

CATHOLIC SYRO-MALABAR EPARCHY OF GREAT BRITAIN

Safeguarding Policy

Updated 2019

*Safeguarding of children, young people and
vulnerable adults within the church*

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Forward

“See that you do not despise one of these little ones. For I tell you that their angels in heaven always see the face of my Father in heaven” (Mt 18:10)

Care for the little ones, a concern that encompasses a wide variety of sympathetic attitudes is at the heart of the Gospel message. It is enshrined in the very mission proclamation of Jesus at the beginning of his public ministry (Lk 4:18-19). The Church that is called to continue the mission of Jesus today, understands that upholding the inalienable dignity of every human person, is an important task of her ministry. The Church, as she lives out her call and mission, takes into consideration the positive developments in the ethical and legal disciplines towards providing a just, caring, and responsible environment for all. Catholic Syro-Malabar Eparchy of Great Britain is committed to ensure that all, especially the children and the vulnerable adults feel safe in our communities. The Eparchial Safeguarding Commission is established to coordinate and promote our safeguarding practices in accordance with the policy and directives of the National Catholic Safeguarding Commission (NCSC). The commission, made up of experts from different fields related to safeguarding as well as representatives from our ministries will liaise with the National Safeguarding Advisory Service (NSAS) and will update us on the developments in this field.

The commission will also take initiatives to establish safeguarding teams at local (Parish/Mission/ Holy Qurbana Centre) and regional levels. They are to develop the safeguarding policy for the Eparchy, based on the policy of the National Catholic Safeguarding Commission (NCSC). The following would be the members of the Commission.

Yours in our Lord and our God,

Mar Joseph Srampickal

Bishop, Syro Malabar Eparchy of Great Britain

What is safeguarding?

Safeguarding applies to both adults and children.

Children's safeguarding is shaped by the Children Act 1989, but the key statutory guidance for faith groups is '*Working together to safeguard children*'

Safeguarding and promoting the welfare of children is defined as:

- *Protecting children from maltreatment;*
- *Preventing impairment of children's health or development;*
- *Ensuring that children grow up in circumstances consistent with the provision of safe and effective care;*
- *Taking action to enable all children to have the best outcomes*

The Care Act 2014 provides the legal basis for adult safeguarding. Under it, adults with care and support needs at risk of or experiencing abuse and unable to prevent it themselves must be supported.

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

There are many different types of abuse which the Church have a huge potential to identify and prevent. These include:

Abuse

A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children.

Physical abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child.

Physical harm may also be caused when a parent fabricates the symptoms of, or deliberately induces illness in a child.

Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent effects on the child's emotional development, and may involve:

- Conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person;
- Imposing age or developmentally inappropriate expectations on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction;
- Seeing or hearing the ill-treatment of another e.g. where there is domestic abuse;
- Serious bullying, causing children frequently to feel frightened or in danger;
- Exploiting and corrupting children.

Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Sexual abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (e.g. rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.

Sexual abuse includes non-contact activities, such as involving children in looking at, including online and with mobile phones, or in the production of pornographic materials, watching sexual activities or encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

In addition; Sexual abuse includes abuse of children through sexual exploitation. Penetrative sex where one of the partners is under the age of 16 is illegal, although prosecution of similar age, consenting partners is not usual. However, where a child is under the age of 13 it is classified as rape under s5 Sexual Offences Act 2003.

Neglect

Neglect is the persistent failure to meet a child's basic physical and / or psychological needs, likely to result in the serious impairment of the child's health or development.

Neglect may occur during pregnancy as a result of maternal substance misuse, maternal mental ill health or learning difficulties or a cluster of such issues. Where there is domestic abuse and violence towards a carer, the needs of the child may be neglected.

Once a child is born, neglect may involve a parent failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- Protect a child from physical and emotional harm or danger;
- Ensure adequate supervision (including the use of inadequate care-givers);
- Ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional, social and educational needs.

Included in the four categories of child abuse and neglect above, are a number of factors relating to the behaviour of the parents and carers which have significant impact on children such as domestic abuse. Research analysing Serious Case Reviews has demonstrated a significant prevalence of domestic abuse in the history of families with children who are subject of Child Protection Plans. Children can be affected by seeing, hearing and living with domestic abuse as well as being caught up in any incidents directly, whether to protect someone or as a target. It should also be noted that the age group of 16 and 17 year olds have been found in recent studies to be increasingly affected by domestic abuse in their peer relationships.

Domestic Abuse

The Home Office definition of Domestic violence and abuse was updated in May 2018 as: "Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:

- Psychological;
- Physical;

- Sexual;
- Financial;
- Emotional."

Controlling behaviour is: a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.

Coercive behaviour is: an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim."

In addition Working Together to Safeguard Children has introduced the concept of Contextual Safeguarding which recognises that as well as threats to the welfare of children from within their families, children may be vulnerable to abuse or exploitation from outside their families. These extra-familial threats might arise at school and other educational establishments, from within peer groups, or more widely from within the wider community and/or online. These threats can take a variety of different forms and children can be vulnerable to multiple threats, including: exploitation by criminal gangs and organised crime groups such as county lines; trafficking, online abuse; sexual exploitation and the influences of extremism leading to radicalisation.

Safeguarding in Church and Faith Organisations

Working together to safeguard children 2018 makes the following reference to the roles and responsibility of the Church in safeguarding

Voluntary, charity, social enterprise (VCSE) and private sector organisations and agencies play an important role in safeguarding children through the services they deliver. Some of these will work with particular communities, with different races and faith communities and delivering in health, adult social care, housing, prisons and probation services. They may as part of their work provide a wide range of activities for children and have an important role in safeguarding children and supporting families and communities.

Like other organisations and agencies who work with children, they should have appropriate arrangements in place to safeguard and protect children from harm. Many of these organisations and agencies as well as many schools, children's centres, early years and childcare organisations, will be subject to charity law and regulated either by the Charity Commission or other "principal" regulators. Charity trustees are responsible for ensuring that those benefiting from, or working with, their charity, are not harmed in any way through contact with it. The Charity Commission for England and Wales provides guidance on charity compliance which should be followed. Further information on the Charity Commission's role in safeguarding can be found on: the Charity Commission's page on Gov.uk.

Some of these organisations and agencies are large national charities whilst others will have a much smaller local reach. Some will be delivering statutory services and may be run by volunteers, such as library services. This important group of organisations includes youth services not delivered by local authorities or district councils.

All practitioners working in these organisations and agencies who are working with children and their families are subject to the same safeguarding responsibilities, whether paid or a volunteer.

The DTC agencies are listed in section 325(6) of the CJA 2003. They are required to co-operate as far as they can do so, consistent with the exercise of their other statutory functions.

Every VCSE, faith-based organisation and private sector organisation or agency should have policies in place to safeguard and protect children from harm. These should be followed and systems should be in place to ensure compliance in this. Individual practitioners, whether paid or volunteer, should be aware of their responsibilities for safeguarding and protecting children from harm, how they should respond to child protection concerns and how to make a referral to local authority children's social care or the police if necessary.

Every VCSE, faith-based organisation and private sector organisation or agency should have in place the arrangements described in this chapter. They should be

aware of how they need to work with the safeguarding partners in a local area. Charities (within the meaning of section 1 Charities Act 2011), religious organisations (regulation 34 and schedule 3 to School Admissions) and any person involved in the provision, supervision or oversight of sport or leisure are included within the relevant agency regulations. This means if the safeguarding partners name them as a relevant partner they must cooperate. Other VCSE, faith-based and private sector organisations not on the list of relevant agencies can also be asked to cooperate as part of the local arrangements and should do so.

National Safeguarding Structure

The Catholic Church in England & Wales has established new structures to take forward the work of safeguarding children and vulnerable adults following the recommendations of the Cumberlege Commission Report “Safeguarding with Confidence.”

The National Catholic Safeguarding Commission (NCSC)

The NCSC is responsible for setting the strategic direction of the Church’s safeguarding policy and monitoring compliance. Mandated by the Conference of Bishops and Conference of Religious, it will ensure that standards are met and policies are implemented.

The NCSC comprises an Independent lay chair, a Bishop and a member of CoR as vice chairs, representation from the Conference of Bishops, Conference of Religious and Chairs of Commissions, a Parish Priest/Canon Lawyer as well as 4 lay members, recruited for relevant expertise in the field of safeguarding and the criminal justice system.

The Catholic Safeguarding Advisory Service (CSAS)

The CSAS reports to and provides expert advice to the NCSC on safeguarding matters. It oversees and co-ordinates safeguarding training, ensuring that the Church’s policies on safeguarding are kept up to date with good practice and are accessible to people at all levels in the Church. The CSAS is responsible for driving and supporting improvements in safeguarding practice.

The CSAS is the point of liaison with other national stakeholders – both safeguarding units in other Churches and secular organisations concerned with safeguarding children and vulnerable adults, including government.

The CSAS is the registered body for CRB and Vetting & Barring.

The CSAS is located within the Department of Christian Responsibility and Citizenship, one of the Departments of the Bishops Conference. An appointed member of CoR is a member of the Department to ensure they can play a full role in delivering a one Church approach.

Being located within this Department provides peer support for the Director of CSAS, encourages cross fertilisation of ideas and work to ensure safeguarding is part of the mainstream activity within the Church.

The CSAS reports and is accountable to the Bishops Conference and Conference of Religious through the NCSC.

Local Safeguarding Structure

Including the roles and responsibilities

Bishop

As the successor of the Apostles the Bishop has overall pastoral responsibility for his Eparchy and all the faithful within it. Through the Trustees he delegates the implementation of national safeguarding policies to the Safeguarding Commission which does this in his name. He seeks the advice of the Commission on all safeguarding issues in particular when allegations have been made against a person who exercises a ministry within the church.

Commission

The Safeguarding Commission for Syro Malabar Eparchy of Great Britain was formed in November 2018 and has been a driving force to implement the national policies and procedures.

Appointed by the Eparchial Bishop and acting on his and the diocesan trustees' behalf the Commission has advisory and supportive functions. The Commission receives all national policies and through the Co-ordinator/s and Safeguarding representatives implements/updates them across the Eparchy in a timely fashion.

The Commission also acts upon new reports of allegations/concerns of abuse of children, young people and vulnerable adults that have occurred within a Church environment and works with the statutory agencies accordingly. Existing cases are reviewed regularly. The Commission also regularly updates the bishop on all safeguarding matters and advises him accordingly. This is often delegated to the Co-ordinator/s. The Chair of the Commission also meets with the Bishop on a regular basis. Annual reports are made to the Trustees and Catholic Safeguarding Advisory Services.

Safeguarding Coordinator/s

The Coordinator/s is appointed by the Eparchy Bishop on the advice of the Commission.

Due to the geographical spread of the Eparchy there is a lead coordinator and regional coordinators to assist the lead co-ordinator.

The Coordinator/s develops and launches the policies across the diocese bringing the Commission up to date at the same time. On behalf of the Commission the Coordinator/s ensures that the Bishop is kept up to date with all safeguarding matters. It is the remit of the Coordinator to organize the Commission meetings.

The Coordinator/s is not a member of the Commission

Parish/Mission Safeguarding Representative/s

The Syro Malabar Eparchy of Great Britain is divided into 7 different regions and functions in as a 'Mission' locally which is equal to parishes in traditional catholic dioceses. There will be Mission Safeguarding Rep/s in each Mission to implement the safeguarding policy and procedures. The Rep is the link between the Mission and the Eparchy and as such is in regular contact with the Regional Coordinator.

The Rep has a sound knowledge of the policies and procedures and also who to contact if there is a significant incident. The Rep is involved in the recruitment of people to roles within the Mission and has the responsibility for facilitating the DBS procedure at Mission level.

Structure Chart



Procedures to respond to and report concerns and allegations

All concerns must be brought to the Safeguarding Representative, who in turn will contact the regional or Lead/Regional Safeguarding Coordinator. Never delay taking action. If you are unable to contact the Safeguarding Representative and/or Coordinator you can contact the Catholic Safeguarding Advisory Service (CSAS) if you require advice.

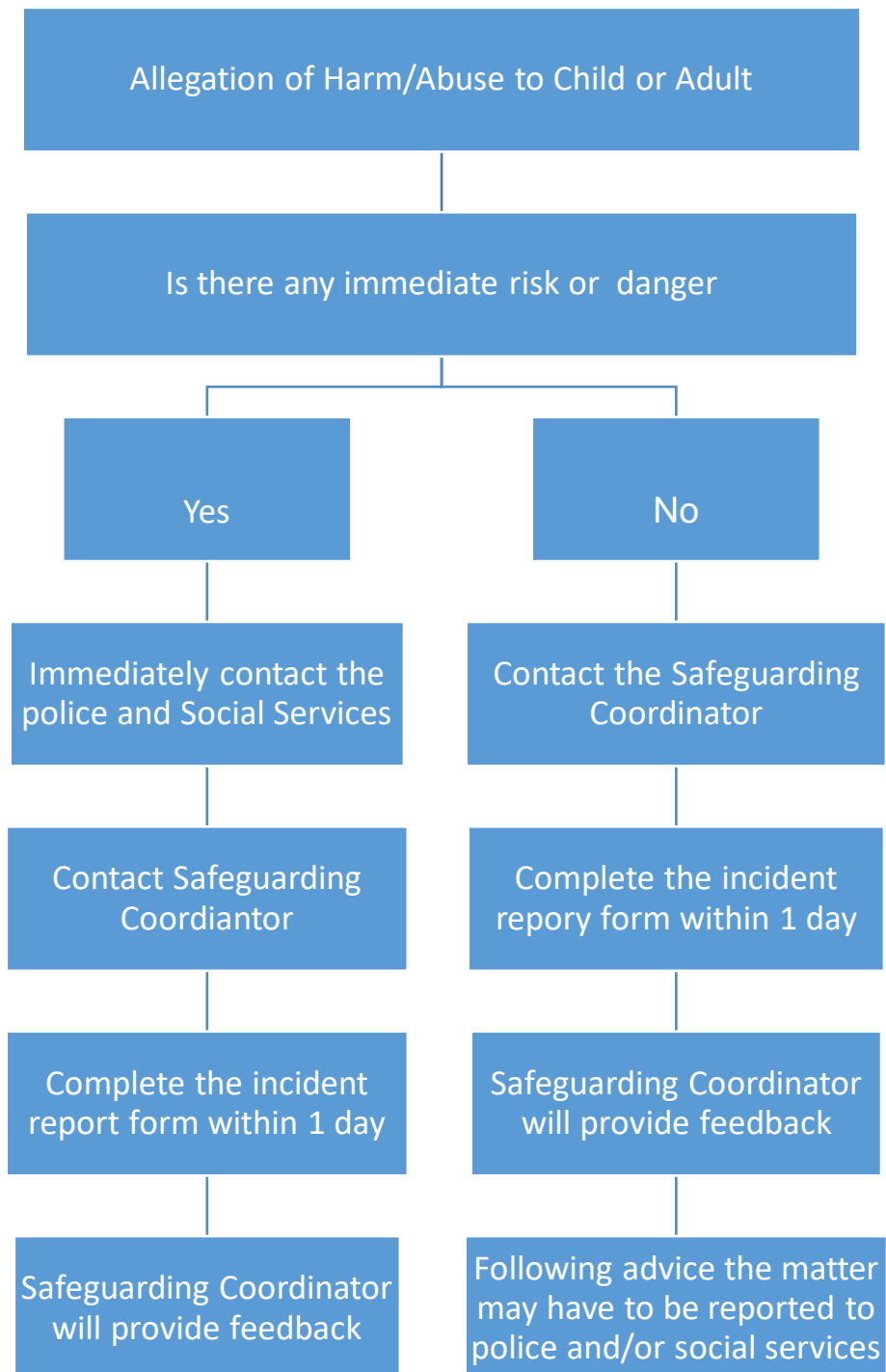
Is there any immediate risk or danger? – Yes

- Immediately contact the Police, Social Services or Local Authority Designated Officer
- Contact the Safeguarding Co-ordinator
- Take notes and pass on within 1 day (Form in policy)
- A record will be kept
- Safeguarding Co-ordinator will provide feedback
-

Is there any immediate risk or danger? – No

- Contact the Safeguarding Co-ordinator
- If the Safeguarding Coordinator is not available contact the Police, Social Services or Local Authority Designated Officer
- Take notes and pass on within 1 day (Form in policy)
- A record will be kept
- Allegations of past abuse should be reported to the police, even if the alleged perpetrator is no longer alive or not perceived to be a current risk to children / adults at risk
- Safeguarding Co-ordinator will provide feedback

Procedure Chart



Safer recruitment procedures

As part of its commitment to ensuring that children, young people and adults are kept safe from harm, the Catholic Church in England and Wales will apply robust selection and appointment processes to anybody who is applying to work or minister within the Church in a role which gives them direct access to children or adults.

Reliance on a practice of untested trust is insufficient and we aim to adhere to the highest standards of practice and public accountability, while continuing to foster a spirit of trust and openness that reflects the values of the Church.

Recruitment, selection and appointment procedure for clergy, religious, employees and volunteers

Pre-recruitment preparation

The case for the new appointment, the position of the appointment within existing structures and where appropriate, provision of supervision and management of the role should be clarified.

The Safeguarding Coordinator should be consulted about recruitment to the post to determine whether an Enhanced DBS Disclosure/Barred list check will be required, and to ensure that other safeguarding considerations are taken into account at an early stage.

Job/role description and person specification

A job or role description¹ and person specification for the role must be developed and formal and detailed job descriptions drawn up for paid appointments by the employing body.

The job or role description should include:

- A detailed description of the work that reflects the specific nature of the role and the specific aspect of the role that justifies the requirement for a DBS Disclosure (where appropriate);
- A list of responsibilities, including the responsibility to become familiar with the National Safeguarding Policies and Procedures;
- The duty to promote safe practice, minimise all risks of abuse and take action to report concerns and/or allegations.

Application or 'personal details form'

An application or personal details form must be completed by all those seeking to work with children and adults at risk. The standard mandatory form for volunteers and sample application forms and reference requests are contained within this procedure. However, to ensure that application forms are compliant with employment law and

other relevant legislation, advice should be sought from diocesan or congregational HR departments.

The application or personal details form should also:

- State whether or not the role will require a DBS Disclosure and if so, when sending out the application form, include the Policy Statement on the Recruitment of Ex-Offenders which is located in the national safeguarding procedures manual or signpost the applicant to it;
- Request the names and contact details of a minimum of two referees (including the current employer for paid positions) and ask whether references can be taken up before interview. Permission must be sought from referees in advance of providing their contact information for the purpose of providing a reference;
- State that identity will be verified and whether this is to be done at interview, following an offer of appointment or, for eligible roles, as part of the DBS application process;
- State that where required for certain positions, there will be a requirement to disclose and discuss relevant convictions at interview or another agreed time after interview. The applicant should not be required to disclose relevant convictions in advance of being offered an interview or formal discussion to assess their suitability for the role;
- State that the National Database will be checked in respect of all applicants before any offer of appointment is confirmed.

[Advertising or making the vacancy or position known](#)

Advertise the post or make the position known, noting where required for certain roles, the requirement for a DBS check

If someone comes forward independently and offers unsolicited services, the requirement for the following safeguarding checks must be made known as soon as possible

- Verification of Identity – (see also DBS Information Sheet – Identity Verification);
- Safeguarding Self Declaration (SSD) where the role is eligible – see also Policy Statement on Recruitment of Ex-Offenders;
- DBS Disclosure, where the role is eligible;
- Uptake of satisfactory references;
- Eligibility to Work in UK
- Required health checks.

[Shortlist and interview or formal discussion regarding role and suitability](#)

Select suitable applicants for interview or discussion and for those short-listed, send a safeguarding self-declaration form for completion and advise that the completed form should be brought to interview.

For paid posts, a formal interview must be conducted and for unpaid posts, the prospective volunteer must participate in a formal discussion.

Both formal interviews and formal discussions should be used to assess the candidate's suitability including experience and skills for the role as well as motivation and attitude

The interview or formal discussion should also be used to inform the applicant about the requirements of the role, expectations, time-commitment, training and support provisions.

For paid positions, the completed Safeguarding Self-Disclosure (SSD) form should be discussed at the end of the formal interview process or at another agreed time after the interview. This process ensures that the applicant has the opportunity to provide context and explanation in respect of any relevant convictions.

The discussion about relevant convictions is to be fully documented on the Safeguarding Self-disclosure form (SSD) which is used by the applicant to disclose relevant offences.

For volunteers, relevant convictions do not need to be disclosed in advance or during the formal discussion about the role. The completed Safeguarding Self-Disclosure (SSD) is to be sent to the safeguarding office for processing with the DBS application. Relevant convictions will be discussed with the volunteer applicant before a decision about appointment is made.

If identity verification is to take place at interview, applicants should be asked to bring original documentary evidence of identity to the interview in addition to completing the Catholic Church Identity Verification Form. Alternatively, arrangements can be made to verify identity after an offer of appointment is made.

[Employment checks](#)

For all posts, references from relatives or the current Parish Priest or Deacon are not acceptable. All references should be sought directly from the referee; generic references or those addressed "To whom it may concern" are not acceptable. Those appointing (e.g. Parish Priest, Diocesan/Congregational HR or Care Home Manager) are responsible for satisfying themselves that references are authentic and should follow up with the referee by telephone or face to face discussion where:

- There are negative or ambiguous statements;
- There are gaps in information in the reference and further information is required;
- There is inconsistent information in the reference that you consider requires clarification;
- There are doubts about the authenticity of the reference.

In the event that any safeguarding concerns arise on receipt of a reference, advice can be sought from the Safeguarding Coordinator or CSAS.

DBS Disclosure

For eligible roles, the DBS Disclosure process is only undertaken once a provisional job/role offer has been made.

When an existing office holder, employee or volunteer transfers into a position eligible for a DBS Disclosure, or a position that requires a different level of check, they will then be asked to undertake the Disclosure application process.

If the individual indicates they have an existing DBS Disclosure Certificate and have subscribed to the Online Update Service, any check made must be in accordance with the requirements of the DBS – see Information Sheet – Online update service in the procedures manual.

The CSAS National Database will be checked before any new application is made to the DBS to determine whether an existing suitable check has already been made and whether relevant risk information is available.

If the individual needs a new DBS Disclosure the counter-signatory in the diocesan safeguarding office or the safeguarding representative can advise on eligibility and the level of check required. The Safeguarding Coordinator or Safeguarding Representative will initiate the application process, dependent upon role of appointee. The application process will include ID verification and self-disclosure of relevant offences. The details of the application will be added to the National Database

Identity verification Clergy, Religious, lay persons, employees and volunteers are all required to evidence their identity as part of the DBS Disclosure process.

For roles that are not eligible for DBS Disclosure, the appointing person should verify the identity of the applicant in line with the documents accepted by the DBS (see DBS Information Sheet – Identity Verification).

Anyone who is seeking to work with children or adults whether in a paid or unpaid capacity must be provided with the opportunity to self-disclose relevant conviction information. This is a DBS Code of Practice requirement and applies to anyone being asked to have an Enhanced Disclosure.

For Clergy, Religious and volunteers and as part of the DBS application process, the completed Safeguarding Self Declaration (SSD) should be handed to the Safeguarding Representative or relevant person in a sealed envelope for confidentiality purposes and sent to the Safeguarding Office for processing.

The front page of the SSD clearly indicates how any information will be handled and how long the completed form will be retained for. This form also indicates that details of the DBS Disclosure will be retained on the National DBS Database.

Please note that in circumstances where the completed SSD is submitted to the Safeguarding Office in advance of the completed DBS application, the Counter-signatory has the discretion to determine the maximum validity of the completed SSD subject to a minimum period of 3 months

For paid positions, applicants will be required to bring the completed SSD if invited for interview and as part of the process any relevant convictions will be discussed. Applicants should also be informed that the National Database will be checked in respect of all shortlisted applicants.

[Right to work in the UK](#)

The appointing organisation/employer must satisfy itself that the paid or voluntary appointee is legally entitled to work in the UK. Please refer to the “Summary Guide for Employers on Preventing Illegal Working in the UK” available from the UK Visas and Immigration website.

Required Health Checks Refer to your HR department for advice as to whether relevant health checks are required.

[Appointment](#)

Appointments should not be confirmed until a satisfactory DBS Disclosure has been received. Following appointment, the use of Disclosures must not be viewed as the final step in the process and should not replace the need for on-going vigilance, careful supervision and sound management.

Employees and volunteers should sign a document to indicate that they have received and understood the job/role description and agree to adhere to the national safeguarding policies and procedures. This should be retained by the Safeguarding Representative or employer.

Training and support of staff and volunteers

Induction is the process which orientates a Mission Safeguarding Representatives and volunteers to their role and provides them with essential information and support, in the early stages, to enable them to do it well. It is a planned process, within set timescales, which aims to ensure that role holders receive the information and guidance they need to meet their responsibilities. Induction helps the Mission Safeguarding Representative and volunteers to understand the context within which they perform their role, and what is expected of them in relation to their conduct and how they perform their role.

All new Mission Safeguarding Representatives and volunteers will complete an induction programme, as far as possible tailored to the demands of their new role and their individual needs.

The Safeguarding Coordinators are responsible for ensuring that new Mission Safeguarding Representatives complete an induction programme. The training and induction for volunteers would be delivered by the Mission Safeguarding Representatives.

The Mission Safeguarding Representatives will be supervised by the Regional Safeguarding Coordinator.

The safeguarding roles and responsibilities of volunteers will be overseen by the Mission Safeguarding Representatives.

The Training modules set out by CSAS will be followed and where possible will be tailored to local needs for induction, training and supervision of the Mission Safeguarding Representatives and volunteers.

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