



Trinity Church Westminster

Safeguarding children, young people and adults

September 2026

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Section A: Safeguarding Statement

Trinity Church Westminster ("**TCW**") is committed to creating a healthy church environment. We want everyone who comes into contact with us to feel safe, valued and cared for. We believe that each person is made in the image of God, and as a result has an inherent dignity and worth.

We also recognise that we live in a sinful world, where human beings rebel against God and his ways for us. Sadly, this includes harming one another. We believe that the human heart is wicked and deceitful and all of us, Christian or otherwise, are all capable of falling into sin.

We believe in the good news of forgiveness and new life in Jesus Christ. We believe that whenever someone turns to Christ and accepts him as Lord, they are renewed after the image of their Creator. As humanity, true joy is to be found in relationship with God, knowing his transforming work within us. As we live lives in obedience to Jesus, we glorify God.

A healthy church is one where the love of God for each person is displayed and where its members live, learn, and grow together in the faith. This involves supporting and encouraging one another. Sometimes, it will also include challenging and rebuking one another, for the glory of God and our good as his people. We believe that God sees everything and that he knows even our secret and hidden sins and that one day each of us will stand before him as our judge.

At TCW, as we seek together to learn from and teach others about Jesus, we recognise that we are not perfect. At various times we will all have to both offer and seek forgiveness. We also recognise, however, that within our church there is the opportunity for individuals or groups to harm, abuse, or exploit others. We as a church stand against any misuse of power, abuse, harassment exploitation or other forms of harm. We all have a responsibility to care for and protect each member of our church community. This includes those who are more weak or vulnerable.

In light of this, the policies and procedures that follow are intended to create a healthy culture at TCW. They are also intended to ensure those responsible for protecting children and vulnerable adults are competent and that our arrangements are effective.

We actively seek to encourage a culture where concerns about the way that individuals or groups have been treated, or about anything that we do as a church, can be raised openly. When concerns are raised, we commit to examining them carefully and impartially, establishing truth and upholding justice for all involved. We strive to reflect, learn, and grow as we consider such concerns; particularly where we fail to meet the standards that we have set for ourselves. Any concerns can be raised with the Senior Minister or Designated Safeguarding Lead.

As a church we are committed to safeguarding everyone who participates in church life. We regard care for the vulnerable as a biblical imperative and not just as a legal requirement. We will work with local and national partners, doing all we can to keep everyone safe. We will strive to fulfil all our *legal* duties to protect both children and vulnerable adults, but we aim to go above and beyond and to discharge our safeguarding duties in a way that is biblically faithful and pleasing to our loving Heavenly Father, who calls us to act with justice, love kindness and to walk humbly before him.

Section B: Church Context

Trinity Church Westminster ("**TCW**") is an evangelical Anglican church (charity number 1217732), launched in summer 2026. The trustees of TCW have fully delegated safeguarding responsibilities to Luke Cornelius (Senior Minister), Tom James (Trustee) and Eloise James (Designated Safeguarding Officer).

TCW stands in a broad protestant and theologically evangelical tradition. We believe that the Bible (Old and New Testament) is inspired by God and is our final authority in all matters to which it speaks.

We believe, in line with historically protestant / reformed theology that we are sinners before a holy God and that we are saved "by grace alone, through faith alone, in Christ alone".

We seek to be obedient to the command of Jesus to go and make disciples of all nations, baptising them in the name of the Father and of the Son and of the Holy Spirit, teaching them to observe all that he commanded us (Matthew 28:19-20). As such, we believe that the church's mission involves:

- Evangelism: making Jesus known to those who are not yet in relationship with him, making the offer of forgiveness and deliverance from God's righteous judgement, through the death and resurrection of Jesus as our saviour.
- Discipleship: encouraging Jesus' followers to live lives of obedience to all that he has commanded us, growing in love for him, devotion to him, and in his image.

Jesus told us that the mark of believers, and the way that the world will know that we are his disciples, is love for one another (John 13:35). Jesus also commanded us to love our enemies, praying for those who persecute us (Matthew 5:44) and said we should treat others as we ourselves want to be treated (Matthew 7:12).

As those within the Anglican evangelical tradition, our beliefs are in keeping with the Book of Common Prayer (1662), the Ordinal and the 39 Articles of Religion. They are also in keeping with the Jerusalem Declaration (2008) and the ReNew Statement of Faith.

TCW is led by the Senior Minister, Luke Cornelius. He shares *internal* oversight with the church wardens, Julian Bertie and Tom James.

External oversight for the church will be provided by Ollie Johnstone (External Trustee). In addition, Luke Cornelius will be overseen by an ASO (Alternative Spiritual Overseer), who is Vaughan Roberts (St Ebbe's Church).

The church fulfils its mission through a range of activities, including Sunday services, midweek small groups, one-to-one Bible reading and prayer meetings. It also runs regular evangelistic events.

Section C: Safeguarding Policy

Purpose

This policy outlines our moral and legal responsibilities and sets out our safeguarding commitments in light of those. It aims to establish a framework and appropriate standards that apply to the whole church and to support the trustees and wider church leadership in their responsibility to safeguard everyone who engages with the church.

Scope

The requirements of this policy apply to everyone who acts on behalf of TCW whether staff or volunteers. It applies to all the official activities of the church.

Our responsibilities and commitments

1. General duty of care

We recognise that we have a general duty of care to everyone who is involved in the life of our church. We therefore commit to:

- a. Ensuring that we identify and manage risk appropriately through our policies, procedures and risk assessments.
- b. Developing, monitoring, and maintaining a church culture that is healthy in all aspects. This includes promoting the spiritual, physical, emotional, psychological, and social wellbeing of those who engage with us.

2. Those who are vulnerable

We recognise that we have a particular responsibility to those who are more vulnerable. This includes: children and young people (i.e. those who are under 18 years of age), adults with care and support needs, and adults at risk of abuse / in need of protection (as defined in the 2014 Care Act). This is a responsibility under God who commands us to protect and care for the weak and vulnerable. We therefore commit to:

- a. Establishing proportionate safeguarding arrangements.
- b. Developing a culture that is protective and healthy.
- c. Ensuring that our approach to safeguarding is shaped by our biblical values and that it is fully legally compliant and in line with safeguarding best practice.

3. Dignity and respect

The Bible teaches us that all human beings, including unborn children, are made in God's image and therefore have intrinsic value to him. We therefore commit to:

- a. Treating everyone who engages with us as loved by God and precious in his sight.
- b. Treating everyone as equal in God's sight, showing neither fear nor favour.

4. Sin and the fall

The Bible teaches us that since Adam and Eve fell into sin, all human beings have a sinful nature. While the good news of forgiveness of sin and eternal life with God are at the heart of the Christian gospel, in this life, even Christians sadly continue to sin. As such, we recognise the need to be vigilant and to oppose all forms of abuse, exploitation or other injustice in our midst. We therefore commit to:

- a. Establishing clear expectations and standards for all who act on our behalf.
- b. Establishing clear processes for handling abuse that is discovered or disclosed; whether that abuse has occurred in the church or elsewhere.
- c. Ensuring that we have clear processes for handling complaints, allegations, grievances, whistle blowing or any other expression of dissatisfaction.
- d. Promoting across the whole church community the importance of caring well for everyone who engages with us through our various activities.

5. Governance and leadership

Ensuring our leaders are effective and servant-hearted is a key priority for TCW. We also recognise our responsibilities under charity law and Charity Commission guidance. We therefore commit to:

- a. Modelling biblically grounded servant-hearted leadership.
- b. Ensuring the trustees, who share final legal responsibility for safeguarding, maintain, review and sanction the policies and procedures detailed in this document.
- c.
- d. Visibly demonstrating our commitment to safeguarding throughout the church.
- e. and accountability to everyone who works (whether paid or voluntarily) on our behalf; including providing accountability and challenge to each other as leaders.
- f. Monitoring the effectiveness of the arrangements that we have implemented.
- g. Creating an environment of ongoing reflection, learning and improvement.
- h. Ensuring that delegated safeguarding roles and responsibilities are clearly defined, and that appropriate accountability and support are provided to those fulfilling the roles.

6. Safeguarding arrangements.

We recognise that we have a responsibility to the state to ensure that we have compliant and effective safeguarding arrangements in place. We therefore commit to:

- a. Appointing a suitably trained, competent and experienced Designated Safeguarding Lead (DSL) to work alongside the Senior Minister (SM) in implementing policies and procedures
- b. Maintaining compliant safeguarding policies and procedures, which meet legal and best practice standards. These will be reviewed on an annual basis.
- c. Ensuring that relevant safeguarding information - including our safeguarding policy documents and contact details for the DSL, SM and other relevant authorities - are publicly available.
- d. Ensuring that a healthy culture is supported by processes for listening to expressions of dissatisfaction (complaints, allegations, whistleblowing etc.) and that such expressions are encouraged, taken seriously, and responded to positively.
- e. Ensuring that we keep records of safeguarding concerns in line with safeguarding expectations and that we share information appropriately as required.

7. Suitability and competence of staff and volunteers

We recognise that we have a responsibility to ensure that those who act on our behalf are competent in and suitable for the roles they undertake. We therefore commit to:

- a. Implementing proportionate safe recruitment processes.
- b. Ensuring that our leaders are competent and fulfill their responsibilities with humility, clarity, and biblical faithfulness.
- c. Ensuring that our staff and volunteers are supported and that we provide appropriate guidance, oversight, and accountability.
- d. Providing appropriate training and skills development as required.
- e. Ensuring that as a church we are alert to the risks within society - including: risks associated with grooming, online abuse, radicalisation, gender-based violence, exploitation and domestic abuse - and reporting them as required.

8. Healthy culture

We recognise that we have a responsibility to encourage a healthy church environment. This will include transparency, accountability and biblical faithfulness. We therefore commit to:

- a. Developing a ministry that reflects biblical principles; encouraging growth in obedience to God and his word with equity, transparency, and sensitivity.
- b. Valuing, respecting and listening to the wishes and views of every member the church, including children and young people, and others who are vulnerable or find it difficult to make their voice heard.
- c. Developing a culture that challenges any form of bullying, harassment, abuse, exploitation, or any other harmful contact; both in the online and the physical environments.

- d. Ensuring that we set clear standards and expectations of those who participate in our church community and that we have clear processes to challenge and address failure to live up to the standards that we have set for ourselves.

9. Partnership working

We will ensure that we work appropriately with statutory and other services, sharing information in accordance with legal requirements and involving parents, children and young people and adults with support needs or in need of protection in the decisions that affect them as far as they are able.

10. Supporting those who have experienced abuse or other trauma

When working with those who have experienced abuse or trauma, we will seek to do so with sensitivity. We will seek to give them a voice and allow them to progress at their own pace while recognising the limits of our own competence and signposting to specialist support where required.

Section D: Safeguarding Procedures

1. Governance and oversight

Overall responsibility for safeguarding across the ministries of Trinity Church Westminster ("TCW") lies with the trustees. As such, they must:

- a. Maintain, review and sanction the policies and procedures detailed in this document. These must be legally compliant and should be reviewed on an annual basis.
- b. Ensure that the church leadership promotes the importance of safeguarding and leads the development of a culture that is biblically faithful, healthy and transparent. Safeguarding must also be appropriately prioritised, and its profile maintained.
- c. Ensure that a suitably knowledgeable and appropriately trained Designated Safeguarding Lead (DSL) is appointed to work alongside the Senior Minister (SM) in implementing policies and procedures.
- d. Hold the Senior Minister accountable for the implementation of the above.
- e. Ensure the DSL and SM provide updates on safeguarding to the trustees as required.
- f. Include a clear statement in relation to safeguarding in the annual Charity Commission submission.
- g. Report any "Serious Incidents" (as defined in the Charity Commission Guidance - <https://www.gov.uk/guidance/how-to-report-a-serious-incident-in-your-charity>) to the Charity Committee in an accurate and in a timely manner.

2. Recruitment and ongoing support of staff and volunteers

The recruitment, appointment and support of staff and volunteers is of critical importance to TCW. To fulfil our legal duties and to ensure we meet the still higher standards dictated by Scripture, all staff and volunteers will be subject to appropriate recruitment processes.

3. Management of recruitment processes

- a. At least one person who is involved in the process of recruitment of staff or appointment of volunteers will be trained in Safe Recruitment.
- b. Staff and volunteers will be provided with written job / role descriptions and person specifications prior to deciding whether to take up the position / role.
- c. Roles that involve regulated activity (i.e. working with children or vulnerable adults) and which consequently are subject to a Disclosure and Barring Service (DBS) check will be clearly identified as exempt from the Rehabilitation of Offenders Act.
- d. Appropriate records will be kept of all recruitment processes and decisions.
- e. A Single Central Record of recruitment checks and a Training Log will be maintained.

4. Recruitment process

- a. Prior to appointment, all staff and volunteers whose roles involve regulated activity will be required to submit an application form ([see appendix 4](#)). This includes a self-declaration of fitness and suitability for the role. Where necessary and appropriate (e.g. lack of literacy skills or English as a second language) support can be provided for completion of this.

Paid staff positions.

- b. Prior to appointment, all paid staff will be required to attend a formal interview, regardless of whether a competitive process is in operation.
- c. References will be sought including, where possible, a reference from a current or previous employer.
- d. Upon commencement of their position, all staff will be required to complete a formal induction process as outlined in their role description and including any matters identified during the recruitment process.
- e. The Single Central Record, Training Log and Personnel File will be updated as appropriate throughout the process.

Volunteer positions.

- f. Prior to appointment, all volunteers whose roles involve regulated activity will be required to attend a formal discussion to ensure their suitability and clarity of understanding of the role and its requirements.
- g. References will be sought. (Note – internal references are acceptable for volunteer positions).
- h. Following appointment, volunteers will be required to complete a formal induction process as defined in the role description.
- i. The Single Central Record, Training Log and Personnel File will be updated as appropriate throughout the process.

5. DBS Checks

- a. Following appointment and prior to commencement of roles that involve regulated activity, staff and volunteers will be required to complete a DBS check.
- b. Individuals will not commence their role until the result of the DBS check has been received.
- c. Once formal notification of a clear DBS check has been received, the Single Central Record will be updated with the relevant information.

6. Blemished DBS Checks

- a. In the event of a blemished DBS check, the applicant will be asked to present the DBS certificate to the Designated Safeguarding Lead (DSL) or Senior Minister (SM).
- b. The applicant may, if they wish to, withdraw their application.
- c. If the application is withdrawn, consideration will be given to whether this requires the triggering of the procedure for the “Management of ex-offenders or those who pose an actual or potential risk to others; particularly to vulnerable people” ([see section D13](#)).
- d. If the applicant self-declared the blemish and it has been discussed previously, the DSL will check to ensure that the detail provided in the self-disclosure is consistent with the information on the DBS certificate.
- e. If the applicant did not self-disclose, an open conversation about the circumstances of the blemish will be discussed with the applicant.
- f. Whether the discussion arises from self-disclosure or examination of the certificate, a formal assessment will be conducted to ascertain the applicant’s suitability for the role by the DSL and/or the SM, and the outcome will be recorded in the Personnel File.
- g. Advice can be sought from Christian Safeguarding Services if required.
- h. The applicant will be given every opportunity to provide input to the assessment and the outcome will be explained to them.
- i. A blemished DBS check does not necessarily prevent the individual from engaging in regulated activity. The risk assessment may conclude:
 - i. That the individual is unsuitable for the role.
 - ii. That further investigation is required.
 - iii. That the person is suitable for the role with restrictions.
 - iv. That the blemish does not indicate unsuitability.
- j. If the risk assessment concludes that the individual is unsuitable for the role, consideration will be given to:
 - i. Whether there are other roles for which the individual would be suitable.
 - ii. Whether the “Management of ex-offenders or those who pose an actual or potential risk to others; particularly to vulnerable people” ([see section D13](#)) process needs to be triggered.
- k. Once the details of the certificate have been recorded in the Single Central Record, the certificate will be returned to the applicant and no copies will be retained.

7. Probationary / settling in periods.

The precise nature and expectations of probationary/settling in periods will vary from role to role and will be described in the role description. Where used, probationary periods are intended to be supportive of the volunteer/employee and to provide a framework of accountability for both the individual and organisation. They will not be used for punitive purposes.

- a. All staff and volunteers whose roles involve regulated activity will be subject to a probationary period.

- b. Prior to commencement of the role, a clear statement of the criteria for successful completion of the probationary period will be provided.
- c. Regular support, guidance and review will be provided throughout the probationary period and the outcome (passed, extended, failed) will be communicated to the employee or volunteer prior to the end of the probationary period and records will be retained of all discussions.

8. Ongoing support and supervision

- a. All staff and volunteers will receive proportionate supervision and pastoral care. Supervision will include both personal wellbeing and performance management.
- b. Where DBS checks are required, these will be updated at least every three years.

9. Training

- a. All staff and volunteers in roles that involve regulated activity or those who manage such staff will be required to attend regular safeguarding training.
- b. Trustees will receive initial training. While there is no legal requirement for formal update training, the trustees will ensure that they are competent in their roles and that their knowledge of compliance with legislation and Charity Commission guidance up to date.
- c. The Designated Safeguarding Lead (DSL) and Senior Minister are required to attend formal update training at least every two years.
- d. Staff and church wardens will refresh their training every three years.
- e. Volunteers working with children or vulnerable adults are required to update their training at least every three years.
- f. All staff, volunteers and trustees will undergo some informal update activity annually.
- g. Training should include themes on domestic abuse and trauma and the impact on victims including children.
- h. A Training Log will be maintained by the DSL.

10. Ensuring a safe and healthy environment

TCW recognises that there are many factors that impact on and contribute to the safety of the environment for everyone; some of these being procedural and others cultural. Here we describe only the procedural aspects.

a. Health and Safety

TCW aims to ensure the health and safety of everyone attending one of our meetings by:

- i. Regularly reviewing our Health and Safety Policy to maximise effectiveness and ensure ongoing legal compliance.
- ii. Maintaining and implementing proportionate Risk Assessments for both the premises and the activities of the church.
- iii. The maintenance and analysis of Accident and Incident Reports (see Appendix 4) to ensure appropriate lessons are learned and responses are timely. In addition, an overview analysis of reports that examines trends and recurring themes will be conducted at least annually.
- iv. Ensuring that adequate First Aid cover is available, and that only qualified First Aiders administer First Aid, except in emergency situations when instructed to do so by the Emergency Services.
- v. Working with host venues to ensure that appropriate safety equipment (e.g. First Aid kits, fire extinguishers) are available and maintained
- vi. Working with host venues to ensure Health and Safety information is prominent and signage effective.

b. Awareness raising

TCW recognises that any member of our church community could discover or receive a disclosure of abuse, and therefore all members need a basic awareness of how to deal with such disclosures. This includes those not directly ministering to children or vulnerable adults. We will therefore raise awareness by ensuring that:

- i. Our policies, procedures and codes of conduct are publicly available and promoted by our leaders.
- ii. Contact details for the Designated Safeguarding Lead (DSL) and Senior Minister (SM) are publicly available.
- iii. We set clear expectations of conduct and that clear processes for identifying, challenging, investigating, and dealing with inappropriate conduct are implemented.
- iv. We implement and promote clear and transparent processes for the raising of concerns or complaints, supported by a culture that encourages and welcomes these as opportunities to learn and improve.

c. Ministry to children and / or young people

When engaging in ministry to children and / or young people we will:

- i. Ensure that registers of children attending, and leaders present are maintained.
- ii. Ensure that those involved in such ministries have been appointed in accordance with our recruitment procedures.
- iii. Ensure that consent is obtained for their attendance at the group and that contact details and information about any additional or specific needs are recorded.

- iv. Ensure that appropriate child: adult ratios are maintained in line with guidance from the NSPCC:
 - 0 - 2 years - one adult to three children
 - 2 - 3 years - one adult to four children
 - 4 - 8 years - one adult to six children
 - 9 - 12 years - one adult to eight children
 - 13 - 18 years - one adult to ten children

NOTE – each group should have a minimum of two caregivers.

- v. Ensure that appropriate accident / incident reporting is in place and that any accidents or incidents are reported to parents / carers in a timely manner.
- vi. Ensure that appropriate order and discipline are maintained.
- vii. Ensure that children are encouraged and empowered to raise any concerns that they may have with leaders or their parents as appropriate.

d. All age group meetings

When children or young people are present at meetings that are primarily aimed at adults and childcare is not provided and their parents are present:

- i. Children remain the responsibility of their parents who are responsible for their safety and care.
- ii. Any concerns or support needs identified will be recorded and reported to the DSL in the usual way.

When young people are present at meetings that are primarily aimed at adults and participating in that meeting in their own right:

- iii. Although there are not specific procedures for such meetings, the normal principles of safeguarding will apply.
- iv. If the young person is not believed to be competent to consent to attendance, consent will be sought from their parents / carers.
- v. If the young person is believed to be competent to consent to attendance, they will be encouraged to be open and transparent with their parents / carers and consent will be sought for the church to contact the parents and establish open communication and transparency.
- vi. Leaders of the church or of the meeting in question will be vigilant to ensure that the young person is adequately protected.
- vii. Any concerns or support needs identified will be recorded and reported to the DSL in the usual way.

e. Ministry to Adults at Risk of Abuse or Adults with care and support needs

- i. If the individual is not believed to be competent to consent to attendance, consent will be sought from their carers.
- ii. If the individual is believed to be competent to consent to attendance, they will be encouraged to be open and transparent with their carers, and consent will be sought for the church to contact them with a view to establishing open communication and transparency.
- iii. Leaders of the church or of the meeting in question will be vigilant to ensure that the individual is adequately protected.
- iv. Any concerns or support needs identified will be recorded and reported to the DSL in the usual way.

f. General provisions

- i. The church will ensure that information relating to safeguarding (including: relevant contact details and a copy of these policies and procedures) is available on our website.
- ii. Leaders will promote the need for every member to be vigilant to safeguarding concerns through the processes, teaching, and culture of the church and by personal example.

11. Responding to safeguarding concerns or disclosures

a. Managing immediate risk

- i. Upon identification of a concern or receipt of a disclosure, the individual identifying the concern (or to whom the disclosure has been made) should make an assessment as to whether any immediate, protective action is necessary.
- ii. The individual identifying the concern (or to whom the disclosure has been made) may seek advice from the Senior Minister (SM) or Designated Safeguarding Lead (DSL). The seeking of advice, however, should not unnecessarily delay or prevent protective action or place the individual at risk of further or increased harm.
- iii. In urgent situations, the individual should contact either the police on 999 or Social Care to obtain support. Under such circumstances, the SM or DSL should be notified at the earliest possible opportunity.

b. Reporting concerns

- i. Once it has been established that the individual is not, or is no longer in imminent danger, the concern should be reported to the SM or DSL. This may be done verbally, but it would be preferable for concerns to be reported in writing (e.g. via the Concerns Reporting Form in [Appendix 4b](#)).

- ii. The SM or DSL may, at this stage, discuss the concern with the individual who raised it, in order to ensure clarity of understanding.

c. Managing the risks

- i. In discussion with the individual reporting the concern, the SM or DSL will review any immediate actions taken and will be responsible for follow-up or further action that may be required.
- ii. At the earliest opportunity, the DSL will open a confidential file in relation to the person at risk.
- iii. A chronology ([see appendix 4d](#)) will be kept and included in the front of the confidential file.
- iv. The confidential file will be updated with any further discussions or actions, including any advice sought or referrals made and updating will continue on an ongoing basis.
- v. The SM or DSL will confirm to the person raising the concern that the matter has been actioned. They will not provide any unnecessary information. Information is only shared on a “need to know” basis.
- vi. Where the concern meets the statutory threshold, the SM or DSL will notify the parent or carer of the individual concerned (or the individual themselves if they are a competent adult) that a referral is being made to Social Care.

Information will not be shared with the parent / carer in situations where:

- To do so would place a child at increased risk of harm or abuse.
 - To do so would place an adult at increased risk of harm or abuse.
- vii. The referral will be made to the appropriate Social Care service
 - viii. If the referral has not been acknowledged within two working days, the SM or DSL may follow up with Social Care (or other agencies as required).
 - ix. The DSL will work with the Local Authority and other partners on behalf of the church to ensure that we fully participate in the safeguarding process.
 - x. All conversations, correspondence, and documentation will be placed into the confidential file.
 - xi. Actions taken will be recorded and a chronology maintained on an ongoing basis.
 - xii. Confidential files will be stored in a secure folder, only accessible to the SM and DSL.
 - xiii. The SM and DSL will share information as necessary with other individuals in the church to facilitate effective safeguarding.

12. Allegations against or concerns about staff and volunteers

TCW will always take allegations against our staff or volunteers seriously. As such, we will ensure they are investigated proportionately, transparently and in a timely manner. It is our

responsibility to keep vulnerable people safe and to support the person accused throughout the process.

- a. Allegations or concerns should be raised with the Senior Minister (SM) or Designated Safeguarding Lead (DSL). This may be done verbally, but it would be preferable for concerns to be reported in writing.
- b. Where they concern the SM, they should be reported to the DSL.
- c. Where they concern the DSL, they should be reported to the SM.
- d. In the event an allegation concerns both the SM and DSO, they should be reported to a church warden, trustee or **Ollie Johnson (External Trustee)**. **Ollie can be contacted through: oliver@trinitywestminster.com**
- e. Full details of the allegation will be recorded. Where the allegation has been made verbally, it should be noted at the earliest opportunity in a factual manner. This note should refrain from offering overly subjective or emotive reflections.
- f. The SM will be responsible for investigating the complaint and assessing what, if any, immediate action is required to ensure the safety of everyone involved.
 - i. Where there is a conflict of interest (e.g. an allegation is made against the SM) a church warden, trustee or the DSL will instead be responsible.
 - ii. In cases of less serious allegation, responsibility for investigation may be delegated to another member of the church's leadership team.
- g. Dependent upon circumstances and the immediate action required, notifying the individual that an allegation has been received may be unavoidable.
- h. If so, care will be taken not to compromise the gathering of evidence.
- i. If it is necessary to notify the individual at this stage, details of the allegation will not be divulged.
- j. Support must be offered to the subject of the allegation as well as any potential victims.
- k. Where abuse is alleged, the LADO (Local Authority Designated Officer) should be consulted at the earliest opportunity:
 - i. If the LADO cannot be contacted due to working hours, initial advice can be sought from Christian Safeguarding Services (CSS).
- l. If the allegation meets the threshold for LADO, the church's investigating officer will work with LADO to ensure that the allegation is thoroughly investigated, and all issues raised are addressed.
- m. If the allegation does not meet the threshold for LADO, the investigating officer will consult with CSS, who will provide independent support and advice to ensure transparency.
- n. Thorough records of all aspects of the handling of the allegation will be retained throughout the process.
 - i. These records will be held confidentially in a secure folder
- o. The investigating officer will seek and follow specialist advice throughout the process as required.

13. Management of ex-offenders or those who pose an actual or potential risk to others, particularly to vulnerable people.

As a church, we believe in the power of God to forgive and transform individuals. We also believe that every individual is valuable to God and should be protected; particularly those who are vulnerable.

- a. Where the church becomes aware that an individual is an ex-offender or that they may pose a risk to vulnerable people, the church leaders will enter into an open and frank discourse with that individual to understand the context and the risks.
- b. With the consent of the individual (if required), the church will seek to work in partnership with probation services or other agencies supporting the individual where this is appropriate.
- c. The leaders will assess the risk posed by the individual and a formal risk assessment will be formulated.
- d. A formal agreement with the individual will be drawn up and will be signed by both the individual and the church leadership. The agreement will include:
 - i. The church's commitments to the individual who poses the risk.
 - ii. The steps the church will take to support the individual while simultaneously protecting everyone in the church community.
 - iii. The restrictions and conditions that will be applied to the individual's involvement in the life of the church.
 - iv. The consequences of failure to comply with the agreement.
 - v. When and how the risk assessment and formal contract will be reviewed.
- e. All decisions and agreements will be formally recorded and securely stored.
- f. The individual who poses a risk will be fully involved in the planning process and information will only be shared with church members by the leaders either:
 - i. With the agreement of the individual who poses a risk.
 - ii. Where information needs to be shared to protect vulnerable people and then, only the minimum information that is essential will be shared and the individual will be informed in advance what information will be shared.
- g. If the individual chooses to leave the church to avoid the management of the risk and starts to attend elsewhere, the church leaders will take specialist advice as to whether this information should be passed on.
 - i. All records of risk assessments and formal agreements will be stored in a secure folder on a password protected, cloud-based drive.

14. Complaints and concerns

- a. TCW recognises the importance of listening to all members of the church community, including those who find it hard to make their voices heard and those who hold contrary views to the church leadership. The church leadership will proactively seek the views of all who engage with the church in a variety of ways; however, we also

recognise the importance of responding well when concerns, criticisms or complaints are raised with us.

- b. Complaints that have a safeguarding element will be dealt with in accordance with our policy on Allegations against or concerns about staff or volunteers (detailed above)
- c. Our separate Complaints Procedure covers complaints that are *not* of a safeguarding nature.

Section E: Codes of Conduct

Code of conduct for staff and volunteers working with children or young people

Those working with children and young people will:

- Ensure that they understand the policies, procedures, systems, guidelines, and risk assessments etc. that are provided and that they are implemented.
- Attend safeguarding training on the frequency stipulated in this policy.
- Work in a transparent and responsible manner that ensures that they are accountable to the church leaders and that they are open to discussion with and challenge from parents.
- Ensure that their conduct embraces their responsibility for the safety of the children in their care.
- Maintain a state of vigilance to identify and report any safeguarding concerns, including concerns about adults who may pose a risk to children.
- Refrain from any abuse of their power or authority as adults and leaders within the group.
- Only take responsibility for children if they are physically and mentally fit and able to do so.
- Treat them with respect and dignity.
- Treat them in an age-appropriate way that recognises their developmental stage and ability.
- Provide them with appropriate levels of choice.
- Treat them as individuals.
- Respect their views and wishes.
- Promote and ensure appropriate behaviour towards one-another.
- Ensure that appropriate professional boundaries are maintained.
- Refrain from physical play (e.g. rough and tumble games that involve excessive physical contact).
- Ensure that age-appropriate boundaries are clearly explained and consistently implemented in accordance with this policy.
- Ensure that any age-appropriate physical contact is child led.
- Ensure that physical intervention is only used as a last resort to ensure the safety of an individual child or the group.
- Refrain from any physical chastisement.
- Refrain from making any social media connections with them.
- Not engage in any sexualised, aggressive, humiliating, demeaning or discriminatory language or behaviour with them.
- Act with fairness and treat children equitably, avoiding discrimination or favouritism.
- Seek to avoid any language or behaviour or adopting any attitude that could lead to misunderstanding.

Code of conduct for staff and volunteers working with vulnerable adults

Those working with vulnerable adults including adults at risk of abuse will:

- Ensure that they understand the policies, procedures and risk assessments etc that are provided and that they are implemented.
- Attend safeguarding training on the frequency stipulated in this policy.
- Work in a transparent and responsible manner that ensures that they are accountable to the church leaders.
- Ensure that their conduct embraces their responsibility for the safety of those with whom they are working.
- Maintain a state of vigilance to identify and report any safeguarding concerns, including concerns about people who may pose a risk to them.
- Refrain from any abuse of their power or position and will always seek to act in the best interest of the individual.
- Only engage in activity for which they are physically and mentally fit.
- Treat them with respect and dignity.
- Ensure that support is client led and that their views, wishes, and choices are respected.
- Treat them as individuals.
- Promote and seek to ensure appropriate behaviour towards one-another.
- Ensure that appropriate professional boundaries are maintained.
- If working in groups, seek to ensure that necessary behavioural and interpersonal boundaries are clearly explained and consistently implemented.
- Ensure that any physical contact is client led.
- Ensure that proportionate physical intervention is only used as a last resort to ensure the safety of an individual or the group.
- Not engage in any sexualised, aggressive, humiliating, demeaning or discriminatory (etc) language or behaviour with them.
- Act with fairness and treat each person equitably, avoiding discrimination or favouritism.
- Seek to avoid any language or behaviour or adopting any attitude that could lead to misunderstanding.
- Support the participation of the vulnerable person (and their carers where appropriate) in the planning of support or other decisions that affect them.

Code of conduct for staff and volunteers providing pastoral care

Those involved in providing pastoral care will:

- Ensure that support provided is led by the person receiving the support.
- Ensure that the dignity and wishes of the individual are always respected.
- When delivering challenge or difficult messages, do so in a respectful, compassionate, and gentle way that is in line with their best interests (including their emotional and spiritual wellbeing).
- Seek to ensure that the individual's right to question or ignore any advice or suggestions is fully understood.
- Attend safeguarding training on the frequency stipulated in this policy.
- Work in a transparent and responsible manner that ensures that they are accountable to the church leaders.
- Maintain a state of vigilance to identify and report any safeguarding concerns, including concerns about people who may pose a risk to them.
- Refrain from any abuse of their power or position and will always seek to act in the best interest of the individual.
- Only engage in activity for which they are physically and mentally fit.
- Ensure that appropriate professional boundaries are maintained.
- Ensure that any physical contact is client led.
- Ensure that proportionate physical intervention is only used as a last resort to ensure the safety of an individual or the group.
- Not engage in any sexualised, aggressive, humiliating, demeaning or discriminatory language or behaviour with them.
- Act with fairness and treat each person equitably, avoiding discrimination or favouritism.
- Seek to avoid any language or behaviour or adopting any attitude that could lead to misunderstanding.

Section F: Appendices

Appendix 1: Safeguarding responsibilities

Governance of safeguarding

Overall responsibility for safeguarding across the ministries of Trinity Church Westminster ("TCW") lies with the trustees. As such, they must:

- Maintain, review and sanction the policies and procedures detailed in this document. These must be legally compliant and should be reviewed on an annual basis.
- Ensure that the church leadership promotes the importance of safeguarding and leads the development of a culture that is biblically faithful, healthy and transparent. Safeguarding must also be appropriately prioritised, and its profile maintained.
- Ensure that a suitably knowledgeable and appropriately trained Designated Safeguarding Lead (DSL) is appointed to work alongside the Senior Minister (SM) in implementing policies and procedures.
- Hold the Senior Minister accountable for the implementation of the above.
- Ensure the DSL and SM provide updates to the trustees as required.
- Include a clear statement in relation to safeguarding in the annual Charity Commission submission.
- Report any "Serious Incidents" (as defined in the Charity Commission Guidance - <https://www.gov.uk/guidance/how-to-report-a-serious-incident-in-your-charity>) to the Charity Committee in an accurate and timely manner.

Leadership and management of safeguarding

The Designated Safeguarding Lead and Senior Minister, will ensure that:

- The Safeguarding Policy is regularly reviewed, updated and any changes signed off by the trustees.
- Safeguarding concerns are managed in a timely and proportionate manner, including making referrals to statutory agencies as required, working with partner agencies such as the Local Authority and the Police and the maintenance of accurate records and systems.
- Leading the implementation of the safeguarding policies and procedures
- Ensuring that those engaged in ministry on behalf of CSS are provided with proportionate and appropriate training and that they are competent to discharge their safeguarding responsibilities.
- Ensuring that regular reports are provided to the trustees and that any urgent issues are communicated to the chair of trustees in a timely manner.
- Raising awareness of safeguarding and promoting its importance across the organisation

Individual responsibilities

Everyone working on behalf of TCW is required to:

- Act in accordance with the policies, procedures and codes of conduct provided.
- Adhere to local legislation, guidance, and procedures.
- Ensure that they remain vigilant to the risks of harm.

Appendix 2: Key safeguarding contacts

Key Safeguarding Contacts	
Organisational E-mail: safeguarding@trinitywestminster.com Designated Safeguarding Lead: Eloise James Senior Minister: Luke Cornelius Our policies and other useful information about safeguarding can be found at: Trinity Church Westminster The roles and responsibilities of those involved in safeguarding can be found in appendix A Allegations against staff or volunteers should be reported to the Designated Safeguarding Lead (DLS) or, if it is in relation to the DSL, to the Senior Minister. Christian Safeguarding Services: Email: advice@thecss.co.uk Phone: 0116 2184420 Emergency Number: 07592150156 Fill out form on website: https://shorturl.at/ahzgQ	Statutory services Local Authority details: Trinity Church Westminster is in the City of Westminster Safeguarding children Report to Access to Children's Services Phone: 020 7641 4000 (Mon–Fri, 9am–5pm) Emergency out-of-hours (Emergency Duty Team): 020 7641 2388 Email: accesstochilrensservices@westminster.gov.uk More information on the Westminster social care site: Children's social care Westminster City Council Safeguarding Children Partnership Local Safeguarding Children Partnership for Kensington and Chelsea and Westminster Phone: 020 7361 3013 Emergency Duty Team: 020 7641 2388 Website: https://www.rbkc.gov.uk/lscp/ E-mail: socialservices@rbkc.gov.uk Safeguarding Adults Report concerns to Adult Social Care Phone: 020 7641 2176 (safeguarding helpline, 9am–5pm) E-mail: adultsocialcare@westminster.gov.uk More information on the Westminster social care site: Safeguarding adults Westminster City Council

Appendix 3 - Basis of the policies and procedures and the legal framework

Trinity Church Westminster Internal framework

- Our statement of faith
 - This policy reflects the organisation's fundamental biblical beliefs and should be read in conjunction with the statement of faith.
- Our governing documents

National guidance

Safeguarding children

- National legislation and guidance (Safeguarding Children)
 - Children Acts (1989 & 2004)
 - Children and Families Act 2014
 - Children and Social Work Act 2017
 - Working together to safeguard children (2023)
 - What to do if you're worried a child is being abused: advice for practitioners (Department for Education, 2015)
 - Protection of Children Act 1999
 - Safeguarding vulnerable groups act 2006
 - Protection of freedoms Act 2012
 - Disqualification under the childcare act 2006 (2018 amended)
 - Prevent duty guidance 2016
 - Sexual offences Act 2003
 - The Safe Network Standards (available from the NSPCC website)
 - The policy also takes account of the principles outlined in:
 - Keeping children safe during community activities, after school clubs and tuition
 - Keeping children safe in education 2023
 - FGM duty guidance
 - Prevent duty guidance
 - Domestic Abuse Act 2021

Safeguarding adults

- National legislation and guidance (Safeguarding adults)
 - The Care Act 2014
 - Human Rights Acts 1998
 - Care Standards Act 2000
 - Mental Capacity Act 2005
 - Deprivation of Liberty Safeguards 2007
 - Sexual Offences Act 2003
 - Police and Criminal Evidence Act 1984 of Fraud Act 2006
 - Public Interest Disclosure Act 1998
 - Health and Social Care Act 2008
 - Disclosure and Barring Service (DBS)
 - Multi-Agency Public Protection Arrangements (MAPPA)
 - Multi-Agency Risk Assessment Conference (MARAC)
 - LSAB Multiagency Policy and Procedures

Local guidance

- Local guidance and procedures
 - *Local Safeguarding Children Board procedures*
 - *Local authority guidance*

- Local guidance and procedures
 - *Local Safeguarding Adults Board procedures*
 - *Local authority guidance*

Appendix 4: Standard Document Samples

a)	Application to volunteer
b)	Concerns reporting form
c)	Role description
d)	Confidential file chronology
e)	Confidential file record of conversations and actions
f)	Template report from DSL to trustees
g)	Complaint form

Trinity Church Westminster: Volunteer Application Form

About You		
Full name	Address	
Phone number		
Mobile number		
E-mail address		
About the role		
Department /Group / ministry area	Role applied for	
Is the role subject to a DBS check?		
Children only	Adults only	Children and adults
Personal statement		
Please briefly describe your reasons for applying for this role and any appropriate experience in similar roles.		
Do you have any questions or concerns about the role, or your ability to fulfil it, that you would like to discuss with us?		
Please supply details of 2 people who can comment on your suitability for this role.		
Reference 1	Reference 2	
Name	Name	

Relationship to you or capacity in which you are known to them	Relationship to you or capacity in which you are known to them														
Address	Address														
Phone	Phone														
E-mail address	E-mail address														
Self-declaration															
	<table border="1"> <thead> <tr> <th>Yes</th> <th>No</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> </tr> <tr> <td></td> <td></td> </tr> <tr> <td></td> <td></td> </tr> <tr> <td></td> <td></td> </tr> <tr> <td></td> <td></td> </tr> <tr> <td></td> <td></td> </tr> </tbody> </table>	Yes	No												
Yes	No														
Do you have any criminal convictions that would affect your ability to perform this role?															
Is your state of physical, mental, emotional, and spiritual health adequate to fulfil this role?															
If the role involves working with children, young people, or vulnerable adults, are you, or have you ever been barred from such work?															
Are you in agreement with the church's beliefs as outlined in the statement of faith?															
Do you agree to abide by the policies, procedures, codes of conduct, risk assessments etc that are relevant to this role?															
Is there anything that you wish to add or that you wish us to consider in relation to this self-declaration?															
I confirm that the information supplied in this form is accurate to the best of my knowledge. Signature:															

Date:

For office use only: Form reference / volunteer reference as per Single Central Record.

Trinity Church Westminster: Staff/Volunteer role description

Role title:	
Responsible to:	
Role purpose	
Role description	
Person specification	
Date last reviewed.	Reviewed by

Trinity Church Westminster: Incident / concern reporting form

About this form and the person completing it			
Your name	Your phone number	Your mobile number	Your e-mail address
Are you reporting: <i>Please tick the appropriate box(es)</i>	An incident	A disclosure	A concern
Department /Group / ministry area			Date completed.
About the person or people, we are concerned about or involved in the incident			
Their name(s)	Their Address and contact details	Their Date of birth	Name & contact details for parent / (where appropriate)
<i>Please insert more lines as required</i>			
Details of the incident / disclosure / concern			
<i>What happened / was said / have you noticed etc?</i> 			

Context of the incident / disclosure / concern	
<i>Where / when / who else was present etc.</i>	
Date of incident / disclosure	Time of incident / disclosure
Action taken to ensure immediate safety.	
Other action taken or advice sought.	
Signature	
For office use only: Form reference –	

Notes for completion

About this form and the person completing it

Please complete all sections

About the person or people, we are concerned about or involved in the incident.

When reporting a concern involving a child or young person, please complete all sections.

When reporting a concern about an adult, the parent / carer details may not be required. Where this is recorded, please include the relationship to the person involved. Please insert additional lines as required.

Details of the incident / disclosure / concern

Please include as much relevant detail as you can.

When reporting a disclosure, please quote the individual where possible. Please also comment on their body language or any other non-verbal communication that might be useful.

When drawing conclusions, please include the evidence that has led to that conclusion.

Context of the incident / disclosure / concern

Please include as much relevant detail as you can.

Action taken to ensure immediate safety.

Please provide details. If no action was required, please indicate by writing "None".

Other action taken or advice sought.

If any advice was sought, please provide details including who you spoke to, their contact details and what advice was given or action that was taken.

Signature

Please ensure that you sign the form.

Trinity Church Westminster: Confidential file chronology

[illegible]

Trinity Church Westminster: Record of safeguarding conversations and actions

Date of action / conversation	Document reference.
Description of record	
Information given.	
Advice received.	
Actions to take.	
Outcomes	
Recorded by	Date recorded

Trinity Church Westminster: Safeguarding report to the trustees and officers

Report from the Designated Safeguarding Lead and Deputy covering the period from	
Report completed by:	Date
Summary of safeguarding activity	
Number of concern / incident reports received in relation to children	
Number of concern / incident reports received in relation to adults	
Number of cases referred to Children's Social Care	
Number of cases referred to Adult Social Care	
Number of allegations received	
Number of allegations investigated by Local Authority	
Number of reportable incidents reported to charity commission	
Were there any common themes or issues in the reports submitted?	Yes / No
If so, what?	
Do you have any concerns about the effectiveness of the safeguarding arrangements that are in place?	Yes / No
If so, what?	

What training or informal update activity been completed this year?		
Any recommendations to or requests of the trustees?		
Declaration from Safeguarding Leads	Yes	No
Has the policy been reviewed for legal compliance and effectiveness? <i>(CSS can be consulted to check whether any significant changes have occurred)</i>		
Are DBS checks up to date for all staff and volunteers?		
Is the Single Central Record up to date?		
Is staff and volunteer training up to date?		
Is DSL training up to date?		
Is the training log up to date?		
Any other comments		

Trinity Church Westminster: Complaints and concerns

Complainant details	
Name:	Home address:
Phone:	E-mail:
Details of the concern or complaint	
Details of the complaint:	
Have you raised this matter with anyone from the church before completing this form? If yes, please provide details of who.	
Handling of this complaint	
<i>Please delete statement that does not apply</i> I would like this complaint to commence at stage 1 of the complaints process (informal resolution) I would like this complaint to be considered at stage 2 of the complaints process (formal investigation)	
Date completed	
Office use	
Complaints log reference:	

Trinity Church Westminster: Complaints log

Reference	Date Rec'd	Complainant name(s)	Nature of complaint / key theme(s)	Acknowledged	Stage 1 commenced	Stage 1 complete	Stage 1 outcome	Stage 2 commenced	Stage 2 complete	Stage 2 outcome	Appeal commenced	Appeal complete	Appeal outcome	Closed
2021-1														

Trinity Church Westminster Safeguarding Poster



SAFEGUARDING INFORMATION

Safeguarding everyone at our church is a priority for us.
It is an outworking of our Biblical principles.

Church Name: Trinity Church Westminster

Charity Number: 1217732

KEY CONTACTS



SAFEGUARDING COORDINATOR

Eloise James

safeguarding@trinitywestminster.com



SENIOR MINISTER

Luke Cornelius

luke@trinitywestminster.com

IN AN EMERGENCY

Call your Local Authority:

Children's Services: 020 7641 4000 (Emergency out-of-hours: 020 7641 2388)

Adults' Services: 020 7641 2176

or the Police — 999

Christian Safeguarding Services' Advice Line

0116 218 4420 — available 7 days a week, 8am to 10pm

Website: www.thecss.co.uk

