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SAFEGUARDING POLICY

Contents

SAFEGUARDING POLICY	1
Details of the institution	2
Our commitment	3
Recognising and responding appropriately to an allegation or suspicion of abuse	6
Understanding abuse and neglect	6
Safeguarding awareness	6
RESPONDING TO ALLEGATIONS OR SUSPICIONS OF ABUSE.....	6
SUSPICIONS OR ALLEGATIONS OF PHYSICAL OR SEXUAL ABUSE.....	8
Prevention.....	8
Safe recruitment	8
Management of Workers – Codes of Conduct	9
Pastoral Care.....	9
Supporting those affected by abuse.....	9
Practice Guidelines.....	9
Working in Partnership	9
Appendix 1: Definitions of Abuse	10
Statutory Definitions of Abuse (Adults at Risk).....	10
Appendix 2: Signs of Possible Abuse: Adults at Risk.....	11
Appendix 3: Effective Listening	13
Appendix 4: Guidelines for Behaviour When working with Adults at Risk	14

DETAILS OF THE INSTITUTION

Westfield House of Theological Studies

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Email address: **principal@cam.ac.uk**

Westfield House is a member of the Evangelical Lutheran Church of England (ELCE).

The ELCE is a registered charity in England and Wales (number 220466). The ELCE Trust Ltd is a registered company (number 579460) and a registered charity in England (number 220467) and Scotland (number SC041204). The registered office is at 28 Huntingdon Road, Cambridge CB3 0HH, United Kingdom.

Insurance Company	Employers Liability Insurance Ansvar Insurance Company Limited Ansvar House St Leonards Road Eastbourne BN21 3UR Policy number CHP 48667 Tel: 0845 6020999
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The following is a brief description of our theological house of study and the type of work / activities we undertake with adults at risk:

Westfield House, the theological college of the Evangelical Lutheran Church of England (ELCE), is a small residential college located close to the centre of Cambridge. Its core work is to prepare students for ministry in the Lutheran Church either as a pastor or for other church work, and in addition the college has recently developed a liberal arts course. Westfield House is accredited by the British Accreditation Council (BAC), inspected on behalf of UKVI by Schools Inspection Service (SIS), a member of the Cambridge Theological Federation and an Affiliate Teaching Centre of the University of London.

Our student body comprises internal UK/EU students, students from Lutheran church bodies around the world and 'study abroad' students from Lutheran universities and seminaries. Westfield House does not accept students under 18 years of age and our policy prohibits anyone under 18 years of age residing in our student accommodation.

The objects of Westfield House are:

- To advance the education of the public in the areas of theology, liberal arts and sciences, in particular, but not exclusively, by:
- Providing Higher Level education for Students from the UK and other countries;
- Providing study abroad opportunities for Students from countries outside the UK and enhancing their time in the UK by arranging suitable cultural experiences;

- Providing pastoral and diaconal training in the Lutheran tradition and ethos, for church workers and members of the public;
- Providing continuing education and opportunities for further development for pastors, church workers and laity;
- Raising awareness of Lutheran theology and the work of Westfield House by offering short courses and conferences and publishing newsletters, articles and books for the public;
- Providing a stimulating and robust academic learning environment for students by encouraging and fostering academic research in theology, liberal arts and sciences;
- Improving the welfare of Students of Westfield House and others who are studying, completing an internship or conducting academic research in Cambridge by providing suitable accommodation in a safe and pastoral environment;
- Promoting the personal development of Westfield House students by providing social, cultural, sporting and recreational activities and forums for discussions and debate;
- Supporting needy students who have been accepted to study at Westfield House by providing scholarships.

As a registered charity the ELCE reports to the Charities Commission on behalf of all the member congregations and Westfield House in England and Wales and to the Office of the Scottish Charity Regulator on behalf of the congregation in Scotland.

OUR COMMITMENT

Westfield House, Cambridge, along with Christians worldwide, believes that all people are created in the image of God and therefore have inherent dignity and worth. Consequently each individual is to be valued, respected and protected from harm.

Westfield House is committed to promoting and supporting environments which:

- ensure that all people of any age feel welcomed, respected and safe from abuse;
- encourage adults who may be at risk to lead as independent a life as possible, to choose how to lead their life, and to be active contributors to the Westfield community;
- protect adults who may be at risk from actual or potential harm;
- enable and encourage concerns to be raised and responded to openly and consistently.

We recognise that:

- everyone has different levels of risk, and that each of us may be regarded as at risk at some time in our lives;
- all adults and children who may be at risk (regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity) have the right to equal protection from all types of harm or abuse;
- abuse of adults and children who may be at risk can occur in all communities and is most likely to occur within families and by people known to them;
- working in partnership with adults and children who may be at risk, their carers and other agencies is essential in promoting their welfare.

Westfield House will endeavour to safeguard anyone who may be at risk by:

In all our activities -

- valuing, listening to and respecting anyone who may be at risk;

- fostering and encouraging best practice by setting standards for working with anyone who may be at risk, and boundaries for acceptable behaviour, in co-operation with statutory bodies, voluntary agencies and other faith communities [see Appendix 7 for guidelines for behaviour].

In our recruitment of paid staff and volunteers, -

- ensuring careful selection and recruitment of ordained and lay faculty and staff in line with safer recruitment principles and checks [see Section 4 Prevention/safe recruitment and Appendix 6 for a protective ethos contract];
- providing supervision, support and training.

When concerns are raised -

- responding without delay to every concern raised that an adult or child may have been harmed, or be at risk from harm, through abuse, harassment or bullying; or about the behaviour of an adult or child;
- working with the Evangelical Lutheran Church of England (ELCE) as a whole and the appropriate statutory bodies during an investigation into abuse, including when allegations are made against a member of the Westfield community;
- challenging any abuse of power, especially by anyone in a position of trust.

In our care -

- ensuring that informed and appropriate pastoral care is offered to anyone who has suffered abuse;
- ensuring that appropriate pastoral care is offered to any member of our community against whom an allegation is made.

In our supervision -

- ensuring, in partnership with the ELCE and other agencies, that care and supervision is provided for any member of our Westfield community known to have offended against an adult at risk or child, or to pose a risk to them.

We acknowledge that children, young people and adults at risk can be the victims of physical, sexual and emotional abuse, and neglect. We accept the UN Universal Declaration of Human Rights and the International Covenant of Human Rights, which states that everyone is entitled to “all the rights and freedoms set forth therein, without distinction of any kind, such as race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth or other status”. We also concur with the Convention on the Rights of the Child which states that children should be able to develop their full potential, free from hunger and want, neglect and abuse. They have a right to be protected from “all forms of physical or mental violence, injury or abuse, neglect or negligent treatment or exploitation, including sexual abuse, while in the care of parent(s), legal guardian(s), or any other person who has care of the child.” Westfield House has therefore adopted the procedures set out in this safeguarding policy in accordance with statutory guidance. We are committed to build constructive links with statutory and voluntary agencies involved in safeguarding.

The policy and attached practice guidelines are based on the ten Safe and Secure safeguarding standards published by the Churches' Child Protection Advisory Service (CCPAS) and prepared in

consultation with the Executive Council of the ELCE and the ELCE acknowledges CCPAS' assistance and support in the production of our policy.

The Leadership of the ELCE and Westfield House undertakes to:

- endorse and follow all national and local safeguarding legislation and procedures, in addition to the international conventions outlined above;
- provide on-going safeguarding training for all its workers and will regularly review the operational guidelines attached;
- ensure that the premises meet the requirements of the Equality Act 2010 and all other relevant legislation, and that it is welcoming and inclusive;
- support the Safeguarding Coordinator(s) in their work and in any action they may need to take in order to protect children and adults at risk;
- file a copy of the policy and practice guidelines with the ELCE Central Office and any amendments subsequently published. The Church agrees not to allow the document to be copied by other organisations.

NOTES AND DEFINITIONS:

- The term 'adult at risk' has a number of different definitions. This is the definition which will be used in this policy.

An adult is someone over 18 years old and includes any adult, whether or not they consider themselves vulnerable, who may be vulnerable by reason of age, illness, disability; and any adult who has been made vulnerable by their situation or circumstance, such as by discrimination, or as a victim / survivor of abuse.

- The term 'child' refers to anyone under the age of eighteen. Westfield House does not accept students under the age of 18 and has a policy of not allowing children under the age of 18 to reside in its student accommodation.
- Safeguarding is the term that describes the function of protecting adults and children from abuse or neglect. It is an important shared priority of many public services, and a key responsibility of local authorities.
Safeguarding relates to the need to protect certain people who may be in vulnerable circumstances. These are people who may be at risk of abuse or neglect, due to the actions (or lack of action) of another person. In these cases, it is critical that services work together to identify people at risk and put in place interventions to help prevent abuse or neglect, and to protect people.
- The term 'adult at risk' has been used in this policy. This is because the term 'vulnerable adult' may wrongly imply that some of the fault for the abuse lies with the adult abused. The term 'adult at risk' is used as an exact replacement for 'vulnerable adult', as used throughout existing government guidance to local authorities.
- Abuse is a violation of an individual's human and civil rights by another person or persons. Abuse may consist of a single act or repeated acts. It may be physical, financial, verbal or psychological or an act of neglect or omission to act. It may occur when an adult at risk is persuaded to enter into a financial or sexual transaction to which s/he has not consented, or cannot consent. Abuse can occur in any relationship and may result in significant harm to, or

exploitation of, the person subjected to it. The definition of 'abuse' with respect to adults at risk is included at Appendix 1.

Recognising and responding appropriately to an allegation or suspicion of abuse

UNDERSTANDING ABUSE AND NEGLECT

Defining child abuse or abuse against an adult is a difficult and complex issue. A person may abuse by inflicting harm, or failing to prevent harm. Children and adults in need of protection may be abused within a family, an institution or a community setting. Very often the abuser is known or in a trusted relationship with the child or adult.

In order to safeguard those in the Westfield House community, we adhere to the UN Universal Declaration of Human Rights with particular reference to Article 5 which states:

“No one shall be subjected to torture or to cruel, inhuman or degrading treatment or punishment.”

Detailed definitions, and signs and symptoms of abuse, as well as how to respond to a disclosure of abuse, are included here in our policy.

- **Definitions of abuse;** these are included at Appendix 1.
- **Signs and symptoms of abuse;** these are included at Appendix 2
- **How to respond to anyone wishing to disclose abuse;** basic guidance for listening effectively are included at Appendix 3.

SAFEGUARDING AWARENESS

Westfield House is committed to on-going safeguarding training and development opportunities for all workers, developing a culture of awareness of safeguarding issues to help protect everyone. The Safeguarding Coordinator will ensure that appropriate safeguarding training opportunities are in place for staff and students of Westfield House.

Ordained faculty will be encouraged to attend an annual refresher course or review of the policy at either ELCE Pastors' Study Week or at an ELCE Barnes Conference.

Westfield House will also ensure that a copy of this policy will be displayed prominently on the House notice board together with information on where to get help and advice in relation to abuse, discrimination, bullying or any other matter where they have a concern.

All workers will be encouraged to follow the 'Facing the Unthinkable' distance learning course run by CCPAS and will be encouraged to attend the Children's Ministry Conferences run by the ELCE's Congregational House Life Committee.

RESPONDING TO ALLEGATIONS OR SUSPICIONS OF ABUSE

Under no circumstances should a worker carry out their own investigation into an allegation or suspicion of abuse. Follow procedures as below:

The person in receipt of allegations or suspicions of abuse should report concerns as soon as possible to Cynthia Lumley (hereafter the "Safeguarding Co-ordinator") tel no: 07462 882347 who is

nominated by Westfield House to act on their behalf in dealing with the allegation or suspicion of neglect or abuse, including referring the matter on to the statutory authorities.

In the absence of the Safeguarding Co-ordinator or, if the suspicions in any way involve the Safeguarding Co-ordinator, then the report should be made to Joel Humann (hereafter the "Deputy") tel no: 07859 559595. If the suspicions implicate both the Safeguarding Co-ordinator and the Deputy, then the report should be made in the first instance to the Churches' Child Protection Advisory Service (CCPAS) PO Box 133, Swanley, Kent, BR8 7UQ. Telephone 0845 120 4550. Alternatively contact Social Services or the police.

Where the concern is about a child the Safeguarding Coordinator should contact Children's Social Services. Where the concern is regarding an adult in need of protection contact Adult Social Services or take advice from CCPAS as above.

The Cambridgeshire County Council Children's Social Services telephone numbers are:

0345 045 5203 (office hours)

01733 234724 (emergencies out of office hours)

The Cambridgeshire County Council Adult Social Services telephone numbers are:

0345 045 5202 (office hours)

01733 234724 (emergencies out of office hours).

The Police Protection Team which deals with adults and children can be contacted on:

999 (Emergencies)

101 (Non-emergencies)

Where required the Safeguarding Co-ordinator should then immediately inform the ELCE Chairman or, if he is not available, a member of the ELCE Executive Council; and inform the insurance company if a Faculty or Staff member is involved in the allegation [employees' insurance details are displayed on the Westfield House notice board.]

(ELCE Chairman) Rev Jon Ehlers tel no: _____

Suspicions must not be discussed with anyone other than those nominated above. A written record of the concerns should be made in accordance with these procedures and kept in a secure place.

Whilst allegations or suspicions of abuse will normally be reported to the Safeguarding Co-ordinator, the absence of the Safeguarding Co-ordinator or Deputy should not delay referral to Social Services, the Police or taking advice from CCPAS.

The ELCE will support the Safeguarding Co-ordinator/Deputy in their role, and accept that any information they may have in their possession will be shared in a strictly limited way on a need to know basis.

It is, of course, the right of any individual as a citizen to make a direct referral to the safeguarding agencies or seek advice from CCPAS, although it is hoped that members of the Westfield House community will use the procedure detailed here. If, however, the individual with the concern feels that the Safeguarding Co-ordinator/Deputy has not responded appropriately, or where they have a disagreement with the Safeguarding Co-ordinator(s) as to the appropriateness of a referral they are free to contact an outside agency direct. We hope by making this statement that Westfield House

demonstrates its commitment to effective safeguarding and the protection of all those who are vulnerable.

The role of the safeguarding co-ordinator/ deputy is to collate and clarify the precise details of the allegation or suspicion and pass this information on to statutory agencies who have a legal duty to investigate.

The following procedure will be followed where there is a concern that an adult is in need of protection:

SUSPICIONS OR ALLEGATIONS OF PHYSICAL OR SEXUAL ABUSE

If an adult has a physical injury or symptom of sexual abuse the Safeguarding Co-ordinator/Deputy will

- discuss any concerns with the individual themselves giving due regard to their autonomy, privacy and rights to lead an independent life
- if the adult is in immediate danger or has sustained a serious injury contact the Emergency Services, informing them of any suspicions.

For advice contact the Adult Social Care Team who have responsibility for safeguarding under the Care Act 2014 to investigate allegations of abuse. Alternatively CCPAS can be contacted for advice.

PREVENTION

Safe recruitment

Westfield House will ensure all workers will be appointed, trained, supported and supervised in accordance with government guidance on safe recruitment. This includes ensuring that:

- There is a written job description / person specification for the post
- Those applying have completed an application form and a self declaration form [see Appendix 8 for a template of an application form from CCPAS]
- Those short listed have been interviewed
- Safeguarding has been discussed at interview
- Written references have been obtained, and followed up where appropriate
- A disclosure and barring check has been completed (we will comply with Code of Practice requirements concerning the fair treatment of applicants and the handling of information)
- Qualifications where relevant have been verified
- A suitable training programme is provided for the successful applicant
- The applicant has completed a probationary period
- The applicant has been given a copy of the church's safeguarding policy (this document) and knows how to report concerns.

In appointing workers, whether paid or voluntary, Westfield House is responsible for ensuring that the worker has completed a protective ethos contract [see Appendix 6]. The worker is given a written note about his/her responsibilities and the name of the person who will support and supervise him/her. She/he will also be issued with guidelines for behaviour in working with adults and children [see Appendix 6]. These guidelines are designed to discourage people who seek contact with adults and children in order to abuse them and also to protect workers from situations where allegations of misconduct might arise. Workers are strongly advised not to accept working conditions that do not conform to the guidelines.

Where the work involves substantial one-to-one contact with adults at risk, especially where the worker will often work alone, a criminal records check at the appropriate level is undertaken. For other situations the voluntary disclosure statement contained in the protective ethos contract is usually deemed sufficient, but if in doubt Westfield House always takes the more cautious approach.

Management of Workers – Codes of Conduct

Westfield House is committed to supporting all workers and ensuring they receive support and supervision. All workers have been issued with a guideline for behaviour in working with adults and children [Appendix 4]. Westfield House undertakes to follow the principles found within the ‘Abuse Of Trust’ guidance issued by the Home Office and it is therefore unacceptable for those in a position of trust to engage in any behaviour which might allow a sexual relationship to develop for as long as the relationship of trust continues.

PASTORAL CARE

Supporting those affected by abuse

Westfield House is committed to offering pastoral care, working with statutory agencies as appropriate, and support to all those who have been affected by abuse who have contact with or are part of the organisation.

The practice of pastoral care for clergy within the ELCE is that the Chairman of the ELCE is the “pastor’s pastor”. In addition the ELCE has the post of Pastoral Advisor within the ELCE Executive Council. Pastors are also encouraged to develop a ‘brother/father confessor’ relationship with one or more other pastors within the ELCE to discuss issues and concerns.

PRACTICE GUIDELINES

As an institution working with adults at risk we wish to operate and promote good working practice. This will enable workers to run activities safely, develop good relationships and minimise the risk of unfounded allegations.

We have established guidelines for those working with adults at risk. These are included at Appendix 4.

Working in Partnership

The diversity of organisations and settings means there can be great variation in practice when it comes to safeguarding adults at risk. This can be because of cultural tradition, belief and religious practice or understanding, for example, of what constitutes abuse.

We therefore have clear guidelines in regards to our expectations of those with whom we work in partnership, whether in the UK or not. We will discuss with all partners our safeguarding expectations and have a partnership agreement for safeguarding. It is also our expectation that any organisation using our premises, as part of the letting agreement will have their own policy that meets CCPAS’ safeguarding standards.

Good communication is essential in promoting safeguarding, both to those we wish to protect, to everyone involved in working with children and adults at risk and to all those with whom we work in partnership. This safeguarding policy is just one means of promoting safeguarding.

Signed by: _____ **(Westfield House representative)**

Date: _____

Appendix 1: Definitions of Abuse

Statutory Definitions of Abuse (Adults at Risk)

The following definition of abuse is laid down in *No Secrets: Guidance on developing and implementing multi-agency policies and procedures to protect adults at risk from abuse (Department of Health 2000)*:

Abuse is a violation of an individual's human and civil rights by any other person or persons. In giving substance to that statement, however, consideration needs to be given to a number of factors:

Abuse may consist of a single act or repeated acts. It may be physical, verbal or psychological, it may be an act of neglect or an omission to act, or it may occur when an adult at risk is persuaded to enter into a financial or sexual transaction to which he or she has not consented, or cannot consent. Abuse can occur in any relationship and may result in significant harm to, or exploitation of, the person subjected to it.

Physical Abuse

This is the infliction of pain or physical injury, which is either caused deliberately, or through lack of care.

Sexual Abuse

This is the involvement in sexual activities to which the person has not consented or does not truly comprehend and so cannot give informed consent, or where the other party is in a position of trust, power or authority and uses this to override or overcome lack of consent.

Psychological or Emotional Abuse

These are acts or behaviour, which cause mental distress or anguish or negates the wishes of the adult at risk. It is also behaviour that has a harmful effect on the adult at risk's emotional health and development or any other form of mental cruelty.

Financial or Material Abuse

This is the inappropriate use, misappropriation, embezzlement or theft of money, property or possessions

Neglect or Act of Omission

This is the repeated deprivation of assistance that the adult at risk needs for important activities of daily living, including the failure to intervene in behaviour which is dangerous to the adult at risk or to others. An adult at risk may be suffering from neglect when their general well being or development is impaired

Discriminatory Abuse

This is the inappropriate treatment of an adult at risk because of their age, gender, race, religion, cultural background, sexuality, disability etc. Discriminatory abuse exists when values, beliefs or culture result in a misuse of power that denies opportunity to some groups or individuals. Discriminatory abuse links to all other forms of abuse.

Institutional Abuse

This is the mistreatment or abuse of an adult at risk by a regime or individuals within an institution (e.g. hospital or care home) or in the community. It can be through repeated acts of poor or inadequate care and neglect or poor professional practice.

Appendix 2: Signs of Possible Abuse (Adults at Risk)

Physical

- A history of unexplained falls, fractures, bruises, burns, minor injuries.
- Signs of under or over use of medication and/or medical problems unattended

Sexual

- Pregnancy in a woman who is unable to consent to sexual intercourse
- Unexplained change in behaviour or sexually implicit/explicit behaviour
- Torn, stained or bloody underwear and/or unusual difficulty in walking or sitting
- Infections or sexually transmitted diseases
- Full or partial disclosure or hints of sexual abuse
- Self-harming

Psychological / Emotional

- Alteration in psychological state e.g. withdrawn, agitated, anxious, tearful
- Intimidated or subdued in the presence of the carer
- Fearful, flinching or frightened of making choices or expressing wishes
- Unexplained paranoia
- Changes or regression in mood or behaviour
- Depression, aggression, extreme anxiety
- Nervousness, frozen watchfulness
- Obsessions or phobias
- Sudden under-achievement or lack of concentration
- Inappropriate relationships with peers and/or adults
- Attention-seeking behaviour
- Persistent tiredness
- Running away/stealing/lying

Financial or Material

- Disparity between assets and living conditions
- Unexplained withdrawals from accounts or disappearance of financial documents
- Sudden inability to pay bills
- Carers or professionals fail to account for expenses incurred on a person's behalf
- Recent changes of deeds or title to property

Neglect or Omission

- Malnutrition, weight loss and /or persistent hunger
- Poor physical condition, poor hygiene, varicose ulcers, pressure sores
- Being left in wet clothing or bedding and/or clothing in a poor condition
- Failure to access appropriate health, educational services or social care
- No callers or visitors

Discriminatory

- Inappropriate remarks, comments or lack of respect
- Poor quality or avoidance of care

Institutional

- Lack of flexibility or choice over meals, bed times, visitors, phone calls etc
- Inadequate medical care and misuse of medication
- Inappropriate use of restraint
- Sensory deprivation e.g. denial of use of spectacles or hearing aids
- Missing documents and/or absence of individual care plans
- Public discussion of private matter
- Lack of opportunity for social, educational or recreational activity

Appendix 3: Effective Listening

Ensure the physical environment is welcoming, giving opportunity for the child or adult at risk to talk in private but making sure others are aware the conversation is taking place.

- It is especially important to allow time and space for the person to talk
- Above everything else listen without interrupting
- Be attentive and look at them whilst they are speaking
- Show acceptance of what they say (however unlikely the story may sound) by reflecting back words or short phrases they have used
- Try to remain calm, even if on the inside you are feeling something different
- Be honest and don't make promises you can't keep regarding confidentiality
- If they decide not to tell you after all, accept their decision but let them know that you are always ready to listen.
- Use language that is age appropriate and, for those with disabilities, ensure there is someone available who understands sign language, Braille etc.

HELPFUL RESPONSES

You have done the right thing in telling

I am glad you have told me

I will try to help you

DON'T SAY

Why didn't you tell anyone before?

I can't believe it!

Are you sure this is true?

Why? How? When? Who? Where?

I am shocked, don't tell anyone else

Appendix 4: Guidelines for Behaviour When working with Adults at Risk

Treat the individuals you are working with, with respect, referring to them by name.

Act respectfully, for instance knocking before entering their room/house, asking permission to join them, and respecting their privacy and possessions.

When visiting, use cards or letters of authority.

- Respect differences, their likes and dislikes.
- Respect dignity and feelings; ask about personal preferences, forms of address and how much help might be required.
- Take care over the language you use. For instance, promote positivity by using language that describes the person as having a physical, mental or learning disability, not being the disability
Use appropriate language and provide for those who do not have spoken language, i.e. sign language
Include all in conversation or question-and-answer sessions
- Actively promote empowerment and the well-being of the individuals with whom you are in ministry through appropriate opportunities

Bear in mind that the protective ethos is designed to protect the adults you are dealing with from those who might try to abuse them. It also seeks to protect you from false allegations that might arise, whether this is through simple misinterpretation of your actions or a malicious untruth. So it is important that you always think about what you are doing from the point of view of an outside onlooker. Apply the 'video test': if your actions were caught on videotape, how easy would it be to explain what you were doing?

The first and most basic rule for working with adults at risk is not to put them - or you – in a situation where suspicion could be aroused. But don't be paranoid either. Use common sense and sound judgement, and in addition bear in mind the following general principles:

1. Do not meet one to one in any place or situation where you cannot be seen by another trusted adult.
2. Do not give lifts in your car unless it is unavoidable, especially if it will mean being alone in the car with just one adult at risk. If this is unavoidable, make sure someone else knows what you are doing, and ask the adult to sit in the back seat.
3. ALWAYS have a GOOD reason for any kind of physical contact. Use appropriate contact. Break away from contact as soon as you can without distressing the adult. Afterwards, make sure your pastor or another trusted adult knows what happened. If you feel at all worried about it, make a written note (with the date, the facts of what happened, and why you acted as you did).
4. Be very careful about offering confidentiality. If you are asked if you can keep a secret, say something like, 'That depends. I will keep secrets where I can, but if I think it involves someone being hurt I might have to tell.' If an adult is clearly distressed and will not talk without a guarantee of confidentiality, give him/her access to a telephone to call one of the contacts above. If you have questions about handling confidentiality, seek advice from the Safeguarding Coordinator.

5. If you see a fellow worker doing something that breaks the protective ethos, talk to him/her about it and point out the risk. Expect and encourage others to do the same for you, not in a spirit of suspicion, but in the spirit of strengthening the protective ethos and of looking out for each other in Christian love and concern. If you are still worried about that person, talk to the Designated Person.
6. These guidelines do not suggest that you never touch under any circumstances. Most human beings would find it impossible to keep this rule anyway, as our instinct is to reach out and touch people who are in need or distress. Accept that some level of risk is always there when you work with adults at risk, and your actions may be misinterpreted. The only way to avoid this risk altogether is to having nothing to do with adults at risk at all. The important thing is to minimise the risk, and communicate quickly and efficiently with others at the first sign of a problem.