



**Biblical
Counselling** UK

**Safeguarding Policy,
Procedures
and
Code of Conduct**

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Biblical Counselling UK

Safeguarding Policy

Safeguarding children, young people and vulnerable adults

1. Purpose

This policy with its appendices outlines how we will:

- 1.1. Ensure that Biblical Counselling UK (BCUK) provides a healthy, nurturing, and protective environment for everyone who engages with our organisation
- 1.2. Ensure that everyone involved in the ministry of BCUK is protected from harm and abuse and that if abuse is identified, it is handled effectively, promptly, and proportionately
- 1.3. Ensure that our trustees, employees, workers, contractors and volunteers are clear about their responsibilities and duties and are supported to competently and confidently fulfil them
- 1.4. Support the development of an open and transparent culture that listens to the views and wishes of everyone involved in the work of BCUK and supports the raising of concerns and complaints
- 1.5. Provide leadership and accountability for those involved in the work of BCUK in relation to safeguarding

2. Scope

This policy applies to everyone linked to BCUK (trustees, employees, workers, contractors or volunteers) who work with children, young people or their parents / carers or with adults at risk of abuse.

3. Context

BCUK is a Charitable Incorporated Organisation, charity number **1164965**

BCUK seeks to serve the local church through:

- Helping pastors and church members to develop a rich pastoral vision which reflects a biblical counselling approach to ministry
- Helping experienced carers to deepen their wisdom and skill
- Providing resources both for individual strugglers and that equip individuals for inter-personal ministry

BCUK is governed by a Board of Trustees who appoint an Executive Director to lead the work of the organisation.

This document will address three areas of our charitable activities where there are particular safeguarding implications:

1. Conferences and speaking engagements
2. Training
3. The Church-based Intern Scheme

4. Values and beliefs

- 4.1. Everyone who engages with BCUK has the right to be protected from any form of bullying or harassment, exploitation or abuse and we will seek to ensure that we provide a caring and nurturing environment that is open and transparent and that promotes the raising of concerns with senior leaders
- 4.2. We have a particular responsibility to protect and promote the wellbeing of those who are vulnerable; particularly to children, young people and adults at risk of abuse; ensuring they are safe while in our care and that we respond appropriately to disclosures or indicators that they are experiencing abuse or neglect while in our care or elsewhere
- 4.3. Everyone involved in the work of our organisation has a responsibility to act to support the values and commitments outlined in this policy
- 4.4. Our approach to safeguarding is shaped by our belief as Christians that:
 - 4.4.1. We are to honour those that God has set in authority over us and to live as responsible and good citizens in the time and place that God has set us in
 - 4.4.2. Every human life, including that of the unborn, is valuable to God and each person bears his image
 - 4.4.3. We live in a fallen and sinful world, where there are many risks and dangers and we must seek to protect everyone, but particularly the vulnerable in our midst from those dangers
 - 4.4.4. God cares for the widow, the orphan, and the stranger; he calls us to protect and care for those who are vulnerable in our society and to oppose exploitation
 - 4.4.5. Jesus' example was one of valuing, accepting, and caring about everyone
 - 4.4.6. We are to love those around us as God loves them and to seek to bring healing, restoration and reconciliation to broken and damaged lives by the manifestation of the love of God through us
 - 4.4.7. The church (and the community associated with BCUK) is not a gathering of sinless and perfect people, but rather a community of grace where we seek to encourage one another to grow in faith and obedience to God
 - 4.4.8. We are called to encourage and challenge each other lovingly and to spur one another on to greater holiness and obedience to God in an attitude of humility, grace and forgiveness
 - 4.4.9. We have adopted the following statement of faith: [Statement of Faith.pdf](#)

5. Our responsibilities and commitments

5.1. Our responsibilities

- 5.1.1. To ensure that the protection of all those involved in the work of BCUK, but particularly children, young people and adults at risk of abuse and the promotion of their welfare is of paramount importance to us and that best practice in safeguarding is embedded into the culture of our organisation
- 5.1.2. To treat each person as equal in the sight of God; equally sinful, equally loved and equally offered the gift of salvation and reconciliation to God and equally protected and respected
- 5.1.3. To seek to minister to, and to encourage growth in obedience to God and his word with equity, transparency and sensitivity, in accordance with our fundamental beliefs as laid out in our statement of faith, charitable aims and governing documents
- 5.1.4. To value, respect and listen to all those involved in the work of BCUK, including those who are vulnerable or find it difficult to make their voice heard
- 5.1.5. To work in partnership with children, young people, their parents / carers adults at risk of abuse and local and national partner agencies and organisations to promote the welfare of and to protect all those involved in the work of BCUK, and particularly the vulnerable
- 5.1.6. To work to develop and maintain an environment that is protective, caring and nurturing for all who engage with BCUK, in accordance with our doctrines and beliefs as outlined in our governing documents

5.2. How we will seek to fulfil these responsibilities

- 5.2.1. We will seek to visibly demonstrate our commitment to safeguarding throughout the organisation and our most senior leaders will support the development of best practice and provide accountability to everyone who works (whether paid or voluntarily) on our behalf; including providing accountability and challenge to each other
- 5.2.2. We will ensure that those who are responsible for safeguarding at the various levels of the organisation are appropriately trained and supported to competently and confidently fulfil their role
- 5.2.3. We will actively seek to create and maintain a culture that is consistent with our biblical principles and best practice in safeguarding
- 5.2.4. We will ensure our training and resources promote best practice in safeguarding
- 5.2.5. We will ensure that we have robust and relevant policies, procedures and systems that support the culture of our organisation and the work of all those involved in safeguarding and that these are regularly reviewed for effectiveness
- 5.2.6. We will ensure that we appoint a Designated Safeguarding Lead and at least one deputy who will take responsibility for leading the safeguarding of children and adults across the organisation
 - 5.2.6.1. Safeguarding will be promoted and overseen by our senior leaders
 - 5.2.6.2. Delegation of tasks and responsibilities will be clearly outlined in the relevant role descriptions and the organisation's safeguarding structures, complete with contact details, will be included in our procedures and made publicly available
- 5.2.7. We will adopt safer recruitment best practice in the recruitment and selection of staff, contractors and volunteers
- 5.2.8. We will provide effective leadership, management and support for our staff, contractors and volunteers who deliver services on our behalf including:
 - 5.2.8.1. Ongoing training and skills development
 - 5.2.8.2. Supervision and pastoral support
 - 5.2.8.3. Quality and performance management measures
- 5.2.9. We will ensure that we consider safety in all areas of our work and ministry;
 - 5.2.9.1. Developing a positive culture
 - 5.2.9.2. Managing health and safety through effective policies and procedures; using risk assessments, processes and proportionate systems
 - 5.2.9.3. Creating a positive and nurturing environment in all aspects of the work of BCUK, including spiritual, physical, social, emotional, psychological, etc environments
 - 5.2.9.4. Considering the online as well as the physical environments; including our use of social media and technology
- 5.2.10. We will ensure that we monitor the conduct of our staff and that we have policies, procedures and systems for managing allegations against staff, contractors or volunteers, supported by a culture of listening to allegations and responding with rigour, fairness and transparency
- 5.2.11. We will ensure that our expectations in relation to the conduct of those involved with BCUK are clear through codes of conduct, policies and procedures including:
 - 5.2.11.1. Anti-bullying and zero-tolerance approach to bullying; including cyber-bullying and the bullying of staff and leaders
 - 5.2.11.2. Dealing with peer-abuse and harassment (including sexual harassment)
 - 5.2.11.3. Clear accountability processes and sanctions for infringements of the codes of conduct
 - 5.2.11.4. Equality and diversity and a culture of zero-tolerance of discriminatory or abusive attitudes, language or behaviours
- 5.2.12. We will seek to clearly identify concerns about the safety or wellbeing of those who are involved with the work of BCUK and to respond appropriately and proportionately:
 - 5.2.12.1. To signpost or refer them to local or national services that can help them

- 5.2.12.2. To provide information, guidance and support as we are able, to help them overcome their challenges
- 5.2.12.3. To share information appropriately with partner agencies where we have concerns about the safety of an individual and statutory thresholds and / or criteria are met
- 5.2.13. We will record and store information accurately, keeping it securely in line with our legal duties, information sharing policies and national and local guidance and agreements. This will include (where applicable to our activities) records such as:
 - 5.2.13.1. Consent forms
 - 5.2.13.2. Attendance data for work with children, young people and adults at risk of abuse
 - 5.2.13.3. Accident and incident reporting
 - 5.2.13.4. Confidential recording of safeguarding concerns
 - 5.2.13.5. Confidentiality agreements for those involved in counselling triads as part of the Certificate course
- 5.2.14. We will involve children, young people, their parents or carers and adults at risk of abuse in our safeguarding processes wherever possible; making reasonable adjustments where necessary to enable them to participate in the decisions that affect them
- 5.2.15. We will ensure that we have a culture and policies and procedures for raising concerns or complaints by anyone involved in the work of BCUK including children, young people, adults at risk or abuse and their parents / carers and for dealing with those concerns in an efficient, open, honest and fair manner; including clear appeals processes
 - 5.2.15.1. We will also ensure that our leaders are competent and confident in handling complaints
- 5.2.16. We will develop a culture that encourages everyone involved with the work of BCUK to identify and raise concerns and will support this with a clear whistleblowing policy
- 5.2.17. We will ensure our website clearly describes the process to follow if someone has a safeguarding or whistleblowing concern and that our complaints policy and procedure is publicly available

Safeguarding Procedures

6. Purpose

These procedures aim to provide employees, workers, contractors and volunteers with clear and simple instructions as to how safeguarding is promoted and how concerns should be handled. They are not provided for training purposes and will not be used as a substitute for training.

7. Scope

These procedures will be applied to all employees, workers, contractors and volunteers who act on behalf of BCUK.

8. Definitions

Staff: refers to employees and also Trainee Tutors, Tutors, Graders, Mentors, and Ministry Support Group Facilitators holding any of the following agreements: Worker, Volunteer, Seconded or Contractor.

Trustees: refers to those appointed to serve as trustees on the Board, in line with the requirements of the Charity Commission.

9. Governance and oversight

The Board of Trustees will provide effective oversight of safeguarding in the work of BCUK by:

- 9.1. Ensuring that the leadership of BCUK promote the importance of safeguarding and lead the development of a culture that is biblically faithful, healthy, transparent, and accountable
- 9.2. Ensuring that a suitably knowledgeable and appropriately skilled Designated Safeguarding Lead (DSL) and a deputy are appointed and that they are adequately supported and resourced
- 9.3. Ensuring that a proportionate and legally compliant safeguarding policy is in place and that it is reviewed by the DSL and Deputy DSL at least annually, but more frequently as required
- 9.4. Ensuring safeguarding is a standing item on all Board agendas and that the DSL provides a written update to all trustee meetings (which can be conveyed via one of the trustees).
- 9.5. Nominating one of the current trustees to have a specific responsibility for reviewing safeguarding compliance, and who undertakes to follow-up with the DSL any concerns that are raised about BCUK's compliance or safeguarding incidents that have been logged, with a view to then reporting back to the Board on the effectiveness of safeguarding arrangements.
- 9.6. Ensuring the effectiveness of the safeguarding arrangements is reviewed annually in line with the review of the policy and procedures, by the Executive Director and leadership team.
- 9.7. Ensuring role clarity is achieved through a clear definition of the responsibilities of all those involved in safeguarding across the work of the organisation (see appendix A)

10. Recruitment, support and training of trustees

10.1. Management of recruitment processes

- 10.1.1. At least one person who is involved in the process of recruitment of trustees will be trained in Safer Recruitment

10.2. Recruitment process

- 10.2.1. Potential trustees are discussed by the Board and due diligence undertaken on their previous experience of serving on a Board, connection to BCUK and/or biblical counselling, and current/previous employment. The Chair of Trustees, or their representative, will have an initial discussion with the person to establish whether they are interested in the role and if they appear suitable for consideration.
- 10.2.2. The Chair of Trustees, or their representative, will seek a verbal or written reference from someone who knows the person and confirmation of their suitability for the role.
- 10.2.3. If it is agreed by the Board to progress to the next stage, the person will be invited to submit their CV and explain their motivation for serving in this capacity. They will also be invited to attend a Board meeting.
- 10.2.4. Subject to Board agreement, the person will then be invited to join the Board as a Trustee.
- 10.2.5. All trustees must complete a declaration of eligibility and responsibility.
- 10.2.6. New trustees will be provided with a copy of the BCUK Board's Governance documents, this safeguarding policy and BCUK's Code of Conduct. Trustees must confirm they have read, understood and agree to comply with these documents.
- 10.2.7. The Trustees have considered the government's guidance on when a DBS check can be undertaken and have concluded only the Chair of Trustees and Trustee with responsibility for safeguarding should have an Enhanced DBS (without a barred list) check as they carry a degree of management responsibility for others in the organisation who can come into contact with children and/or vulnerable adults in the course of their duties.
- 10.2.8. All other Trustees are not required to have a DBS check.
- 10.2.9. Where a DBS check is required, this will be made clear in preliminary discussions with the potential trustee ahead of them accepting the role. The check will be updated at least

every three years. Appointment to the Board will only be made subject to BCUK's receipt of a satisfactory DBS check.

10.2.10. A "Single Central Record" of recruitment checks for all trustees needing a DBS, and a training log for all trustees, will be maintained by the DSL.

10.3. Probationary periods

10.3.1. Trustees are not subject to a probationary period.

10.4. Supervision and training

10.4.1. All trustees will receive proportionate supervision and training.

10.4.2. Trustees are required to obtain safeguarding training by an external provider, as follows:

Training equivalent to Church of England C2 (Safeguarding leadership)

- Chair of Trustees
- Trustee with responsibility for safeguarding

Training equivalent to Church of England C0 (a basic overview of safeguarding)

- All other trustees

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- Chair of Trustees

10.4.3. There is no requirement for formal update training, however, the trustees must ensure that they are competent in their role and that their knowledge of compliance with legislation and Charity Commission guidance up to date.

10.5. Disclosure & Barring Service (DBS) check

10.5.1. Following the government's guidance on who is eligible for having a DBS check, both the Chair of Trustees and the Trustee with responsibility for safeguarding will have an enhanced DBS check (without a barred list check). This will be renewed every 3 years.

11. Recruitment, support and training of staff

The recruitment and support of staff is of critical importance to the work and ministry of BCUK. In order to fulfil our legal duties and to ensure we meet the still higher standards dictated by Scripture, all staff will be subject to appropriate recruitment processes.

11.1. Management of recruitment processes

11.1.1. At least one person who is involved in the process of recruitment of staff will be trained in Safer Recruitment

11.1.2. Appropriate records will be kept of all recruitment processes

11.1.3. A "Single Central Record" of recruitment checks for all staff and a training log will be maintained

11.1.4. Staff will be provided with written job/role descriptions and person specifications prior to deciding whether to apply to the position

11.1.5. Recruitment of staff must be in-line with BCUK's Advertising & Recruitment Policy which gives further details with regard to the organisation's safer recruitment practices.

11.2. Employees

11.2.1. Prior to appointment, all employees will be subject to a 'Right to Work' check.

11.2.2. Prior to appointment, all employees will be required to submit an application form and sign to indicate they have read, understood, and agree to comply with this safeguarding policy and BCUK's general code of conduct (see Appendix D).

11.2.3. Prior to appointment, all employees will be required to attend an interview, regardless of whether a competitive process is in operation. Employees will follow a more rigorous process than other staff.

11.2.4. Prior to appointment, references will be sought. For employees this will include, where possible, a reference from the current or previous employer, and current church leader.

- 11.2.5. Where a DBS check is required, this will be identified in the job description and the check will be updated at least every three years. Appointment will only be made subject to BCUK's receipt of a satisfactory DBS check.
- 11.2.6. Upon commencement of their position, all employees will be required to complete a formal induction process as outlined in their role description and including any matters identified during the recruitment process.
- 11.2.7. All employees will be subject to a formal probationary period.
- 11.2.8. Prior to commencement of the role, a clear statement of the criteria for successful completion of the probationary period will be provided.
- 11.2.9. Regular support, guidance and review will be provided throughout the probationary period and the outcome (passed, extended, failed) will be communicated to the employee prior to the end of the probationary period and records will be retained of all discussions.
- 11.2.10. All employees will receive proportionate supervision, pastoral care and training to enable them to better perform the duties of their role. Supervision and training will include both personal wellbeing and performance management.

11.3. Trainee Tutors

- 11.3.1. Prior to appointment, all Trainee Tutors will be subject to a 'Right to Work' check.
- 11.3.2. Prior to appointment, all Trainee Tutors will be required to attend an interview, regardless of whether a competitive process is in operation, with the Director of Training & Resources
- 11.3.3. Prior to appointment, references will be sought. For Trainee Tutors this will include, where possible, a reference from their current church leader.
- 11.3.4. On appointment, all Trainee Tutors will be provided with a volunteer agreement and sign to indicate they have read, understood and agree to comply with this safeguarding policy and BCUK's general code of conduct along with other relevant organisation policies.
- 11.3.5. Upon commencement of their position, all Trainee Tutors will be provided with a comprehensive handbook and given on-the-job training by their Trainer.
- 11.3.6. The training period will usually be one year (unless an extension is agreed by all parties).
- 11.3.7. Volunteers will not be subject to a formal probationary period as the nature of a volunteer agreement allows BCUK to terminate the agreement at any time, without notice, should that be necessary.

11.4. Tutors

- 11.4.1. Prior to appointment, all Tutors must have participated in the 'Trainee Tutor' scheme which typically lasts one year. During this time they will have been observed by their Trainer and, on occasions, by either the Director of Training & Resources or the Director of the Certificate Programme. This observation will enable a thorough assessment of whether the individual is suitable, and has the right skills and experience, to be a Tutor.
- 11.4.2. The only exception 11.3.1 is if an individual has significant tutoring experience elsewhere, in which case a formal interview will be conducted to establish their suitability as a Tutor. If appointed, they will be given a 4 month probationary period.
- 11.4.3. Prior to appointment, all Tutors will be subject to a 'Right to Work' check if this has not been previously conducted by BCUK (the exception is if they are contractors).
- 11.4.4. Prior to appointment, all Tutors will be required to attend an interview, regardless of whether a competitive process is in operation, with the Director of Training & Resources
- 11.4.5. Prior to appointment, references will be sought. For Tutors this will include, where possible, an updated reference from their current church leader.
- 11.4.6. On appointment, all Tutors will be provided with an agreement (either worker, volunteer, secondee or contractor – depending on their circumstances) and sign to indicate they have read, understood and agree to comply with this safeguarding policy and BCUK's general code of conduct along with other relevant organisation policies.

- 11.4.7. Upon commencement of their position, all Tutors will be provided with a handbook and in their first year will usually be placed with a more experienced Tutor.
- 11.4.8. Tutors will not be subject to a formal probationary period as the nature of their agreement (whether worker, volunteer, secondee or contractor) allows BCUK to terminate the agreement, should that be necessary.

11.5. Graders

- 11.5.1. Prior to appointment, all Graders will be required to submit an application form.
- 11.5.2. Prior to appointment, all Graders will be subject to a 'Right to Work' check if this has not been previously conducted by BCUK (the exception is if they are contractors).
- 11.5.3. Prior to appointment, all Graders will be required to attend an interview, regardless of whether a competitive process is in operation.
- 11.5.4. Prior to appointment, references will be sought. For Graders this will include, where possible, a reference from their current church leader.
- 11.5.5. On appointment, all Graders will be provided with an agreement (either worker, volunteer, secondee or contractor – depending on their circumstances) and sign to indicate they have read, understood and agree to comply with this safeguarding policy and BCUK's general code of conduct along with other relevant organisation policies.
- 11.5.6. Upon commencement of their position, all Graders will be provided with a handbook and induction training.
- 11.5.7. Graders will not be subject to a formal probationary period as the nature of their agreement (whether worker, volunteer, secondee or contractor) allows BCUK to terminate the agreement, should that be necessary.

11.6. Mentors and Ministry Group Facilitators

- 11.6.1. Prior to appointment, all Mentors and Ministry Group Facilitators will be subject to a 'Right to Work' check if this has not been previously conducted by BCUK (the exception is if they are contractors).
- 11.6.2. Prior to appointment, all Mentors and Ministry Group Facilitators will be required to attend an interview, regardless of whether a competitive process is in operation.
- 11.6.3. Prior to appointment, references will be sought. For Mentors and Ministry Group Facilitators this will include, where possible, a reference from their current church leader.
- 11.6.4. On appointment, all Mentors and Ministry Group Facilitators will be provided with an agreement (either worker, volunteer, secondee or contractor – depending on their circumstances) and sign to indicate they have read, understood and agree to comply with this safeguarding policy and BCUK's general code of conduct along with other relevant organisation policies.
- 11.6.5. Mentors and Ministry Group Facilitators will not be subject to a formal probationary period as the nature of their agreement (whether worker, volunteer, secondee or contractor) allows BCUK to terminate the agreement, should that be necessary.

11.7. Supervision and training

- 11.7.1. All staff will receive proportionate supervision, pastoral care and training to enable them to better perform the duties of their role. Supervision will include both personal wellbeing and performance management.
- 11.7.2. BCUK will pay for employees to obtain safeguarding training by an external provider, as follows:

Training equivalent to Church of England C2 (Safeguarding leadership)

- Executive Director
- Designated Safeguarding Lead (DSL)
- Deputy DSL

Training equivalent to Church of England C1 (a foundational level of safeguarding)

- Ministry staff

Training equivalent to Church of England C0 (a basic overview of safeguarding)

- All other staff

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- Executive Director
- Director of Finance & Operations (Head of HR)
- Director of the Certificate Course
- Director of Training & Resources
- Director of the Intern Scheme

11.7.3. The training should be renewed every 3 years.

11.7.4. All employees will undergo some informal update activity annually.

11.7.5. All Trainee Tutors, Tutors and Graders will receive safeguarding training and guidance as appropriate to their role. Mentors and Ministry Support Group facilitators are expected to undertake safeguarding training independently, as appropriate to their role.

11.8. Disclosure & Barring Service (DBS) check

11.8.1. Following the government's guidance on who is eligible for having a DBS check, all employees who are ministry staff, the DSL and deputy DSL will have an enhanced DBS check (without a barred list check). This will be renewed every 3 years.

11.8.2. A log of safeguarding training and DBS checks will be maintained by the DSL.

12. Recruitment, support and training of Interns

12.1. Management of recruitment processes

12.1.1. At least one person who is involved in the process of recruitment of contractors and volunteers will be trained in Safer Recruitment.

12.1.2. Appropriate records will be kept of all recruitment processes.

12.1.3. Interns will be provided with written role profiles prior to deciding whether to apply to the scheme.

12.2. Recruitment process

12.2.1. Prior to appointment, all Interns will be required to submit an application form.

12.2.2. Prior to appointment, references will be sought, including, where possible, a reference from the current or previous employer and current church leader.

12.2.3. Prior to appointment, all Interns will be required to attend a formal interview.

12.2.4. On appointment, all Interns will be provided with an agreement and sign to indicate they have read, understood and agree to comply with this safeguarding policy and BCUK's general code of conduct, Intern code of conduct and other relevant organisation policies.

12.2.5. All Interns must confirm their church has undertaken a DBS check and that they have read, understood and comply with their church's safeguarding policy.

12.2.6. The Director of the Church-based Intern Scheme will ensure all Interns have a DBS check undertaken by their church, where that is deemed necessary by the church.

13. Ensuring a safe and healthy environment

BCUK fully 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.

13.1. Health and Safety

The Executive Director (or staff member with delegated responsibility) will ensure that the health and safety of everyone involved with the work of BCUK is protected by:

13.1.1. Regularly reviewing our health and safety policy to maximise effectiveness and ensure ongoing legal compliance

13.1.2. Maintaining and implementing proportionate risk assessments

- 13.1.3. Maintenance and analysis of Accident and Incident Reports on receipt to ensure appropriate lessons are learned and timely responses are implemented and an overview analysis of reports that examines trends and recurring themes will be conducted at least annually
 - 13.1.4. Ensuring that the organiser(s) of BCUK-run regional and annual conferences have ensured adequate First Aid cover is available and are aware of first aid provision of the venue (whether that is a First Aid kit or First Aid qualified personnel). The risk assessments will outline procedures to be taken in the event of a medical emergency (whether physical or mental health).
- 13.2. General provisions**
- 13.2.1. BCUK will ensure that information relating to safeguarding, including contact details and other relevant information is prominently displayed online
 - 13.2.2. Leaders will promote the need for all those involved in the work of BCUK to be vigilant to safeguarding concerns through the processes, teaching and culture of the organisation and by personal example

14. Management of ex-offenders who may pose an actual or potential risk to others (particularly where that risk involves vulnerable people).

As an organisation, 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.

- 14.1.1. The areas of BCUK's ministry which are most likely to involve an individual who is an ex-offender are the Certificate Programme, the Intern Scheme and our conferences. Where BCUK becomes aware that an individual is an ex-offender or that they may pose a risk to vulnerable people, BCUK staff will enter into an open and frank discourse with that individual to understand the context and the risks
- 14.1.2. With the consent of the individual, BCUK will seek to work in partnership with probation services or other agencies supporting the individual where this is appropriate
- 14.1.3. BCUK staff will assess the risk posed by the individual and a formal risk assessment will be formulated in consultation with an appropriate safeguarding agency
- 14.1.4. A formal agreement with the individual will be drawn up and will be signed by both the individual and BCUK. The agreement will include:
 - BCUK's commitments to the individual who poses the risk
 - The steps BCUK will take to support the individual while simultaneously protecting everyone involved in the ministry of BCUK
 - The restrictions and conditions that will be applied to the individual's involvement in the ministry of BCUK
 - The consequences of failure to comply with the agreement
 - When and how the risk assessment and formal contract will be reviewed
- 14.1.5. All decisions and agreements will be formally recorded and securely stored
- 14.1.6. The individual who poses a risk will be fully involved in the planning process and information will only be shared with others involved in BCUK's ministry either:
 - With the agreement of the individual who poses a risk, or
 - 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

15. Conferences and speaking engagements

- 15.1. Our national and regional conferences often focus on topics that are sensitive in nature, such as depression or anxiety. Delegates often engage with speakers during breaks or after

- 15.2. an event, though most conversations will not involve safeguarding matters. Our risk assessment will identify a clear pathway for how any safeguarding concerns are handled. Where one of our employees is speaking at an event hosted by a church or organisation other than BCUK, any safeguarding concerns raised will be passed on to the host's DSL.

16. Certificate Programme

- 16.1. Some courses in the Certificate Programme require students to meet with an adult in their church or local setting for a series of conversations to grow practically in wise conversations. Students will be asked to meet with someone from their own church and agree this arrangement with someone from their church's senior pastoral staff. A student will certify that they have obtained consent for this in Canvas. Any arrangement different to this must be communicated to the student's tutor and will require written consent from them. A record will be made of this consent by the Certificate Programme office.
- 16.2. In the context of these conversations matters may be disclosed that have a safeguarding implication, such as suicidal thoughts, past or present experiences of abuse or harm to self / others. In such circumstances, students will be expected to liaise with the local accountability person they identified at the beginning of the course or another senior pastoral leader in their church.
- 16.3. Students taking these courses will be reminded of the importance of safeguarding and will be given guidance to help them decide when a safeguarding referral is needed. Students will be encouraged to seek advice from their own church's safeguarding officer.
- 16.4. Students will be required to read and confirm that they have read their church's safeguarding policy and know who their church's safeguarding officer is.
- 16.5. Students will be asked to report any risk of harm to self or others or any indication of abuse to their church's safeguarding officer and/or the police and/or social services.
- 16.6. Tutors and Graders will be alert to the possibility of a safeguarding concern being mentioned in students' written assignments, in conversation at seminars or in email correspondence. Where they suspect that a situation may constitute a safeguarding concern, they will direct the student to speak to their church's safeguarding officer.
[Guidance is provided in the training materials provided for Tutors and Graders.](#)

17. Courses with practical skills exercises (e.g. Summer Intensives and Skills Days)

- 17.1. At the start of the course all students will be reminded what constitutes a safeguarding concern.
- 17.2. Students will be asked to communicate any safeguarding concerns that arise during the course to one of the tutors.
- 17.3. Tutors who become aware of a safeguarding concern during the course must contact the BCUK DSL for advice and follow actions as directed, making a record as appropriate.

18. Church-based Intern Scheme

- 18.1. The Intern's church maintains primary responsibility for all safeguarding concerns that arise during the course of the internship.
- 18.2. The Intern's church are responsible for ensuring the Intern has been recruited and appointed to the role according to relevant best practice, which ideally includes a DBS check or equivalent. While an enhanced DBS Check for Adults is ideal, under current guidance these are more difficult to obtain as many Intern activities fall outside the scope of requiring one. However, churches may still perform a Basic Check.
- 18.3. The Intern's church will be asked to confirm that the Intern is trained in the recognition and response to the needs of children and of adults who may be at risk of harm and regularly

- refresh their training. Interns and local leaders must sign their agreement to follow safeguarding procedures and if this is not agreed, an Intern role will not be offered.
- 18.4. The Intern must be informed and supported by their church to behave in a way that is appropriate and above reproach.
 - 18.5. The Intern must be familiar with, and must always follow, their church's Safeguarding Policies and Procedures. They must know who to contact within the church and outside of the church when they have a concern about a child or adult. The lead safeguarding person's name and contact details should be recorded in the relevant section on the application to the Intern Scheme.
 - 18.6. Where BCUK has reasonable concerns about a church's mishandling of, or failure to pass on, safeguarding concerns, BCUK may make a safeguarding referral.
 - 18.7. Sustained concern about failures to manage safeguarding concerns appropriately may lead to termination of the church's involvement in the Intern Scheme.
 - 18.8. While Interns are provided with an overview of safeguarding practices at the beginning of each year, this is not a substitute for the more rigorous safeguarding training that must be provided by the Intern's church or a reputable external organisation.
 - 18.9. Where Interns raise safeguarding concerns in Peer Groups or Training Meetings, they will be asked to clarify the safeguarding response that has been taken but Peer Groups and Training Meetings are not the first port of call for advice regarding such concerns. The Intern should speak to their church's appointed safeguarding officer or call the appropriate helpline or make the appropriate referral as soon as possible when a concern arises. Where necessary, BCUK will contact the relevant safeguarding officer to ensure the concerns have been passed on.
 - 18.10. All Mentors working in the Intern Scheme will be required to confirm that they have undergone appropriate safeguarding training.
 - 18.11. BCUK generally discourages Interns from meeting with those under the age of 18 because of their increased vulnerability. However, where this is requested, Interns must discuss the request with the child's parents (or those with parental responsibility), someone from their pastoral leadership, the local leader (if different) and the Intern's BCUK mentor. They should only proceed when all parties are satisfied with the arrangements.
 - 18.11.1. The Intern must follow their church's safeguarding policy in this regard and ensure they meet in public places with other people around. The Intern must ensure that others in leadership in their church know when and where they are meeting with a child.
 - 18.11.2. The Intern must ensure they have the appropriate DBS check for working with children.

19. Responding to and reporting safeguarding concerns and disclosures

19.1. Managing immediate risk

- 19.1.1. Upon identification of a concern or receipt of a disclosure, the person involved should make an assessment as to whether any immediate action is necessary to protect the individual
- 19.1.2. The worker may seek advice from the team leader or from the DSL, however, the seeking of advice should not unnecessarily delay or prevent the protective action or place the individual at risk of further or increased harm
- 19.1.3. In such urgent situations and if the DSL cannot be immediately contacted, the worker should contact either the police on 999 or children's social care to obtain support. Under such circumstances, the DSL should be notified at the earliest possible opportunity

19.2. Reporting concerns to the Designated Safeguarding Lead

- 19.2.1. Once it has been established that the individual is not, or is no longer in imminent danger, the concern will be reported to the DSL
- 19.2.2. The concerns will be discussed with the DSL at the earliest opportunity, to ensure clarity of understanding
- 19.2.3. Details of the concern must be recorded on the “Incidents and concerns reporting form” (See Appendix C) either before, during, or immediately after the discussion with the DSL

19.3. Managing the risks: the role of the DSL

- 19.3.1. In discussion with the person reporting the concern, the DSL will review any immediate actions taken and will be responsible for follow-up or further action that may be required
- 19.3.2. Upon receipt of the completed form, the DSL will establish an electronic “Confidential File” in relation to the person at risk
- 19.3.3. If there are multiple logs relating to the same individual, a chronology (See Appendix C) will be established and inserted at the front of the confidential file
- 19.3.4. 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
- 19.3.5. The DSL will confirm to the person raising the concern that the matter has been actioned. The DSL will not provide any unnecessary information. Information is only shared on a “need to know” basis
- 19.3.6. Where the concern meets the statutory threshold, the DSL will notify the parent or carer of the individual concerned (or the individual themselves if they are an adult) that a referral is being made to Social Care
- 19.3.7. 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 neglect
 - To do so would place an adult at increased risk of harm or abuse
 - The concern relates to Fabricated or Induced Illness
- 19.3.8. The referral will be made to the appropriate social care service.
- 19.3.9. If the referral has not been acknowledged within 3 working days, the DSL will follow up with the social care service.
- 19.3.10. The DSL will work with the Local Authority and other partners on behalf of BCUK to ensure that we fully participate in the safeguarding process
- 19.3.11. All conversations, correspondence, and documentation etc will be placed into the confidential file and the “Record of action” and Chronology will be maintained on an ongoing basis
- 19.3.12. The DSL will share information as necessary with other individuals in the organisation to facilitate effective safeguarding
- 19.3.13. The safeguarding logs and confidential files will be shared with a limited number of people: the deputy DSL and the Executive Director. Individual logs will be shown to the person reporting the concern to ensure information has been captured accurately.

20. Allegations against or concerns about staff and volunteers

BCUK takes allegations against our staff and volunteers very seriously and will ensure that they are investigated thoroughly, via a transparent process that expedites the matter in a timely manner. We recognise that that we have a responsibility to take the allegation seriously, to manage the situation effectively while the investigation takes place and to and to support the person accused throughout the process.

- 20.1. Allegations against staff or volunteers should be reported to Steve Midgley, Executive Director of BCUK at stevemidgley@bcuk.org
- 20.2. If the allegation is against the Executive Director, it should be reported to Mike Warren, Chair of the Board of Trustees at chairoftrustees@bcuk.org
- 20.3. Full details of the allegation will be recorded

- 20.4. Those receiving such reports must first assess whether any immediate action is required to ensure the safety of everyone involved
- 20.4.1. Dependent upon circumstances and the immediate action required, notifying the individual that an allegation has been received may be unavoidable
- 20.4.2. If so, care should be taken not to compromise the gathering of evidence.
- 20.4.3. If it is necessary to notify the individual at this stage, details of the allegation should not be divulged
- 20.4.4. Support must be offered to the subject of the allegation as well as any potential victims
- 20.5. At the earliest opportunity advice will be sought from Christian Safeguarding Services (CSS)
- 20.6. If the allegation meets the threshold for LADO, the organisation's investigating officer will work with LADO to ensure that the allegation is thoroughly investigated, and all issues raised are addressed
- 20.7. 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
- 20.8. Thorough records of all aspects of the handling of the allegation will be retained throughout the process.
- 20.8.1. These records will be held confidentially in a secure electronic folder
- 20.9. The DSL will seek and follow specialist advice throughout the process

21. Concerns about practice and whistleblowing

- 21.1. Concerns about the culture or practice within the organisation should be raised with the Executive Director
- 21.2. Those concerns will be carefully considered, and a formal response will be provided to the individual
- 21.3. If the complainant is not satisfied with the response, they should formally raise the matter with the Chair of the Board of Trustees, explaining their concerns about the adequacy of the initial response. BCUK's complaints policy and procedure should be followed, which can be found on BCUK's website.

22. Basis of policy and legal framework

This policy is consistent with:

- Current legislation
- National guidance
- Local arrangements
- Our charitable objectives, governing documents and statement of faith

Full details are available in Appendix B

Appendix A - Safeguarding role allocation	
<i>The specific duties of each role are defined in the relevant role description</i>	
<u>Legal responsibility</u>	
Governance / strategic level Legal compliance and final responsibility for safeguarding rests with the Board of Trustees	Trustee acting as Safeguarding Lead on behalf of the Board: Name: Fred Paton Email: fredpaton@bcuk.org
Allegations against staff or volunteers and concerns about practice Concerns about conduct of our staff or volunteers or about practice within the organisation should be addressed to:	Name: Steve Midgley Role: Executive Director Email: stevemidgley@bcuk.org If they are unavailable, their deputy is: Name: Mike Warren Role: Chair of the Board of Trustees Email: chairoftrustees@bcuk.org Phone: 01892 530384
Operational management level:	Designated Safeguarding lead Name: Tarita Smallwood Role: Director of Finance & Operations Email: taritasmallwood@bcuk.org Phone: 07828889676 Deputy Designated Safeguarding Lead Name: Amanda Cook Role: Director of the Intern Scheme E-mail: amandacook@bcuk.org
Details of external specialist support:	Christian Safeguarding Services advice line Phone: 0333 303 4101 E-mail: info@thecss.co.uk

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

We have adopted the following doctrinal statement: [Statement of Faith.pdf](#)

Our governing documents: Charity Commission Constitution and our Ends Statement

Safeguarding Children	Safeguarding Adults
<ul style="list-style-type: none">• National legislation and guidance (Safeguarding Children)<ul style="list-style-type: none">○ Children Acts (1989 & 2004)○ Children and Families Act 2014○ Children and Social Work Act 2017○ Working together to safeguard children (2018)○ 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:<ul style="list-style-type: none">▪ Keeping Children Safe in Education 2019▪ FGM duty guidance	<ul style="list-style-type: none">• National legislation and guidance (Safeguarding adults)<ul style="list-style-type: none">○ 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 or 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

Appendix C - Standard Document Samples

	Concerns reporting form
	Confidential file chronology
	Confidential file record of conversations and actions
	Template report from DSL to trustees

Date of incident / disclosure	Time of incident / disclosure
Action taken to ensure immediate safety	
Other action taken or advice sought	

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.

Biblical Counselling UK

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

Biblical Counselling UK

Safeguarding report to the trustees and officers

Report from the Designated Safeguarding Lead covering the period from 1st April 2022 to 31st March 2023	
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		

Appendix D - Code of Conduct

[BCUK General Code of Conduct \(August 24\).pdf](#)