteer roles within the organisation, UCCF is committed to recruitment and selection processes and procedures that promote the safeguarding of children and adults at risk. These include:

- Advertisements and job descriptions for job roles/volunteering opportunities clearly stating whether the work involves regulated activity with children, and the nature of such work.
- Requiring candidates to complete application forms.
- Requiring candidates to attend interview (NB. Exceptions are made for voluntary roles where a candidate has previously been employed/volunteered with UCCF, is well known to the fellowship or is volunteering in a short-term capacity at a UCCF conference/event where they will be constantly supervised).
- Requiring candidates to declare unspent convictions.
- Taking up two references (minimum) for all candidates (references from family members not permitted).
- Making offers of employment or voluntary work conditional on the receipt of satisfactory disclosure checks, from the Disclosure and Barring Service (DBS), where the work involves regulated activity with children.

### Volunteers

UCCF regularly invites volunteers to serve in a short-term capacity, for example as speakers at events for staff or students. These volunteers would often be well known to the fellowship and respected Christian leaders in their sphere. Many go above and beyond in their service of staff and students they meet in the course of their volunteering with UCCF, offering pastoral care, wise advice, and support in ministry.

UCCF seeks to enable staff and students to continue to benefit from the input of such volunteers while promoting good safeguarding practices by:

- Requiring all volunteers to sign the UCCF DB (Appendix 1) as a statement of their commitment to the kind of character and behaviours that are governed by faith in the core truths of the gospel.
- Requiring most<sup>1</sup> volunteers to inform UCCF's Designated Safeguarding Officers (DSOs) in writing of any planned continual connection with a member or staff or a student they had initially met at a UCCF event.<sup>2</sup>

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<sup>1</sup> Whilst Relay workers are voluntary workers with UCCF, the nature of the work we ask them to do in drawing alongside students means that it would be unworkable for them to abide by this second requirement of other volunteers (e.g. speakers at UCCF events). In relation to working with students, Relay workers would be more akin to staff than to other volunteers with UCCF, and so we do not require them to inform a DSO of every ongoing discipling relationship they have.

<sup>2</sup> 'A UCCF event' here refers to any event arranged by UCCF staff, not any event arranged by an individual CU. CUs are independent entities that affiliate to UCCF for support and training. While UCCF will uphold its duty of care to CUs it works with by encouraging them to take safeguarding matters seriously and to be circumspect in its choice of speakers and their engagement with students who attend their events, UCCF cannot monitor the relationships between speakers and students who meet at any individual CU's events.

- This may include any arrangements to email the student or staff member after the event to continue a conversation, or to meet up in person for any other form of pastoral or ministry support.

### **Existing workforce**

Should UCCF require existing members of its workforce to start carrying out regulated work with children, where previously they had not, they would be required to undertake a DBS check and would only begin carrying out such work once satisfactory checks had been received. (Please see UCCF's *Policy on Recruiting People to Work in Positions Involving Contact with Children or Adults at Risk* for further information about the process of DBS checks).

Where an existing member of UCCF's workforce refuses to undertake a disclosure check, refuses to allow UCCF to see the outcome of a check, or the outcome of the check is not satisfactory, they will not be permitted to undertake the regulated activity with children. In certain circumstances, UCCF may need to consider dismissal of the individual where association with them cannot continue or reputational damage to the fellowship is possible.

### **Education and training**

UCCF's workforce will be made fully aware of the organisation's *Safeguarding Policy and Procedures* as included in handbooks and outlined during the induction process. UCCF's workforce is required to operate in line with processes and practices detailed in the policy and according to *UCCF's Code of Conduct for Working with Children* (see Appendix 4). Failure to do so will be considered a disciplinary offence and dealt with in line with UCCF's *Disciplinary Procedure* (applicable to UCCF staff members only) and may result in suspension or dismissal (applicable to all of UCCF's workforce).

## **Dealing with disclosures or allegations of abuse**

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All cases of suspected abuse must be responded to in a manner that ensures the immediate and future safety of the child or adult concerned. Where a child or adult makes a disclosure of abuse and/or an allegation of abuse against someone, it is important that the person being informed responds in the following ways:

- Stays calm, listens carefully, and avoids expressing their own views on the matter.
- Reassures the individual that they have done the right thing in saying something, and that the matter will be taken seriously.
- Does not push for further information, or use closed or leading questions.
- Does not promise confidentiality but assures the individual that information will only be passed on to a limited number of relevant people.
- Does not talk to the alleged abuser about the allegation.
- Explains to the individual what will happen next i.e. reporting the abuse to someone that will be able to help.
- Informs a DSO as soon as possible. (Please note that if a DSO is implicated in the disclosure/allegation, it should be reported to a designated trustee/Director of UCCF.)
- Does not delay in making a written report of the disclosure, allegation or incident of abuse using the *Safeguarding Disclosure / Incident / Allegation Report Form* (Appendix 7 – available separately for completion via the Staff Resources website) and passing this on to a DSO (a Designated Trustee/ Director of UCCF if a DSO is implicated in the disclosure/allegation) via OneDrive. (NB. Once the report form has been received by a DSO and saved electronically in UCCF's central 'Safeguarding Records' folder, the person should delete their own copy. This is to ensure multiple copies of the record are not stored in multiple places, thus maximising protection of the data).

## **Involving university student support services**

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It is important that UCCF's workforce who are based in the field (e.g. Christian Union Staff Workers; Relay Workers; Associate Staff Workers) familiarise themselves with the reporting approach and support services available at the universities to which the students that they work with attend. Should a student make a disclosure or allegation of abuse (relating to someone unconnected to UCCF) to a member of UCCF's workforce, as well as responding in the ways outlined above, including informing one of UCCF's DSOs, the UCCF staff member/volunteer should also encourage the student to make

a report to their university through the appropriate channels. It may be necessary for the university DSO to be involved and, depending on the circumstances, for any investigation into the student's disclosure/allegation to be conducted by the University rather than by UCCF. It is important that a report of the disclosure/allegation is written up in the usual way as this may be required by the university for any further investigation. If appropriate, the UCCF staff member/volunteer should offer to accompany the student when reporting to their student services.

## **Dealing with concerns of abuse**

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Where concerns pertain to an immediate threat of harm, the police should be contacted immediately.

Where concerns do not pertain to an immediate threat of harm, the following steps should be taken:

- The member of UCCF's workforce should discuss their concerns with one of the DSOs, and a decision made as to whether the statutory authorities should be informed.
- This discussion, and the circumstances surrounding it, should be documented by completing the *Safeguarding Disclosure / Incident / Allegation Report Form* (Appendix 7). This should be stored securely by UCCF's Designated Safeguarding Administrator (DSA) and a copy passed to statutory authorities where a referral is made, and/or, where the student in question has raised the concerns with their university, to the relevant university DSO to assist with any investigation.
- No contact should be made with the individual against whom the allegation is made where it is believed this would put the relevant child/adult at increased risk.

## **Dealing with allegations of abuse concerning a member of UCCF's workforce**

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Where a member of UCCF's workforce (whether an employee or volunteer<sup>3</sup>) is suspected of abuse, a full investigation of the allegation will be undertaken by the DSOs to establish if the allegation has foundation, before being referred to the appropriate external agency.

If an allegation of abuse is made by a child or adult to a member of UCCF's workforce, or if a member of UCCF's workforce observes concerning behaviour by a colleague at first hand, this should be reported immediately to their Team Leader/Supervisor and one of the DSOs, UCCF's lead on handling the allegation. If they have received an allegation or observed something of concern about their own Team Leader/Supervisor, they should report the allegation to their Team Leader's/Supervisor's own Supervisor. If the person who is of concern is one of the DSOs, the matter should be reported to a designated trustee/Director of UCCF..

For concerns relating to a member of UCCF's workforce in relation to adults at risk, Adult Social Care will be contacted.

For concerns relating to a member of UCCF's workforce in relation to children, where it is alleged that they have:

- behaved in a way that has harmed, or may have harmed, a child;
- possibly committed a criminal offence against or related to a child; or
- behaved towards a child/children in a way that indicates they are unsuitable to work with children;

UCCF will contact the Local Authority Designated Officer (LADO) to ensure that the allegation is progressed in a timely and appropriate manner.

There may be up to three lines of enquiry in the consideration of the allegation:

- A police investigation of a possible criminal offence.
- Enquiries and an assessment by the local authority children's social care department (Social Services) about whether a child is in need of protection or in need of services.

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<sup>3</sup> For the purposes of this policy, a 'member of UCCF's workforce' will be defined as a full- or part-time employed member of staff or any volunteer, whether a 'Relay Worker', Associate Staff Worker (ASW) or a volunteer speaker invited to speak at a UCCF event.

- An investigation by UCCF and consideration of disciplinary action in respect of the individual. This includes implementing a plan to manage any risk posed by the individual to children they come across in their work, until the outcome of the other investigations and enquiries is known.

UCCF will attend any strategy meetings to provide relevant information and to help decide how children's social care and the Police will undertake their enquiries. As part of this process, the Local Authority Designated Officer will liaise with UCCF to ensure the member of UCCF's workforce in question is supported appropriately, and to assist UCCF in deciding where suspension of the individual is appropriate whilst investigations are carried out.

Where the preliminary investigation reveals that allegations of abuse are valid and there is a case to answer, in relation to a UCCF staff member, the individual in question would be removed from frontline student work or temporarily suspended and UCCF would set up a disciplinary hearing. UCCF regards the abuse of its beneficiaries as an act of gross misconduct so the allegation could result in summary dismissal, in line with UCCF's disciplinary procedure.

Where an investigation reveals that allegations of abuse are true in relation to a UCCF volunteer, trustee or person working on behalf of UCCF, the individual in question would be dismissed, with immediate effect, from their role within the organisation.

In cases where an allegation is made against a member of UCCF staff it is recognised that a victim may not want to report it directly to UCCF. Anyone wishing to disclose an allegation in relation to UCCF should be encouraged to approach an alternative safeguarding service such as Thirtyoneeight. Thirtyoneeight also recommend a number of other services and organisations who can give advice or support to victims. A list of contact details for these organisations can be found in Appendix 8.

## **Duty of disclosure**

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Given UCCF's status as a regulated activity provider i.e. it employs individuals/appoints volunteers who work in regulated activity, the organisation has a legal duty to refer to the DBS where the following conditions are met:

- UCCF has withdrawn permission for an individual to engage in regulated activity with children (N.B. no member of UCCF's workforce engages in regulated activity with adults) or would have done so had the individual not resigned/retired/been made redundant/been redeployed.
- UCCF believes the individual has engaged in relevant conduct in relation to children, harming them or putting them at risk of harm; satisfied the harm test in relation to children; or been cautioned or convicted of a relevant offence that would lead to automatic inclusion on a barred list.

In addition, UCCF is required to make a report to the Charity Commission if a serious safeguarding risk materialises. This will usually be if any of the following occur:

- Incidents of abuse or mistreatment (alleged or actual) of beneficiaries of UCCF (adults or children) which have resulted in or risk significant harm to them and:
  - This happened while they were under the care of the charity.
  - Someone connected with the charity, for example a trustee, staff member or volunteer, was responsible for the abuse or mistreatment (alleged or actual).
- Other incidents of abuse or mistreatment (alleged or actual) of people who come into contact with UCCF through its work, which have resulted in or risk significant harm to them and are connected to the charity's activities;
- Breaches of procedures or policies at UCCF which have put people who come into contact with it through its work at significant risk of harm, including failure to carry out relevant vetting checks which would have identified that a person is disqualified in law from holding their position within the charity. This might be, for example, because they are disqualified under safeguarding legislation from working with children and/or adults at risk.<sup>4</sup>

Approved by UCCF's Trust Board: 01 Feb 2023

Date of next review: July 2023

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<sup>4</sup> <https://www.gov.uk/guidance/how-to-report-a-serious-incident-in-your-charity>

# Appendix 1: UCCF's Doctrinal Basis

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The basis of the Fellowship shall be the fundamental truths of Christianity, as revealed in Holy Scripture, including:

- a) There is one God in three persons, the Father, the Son, and the Holy Spirit.
- b) God is sovereign in creation, revelation, redemption, and final judgement.
- c) The Bible, as originally given, is the inspired and infallible Word of God. It is the supreme authority in all matters of belief and behaviour.
- d) Since the fall, the whole of humankind is sinful and guilty, so that everyone is subject to God's wrath and condemnation.
- e) The Lord Jesus Christ, God's incarnate Son, is fully God; He was born of a virgin; His humanity is real and sinless; He died on the cross, was raised bodily from death, and is now reigning over heaven and earth.
- f) Sinful human beings are redeemed from the guilt, penalty, and power of sin only through the sacrificial death once and for all time of their representative and substitute, Jesus Christ, the only mediator between them and God.
- g) Those who believe in Christ are pardoned all their sins and accepted in God's sight only because of the righteousness of Christ credited to them; this justification is God's act of undeserved mercy, received solely by trust in Him and not by their own efforts.
- h) The Holy Spirit alone makes the work of Christ effective to individual sinners, enabling them to turn to God from their sin and to trust in Jesus Christ.
- i) The Holy Spirit lives in all those He has regenerated. He makes them increasingly Christ-like in character and behaviour and gives them power for their witness in the world.
- j) The one holy universal church is the Body of Christ, to which all true believers belong.
- k) The Lord Jesus Christ will return in person, to judge everyone, to execute God's just condemnation on those who have not repented and to receive the redeemed to eternal glory.

# Appendix 2: Definitions

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## Child

In England, Northern Ireland and Wales, a child is someone who has not yet reached their 18th birthday. Once they turn 18, they are legally an adult. In Scotland, the definition of a 'child' varies according to the legal circumstances. Part 1 of the National guidance for child protection in Scotland explains that a child is generally defined as someone under the age of 18. But in some child protection contexts, including children's hearings and child protection orders, a child is someone who is under 16.<sup>5</sup>

Despite the differences pertaining in Scotland, UCCF define children as those being under the age of 18 years.

## Adult at risk

Anyone aged 18 or over who:

- has needs for care and support (whether or not the local authority is meeting any of those needs).
- is experiencing, or is at risk of, abuse or neglect.
- as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of, abuse or neglect.

An adult at risk of abuse may:

- have an illness affecting their mental or physical health.
- have a learning disability.
- suffer from drug or alcohol problems.
- be frail.<sup>6</sup>

UCCF also recognises the potential risks inherent in power relationships (such as teacher- student, spiritual mentor-mentee) and how this can create vulnerability in adults who would not otherwise fall under the legal category of "adult at risk" as defined above. For the purposes of this policy, therefore, UCCF distinguishes between "adults at risk" (as defined by official legal guidance) and "other adults participating in UCCF activities" (this broader group of adults who are made potentially at risk by the power context they find themselves in). UCCF's safeguarding policy is intended to encompass and protect both groups.

## Regulated activity

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Regulated activity refers to certain roles that involve working with children or adults at risk, such as teaching and providing care. Regulated activity is work that a barred person must not do.

### Regulated activity (children):

Regulated activities relating to children are split into two groups: work activities and places of work.

**Regulated work activities** – according to government guidance<sup>7</sup>, work activities are regulated if they meet the following criteria:

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<sup>5</sup> <https://www.nspcc.org.uk/preventing-abuse/child-protection-system/legal-definition-child-rights-law/legal-definitions/>

<sup>6</sup> <https://www.gov.uk/guidance/safeguarding-duties-for-charity-trustees#policies-and-procedures-you-need-to-have>

<sup>7</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/550197/Regulated\\_activity\\_in\\_relation\\_to\\_children.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/550197/Regulated_activity_in_relation_to_children.pdf)



Activities	Time period
Teaching, instructing, supervising, training, and coaching children.	This activity is regulated if it is carried out by the same person frequently (once a week or more), four or more days in a 30-day period, or overnight (between 2am and 6am).
Delivering care, including physically helping children if they need assistance due to an illness or disability. E.g. with eating, drinking, toileting, washing, bathing, or dressing. Care also includes healthcare relating to mental health, palliative care, and any procedures similar to medical or surgical care.	This activity is regulated if it is carried out by the same person frequently (once a week or more), four or more days in a 30-day period, or overnight (between 2am and 6am). There are some exceptions however, where the activity is classed as regulated even if it will only be done once.
Providing advice or guidance wholly or mainly for children's physical, emotional, or educational wellbeing.	This activity is regulated if it is carried out by the same person frequently (once a week or more), four or more days in a 30-day period, or overnight (between 2am and 6am).
Moderating web services that children use.	This activity is regulated if it is carried out by the same person frequently (once a week or more) or four or more days in a 30-day period.
Driving a vehicle in which children travel, such as a school bus.	This activity is regulated if it is carried out by the same person frequently (once a week or more) or four or more days in a 30-day period.
Providing foster care, including privately.	No specified conditions.

In some cases, the regulated activities that a person carries out are no longer considered regulated when they are being supervised (these circumstances are known as exceptions). This is applicable when:

- A person who is in regulated activity is supervising someone who, without supervision, would be carrying out regulated activity.
- The supervision is regular and day to day.
- The supervision is 'reasonable in all the circumstances to ensure the protection of children'.

However, it is important to note that this does not apply to people who work in a specified establishment (as defined below) and are being paid. Their activities are still regulated even if supervised. This means that exceptions mainly apply to voluntary positions and paid work that is not in a specified place.

**Regulated places of work** – Government guidance also states that certain work activities are regulated when carried out in specified establishments. For example, any educational setting designed exclusively or mainly for providing full time education to children. Therefore, even if a person is not carrying out work as listed above, it may still be considered regulated because of the location they do it in. This is because they may still have the opportunity to come in contact with children. Specified establishments include schools; pupil referral units; nursery schools; detention centres for children; children's homes; children's centres; childcare premises.

This is particularly relevant to ancillary roles: those that are not primary work activities in the establishment. For example, cleaners, kitchen staff, and IT technicians in a school. Ancillary roles are considered regulated in the above specified establishments if they meet these four conditions:

- The person carries out the work for four or more days in a 30-day period, or overnight (between 2am and 6am), with the opportunity for face-to-face contact with children.
- Their job gives them the opportunity for contact with children in the establishment.
- They work for the purpose of the establishment.
- The work is not temporary or occasional, and it is not a supervised volunteer role.

As mentioned earlier, anyone who is paid to carry out regulated work activities in a specified establishment, including ancillary roles that meet the conditions described above, is engaging in regulated activity, regardless of supervision.

**Regulated activity (adults):**

Regulated activities relating to adults are divided into six categories, according to the type of work they involve:

1. Providing healthcare.
2. Providing personal care.
3. Providing social work.
4. Assistance with general household matters.
5. Assisting with a person's own affairs.
6. Conveying a person to a place of social work or care.

Unlike certain regulated activities involving children, these activities are regulated regardless of how many times and how often a person engages in them. The activities are also not affected by where a person carries them out. They apply equally to those working in hospitals, care homes, day care centres, prisons, and sheltered housing. They also apply to regulated activities carried out in the adult's own home where relevant.<sup>8</sup>

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<sup>8</sup> <https://www.highspeedtraining.co.uk/hub/what-is-regulated-activity/>

# Appendix 3: Safeguarding Policy Statement

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UCCF takes seriously the issue of safeguarding and is committed to protecting its workforce and beneficiaries from all forms of abuse, including physical, emotional, sexual, and spiritual harm.


UCCF is committed to:

- Valuing, listening to and respecting all children and adults.
- Helping prevent all forms of abuse and neglect of children under 18 years of age.
- Helping prevent all forms of abuse, neglect, and exploitation of adults at risk and all other adults participating in UCCF activities.
- Appointing Designated Safeguarding Officers (DSOs) (UCCF's DSOs are Esther Dickson and JP Sivertsen-Wright).
- Appointing a Designated Safeguarding Administrator (UCCF's DSA is Alison Bush).
- Taking seriously all suspicions, reports, or allegations of abuse to children or adults at risk, and responding swiftly and appropriately in such situations.
- Recruiting its workforce safely, undertaking background checks where necessary.
- Adopting protection and safeguarding practices regarding children and adults at risk through procedures for UCCF's workforce, and a code of conduct specifically relating to working with children.
- Keeping up to date with relevant legislation and guidelines in relation to safeguarding children and adults at risk, and ensuring policies and procedures reflect this.
- Providing support and training in developing a healthy culture of discipleship relationships to members of UCCF's workforce whose roles involve contact with children and/or adults at risk and/or all adults participating in UCCF activities.
- Using our procedures to manage any allegations against members of UCCF's workforce appropriately.
- Ensuring effective complaints and whistleblowing measures are in place.

UCCF's *Safeguarding Policy and Procedures* aims to:

- Promote the welfare and protection of children and all adults participating in UCCF activities.
- Provide assurance that UCCF takes reasonable steps to protect children, adults at risk and all other adults that it has contact with through its work.
- Ensure UCCF's workforce is informed of the overarching principles that guide UCCF's approach to safeguarding, and understands the responsibilities required of them with regards to safeguarding.
- Outline the practices and procedures UCCF adopts to prevent abuse to children, adults at risk and all other adults participating in its activities.
- Ensure that appropriate action is taken in the event of suspicions, reports, or allegations of abuse to children or adults at risk, including notifying the police where it is believed that a criminal offence has been committed.

Name: Peter Dray

Signed: 

Date: January 2023

# Appendix 4: UCCF's Code of Conduct for Working with Children

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This code of conduct aims to help UCCF protect children from abuse and reduce the possibility of unfounded allegations being made against its workforce.

It is important that all members of UCCF's workforce understand child safeguarding and follow the below code of conduct. This is particularly important for those working with students as CU members and those who attend CU events or Summer Teams may speak to members of UCCF's workforce about very personal pastoral issues. It is important, therefore, to be able to ascertain where child safeguarding issues may influence those conversations and relationships, so that UCCF can protect the children it works with, the children it comes into contact with, and its workforce.

## Responsibility

You are responsible for:

- Prioritising the welfare of children.
- Providing a safe environment for children, including having good awareness of issues to do with safeguarding and child protection, and taking action when appropriate.
- Following the principles, policies and procedures as outlined in this document.
- Staying within the law at all times.
- Modelling good behaviour for children to follow.
- Challenging all unacceptable behaviour in members of UCCF's workforce and reporting any breaches of the behaviour code to the Head of Human Resources.
- Reporting all allegations/suspicions of abuse following our reporting procedures.

## Rights

You should:

- Treat children fairly and without prejudice or discrimination.
- Understand that children are individuals with individual needs.
- Respect differences in gender, sexual orientation, culture, race, ethnicity, disability and religious belief systems between yourself and others.
- Challenge discrimination and prejudice.
- Encourage children and adults to speak out about attitudes or behaviour that makes them uncomfortable.

## Relationships

You should:

- Promote relationships that are based on openness, honesty, trust, and respect.
- Avoid favouritism.
- Be patient with others.
- Use special caution when you are discussing sensitive issues with children.
- Ensure your contact with children is appropriate and relevant to the work you are involved in.
- Ensure that whenever possible, there is more than one adult present during activities with children:
  - If this isn't possible, ensure that you are within sight or hearing of other adults.
  - If a child specifically asks for or needs some private time with you, ensure colleagues know where you and the child are.
- Only provide personal care in an emergency and ensure there is more than one adult present if possible.

## Respect

You should:

- Listen to and respect children at all times.
- Value and take children's contributions seriously.
- Respect a child's right to personal privacy as far as possible.

### **Unacceptable behaviour**

When working with children, you must not:

- Allow concerns or allegations to go unreported.
- Take unnecessary risks.
- Smoke, consume alcohol or use illegal substances.
- Develop inappropriate relationships with children.
- Make inappropriate promises to children.
- Engage in behaviour that is in any way abusive.
- Act in a way that can be perceived as threatening or intrusive.
- Patronise or belittle children.
- Make sarcastic, insensitive, derogatory, or sexually suggestive comments or gestures to, or in front of children.

# Appendix 5: Abuse of Children

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Much of the following information is adapted from the NSPCC website.<sup>9</sup>

## What is child abuse?

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Child abuse is any action by another person – adult or child – that causes significant harm to a child. It can be physical, sexual or emotional, but can just as often be about a lack of love, care and attention. Neglect, whatever form it takes, can be just as damaging to a child as physical abuse. An abused child will often experience more than one type of abuse, as well as other difficulties in their lives. It often happens over a period of time, rather than being a one-off event. Child abuse can take many forms, including (but not exclusively):

- Physical abuse – deliberately hurting a child, causing injuries such as bruises, broken bones, burns or cuts.
- Neglect (the most common form of child abuse) – the ongoing failure to meet a child's basic needs.
- Sexual abuse – when a child is forced or persuaded to take part in sexual activities.
- Emotional abuse – the ongoing emotional maltreatment of a child. It is sometimes called psychological abuse and can seriously damage a child's emotional health and development.
- Online abuse – any type of abuse that happens on the web, whether through social networks, playing online games or using mobile phones.
- Bullying – behaviour that hurts someone else such as name calling, hitting, pushing, spreading rumours, threatening or undermining someone.

## Signs of possible abuse in children

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It is important to know what to look out for as signs of child abuse are not always obvious and a child may be reluctant to tell someone what is happening to them or may not realise that what is happening to them is abuse.

Unusual behaviour to look out for in all forms of abuse include:

- Withdrawal
- Sudden change in behaviour
- Anxious, clingy, depressed
- Aggressive
- Sleep problems
- Eating disorders
- Bed wetting, soiling clothes
- Obsessive behaviour
- Substance abuse
- Self-harm
- Suicidal thoughts

### Physical abuse

It is not uncommon for children to have bumps and bruises on occasions, but if a child often has injuries, there seems to be a pattern to their injuries, or the explanation given does not match the injury then this is cause for investigation. Things to look out for include:

- Bruising:
  - On the head, neck, trunk, forearm, upper arm, back of the leg, hands or feet
  - Clusters of bruises
  - Bruises with dots of blood under the skin
  - Bruised scalp and swollen eyes from hair being pulled violently
  - Bruises in the shape of a hand or object
- Burns or scalds, sometimes in the shape of an implement e.g. circular cigarette burn, or that reflect an article being used e.g. iron.
- Bite marks.

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<sup>9</sup> <https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/>

- Fractures or broken bones, sometimes at different stages of healing.
- Scarring.
- Effects of poisoning such as vomiting, drowsiness or seizures.
- Respiratory problems from drowning, suffocation or poisoning.

### **Neglect**

Children who are neglected may have:

- Poor hygiene
- Poor state of clothing, inadequate clothing
- Hunger
- Tiredness, anaemia
- Untreated injuries, medical and dental issues
- Repeated accidental injuries
- Recurring illnesses or infections
- Poor muscle tone or prominent joints
- Thin or swollen tummy
- Failure to thrive with no medical reason
- Poor language, communication, or social skills
- An unsuitable home environment e.g. no heating
- Long periods of time when they are left alone
- Caring responsibilities for other family members

### **Sexual abuse**

Children who are sexually abused may:

- Stay away from certain people e.g.:
  - Avoid being alone with people e.g. family members or friends
  - Seem frightened of a person or reluctant to socialise with them
- Show sexual behaviour that is inappropriate for their age e.g.:
  - Become sexually active at a young age
  - Be promiscuous
  - Use sexual language or know information that would be unexpected
- Have physical symptoms:
  - Anal or vaginal soreness
  - An unusual discharge
  - Sexually transmitted infection (STI)
  - Pregnancy

### **Emotional abuse**

Babies and pre-school children experiencing emotional abuse may:

- Be overly affectionate towards strangers or people they haven't known for very long.
- Lack confidence or become wary or anxious.
- Not appear to have a close relationship with their parent.
- Be aggressive or nasty towards other children and animals.

Older children experiencing emotional abuse may

- Use language, act in a way or know about things that would be unexpected for their age.
- Struggle to control strong emotions or have extreme outbursts.
- Seem isolated from their parents.
- Lack social skills or have few, if any, friends.

### **Online abuse and bullying**

Children experiencing abuse online may:

- Spend lots, much more or much less time online, texting, gaming, or using social media.
- Be withdrawn, upset, or outraged after using the internet or texting.
- Be secretive about who they are talking to and what they are doing online or on their mobile phone.
- Have lots of new phone numbers, texts or e-mail addresses on their mobile phone, laptop or tablet.

# Appendix 6: Abuse of adults

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## What is adult abuse?

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This section is adapted from government guidelines for adults at risk, but we have broadened its application to include all those adults participating in UCCF activities.

Abuse, neglect, and exploitation of adults can take many forms and can occur in any relationship whereby an individual misuses their power or control over another person, causing harm or distress.

- Physical abuse – physical force or mistreatment, resulting in possible physical injury e.g. hitting, pushing, misuse of medication, denial of treatment, restraint, physical sanctions.
- Psychological or emotional abuse – harmful acts or behaviour that can cause mental distress, involving verbal and/or non-verbal abuse which can scare, humiliate, and isolate a person e.g. threats, humiliation, provoking fear of violence, verbal abuse, blaming, controlling, intimidation.
- Financial abuse – the attempt to steal or actual stealing or defrauding of a person's money, goods, or property e.g. theft; fraud; exploitation; coercion in relation to a person's financial affairs or arrangements including in connection with wills, property, or inheritance; the misuse or misappropriation of property, possessions, or benefits.
- Sexual abuse – unwanted sexual activity or sexual behaviour that occurs without consent or proper comprehension e.g. rape, sexual assault, indecent exposure, grooming.
- Institutional abuse – the mistreatment or neglect of an adult at risk by a regime or individuals within an institution, such as a hospital or care home e.g. poor standards of care; poor professional practice; strict regimes and rigid routines which violate human rights.
- Spiritual abuse - the use of faith, belief, and religious practice to coerce, control or harm another.
- Neglect and acts of omission – the deprivation of suitable and adequate care and support of an individual e.g. ignoring physical/medical care needs; failure to provide access to necessary health, care and support or educational services.
- Self-neglect – lack of self-care to an extent that it threatens personal health and safety e.g. poor personal hygiene, self-harm, failure to seek appropriate services to meet social/health care needs.
- Exploitation – the deliberate maltreatment, manipulation or abuse of power and control over another person e.g. slavery, human trafficking, sexual/domestic violence, and abuse, forced labour.
- Discriminatory abuse – inappropriate treatment, including misuse of power and denial of opportunities, of a person on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex or sexual orientation (known as 'protected characteristics' under the *Equality Act 2010*).

## Signs of possible abuse in adults

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There are general signs which alert to the existence of harm or abuse to an adult:

- An adult reveals abuse, neglect or exploitation happening to them.
- Concern is raised by a friend or family member.
- Suspicious injuries of physical signs.
- A change in behaviour of the victim or abuser.

Signs of possible abuse that are specific to the different categories of abuse may include:

### Physical abuse

- Frequent injuries
- Unexplained injuries or falls
- Fractures, bruising, burns, marks on the body
- Malnutrition
- Change in behaviour in the presence of a particular person
- Failure to seek medical treatment or frequent change of GP



**Psychological or emotional abuse**

- Change in psychological state e.g. withdrawn, anxious, aggressive, distressed, low self-esteem
- Subdued when a particular person is present
- Insomnia
- Change of appetite, weight loss/gain
- Displaying compulsive behaviour

**Financial abuse**

- Having unusual difficulty with finances
- Not paying bills, receiving eviction notices
- Unexplained lack of money or normal home comforts
- Unexplained withdrawal of funds
- Failure of carer/professional to provide receipts or account for other financial transactions made on person's behalf
- Disparity between financial resources and living conditions
- Recent changes of deeds or title to property

**Sexual abuse**

- Bruising to thighs, buttocks, upper arms, and neck
- Torn, stained or bloody underclothing and/or difficulty walking/sitting
- Infections or sexually transmitted diseases
- Pregnancy in a woman who is unable to consent to sexual intercourse
- Uncharacteristic change in sexual behaviour/attitude and/or use of explicit sexual language
- Incontinence unrelated to any medical diagnosis
- Excessive fear of, or withdrawal from, relationships
- Fear of receiving help with personal care or being touched
- Reluctance to be alone with a particular person

**Spiritual abuse**

- Being blamed for any issues or problems a person identifies with the church or organisational context.
- Being unable to raise questions or concerns without being accused of causing trouble or threatening unity; pressure to stay silent.
- Being required, forced, or coerced into unhealthy levels of accountability, e.g. sharing personal details or including another person in all decision-making.
- Coercion into extreme forms of commitment to a place of worship, sometimes to the detriment of other commitments or relationships.
- Public shaming and coercion to conform to certain actions or behaviours.
- Scripture being used to coerce a person into certain actions or behaviours.

**Abuse of those living in institutions**

- Lack of flexibility and choice for people using the service eg meals, bedtimes, phone calls, visitors
- Unsatisfactory treatment or maltreatment from professionals
- Poor standards of care and lack of adequate procedures
- Inadequate medical care, frequent admissions to hospital
- Lack of personal clothing/possessions and communal use of personal items
- Lack of management overview, adequate procedures, or support
- Absence of care plans and missing documents
- Public discussion of personal matters

**Neglect and acts of omission**

- Malnutrition, weight loss, hunger, thirst
- Poor physical condition (e.g. pressure sores and ulcers) and/or personal hygiene
- Poor environment – dirty or unhygienic
- Untreated injuries and medical problems
- Reluctant contact with medical, educational, or social care organisations
- Uncharacteristic failure to engage in social interaction

**Self-neglect**

- Poor personal hygiene
- Squalid or unsanitary conditions living conditions
- Lack of essential food, clothing, or shelter
- Malnutrition and/or dehydration
- Unwillingness to comply with health or care services
- Inability or unwillingness to take medication or treat illness or injury

**Exploitation**

- Signs of physical or emotional abuse
- Appearing malnourished, unkempt, or withdrawn
- Isolation, seeming under the control or influence of others
- Poor or overcrowded living conditions and/or living and working at the same address
- Absence of personal identification documents
- Wearing the same clothes
- Avoiding eye contact, appearing frightened or hesitant to interact with strangers
- Fear of law enforcers

**Discriminatory abuse**

- Withdrawal, isolation
- Expressions of anger, frustration, lack of respect, fear, or anxiety
- Available support does not take account of the person's individual needs in terms of a protected characteristic

# Appendix 7: Safeguarding Disclosure/ Incident/ Allegation Report Form

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## Basic information

Full name of child/adult concerned:	
Date of birth:	
Address: (Also include parent(s)/carer(s) address(es) if different from child's)	
Contact details (telephone number and/or email address):	
Name(s) of parent(s)/carer(s) (where applicable):	
Date and time of disclosure/incident/allegation:	
Location of disclosure/incident/allegation:	
Other people present/witnesses:	

## Report

It is important to make sure your report is as accurate and detailed as possible. Use quotes wherever possible rather than interpreting what was said using your own words. If you have formed an opinion, please state it but make clear that it is your own opinion and the basis on which you have made it.

Details to record:

- Whether you are reporting your own concerns, or the concerns raised by someone else. If the latter, their name, and position within UCCF.
- Details of the disclosure/incident/allegation or concerns you have, including times, dates, description of any injuries, whether information is first-hand or the accounts of others, any other relevant details.
- The child's/adult's account/perspective – include details such as tone of voice, facial expression, body language.
- What you said in response.
- Details of anyone alleged to have caused the incident or to be the source of any concerns.
- Details of anyone who has witnessed the incident or shares the concerns.
- Whether you are aware of any previous incidents or concerns relating to the child/adult.

Please continue your report on a separate sheet if necessary.

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**Parties contacted about the disclosure/incident/allegation**

(Please include name, position, organisation, contact details).

Designated Safeguarding Officer:	
Children’s services (relevant County Council):	
Adult services (relevant County Council):	
Police:	
Parent(s)/carer(s):	
Other:	

**Declaration**

I hereby declare the information recorded above to be true, complete, and accurate to the best of my knowledge.	
Your name:	

Position held at UCCF:	
Telephone number:	
Email address:	
Signed:	
Date:	

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**To be completed by UCCF's Designated Safeguarding Officer:**

Date Report Form submitted:	
Rationale for making/not making onward referral to external body/ies (University Services/local Social Services/Police):	
Signed:	
Date:	

# Appendix 8: List of safeguarding and victim support services

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Anyone wishing to disclose an allegation in relation to UCCF, or to get advice or support for themselves or someone else, is encouraged to contact one of the organisations below:

**Thirtyone:eight**

Helpline: 0303 003 1111

[www.thirtyoneeight.org](http://www.thirtyoneeight.org)

**Association of Christian Counsellors (ACC)**

<https://www.acc-uk.org>

**British Association of Counselling and Psychotherapy (BACP)**

<https://www.bacp.co.uk>

**National Association for People Abused in Childhood (NAPAC)**

<https://napac.org.uk>

**Samaritans**

<https://www.samaritans.org>

Phone: 116 123

**The Survivors Trust**

<https://www.thesurvivorstrust.org>

**Minister & Clergy Sexual Abuse Service (MACSAS)**

<http://www.macsas.org.uk>

# Appendix 9: Safeguarding Records Retention and Storage Guidelines

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As part of UCCF's *Safeguarding Policy and Procedures*, the organisation has clear guidelines for the retention, storage, and destruction of safeguarding records. These are records which relate to concerns about a child's/adult's welfare and safety, and/or concerns about possible risks posed by a member of UCCF's workforce (staff members; volunteers, including Relay Workers; trustees; and anyone working on behalf of UCCF) working or volunteering with them. Please note that the information detailed in this document is for guidance only and does not constitute legal advice.

## Safeguarding records concerning a member of UCCF's workforce

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Should an allegation/s of abuse concern a member of UCCF's workforce, clear and comprehensive records will be kept, including:

- What the allegation/s was/were
- How the allegation/s was/were followed up
- How things were resolved
- Any action taken
- Decisions reached about the person's suitability to continue work with children/adults.

Keeping these records ensures UCCF can provide accurate information if requested. For example:

- In response to future requests for a reference
- If required to provide clarification about information disclosed as part of a future vetting and barring check
- If allegations resurface after a period, preventing unnecessary re-investigation.

### Storage and access

Records will be stored electronically and in printed form in the relevant person's confidential personnel file. A copy will be given to the individual.

Personnel files are stored in lockable drawers in the Human Resources department at UCCF's office. Electronic files have restricted access, requiring a username and password, and the computers of those with access are protected with Antivirus and a Firewall, as is the entire IT infrastructure in the UCCF office.

Day to day access to the records will be restricted to the Human Resources department, namely the Head of Human Resources, Human Resources Advisor (UCCF's Designated Safeguarding Administrator (DSA) and the Human Resources Assistant.

### Retention periods

Where concerns have been raised about the behaviour of a member of UCCF's workforce in relation to the children and/or young adults that they come across in their work, records will be kept in their personnel file until they reach the age of 65, or for 10 years, whichever is longer, and then confidentially destroyed. For example:

- If a member of UCCF's workforce is 60 when the investigation into the allegation is concluded, the records will be kept until they are aged 70.
- If a member of UCCF's workforce is 30 when the investigation into the allegation is concluded, the records will be kept until they are aged 65.

The records will be retained for the same amount of time regardless of whether the allegations were unfounded. (However, where allegations are found to have been made maliciously, records will be destroyed immediately). Information will be retained for this length of time even if the person stops working for, working on behalf of, or volunteering with UCCF.

In some cases, records will be kept for longer periods of time. For example:

- If the information in the records is relevant to legal action that has been started but not finished.
- If the records have been archived for historical purposes (e.g. if the records are relevant to legal proceedings involving UCCF).

Where there are legal proceedings, UCCF would seek legal advice about how long to retain the records.

Where records are kept for longer than the recommended period, files will be clearly marked with the reasons for the extension period.

## **Safeguarding records concerning a child or adult**

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Should a child or adult (e.g. a student with whom UCCF works or other people who encounter UCCF through its work) make a disclosure of abuse and/or an allegation of abuse against someone, to a member of UCCF's workforce, clear and comprehensible records will be kept, including:

- Information recorded in the *Safeguarding Disclosure / Incident / Allegation Report Form* as documented by the relevant member of UCCF's workforce e.g. details of the disclosure/allegation, any witnesses, people of concern; what was said by the UCCF staff member in response to the disclosure etc.
- How things were resolved.
- Any action taken e.g. referrals made to University services, Social Services, or the police.

### **Storage**

Records will be stored electronically in a central 'Safeguarding Records' folder. The folder has restricted access, requiring a username and password, and the computers of those with access are protected with Antivirus and a Firewall, as is the entire IT infrastructure in the UCCF office.

Day to day access to the records will be restricted to the Human Resources department, namely the Head of Human Resources, Human Resources Advisor (UCCF's DSA) and the Human Resources Assistant.

The child/adult who made the disclosure/allegation will be informed that records will be stored centrally by UCCF and retained for the timeframes set out below.

### **Retention periods**

Records in relation to a child's or adult's disclosure of abuse and/or allegation of abuse that UCCF refers to the relevant University Services, local Social Services, or the Police, will be retained for six years, unless a legal case has been brought within that time frame.

Records in relation to a child's or adult's disclosure of abuse and/or allegation of abuse that UCCF does not refer to an external body, will be retained for one year.

Where there are legal proceedings, UCCF would seek legal advice about how long to retain the records.

Where records are kept for longer than the recommended period, files will be clearly marked with the reasons for the extension period.

## **Destruction of safeguarding records**

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To ensure maximum safeguarding of data relating to a disclosure/allegation of abuse, where a member of UCCF's workforce is in possession of relevant records e.g. *Safeguarding Disclosure / Incident / Allegation Report Form*; email correspondence etc., they will be required to delete the files once they have been securely transferred to one of UCCF's DSOs for storage in the central 'Safeguarding Records' folder. This removes the risk of having multiple sensitive files in multiple locations.

When the relevant retention period has finished, confidential electronic records will be purged.