



Safeguarding Policy

Children, young people and adults at risk • Wales • Version 2026.3

If someone is in immediate danger, call 999. Do not wait for this policy.

If you are worried about a child or an adult at risk, tell the Safeguarding Lead today. You do not need to be certain, and it is not your job to investigate. Never keep a safeguarding concern to yourself.

Who to contact

Role	Name	Phone	Email
Safeguarding Lead	Jenny Price	07974 076132	hillcitysafeguarding@gmail.com
Deputy Safeguarding Lead	Lindsay Osbourne	07851 604747	hillcitysafeguarding@gmail.com
Safeguarding Administrator	Martin Mills		
Elders / trustees	Pete Cole Simon Matheson James Richards		

External contact	Details
Police (emergency)	999
Police (non-emergency)	101
Children's Services — Torfaen	01495 762200 (cs.contact@torfaen.gov.uk)
Adult Services — Torfaen	01495 762200 (socialcarealltorfaen@torfaen.gov.uk)
Emergency Duty Team (out of hours)	0800 328 4432
Designated Officer for Safeguarding / LADO (allegations against a leader, volunteer or Elder)	01495 762200
Thirtyone:eight safeguarding helpline (members)	0303 003 1111 — Mon–Fri, 9am–5pm
NSPCC Helpline / Childline	0808 800 5000 / 0800 1111
Live Fear Free (domestic abuse, Wales)	0808 80 10 800 — 24 hours
Wales Safeguarding Procedures	www.safeguarding.wales

How to use this policy

Parts A to C apply to everyone and to everybody we work with. Part D sets out safe practice — section 12 for work with children and young people, section 13 for work with adults at risk. Part E covers governance.

If you only read one thing, read section 9 — responding to a concern or disclosure.

PART A

Commitment, scope and people

1. Our commitment

Hill City Church is concerned with the physical, intellectual, emotional and spiritual welfare of every individual. We recognise the importance of the family and seek to work in co-operation with parents and guardians. We recognise the right of every individual to stay safe.

The welfare of the child or adult at risk is paramount. It over-rides every other consideration, including the reputation of the church, the interests of any activity or ministry, loyalty to a colleague or friend, and the interests of any person against whom a concern is raised.

We are committed to:

- preventing the physical, sexual, emotional, financial or spiritual abuse and neglect of children, young people and adults at risk;
- taking prompt and appropriate action whenever abuse is disclosed, suspected or discovered;
- recruiting, training, resourcing and supervising everyone who works with those in our care;
- creating a culture in which people feel able to speak up, and in which challenge is welcomed rather than resented;
- caring well for those who have been harmed, and cooperating fully with the statutory agencies.

Knowledge of abuse must never be kept secret. There are no circumstances in which a safeguarding concern is dealt with quietly, internally, or "in-house". Nobody in this church — including the Elders — has the authority to prevent a concern being reported.

2. Scope and definitions

2.1 Who this policy applies to

This policy applies to every Elder, trustee, employee, volunteer, session leader, helper and visiting speaker involved in any Hill City Church activity, whether on church premises or elsewhere. It applies to occasional helpers and to parents helping on a rota.

It covers all our activities — Sunday groups, crèche, youth work, holiday clubs, outings, residential trips, work with older members, foodbank, debt help, counselling and pastoral visiting.

A note on "Elder" and "trustee". Hill City Church is led by three Elders, who are also the charity's three trustees and its only members. The two terms describe the same people in different capacities. "Elder" describes the spiritual leadership of the church; "trustee" is the legal office held under the church's constitution and recognised by the Charity Commission. This policy uses "trustee" wherever a legal duty is being described — approving this policy, reporting a serious incident, recusal from a decision, or the quorum for a meeting — because those duties attach to the trustee role and not to the eldership. Elsewhere the terms may be read interchangeably.

2.2 Children and young people

A child is anyone who has not yet reached their 18th birthday. This is the definition used throughout this policy and in law. The fact that a young person has reached 16, has left school, is living independently, or is in employment does not change their status as a child for safeguarding purposes. Where this policy says **children** or

young people, both are covered by that single definition; age bands are used only to describe how activities are organised.

A **child at risk** is defined in section 130(4) of the Social Services and Well-being (Wales) Act 2014 as a child who is experiencing, or is at risk of, abuse, neglect or other kinds of harm, and who has needs for care and support.

2.3 Adults at risk

This policy uses **adult at risk**, the term used in Welsh law. It replaces "vulnerable adult", which is avoided because it suggests the vulnerability lies in the person rather than their circumstances.

Under section 126 of the Social Services and Well-being (Wales) Act 2014, an adult at risk is a person aged 18 or over who is experiencing or at risk of abuse or neglect; has needs for care and support; and as a result of those needs is unable to protect themselves. In practice this may include someone who is elderly and frail; has a mental illness including dementia; has a physical, sensory or learning disability; has a severe physical illness; misuses substances; is homeless or insecurely housed; is experiencing domestic abuse or coercive control; or is isolated, bereaved or in acute crisis.

Vulnerability is situational, not permanent. Someone may be an adult at risk for a season only, and someone who appears capable may be at risk in a particular relationship. Judge the situation, not the label.

3. Legal and regulatory framework

Safeguarding is devolved in Wales. Guidance written for England does not apply directly here.

Source	What it means for us
Social Services and Well-being (Wales) Act 2014, Part 7	The governing framework. Sections 126 and 130 define adults and children at risk. Sections 128 and 130 place a duty to report on "relevant partners" — local authorities, police, health boards, probation. A church is not a relevant partner and so is not under that statutory duty, but we choose to act as though we are.
Wales Safeguarding Procedures	The operational procedures we follow, at www.safeguarding.wales . Section 5 covers allegations about practitioners and those in positions of trust, and applies to our volunteers and Elders.
Working Together to Safeguard People: Code of Safeguarding Practice (Welsh Government, 2022)	Sets Welsh Government expectations for groups — explicitly including faith groups — offering activities to children and adults. Following it demonstrates that we have taken reasonable steps.
Charities Act 2011 and Charity Commission guidance	Trustees must take reasonable steps to protect from harm everyone who comes into contact with the church, and must report serious safeguarding incidents to the Charity Commission. See section 14.
Safeguarding Vulnerable Groups Act 2006	It is a criminal offence to allow a person barred by the DBS to work or volunteer in regulated activity, and an offence for a barred person to seek such a role. The Act also creates our duty to refer. See sections 6 and 11.
Mental Capacity Act 2005	Adults are presumed to have capacity unless established otherwise. Capacity is decision-specific and can fluctuate. An unwise decision is not evidence of incapacity. See section 9.5.

Source	What it means for us
UK GDPR and Data Protection Act 2018	Governs how we record, store, share and dispose of safeguarding information. Data protection is never a reason to withhold information needed to protect someone. See section 15.

4. Roles and responsibilities

4.1 Everyone

Safeguarding is everybody's responsibility. Every person covered by this policy must know who the Safeguarding Lead is, recognise the signs of abuse, and pass on any concern the same day. Nobody is expected to decide whether abuse has occurred — only to pass the concern on.

4.2 Safeguarding Lead

- First point of contact for all safeguarding concerns about children and adults at risk.
- Decides, taking advice where needed, whether to refer to children's or adult services or the police, and makes that referral.
- Keeps the safeguarding records securely and maintains the concerns log.
- Holds the relationship with the local authority and knows the referral routes and the Designated Officer for Safeguarding.
- Reports directly and in person to the trustees at least annually, and may convene a trustees' meeting at any time.
- Undertakes training appropriate to the role, refreshed at least every three years.

The Safeguarding Lead must not be an Elder or a trustee. Hill City Church is led by a plurality of three Elders, who are also the church's three trustees. Because the leadership and the trustee body are the same people, a concern about an Elder would otherwise be received, assessed and decided upon entirely within that group. Appointing a Lead from outside the eldership means such a concern reaches someone independent from the moment it is raised.

Protection for the Safeguarding Lead

Because the Safeguarding Lead is not a trustee, the following protections apply and may not be set aside:

- The Lead may refer a matter to children's or adult services or the police without trustee approval. No Elder or trustee may prevent, delay or reverse a referral.
- The Lead may contact the Designated Officer for Safeguarding, social services, the police, Thirtyone:eight or the Charity Commission directly at any time, without permission and without notice.
- The Lead may not be removed from the role, nor have the role altered, while any concern they have raised remains unresolved. Any removal requires a reason recorded in the trustees' minutes.
- The Lead has a standing right to attend any part of a trustees' meeting at which safeguarding is discussed.

4.3 Deputy Safeguarding Lead

- Acts in place of the Safeguarding Lead during absence, and is available as a second view on difficult decisions.

- Is the route for any concern that is about the Safeguarding Lead.
- Holds the same level of training as the Safeguarding Lead. Is not an Elder or trustee.

4.4 Safeguarding Administrator

An administrative role, held by someone who is not an Elder or trustee, so that record-keeping does not fall on the Lead alongside casework.

- Maintains the Role and DBS Matrix and the Volunteer Register.
- Processes DBS applications and tracks renewals, references, self-declarations and signed Codes of Conduct.
- Books training and keeps the training records.
- Works through the annual safeguarding checklist and passes it to the Safeguarding Lead, who takes it to the trustees.
- Does not make referral decisions and does not hold case records.

4.5 The Elders, as trustees

Safeguarding is held by the three Elders collectively. It is not delegated to the Safeguarding Lead, and no individual Elder holds it on the others' behalf.

- Approve this policy, resource it, and are accountable for it.
- Ensure the Safeguarding Lead can act independently and is not overruled on a referral decision.
- Report serious safeguarding incidents to the Charity Commission.
- Confirm on appointment, and annually, that they are not disqualified from acting as a charity trustee under section 178 of the Charities Act 2011.
- Ensure every Elder holds an enhanced DBS check and current safeguarding training.

How safeguarding reaches the trustees

- Safeguarding is a standing item at every trustees' meeting, minuted every time, including when there is nothing to report.
- The Safeguarding Lead reports directly and in person at least annually, bringing the completed annual checklist.
- The Lead may convene a trustees' meeting at any time, and attend any part of a meeting at which safeguarding is discussed.
- This policy is reviewed and re-approved annually, and the approval is minuted.

The safeguarding duty is held by the trustees collectively and cannot be delegated away. This does not mean the trustees know the detail of individual cases — they normally will not, and should not seek it. Confidentiality and need-to-know apply to trustees as much as to anyone else, and "the Lead was handling it" is a proper answer about a particular case. What the trustees must be able to demonstrate is that proper arrangements existed, that competent people were appointed and resourced, that the arrangements were followed, and that they were reviewed. Delegating the casework is right. Losing sight of whether the overall safeguarding system is working is not.

A referral decision cannot be overruled. If the Safeguarding Lead judges that a matter should be referred, no Elder or trustee may prevent, delay or reverse that referral. Attempting to do so is a serious disciplinary matter and, in some circumstances, a criminal offence.

4.6 Independent advice from outside the church

Because the eldership and the trustee body are the same three people, the church maintains membership of Thirtyone:eight so that an independent safeguarding professional is available by telephone to the Safeguarding Lead, to any Elder, and to anyone else in the church — including about the conduct of an Elder. Taking advice never replaces or delays a referral to statutory services.

5. Safer recruitment

Everyone who works with children, young people or adults at risk, paid or unpaid, is recruited through a proper process. How much is required depends on what the church can reasonably find out about the person, not on how long they have been coming.

5.1 The process

1. A written role description setting out what the role involves and what it does not.
2. A short written application or expression of interest. This asks for previous involvement with this or other churches, any other work or volunteering with children or adults at risk, and an explanation of any significant gap. It is not a CV or a full employment history.
3. An informal conversation with the Safeguarding Lead or the activity leader.
4. References, as set out in 5.2.
5. A self-declaration form disclosing any relevant convictions, cautions, or previous concerns raised in any setting.
6. A DBS check at the correct level for the role (see section 6).
7. Signing the Volunteer Code of Conduct and confirming they have read this policy.
8. A settling-in period of at least three months alongside an experienced leader before taking any unsupervised responsibility.

5.2 References

What is required depends on two questions.

First: has the person worked or volunteered with children or adults at risk in any other setting? This means another church, a school, a club, a uniformed organisation, a care setting or anything similar.

- **If yes**, one written reference from that setting is required. This is not waived for length of association, and it is not replaced by anything in this section. A previous organisation may hold information that nobody at Hill City Church could know, and a reference is the only way it reaches us. The self-declaration form asks this question directly.
- **If no**, go to the second question.

Second: how long has the church known the person?

- **Twelve months or more.** No reference is required. Instead the Safeguarding Lead records a short file note stating how long the person has been known to the church, in what capacity, and that no concerns are held. The note is countersigned by an Elder who is not a relative. This is a record of the church's own knowledge of the person. It is not a reference and is not described as one.
- **Less than twelve months.** Two references are taken up in writing, at least one of which is not a family member or close friend.

Who can act as a referee. A referee does not need to be a former employer or a church leader. Anyone who has known the person in a position of responsibility is acceptable — an employer however informal, a support

worker, housing officer, probation officer, teacher, tutor, group or club leader, or another church. Where only one suitable referee exists, one considered reference from someone who knows the person well is better than two from people who barely do, and one is enough.

5.3 Where no referee can be identified

Some people have no former employer, no previous church and no professional contacts, through no fault of their own. They are not excluded from serving.

Where the Safeguarding Lead is satisfied that no suitable referee can reasonably be found, the person may begin in a role that involves no unsupervised contact, no regulated activity, and no sole responsibility for any child or adult at risk. They work alongside experienced volunteers throughout. The Safeguarding Lead records the decision and the reasons for it, and reviews how things are going at three, six and twelve months.

After twelve months, the file note route in 5.2 applies and the person may move into a fuller role under 5.4. In these circumstances time and observation do the work that references would otherwise have done.

This route is not available for a role in regulated activity. Someone whose history the church cannot verify does not begin in unsupervised work with children or adults at risk.

5.4 Moving into a new role

Anyone moving into a role in regulated activity for the first time — for example from occasional help into leading a weekly group, or taking on a residential — is reconsidered under 5.1 and 5.2 at that point, whatever was done when they first started.

5.5 Annually

Every worker signs a renewed self-declaration and re-commits to this policy each year. The Safeguarding Administrator records this. The annual declaration is how the church learns of anything that has changed since someone took up their role, and it applies to everyone regardless of which route they came through.

6. Disclosure and Barring Service checks

DBS checks are one part of safer recruitment, never a substitute for it. A clear certificate tells us only that nothing is known.

It is a criminal offence for the church to allow a barred person to take up a role in regulated activity, and an offence for a barred person to apply for one. It is also an offence to request a barred-list check for a role that does not qualify — so we check at the correct level and no higher.

6.1 Children's roles

Regulated activity with children means teaching, training, instructing, caring for or supervising children, carried out frequently — once a week or more, on more than three days in any 30-day period, or overnight between 2am and 6am.

From 1 September 2026 it no longer matters whether the person is supervised. The Crime and Policing Act 2026 removed the supervision exemption across England, Wales and Northern Ireland. A volunteer who helps at a weekly children's group is now in regulated activity even if an experienced leader is present throughout and supervising them at all times.

The practical effect for Hill City Church is that helpers on a weekly or fortnightly rota, who previously needed an enhanced check without the barred list, now require an enhanced check with the children's barred list. It is a criminal offence to allow a barred person to work in these roles, and the duty to refer to the DBS (section 11) extends to them.

There is no equivalent change for adults at risk. The supervision exemption never applied to regulated activity with adults, so section 6.2 is unaffected.

6.2 Roles with adults at risk

There is no frequency test for adults. Certain activities are regulated activity even if carried out once, including providing personal care or healthcare, assisting with a person's cash, bills or shopping because of their age, illness or disability, and acting under a power of attorney.

6.3 Levels

Level of check	When it applies
Enhanced with barred list	Roles meeting the regulated activity definition above — for example a youth leader running a weekly group, a supervised helper on a weekly rota, a leader on a residential, or a volunteer helping an adult at risk with their bills.
Enhanced without barred list	Roles with regular contact that do not meet the frequency condition — for example someone on an occasional rota of less than once a month. Also the trustee role.
Basic	Roles where no enhanced eligibility exists but the trustees judge a check proportionate.
None	Roles with no responsibility for children or adults at risk.

The level for each role is recorded in the church's **Role and DBS Matrix**, maintained by the Safeguarding Administrator and reviewed annually by the trustees. Checks are renewed every three years, or the individual joins the DBS Update Service and the church rechecks the status annually.

6.4 Trustees

Because the church works with children and adults at risk, its trustees are eligible for an enhanced DBS check even where a trustee has no contact with those groups — the eligibility arises from the work of the charity. Hill City Church obtains an enhanced check for every trustee. A barred list check is not available for the trustee role itself, only where the trustee is also personally in regulated activity, such as an Elder who leads a group; where that applies, both roles are declared on the application.

PART B

Recognising abuse

7. Types of abuse

Type	What it can look like
Physical abuse	Actual or likely physical injury, or failure to prevent it — hitting, rough handling, inappropriate restraint, misuse of medication, withholding food, aids or heating, poisoning, suffocation, fabricated or induced illness.
Sexual abuse	Actual or likely sexual exploitation, including involving someone in looking at or producing sexual images, and any sexual act to which the person did not or could not consent. Includes abuse of a child by another child.
Emotional or psychological abuse	Persistent or severe ill-treatment or rejection causing severe adverse effect on emotional and behavioural development; threats, humiliation, intimidation, blaming, isolation from friends, family or support. Includes witnessing domestic abuse.
Neglect and acts of omission	Persistent or severe neglect, or failure to protect from danger — including cold and starvation, failure to provide care, medication or access to health services.
Self-neglect	A person neglecting their own health, hygiene or surroundings to a degree that puts them at risk.
Financial or material abuse	Theft, fraud, pressure over wills, property or benefits, misuse of a power of attorney, exploitation through debt or "help" with money.
Domestic abuse and coercive control	Controlling, coercive, threatening or violent behaviour by a partner or family member. Coercive control is a criminal offence under s.76 of the Serious Crime Act 2015.
Exploitation	Child sexual exploitation, child criminal exploitation, modern slavery, trafficking and forced labour — where someone is manipulated or coerced, often in exchange for attention, status, money, drugs or accommodation. They may not recognise it as abuse.
Bullying and harassment	Persistent unwanted behaviour, including online.
Discriminatory abuse	Harassment or unequal treatment based on age, disability, race, religion, sex, sexual orientation or gender reassignment.
Organised or organisational abuse	Abuse involving more than one abuser acting in concert; an adult using an institutional framework or position of authority to recruit children; or a culture within a service that harms those in its care.
Spiritual abuse	Misuse of power, scripture or spiritual authority to control, coerce, manipulate, extract money or silence. Leadership must never be so controlling that it denies people choice and freedom, including the freedom to disagree.

Also be alert to female genital mutilation, forced marriage, radicalisation, and harm arising from online activity.

8. Signs and symptoms

The following may or may not indicate abuse, but the possibility should be considered.

8.1 In children and young people

- Injuries that have not received medical attention — bruises, cuts, burns, swellings, fractures, bites — for which there is no satisfactory explanation.
- Undernourishment, untreated illness, constant hunger, weight or eating problems.
- Repeated urinary infections or unexplained stomach pains.
- Disturbed sleep, nightmares, bedwetting.
- Extreme changes in mood or behaviour: withdrawn, clinging, depressed, aggressive, nervous, lethargic or obsessive.
- Excessive fear of adults.
- Sudden under-achievement or loss of concentration.
- Play or behaviour displaying sexual knowledge beyond the child's age, or sexually provocative behaviour with adults.
- Unexplained gifts, money or possessions; an older or controlling friend; going missing.

8.2 In adults at risk

- Unexplained injuries, or injuries at various stages of healing; explanations that do not fit.
- Sudden changes in mood, withdrawal, fearfulness, or fear of a particular person.
- Deterioration in appearance, hygiene, weight or health without explanation.
- Unexplained shortage of money, unpaid bills, sudden changes to a will or bank arrangements, a new person managing their finances.
- A carer, relative or friend who answers for them, controls access to them, or discourages them from attending.
- Missing appointments, medication or meals; living conditions deteriorating.
- Reluctance to go home, or distress at the end of a session.

There may be perfectly normal explanations for any of these. It is right to feel concerned, and right to pass the concern on. Deciding what it means is not your job.

Where a child harms another child sexually, or forces themselves on another child, this is still abuse. It must be taken seriously, and both children are treated as children who need safeguarding.

PART C**Responding****9. Responding to a concern or disclosure**

Always care for the person first and get medical attention if it is needed. You are not expected to be a therapist, to judge, or to carry out an investigation. Investigation is the job of the statutory agencies.

9.1 If someone wants to talk to you

Your main role is to listen. If they ask for a more private conversation, choose a place that remains visible to others — a room with the door open next to a busy area, or a quiet corner of an open space — and where possible let another leader know you are there.

Do	Do not
Remain calm.	Panic, or show shock or disgust.
Show acceptance of what they say.	Rush off to find someone else to listen.
Look at them directly, and keep listening.	Rush them.
Act as though you believe them, while keeping an open mind.	Push for information, question or investigate.
Be aware that they may have been threatened.	Lie, or promise to keep things secret.
Keep any questions open-ended.	Promise confidentiality — you cannot, and must not.
Tell them they were right to tell you: "Thank you for telling me."	Make judgments about the alleged abuser or the family.
Tell them it is not their fault.	Put words in their mouth.
Explain what you are going to do next, and that they will be told what happens.	Make them feel they are in any way to blame.
Involve an appropriate witness as soon as possible.	Speak to the person accused.
Write down, as soon as you can, exactly what was said, with date, time, location and who was present.	Delay because you are unsure whether it is serious enough.
Take care of yourself and work out what you are feeling.	Discuss it with anyone who does not need to know.

9.2 What to do next

1. Ensure the person is safe. If they are in immediate danger, or need urgent medical attention, call 999.
2. Write down what was said or seen, in their own words where possible, with date, time, place and who was present. Do this the same day. Record fact and observation, and mark clearly anything that is your opinion.
3. Tell the Safeguarding Lead the same day. If the Lead is unavailable, tell the Deputy. If the concern is about the Lead, tell the Deputy or any Elder — or contact social services yourself.
4. Say nothing to the person about whom the concern has been raised. The first contact must be made by the statutory authorities.

5. Keep the information on a strict need-to-know basis so that any alleged perpetrator is not tipped off. The person also has a right to have their privacy respected as far as possible.

You have discharged your responsibility once you have passed the concern to the Safeguarding Lead.

You do not have to decide whether to refer, and you do not have to be certain. But if you believe a concern has not been acted on, you must escalate it yourself — see section 16.

9.3 Our standard on child sexual abuse

The Crime and Policing Act 2026 created a statutory duty to report child sexual abuse, and a criminal offence of acting to prevent a report being made. The reporting duty applies in England and not currently in Wales. Hill City Church adopts the standard voluntarily:

- Where anyone covered by this policy is told by a child or a perpetrator that a child is being sexually abused, or witnesses it, they report it to the Safeguarding Lead, who notifies children's services or the police as soon as reasonably practicable.
- Any attempt by any person to prevent or discourage a report will be treated as gross misconduct, may be a criminal offence, and will itself be reported.

9.4 Where an adult at risk does not want the concern shared

An adult at risk may not want information about their situation disclosed. This kind of information must not be kept quiet.

You must always tell the Safeguarding Lead, stating the lack of consent. The Lead decides whether to inform adult services. Wherever it is safe to do so, we explain to the person what we are going to do and why, and keep them involved. Consent is overridden without discussion only where there is a risk to life, a risk to others including children, a serious criminal offence, or where the person lacks capacity to make the decision.

Respecting someone's wishes never means staying silent within the church. You may not have the conversation with adult services, but you must always have it with the Safeguarding Lead.

9.5 Mental capacity

- Assume the person has capacity unless there is reason to think otherwise. Capacity relates to a specific decision at a specific time.
- An unwise or unpopular decision is not evidence of a lack of capacity.
- Where capacity is in doubt, raise it with the Safeguarding Lead, who will seek advice. The church does not carry out capacity assessments.

9.6 Response by the Safeguarding Lead

Where a child has a physical injury or symptom of neglect

- Contact children's services directly where there are serious concerns about the child or the parents, or where the child is afraid to return home. Do not tell the parents in those circumstances.
- Where the concerns are less serious it may be appropriate to speak with the parent and suggest, for example, that the child needs medical attention. With older young people, take their wishes into account.
- If a parent is unwilling to seek help, offer to accompany them. If they still fail to acknowledge the need for medical attention, seek help directly.
- Where emergency medical attention is needed, seek it immediately and inform the doctor of any suspicions.

Where there are allegations or concerns of sexual abuse

- **Do not tell the parents.** The child's welfare comes first. Parents may be involved; allegations of sexual abuse are usually denied and difficult to prove. If the parents are not involved they may react in a way that harms the child, or may find it harder to demonstrate their innocence if told.
- **Contact children's services. Do not attempt to investigate.** Our job is to relay information so that the statutory agencies can investigate.
- If an immediate police medical examination may be necessary — for example where a serious sexual assault has occurred within the previous few hours — contact the police directly to avoid delay.

Concerns about an adult at risk

- Consult adult services, or refer directly where the risk is serious.
- Record the person's wishes, whether consent was given, and the reasons for the decision taken.

Independent advice is available from Thirtyone:eight on **0303 003 1111**. Seeking advice does not replace making a referral, and must never be used to delay one.

10. Allegations against a leader, volunteer, employee or Elder

Any adult working or volunteering may become the subject of an allegation. This is distressing, and it is an essential part of safeguarding. Allegations are handled through a separate route and are never dealt with internally.

This procedure applies where it is alleged that a person in a position of trust has:

- behaved in a way that has harmed, or may have harmed, a child or adult at risk;
- possibly committed a criminal offence against, or related to, a child or adult at risk;
- behaved towards them in a way that indicates they may pose a risk of harm; or
- behaved, at church or in their personal life, in a way that raises questions about their suitability.

10.1 Procedure

1. The concern is reported immediately to the Safeguarding Lead. If the allegation concerns the Lead, report it to the Deputy or to any Elder.
2. The Safeguarding Lead contacts the local authority Designated Officer for Safeguarding (DOS/LADO) on the same working day, before taking any other action. Where a criminal offence may have occurred, the police are contacted.
3. The person against whom the allegation is made is not spoken to about it, and is not told who raised it, until the DOS advises that this is appropriate.
4. The person is stood down from all roles pending the outcome. This is a neutral precaution and is not a judgment of guilt — it protects those at risk and the person alike.
5. The trustees are informed, and consider whether the matter is a reportable serious incident (section 14).
6. The church cooperates fully with any strategy discussion convened under Section 5 of the Wales Safeguarding Procedures.
7. Pastoral support is offered to the person, from someone not involved in handling the allegation, and separately to the person harmed and their family.
8. At the conclusion, the trustees record the outcome and rationale in writing, and consider the duty to refer to the DBS (section 11).

10.2 Where the allegation concerns an Elder

Because the three Elders are also the three trustees, an allegation against one of them creates a conflict of interest for the whole trustee body. The following applies in addition.

- The Elder concerned takes no part in any discussion or decision relating to the allegation, sees no papers relating to it, and is not told who raised it. Their recusal is recorded in the minutes.
- The Elder concerned steps back from all roles involving children and adults at risk, and from any public teaching or pastoral role, pending the outcome.
- The Safeguarding Lead contacts the Designated Officer for Safeguarding directly, and does not require the agreement of the remaining Elders to do so.
- The remaining Elders take independent advice — from the Designated Officer for Safeguarding or Thirtyone:eight — before deciding anything, and record the advice received.
- The remaining Elders check the quorum required by the governing document. If two trustees are below the quorum, they must not proceed as though a valid decision has been taken.
- The allegation is reported to the Charity Commission as a serious incident. An allegation against a trustee is reportable in its own right.
- Pastoral support for the Elder concerned is arranged from outside the eldership.

An allegation against an Elder is never handled inside the eldership. The Elders investigate nothing, decide nothing about whether the allegation is true, and reach no private agreement about how to proceed. Their only tasks are to report promptly, remove risk, cooperate fully, and record everything.

11. Duty to refer to the DBS

Under the Safeguarding Vulnerable Groups Act 2006 the church **must** refer a person to the Disclosure and Barring Service where both of the following apply:

1. We have removed the person from a role in regulated activity, or they resigned, retired or stepped down before we could do so; and
2. We believe they have engaged in relevant conduct, satisfied the harm test, or received a caution or conviction for a relevant offence.

This duty overrides any obligation of confidentiality, and it applies even where the person resigns first, where the police take no further action, and where the individual is a long-standing member of the church. Failing to make a required referral is a breach of the law and leaves other organisations unprotected.

The Safeguarding Lead makes the referral and informs the trustees. Where the duty is not triggered but concerns about suitability remain, the trustees may still refer, and will consider doing so.

PART D

Safe practice

12. Working with children and young people

12.1 Health and safety

- Maintain a clean, safe environment. Be aware of potential hazards and communicate any concerns.
- Know the location of first aid boxes and the names of the appointed first-aiders present.
- Know the location of fire extinguishers and exits, and the emergency evacuation procedure.
- Complete the accident book as soon as possible after any incident.
- Adults must not smoke, consume alcohol or use any other substances while involved in this work.
- A register of children attending is kept for each session, with a logbook of leaders present and any significant events.
- Emergency contact details and any medical or dietary needs are held for every child and are accessible to the leader in charge.

12.2 Supervision ratios

These are the standard Hill City Church has adopted — our working minimum, not a statutory requirement for activities of our type. Our sessions are currently exempt from registration with Care Inspectorate Wales because none exceeds two hours; a revised Order takes effect in April 2027 removing that exemption where children under three are present unless a parent stays throughout, and the trustees will review our provision against it.

Age of children	Minimum leaders
0–2 years	1 leader for every 3 children (1:3)
2–3 years	1 leader for every 4 children (1:4)
3–8 years	1 leader for every 8 children (1:8)
9 years and over	1 leader for the first 8 children, then 1:12

- **Activities must always have at least two adults present who are not related to each other and are not in a relationship with each other.** A married couple, or two members of the same family, count as one adult for this purpose — two people who go home together do not provide independent accountability. Where a couple serve on the same team, a third unrelated adult is needed.
- There is no requirement for a male and a female leader, and no law requires it. Two female leaders, or two male leaders, is entirely acceptable provided they are unrelated. Where an activity involves intimate care, toileting or changing, consider whether a leader of a particular sex is needed for that task.
- Avoid being alone with a child. Where one-to-one contact is unavoidable, keep doors open, remain visible, and tell another leader where you are.
- Parents and others helping occasionally are supervised by a recruited leader at all times.

12.3 Relationships and managing behaviour

- Treat and respect all children as individuals. Listen to them.
- Work on each child's positives and always seek to encourage them.

- Do not be over-friendly with some at the expense of others, and do not make favourites. Be particularly careful around children of the opposite sex, and seek guidance from the Safeguarding Lead if you think a child has developed a "crush" on you.
- Be careful not to overlook quieter, well-behaved children.
- Physical punishment must never be used.
- Appropriate means of discipline are agreed between leaders of each group, taking into account the age of the child and the need to respect their dignity.
- Have clear rules and be consistent as a team. Reject the behaviour, not the child.
- Do not use inappropriate language. Threatening, abusive or suggestive expressions are unacceptable, and sarcasm should be avoided. Children must never be subjected to derisory comments, particularly in relation to gender, race, religion or disability.
- Do not shout in anger or put a child down. Speak to the child aside from the group.
- If you feel you are losing control or are unable to cope, walk away and seek help.

12.4 Physical contact

- Avoid unnecessary handling. Restraint may be used only where there is immediate danger of injury, and must be reported to the Safeguarding Lead the same day and recorded.
- Avoid any physical activity which is, or could be construed as, sexually stimulating.
- Minimise bodily contact and avoid invading anyone's personal space.
- Some contact can be healthy and affirming, but is appropriate only in public — never alone — and should be minimal.
- Children are entitled to determine the degree of physical contact they have with others, except where that would go beyond what is acceptable or in exceptional circumstances such as medical attention.

12.5 Transport, outings and residentials

- Seatbelts must be worn, and vehicles must not exceed the permitted number of passengers. Drivers must hold appropriate insurance and observe all driving laws, including the prohibition on mobile phone use.
- Written parental consent, emergency contacts and medical information must be obtained in advance.
- A leader should not transport a single child alone. Where unavoidable, the child sits in the back, another leader is told before and after, and the journey is logged.
- A risk assessment is completed for every outing and residential and kept on file.
- Males and females sleep separately. Where possible, adults have a separate room or tent; where adults must share with young people, there must always be more than one leader per room or tent.
- Leaders do not enter sleeping accommodation alone.
- Overnight activity is regulated activity — all leaders must hold an enhanced DBS check with barred list.

12.6 Electronic communication and online safety

Contact through mobile devices and social media can be a positive and even necessary means of engaging with young people. Because it is easily misunderstood and can be used to isolate a child, the following apply without exception.

- Contact is only ever carried out with the explicit consent of a parent or guardian.
- Use a group setting (for example a WhatsApp group) or a designated church account — never a leader's personal account where this can be avoided.
- Where individual contact is unavoidable, another leader is copied in or told, and the contact is logged.

- Communicate at reasonable hours, and never in a manner or on a platform the young person's parents are unaware of.
- Consider the equivalent conversation face to face. If you would not say it in a room with another leader present, do not write it.
- Any request from a young person for secret or private contact is reported to the Safeguarding Lead.

12.7 Photography and images

- Written parental consent is obtained before any photograph or video is taken or used, recorded and reviewed annually.
- Images are taken on church devices wherever possible, not personal phones, and are not stored on personal devices.
- Names are not published alongside images.
- No images are taken in changing areas, sleeping accommodation or swimming settings.
- Consent may be withdrawn at any time, and we will act on that promptly.

13. Working with adults at risk

13.1 General

- Treat everyone with respect, setting a positive example for others.
- Respect personal space and privacy.
- Ensure your actions cannot be misrepresented by someone else.
- Challenge unacceptable behaviour.
- Do not put anyone, including yourself, in a vulnerable or compromising situation.
- Do not have inappropriate physical or verbal contact with others.
- Do not be left alone with an adult at risk completely unobserved.

Adults at risk have the right to make their own decisions, including unwise ones. Safeguarding adults is about supporting people to stay safe on their own terms wherever possible — not about taking over.

13.2 Home visits

- Carry out a prior risk assessment, considering the risk both to yourself and to the person.
- Visit only with the prior consent of the person.
- Ideally take a colleague; at the very least tell someone where you are going and when you expect to return, and confirm when you have left.
- Agree in advance what the visit is for and how long it will last.
- Do not visit alone where there is any known risk, or where the person has previously raised a concern about a visitor.
- Record the visit — date, time, who was present, and anything of concern.

13.3 Money, gifts and property

Financial abuse is among the most common forms of harm to adults at risk, and church volunteers are unusually well placed to commit it. These rules protect volunteers as much as the people they serve.

- Do not handle an adult at risk's money, bank card or PIN. If shopping is needed, agree the arrangement with the Safeguarding Lead in advance and keep every receipt.

- Do not accept gifts, loans or bequests beyond a token of nominal value. Report any offer to the Safeguarding Lead.
- Do not act as a witness to, or become a beneficiary of, an adult at risk's will.
- Do not take on a power of attorney, deputyship or appointeeship for anyone you know through the church, unless the arrangement has been declared in advance and approved under the conditions in section 13.3a.
- Do not offer personal loans, and do not borrow money.
- Where debt help is provided, follow the agreed process and keep it within the church's advice service, not private arrangements.

13.3a Power of attorney, deputyship and appointeeship

Acting under a power of attorney is regulated activity with adults, and anyone doing so for a person they know through the church needs an enhanced DBS check with the adults' barred list. Where the attorney is also a trustee, a conflict of interest arises under clause 4(7) of the church's constitution, and that conflict is sharper still where the person may leave anything to the church.

The church's normal position is that employees, volunteers, Elders and trustees do not take on these roles for people they know through the church, and will help the person find an alternative — a solicitor, a family member, or someone with no role in church leadership. A professional attorney is a normal and unremarkable arrangement, and the Office of the Public Guardian publishes guidance on choosing one.

Where no alternative can be found and the person would otherwise be left without an attorney, the trustees may approve an exception, but only where all of the following are satisfied and recorded:

- The proposed attorney has declared the arrangement in writing to the Safeguarding Lead before it is made, and it is entered on the church's register of interests.
- The person granting the power has taken independent legal advice from a solicitor with no connection to the church, and that solicitor has prepared the instrument.
- No trustee acts as attorney for anyone who has left, or may leave, a gift to the church in their will, or who may donate to the church. This is not negotiable, and applies however unlikely a challenge is thought to be.
- The attorney holds an enhanced DBS check with the adults' barred list.
- The attorney is not the same person as the Safeguarding Lead or Deputy.
- The Safeguarding Lead has been consulted and their view recorded, and the trustees have approved the arrangement in a minuted decision from which any conflicted trustee has recused themselves under clause 4(7).
- The arrangement is reviewed annually, and financial decisions taken under it are open to scrutiny by the trustees at any time.

13.4 Pastoral care and counselling

- Meet in a place visible to others, or ensure someone knows the meeting is taking place and when it will finish.
- Be clear about the limits of your role. We are not a therapeutic service, and we signpost to specialist support where needed.
- Do not offer confidentiality you cannot keep. Say at the outset that safeguarding information will be shared.
- Keep brief, factual records where there is any safeguarding dimension.
- Be alert to dependency developing, and raise it with the Safeguarding Lead rather than managing it alone.

PART E

Governance and records

14. Reporting serious incidents to the Charity Commission

The trustees have a legal duty to take reasonable steps to protect from harm everyone who comes into contact with the church, and to report serious incidents promptly. The following are reported, in addition to any referral to social services, the police or the DBS:

- A child or adult at risk has been, or is alleged to have been, abused or mistreated while in the care of the church, or by someone connected with the church.
- A person who comes into contact with the church through its work has been abused or mistreated in connection with the church's activities — for example during a home visit, foodbank delivery or debt-help appointment.
- A significant breach of this policy that has put people at risk, including a failure to carry out proper vetting checks.
- A significant data breach involving safeguarding information.

Reports are made by the trustees as soon as reasonably possible, saying what happened and how it is being managed. Where income exceeds £25,000, the trustees confirm in the annual return that all reportable incidents have been declared. Reporting does not breach data protection law; failing to report an incident that later comes to light may be treated as mismanagement.

15. Records, information sharing and data protection

- Every concern, disclosure, referral and decision is recorded in writing on the church's concern form, in the person's own words where relevant, with date, time, place and those present.
- Records distinguish clearly between fact, observation, and opinion.
- Decisions not to refer are recorded, with reasons and who was consulted. This is as important as recording a referral.
- Records are held securely by the Safeguarding Lead, in a locked cabinet or password-protected file accessible only to the Lead and the Deputy. Trustees are given the information they need to discharge their duties, but do not hold routine access to case files.
- Information is shared strictly on a need-to-know basis.
- Records relating to children are retained for a minimum of 25 years from the child's 18th birthday. Records relating to adults at risk are retained for a minimum of seven years from the last entry. Records are never destroyed while any inquiry, review or claim is in prospect.
- The church processes this information under the substantial public interest condition for safeguarding in the Data Protection Act 2018, and maintains the appropriate policy document that condition requires.

Data protection is never a reason not to share information needed to protect someone. The law expressly permits sharing to prevent abuse or serious harm. Failing to share promptly is a far more common cause of harm than sharing too widely.

16. Speaking up and challenging poor practice

Team members take responsibility for monitoring one another's practice, and should feel free to challenge a colleague constructively. Challenge is a sign of a healthy team, not disloyalty.

- Any behaviour felt to be inappropriate or abusive must be reported to the activity leader or the Safeguarding Lead.
- Where a leader has had to depart from these guidelines, they report this to their activity leader, who logs it.
- Nobody who raises a concern in good faith will be penalised, excluded, or subject to any detriment, even if the concern turns out to be mistaken.

16.1 If you believe a concern has not been acted on

You must escalate it. In order:

1. The Deputy Safeguarding Lead.
2. The Elders, as trustees.
3. Social services or the police directly. You may always contact them yourself, and you do not need anyone's permission to do so.
4. The Charity Commission, using its process for reporting serious wrongdoing at a charity as a worker or volunteer.

17. Caring for those affected

We are committed to caring well for those affected by abuse, and we recognise it is important that those who have experienced abuse:

- are accepted for who they are, without being made to forgive, and without being put in a position of feeling guilty or responsible for what happened to them;
- know that God loves them unconditionally, and that nothing can or will change this truth;
- can be confident that those in the church community who know about the abuse are with them on their journey, however long or difficult it may be.

It may be necessary to signpost individuals to specialist support; we do not provide therapeutic services ourselves. Anyone who has received a disclosure will also be offered support — hearing about abuse takes a real toll, and looking after yourself is part of doing this well.

18. Those who may pose a risk

We want to be welcoming to everyone who wishes to be part of our community, while recognising the risk that contact between those at particular risk of abuse and those who may have caused harm presents.

Where the church becomes aware that someone attending has convictions, cautions or allegations relating to harm, or otherwise may pose a risk:

- The information goes first to the Safeguarding Lead, and to nobody else. It is not repeated, and is not acted on as fact until it has been checked.
- The Safeguarding Lead verifies the information with the police, probation or social services, and assesses whether the person presents a risk in the context of our activities. Many cases will end here, with no further action and no wider disclosure. A conviction alone does not mean a risk to anyone in this church.
- Where the Lead judges that no agreement is needed, that decision and the reasons for it are recorded, and the matter goes no further.

- Where an agreement is needed, a written safeguarding agreement is drawn up setting out which activities the person may attend, which they may not, where they may go on the premises, and who will accompany them. At this point the trustees are told that an agreement exists and why, but are not routinely given the underlying detail.
- A small number of named people supervise the arrangement and are given only the information they need in order to make it work. The Lead records who was told what, and when.
- The agreement is reviewed at least every six months, and any breach is reported immediately to the Safeguarding Lead and the relevant statutory agency.
- The person holds no role with children or adults at risk, and is not given a position of trust or public profile.

Handling information that arrives informally. Information about a person's past often reaches a church informally, through rumour, an internet search, or someone who has recognised a name. Whatever the source, it goes to the Safeguarding Lead and to nobody else. It is not discussed, forwarded or repeated, and it is not treated as fact until it has been checked with the police or probation. Repeating unverified information about a person may cause serious harm to them and may expose the church to legal action.

This is not a rule about everyone with a conviction. This section applies where someone may present a risk to children or adults at risk in the context of our activities. It is not a requirement to establish, record or disclose the criminal history of everyone who comes through our doors. We do not ask people about their convictions as a condition of attending church, the foodbank or any other activity, and we do not go looking. Criminal conviction information carries specific protection under data protection law and is held and shared only where there is a genuine safeguarding reason.

19. Training

Who	What	How often
Safeguarding Lead and Deputy	Designated lead level training (Level 3 or equivalent) covering children and adults at risk, including Wales-specific procedures	Every 3 years
All three Elders, as trustees	Trustee safeguarding responsibilities, including serious incident reporting and the collective nature of the duty	Every 3 years
Children's and youth workers	Safeguarding awareness (Level 2 or equivalent)	Every 3 years
Pastoral visitors, foodbank, debt-help and counselling volunteers	Safeguarding adults awareness, including financial abuse and coercive control	Every 3 years
All volunteers and occasional helpers	Church safeguarding briefing: signs, what to do, who to tell	Annually
New volunteers	Policy, Code of Conduct and briefing before starting	Before starting

Training records are maintained by the Safeguarding Administrator. Free and low-cost training is available through the regional safeguarding board, Welsh Government e-learning linked from the Code of Safeguarding Practice, and Thirtyone:eight.

20. Approval and review

Item	Detail
Supersedes	Child Protection Policy (compiled 2002) and Vulnerable Adult Safeguarding Policy (compiled 2018), which are merged into this single document
This version	2026.3
Approved by the trustees on	16/10/2026
Signed on behalf of the trustees	James Richards - Elder
Next review due	16/10/2027

This policy is reviewed annually by the trustees, and immediately following any significant incident or any change in the law or in Welsh Government guidance. Every worker re-commits to it annually.

Compiled with the use and help of the existing policies of Glenwood Church, Cardiff Christian Holidays, Thirtyone:eight (formerly CCPAS), GSUS Live and Highfields Free Church, and revised against the Welsh Government Code of Safeguarding Practice and the Wales Safeguarding Procedures.

**THE SAFETY AND WELL-BEING OF CHILDREN, YOUNG PEOPLE
AND ADULTS AT RISK IS A CORE VALUE OF HILL CITY CHURCH**

Appendix — Safeguarding concern record

Complete this form as soon as possible after a concern, disclosure or incident, and give it to the Safeguarding Lead the same day. Record what was said and seen, not what you think it means. Continue on a further sheet if needed.

Your name and role	
Date and time of this record	
Name of the person concerned	
Child (age / DOB) or adult at risk (why)	
Date, time and place of the incident or disclosure	
Who else was present	
What was said or seen — use their own words in quotation marks where you can	
Any injury or physical sign observed (describe; do not photograph)	
What you said or did in response	
For an adult at risk: do they know you are reporting this, and what are their wishes?	
Your opinion or interpretation, clearly marked as such	
Passed to (name) and when	
Your signature	

For completion by the Safeguarding Lead

Date and time received	
Advice sought from (who, when, what was advised)	
Action taken	

Referred to social services / police / DOS? Date and reference	
If consent was not given, reasons for overriding or respecting it	
If not referred, the reasons for that decision	
Trustees informed? Serious incident report needed?	
DBS referral considered?	
Signature and date	