

# Safeguarding Policy

May 2023

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## Context and Trustee Commitment

A Passion for Life (APfL) is a registered charity that exists to promote the Christian faith by encouraging and resourcing evangelism by individual Christian believers and local churches. Governance of the charity and final responsibility for safeguarding rests with the Trustees of the charity. Day to day management of the charity is delegated to a Management Group.

APfL produces and distributes resources via digital communication channels, provides some in-person training and coaching for church leaders and may from time to time run larger events to promote evangelism. APfL does not work directly with the general public, children, young people or adults at risk (i.e. those aged 18 years or over and at risk of abuse or neglect because of their needs for care and or support). However, we recognise that we may have dealings with vulnerable people from time to time.

The work of the charity is undertaken by a small team of volunteers and paid staff and the Trustees are committed to safeguarding the welfare of its staff and volunteers in their work with the charity. The Trustees are also committed to protecting from harm church leaders and other individuals in the context of their contact with APfL and/or its staff and volunteers.

## Purpose

The purpose of this policy is to:

- 1) Ensure that we provide a healthy, nurturing, and protective environment for our staff, volunteers, others who work on our behalf, beneficiaries and anyone else who engages with our charity and that they are protected from bullying, harassment, exploitation, and abuse.
- 2) Ensure that if we identify abuse in the course of our ministry, it is handled effectively, promptly, and proportionately.
- 3) Ensure that our Trustees, staff and others who work on our behalf are clear about their safeguarding responsibilities and duties and are supported to fulfil them competently and confidently.
- 4) Promote the development of an open and transparent culture; supporting the raising of concerns and complaints and ensuring that they are handled biblically and in an open, carefully rigorous, transparent, and appropriately accountable manner.

## Applicability

This policy applies to anyone working on our behalf, including our staff, Trustees and volunteers.

## Principles

Our Christian faith underpins our values and beliefs in relation to safeguarding including the following:

- 1) Everyone who engages with our charity has the right to be protected from any form of bullying or harassment, exploitation or abuse and we will seek to ensure that we promote a culture that is open and transparent and that encourages the raising of concerns.
- 2) We all have a responsibility to promote the welfare of all of our beneficiaries, staff and volunteers, to keep them safe and to work in a way that protects them.
- 3) We all have a collective responsibility for contributing to a caring and nurturing environment and creating a culture in which people not only feel safe, but also able to speak up, if they have any concerns.
- 4) We are to honour the authorities that God has set over us and to live as responsible and good citizens in the time and place that God has set us, living as God would have us live, setting a good example to those around us.
- 5) That the Christian faith is advanced through example of life and by loving declaration of the good news of the Lord Jesus. It cannot be advanced by force or through violence, but by the spirit of God who convicts of sin, convinces of the truth, enables genuine faith in Christ and empowers obedience to God.
- 6) The Christian church is not a gathering of sinless and perfect people, but rather a community of grace where we seek to encourage and challenge one another to grow in faith, love, knowledge and obedience to God, reflecting his character, including his heart for both justice and mercy.

## Types of Abuse

Abuse can take many forms, such as physical, psychological or emotional, financial, sexual or institutional abuse. It can involve the abuse of power or authority, including the misuse of Scripture; manipulative coercive and/or controlling behaviours; bullying, intimidation, and harassment.

## Responsibilities

A lead Trustee will be given responsibility for the oversight of all aspects of safeguarding, including:

- 1) Creating a culture of respect, in which everyone feels safe and able to speak up.
- 2) Listening to beneficiaries, staff, volunteers and others, involving them as appropriate.
- 3) Responding to any concerns sensitively and acting quickly to address these.
- 4) Ensuring that any complaints against the charity or allegations against its staff or volunteers are properly investigated and dealt with quickly, fairly and sensitively, and any appropriate or required reporting to the Police and/or other statutory authorities is carried out.
- 5) Ensuring that all relevant checks are carried out in recruiting staff and volunteers.
- 6) Making staff, volunteers and others aware of
  - our safeguarding policy and their specific safeguarding responsibilities.
  - the signs of potential abuse and how to report these.
- 7) Reporting to the Trust Board on safeguarding and advising the Board of any complaints, allegations or safeguarding concerns in a timely manner.

## Fundraising

Recognising the potential safeguarding risks in this activity, we will ensure that we act with integrity and that we are above reproach in our fund-raising. We will ensure that we are completely open, honest and transparent in relation to fundraising. We will avoid making any misleading statements regarding the financial needs of the charity or the use of funds. We will not be overly persistent in requests for money; or place undue pressure on individuals or churches to donate. We will not solicit or accept donations from anyone under the age of 18, anyone who is vulnerable or anyone who does not have the capacity to make an informed decision. We will ensure that all donations are used in accordance with the purpose(s) for which the money was donated.

## Online Safety

We will identify and manage online risks by ensuring:

- 1) The online services and content we provide are suitable for our users.
- 2) Protecting people's personal data and follow GDPR legislation.
- 3) We have permission to display any images on our website or social media accounts, including appropriate parental/guardian consent to display images of children.
- 4) We clearly explain how users can report concerns.

## Reporting of Concerns (including allegations and complaints )

If a crime is in progress, or an individual in immediate danger, the police should be called, as in any other circumstances.

Beneficiaries or members of the public can make their concerns known to anyone working for or with A Passion for Life, either verbally or in writing. All concerns raised should be reported to a Trustee and/or a senior member of the Management Group.

Staff members and volunteers working for the charity should, in the first instance, make their concerns known to their line manager. If they feel unable to do so, they should speak to another senior member of the Management Group or to a Trustee.

Trustees must be mindful of their reporting obligations to the Charity Commission in respect of Serious Incident Reporting and, if applicable, other regulator(s); and follow Government guidance on handling safeguarding allegations.

## Handling of Concerns, Allegations and Complaints

All concerns are to be taken seriously. Allegations against a staff member, volunteer or Trustee and/or complaints concerning a breach of this safeguarding policy must be reported to the Trustee with responsibility for safeguarding (or another Trustee as appropriate). The relevant procedure for handling allegations (Appendix 1) or complaints (Appendix 2) must be followed.

## Review

This safeguarding policy will be reviewed and approved by the Board annually.

*Version 1 - Approved by the Trustees, 5 May 2023*

## Appendix 1

### Handling allegations against Trustees, staff or volunteers

Concerns, complaints, and allegations will generally be investigated internally. In exceptional circumstances such as where APFL have concerns about the independence or competence of staff, or their capacity to conduct a timely investigation, the Trustees may decide it is appropriate to involve an independent external individual or organisation to assist with the investigation. Unless directed by a statutory or regulatory body to involve an independent, external body, the Trust Board will make such decisions.

#### Anonymous allegations

Allegations that are made anonymously cannot be handled in the usual way and will generally be filed without full investigation. Allegations that request a level of confidentiality that would compromise the integrity of an investigation, or its outcome, will not be investigated, but may be addressed in general terms with the subject of the allegation. They will generally be filed without full investigation.

Anonymous allegations will be logged so that any patterns or consistency in a series of allegations can be identified, prompting further investigation.

APfL will not respond to allegations or complaints made in a public space such as social media or other online or in-print publications. All allegations should be addressed to APFL directly and the appropriate allegations/complaints processes invoked.

#### Initial procedure for handling allegations

Allegations against APFL Trustees, staff or volunteers should be reported to the Trustee responsible for safeguarding. If the allegation is against the Trustee responsible for safeguarding, it should be reported to the Chair of Trustees who will assume responsibility for safeguarding in this instance.

1. Full details of the allegation will be established and recorded.
2. An initial assessment to establish whether any immediate action is required to ensure the safety of everyone involved will be conducted and enacted.
3. The Trustee responsible for safeguarding, in consultation with the Chair of Trustees (or the Chair in consultation with another Trustee) will identify an initial plan of action.
4. Dependent upon circumstances and the immediate action required, notifying the individual that an allegation has been received may be unavoidable. If so, care should be taken not to compromise the gathering of evidence. If it is necessary to notify the individual at this stage, details of the allegation should not be divulged.
5. Support must be offered to the subject of the allegation as well as any potential victims.

### Allegations that meet a threshold for statutory reporting

The Trustee responsible for safeguarding will, at the earliest opportunity, consult with/refer to relevant statutory agencies. They will work with, and under, the guidance of the statutory agencies to ensure that the allegation is thoroughly investigated, and all issues raised are addressed.

### Allegations that do not meet the thresholds for statutory reporting

The Trustee responsible for safeguarding will, in consultation with the Chair of Trustees, identify and appoint an investigation team consisting of an overseeing officer (who must be a Trustee (or, in exceptional circumstances, an external specialist) to provide scrutiny and accountability and an investigating officer who will lead the investigation. The investigating officer may consult a competent external agency for independent support and advice to ensure transparency.

1. The investigating officer will acknowledge receipt of the allegation and will notify those making the allegation and the accused of the process that will be followed and of anticipated timeframes.
2. A detailed investigation plan will be developed by the investigating officer and signed off by the overseeing officer.
3. The investigation will be conducted.
4. Thorough records of all aspects of the handling of the allegation will be retained throughout the process.
5. These records will be held and stored confidentially and securely by the investigating officer until the investigation is complete.
6. Once the investigation is complete, the final investigation report will be passed to the overseeing officer for sign off.
7. The report will conclude using the same outcome findings as the statutory processes (i.e. substantiated, unsubstantiated, unfounded, false or malicious).
8. Details of the investigation outcome will be retained in the person's confidential file unless the outcome is "malicious".
9. Documentation relating to the investigation process and outcomes will be held securely by the Trustee responsible for safeguarding for the purpose of regulatory accountability.
10. The investigation outcomes will be reported to the Chair of Trustees.
11. The accused and those making the allegation will be informed of the outcome.
12. If the allegation is upheld, corrective or disciplinary measures will be enacted according to the appropriate policies and contractual requirements.

13. There is no appeal stage in relation to an allegation against a member of staff, volunteer or other individual acting on behalf of APFL.
14. If the person making the allegation believes that the outcome is incorrect, they can raise their concerns using the complaints process (see Appendix 2). The complainant must outline clearly the basis of the complaint and the justification for complaining about the process and / or outcome.
15. The process will be reviewed to identify lessons that can be learned.

## Appendix 2

### Procedure for handling complaints about APfL processes or actions

Concerns, complaints, and allegations will generally be investigated internally. In exceptional circumstances such as where APfL have concerns about the independence or competence of staff, or their capacity to conduct a timely investigation, the Trustees may decide it is appropriate to involve an independent external individual or organisation to assist with the investigation. Unless directed by a statutory or regulatory body to involve an independent, external body, the Trust Board will make such decisions.

#### Anonymous complaints

Complaints that are made anonymously cannot be handled in the usual way and will generally be filed without full investigation. Complaints that request a level of confidentiality that would compromise the integrity of an investigation, or its outcome will not be investigated, but may be addressed in general terms. They will generally be filed without full investigation.

Anonymous complaints will be logged so that any patterns or consistency in a number of allegations can be identified, prompting further investigation.

APfL will not respond to complaints made in a public space such as social media or other online or in-print publications. All complaints should be addressed to APfL directly using this complaints process.

#### Complaints Process

Complaints about APfL's processes or actions should be addressed to the Chair of Trustees or to the Trustee responsible for safeguarding who will inform the Chair of Trustees. The Chair of Trustees will assess whether any immediate action is required.

The Chair of Trustees and the Trustee responsible for safeguarding will together develop an initial plan of action. Consideration will be given to whether a Serious Incident Report needs to be submitted to the appropriate charity regulator.

The Trustee responsible for safeguarding will, in consultation with the Chair of Trustees, identify and appoint an investigation team consisting of an overseeing officer (who must be a Trustee (or, in exceptional circumstances, an external specialist) to provide scrutiny and accountability and an investigating officer who will lead the investigation. The investigating officer may consult a competent external agency for independent support and advice to ensure transparency.



### Preliminary actions

The investigating officer will acknowledge receipt of the complaint and will respond to the complainants by:

1. Discussing the complaint with the complainants to confirm and clarify the details of the complaint.
2. Providing details of the complaint process and of key contacts will be provided to the complainants.
3. Establishing whether the complainants wish to start the process at stage 1 (informal resolution) or stage 2 (formal complaint).

A detailed investigation plan will be developed by the investigating officer and signed off by the overseeing officer.

### Stage 1 – Informal resolution

Where possible, APFL prefers to commence at this stage; believing this to be best aligned to the biblical principles, however, this will be a decision for the complainants, and if they request commencement at stage 2, that decision will be fully respected by APFL. The investigating officer, supported by a Trustee or staff member if required, will arrange to discuss the matter with the complainants. The aim at this stage is to establish whether agreement can be reached about action that is required. APFL will make a written record of the discussion that includes:

1. The key points discussed, and views expressed.
2. Areas of agreement.
3. Areas of disagreement.
4. Conclusions and actions agreed.

The written record of the meeting will be provided to the complainants who will have opportunity to request amendments or clarification. Once agreed, the complainants will be asked to confirm the accuracy of the notes of the discussion.

### If resolution has been agreed

Once APFL have completed the agreed actions, they will notify the complainants of the action taken. The complainants will be asked to confirm that they are happy that the matter has been addressed. The complaints log will be updated and the notes will be stored securely by the Trustee responsible for Safeguarding.

### If resolution has not been agreed

A record of the closing position of the informal stage will be agreed between the complainants and the investigating officer. This will include any progress made and actions agreed/completed and the issues that could not be resolved. The closing report will be signed off by the overseeing officer who will escalate the matter to the formal stage.

### Stage 2 – formal investigation

Complaints at the formal stage will be reviewed by the Trust Board to ascertain whether there are sufficient grounds for a full investigation. The overseeing officer and Investigation officer for this stage will be agreed/appointed by the Trust Board.

1. A detailed investigation plan will be developed by the investigation team and will then be communicated to the complainant.
2. The matter will be thoroughly investigated and a final (Stage 2) report will be delivered to the overseeing officer for sign off.
3. Once signed off, the outcome will be communicated to the complainants and the Board of Trustees. The complainants will be notified of their right of appeal and of the process and timescales for doing so.
4. All records will be stored confidentially by the Trustee responsible for safeguarding

### Stage 3 - Appeal

If the complainants believe that the process or findings of the formal investigation is incorrect, they can raise their concerns using the appeal process.

1. The complainant must outline clearly the basis of the appeal and the justification for appealing the process and/or outcome.
2. The Trustees (or a nominated subgroup thereof) will consider the submission and assess whether there are sufficient grounds for the appeal process to proceed and advise the complainants of their decision.
3. If it proceeds, the appeal will be conducted by suitably skilled individuals who were not part of the stage 2 process and who are not involved in the complaint.
4. An appeal report will be produced and submitted to the Trustees (or the subgroup thereof) for final signoff.
5. The complainants will be notified of the outcome of the appeal and their options for further action (e.g. referral to the Charity regulator, the police, or the Local Authority etc will be provided).
6. The process will be reviewed to identify lessons that can be learned.