

Children and Adult Safeguarding Policy

1. POLICY OVERVIEW

The Jesuits in Britain are committed to safeguarding all children and adults at risk. For the Jesuits in Britain this commitment directly relates to the fact that we are all made in the image of God and the Church's common belief in the preciousness, dignity and uniqueness of every human life. We start from the principle that each person has a right to expect the highest level of protection, love, encouragement and respect. Following on from the McLellan commission in Scotland in 2015 and the Elliot review in 2020 into Safeguarding we are committed to the One Church Approach to safeguarding by implementing the changes needed and ensuring we respond to victim/survivors promptly and compassionately.

The Jesuits in Britain (Jesuits in Britain CIO) is a registered charity in England & Wales (1207742) and Scotland (SC053495).

2. SCOPE

- 2.1 This policy and procedure apply to all Jesuits and their employees and volunteers regardless of their role or the activities they undertake across the province
- 2.2 It is the responsibility of all Jesuits and all staff and volunteers to ensure a safe environment for everyone, to prevent, and respond effectively to abuse whether by action or omission. Abuse in this policy includes: physical; sexual; emotional; spiritual; neglect; psychological; financial; domestic or verbal abuse. Additionally, behaviour which results in modern day slavery or where there is evidence of discrimination or radicalisation, needs to be recognised and may need to be addressed as a safeguarding issue, in accordance with the procedures outlined in Section 7.

3. TRAINING

- 3.1 All will undergo Religious Life Safeguarding Service (RLSS) Safeguarding Training in England and Wales and Scottish Catholic Safeguarding Standards Agency (SCSSA) accredited training in Scotland, in relation to both safeguarding of children and adults relevant to their role. The list below outlines the minimum standards for training in each role:

Role	Type of safeguarding training
All employees and volunteers including roles which are non-public facing	RLSS Basic safeguarding training /SCSSA approved basic training
Provincial, Superiors, Directors of Work	RLSS/SCSSA Religious Lead Training
Safeguarding Lead	RLSS/SCSSA Safeguarding Lead Training
Trustees	RLSS /SCSSATrustee Training
Jesuits who work / have contact with the public	RLSS/SCSSA Advanced safeguarding training RLSS/SCSSA Safeguarding Adults at Risk RLSS/SCSSA Safeguarding Children
Jesuits who are community based	RLSS Basic safeguarding training / SCSSA approved basic training

- 3.2 All Jesuits, staff, volunteers and Board members will undertake top-up training at least Biannually.

4. ROLES AND RESPONSIBILITIES

4.1 The Trustees Board and Trustees' Safeguarding Committee

The Board has a duty to maintain appropriate governance and oversight of safeguarding in accordance with this policy and national guidelines. The safeguarding functions of the Board will ordinarily be delegated to the Trustees Safeguarding Committee.

The Safeguarding Committee has a duty to maintain appropriate governance and oversight of safeguarding in accordance with this policy and national guidelines. The committee will report to the next Trustees' Board meeting after every committee meeting.

4.2 The Provincial

The Provincial is responsible for ensuring appropriate policy, procedures and best practice are in place for the effective delivery of safeguarding, including any related due diligence checks. There are different laws and national guidelines across the province (legislation in England and Wales differs from the legislation in Scotland) and the application of this policy will be subject to the differing legislation and guidance applicable. Certain functions of this will be delegated to the safeguarding team and safeguarding committee as indicated below.

4.3 The Safeguarding and Professional Conduct Coordinator

The Safeguarding and Professional Conduct coordinator has direct oversight of the Jesuits In Britain safeguarding policy and guidance, including management and oversight of documentation, case progression/management and the secure, legally compliant storage of safeguarding reports and related material, as well as oversight of the relationship with and liaison between the Jesuits in Britain and the RLSS/SCSSA.

- 4.4 The Safeguarding and Professional Conduct Coordinator may delegate some of this

responsibility to the RLSS/SCSSA by referring the case to them but will remain as key contact for the case duration unless another individual is identified to assume responsibility.

The Safeguarding Advisor provides support and help with accessing suitable services to support victim/survivors where an allegation has been made involving a Jesuit, a member of staff or a volunteer.

4.5 All other roles

All SJ's, staff and volunteers have an obligation to ensure they know how to respond to safeguarding concerns by being familiar with the content of this policy and the procedure associated with it and any other relevant policies/procedures.

4.6 General

Everyone involved in the work of the Jesuits in Britain has a duty to promptly refer to the Safeguarding and Professional Conduct Coordinator, Provincial or Chair of Trustees' Safeguarding Committee any safeguarding concerns that they have or have been raised with them.

5. **DEFINITIONS**

5.1 Adult definition

An 'adult at risk' means a person aged 18 or over whose ability to protect himself or herself from violence, abuse, neglect, or exploitation is significantly impaired either because of external factors such as coercion, undue influence, or duress or through physical or mental disability or illness, learning disability, sensory or cognitive impairment or substance misuse. The reference to being impaired is to be understood as being temporarily or indefinitely impaired.

5.2 Child Definition

A child – is defined as a person who is aged under 18 and includes an unborn child.

A child at risk – is a child who:

- Is experiencing or is at risk of abuse, neglect, or other kinds of harm.
- Has needs for care and support (whether or not the Statutory authorities are meeting any of those needs).

It is important to note that the use of the term 'at risk' means that actual abuse or neglect does not need to have occurred, rather that early interventions should be considered to prevent actual harm.

6. **PRACTICE GUIDANCE**

- 6.1 In accordance with Article 19 of Pope Francis' Apostolic Letter, "Vos Estis Lux Mundi", 7 May 2019 [3], It is the policy of the Catholic Church in England and Wales, as agreed by the Bishops Conference, April 2020. In Scotland, the text of In God's Image was ratified

unanimously by the Bishops of Scotland on 6th July 2021 and came into effect 8th September 2021. These requires that a report be made to the statutory authorities regarding all allegations of abuse made against those working in the name of the Church, regardless of whether the allegations or concerns relate to a person's behaviour in relation to their role within the Church or another setting. This policy must be applied in all situations where it is alleged, or there are reasonable grounds to believe, that a member of the Religious Community, lay persons, or associated volunteer or employee, has acted in one of the following ways:

- Has behaved in a way that has harmed or is likely to harm a child or an adult at risk. This would include any adult at risk, irrespective of the cause of that vulnerability or whether the vulnerability is temporary or permanent.
- Has or is suspected to have committed a criminal offence against or related to a child or an adult at risk (including a vulnerable adult as indicated above).
- Has behaved in a way or made statements indicating that they may not be suitable to work with children or adults at risk.
- Has behaved intentionally in such a way that, by actions or omissions, their conduct is or has been intended to interfere with, prejudice, undermine or avoid a criminal, civil or canonical investigation, against any person associated with or who is a member of a contracting congregation.

6.2 The behaviours above are to be considered within the context of the different categories of abuse outlined above and further detailed guidance can be obtained from the safeguarding team in relation to sexual offences against children, including both recent and non-recent offences, and possession and distribution of indecent images of children.

6.3 Additional guidance is provided by the safeguarding team in relation to the sexual and criminal exploitation of children by organised criminal networks.

6.4 It is the policy of the Catholic Church in England, Wales and Scotland (legal obligations differ) to report to statutory authorities where a child or an adult is at immediate risk of harm, or there is concern that a child or adult is suffering or is likely to suffer from significant harm or abuse, from somebody who does not hold a role within the Church. This includes, but is not limited to:

- Someone who is at serious risk of harm from self or others.
- Someone who poses a serious risk of harm to someone else.
- A concern about a child or adult at risk of harm from someone else
- Concerns over the mental capacity of a person over the age of 16.

6.5 Additional guidance from the safeguarding team is available in relation to adults disclosing abuse outside the context of the Church. If a competent adult explicitly refuses the making of a referral about abuse that occurred outside of the Church, consideration must be given

to whether the accused person has access to children who may be at risk. In these circumstances, the name of the accused and details of the allegation must always be referred to the statutory authorities. In England and Wales this can be done without disclosing the name of the victim/survivor where they have refused consent to do so, or where it is not possible to obtain consent. In Scotland there is no option to remain anonymous but they can choose not to work with statutory.

7. PROCEDURE

- 7.1 If a Jesuit, member of staff or volunteer becomes aware of a safeguarding issue, they should contact the Safeguarding Team and refer the concern and all associated documentation immediately. You should ensure the person who made you aware of the concern knows you are doing this.
- 7.2 The member of the Safeguarding Team at the Jesuits in Britain who takes the referral should:
- Ensure the victim/survivor or individual has been informed of the next steps
 - Explain what will happen, give them options if possible and an indicative timescale.
 - Contact any relevant bodies.
 - Complete the safeguarding paperwork promptly and ensure appropriate record keeping of all communications including phone calls, meetings, and discussions in relation to the case.
 - Inform the safeguarding committee that there has been a new safeguarding referral.
 - All referrals / reports to the safeguarding team and any statutory bodies should be made within 24 hours of receiving the information, unless there are exceptional circumstances to postpone making this referral/report.
- 7.3 When the concern needs to be reported to a statutory agency, the individual reporting the issue must be told that the information will not be kept confidential, and that the details will be passed on to the police and any other appropriate statutory body. All staff should be supportive of the individual making the disclosure but should not seek more details than necessary for an initial statutory referral.
- 7.4 When to report:
- **Allegations or safeguarding concerns** – When abuse is suspected, witnessed or a disclosure of current abuse is received, there is a requirement to report within 24 hours these allegations of abuse, and other relevant safeguarding concerns through the safeguarding team to the appropriate statutory authority including social services and the police.
 - **In case of emergency** – If a child or adult is in immediate danger, at imminent risk or requires medical attention, the relevant emergency service must be contacted via

999. Local Social Services should also be contacted at the earliest opportunity in the case of a child or vulnerable adult.

- **In case of non-emergency**– In a situation when there is no immediate risk to a child or vulnerable adult and no requirement to make a statutory report, the safeguarding team will work with the individual to agree desirable outcomes in line with this policy.

- 7.5 **In the case of a child** - Referrals should be made to children's social care/LADO for the area where the child is living or is found. If in Scotland the Designated Child Protection Lead. If a crime has also been committed, the police in that area should also be contacted. The referrer should confirm any verbal and telephone referrals in writing, within 48 hours, and obtain social care /police report reference details for inclusion on the relevant case file.
- 7.6 **In the case of an adult** - a person over 18 - Referrals should be made to the adult social care. If a crime has also been committed, the police in that area and if applicable, should also be contacted. The referrer should confirm any in person and telephone referrals in writing, within 48 hours, and obtain any report references for inclusion on relevant case file.
- 7.7 When a person's conduct towards a child or an adult may impact on their suitability to work with or continue to work with children or adults, the allegation must be referred to the Local Authority Designated Officer/ Designated Child Protection Lead for safeguarding within 24 hours.
- 7.8 Additionally, restrictions may need to be placed on the person's role and remit while the matter is investigated. For example, they may need to step down from ministry or other conditions may need to be imposed pending the outcome of an investigation.
- 7.9 Where it is believed that a criminal offence may have taken place, regardless of whether the accused person is living or deceased, the allegation should be referred to the police within 24 hours.

8. WHISTLEBLOWING

- 8.1 The Jesuits in Britain will encourage and enable anyone with a serious concern to raise that issue without fear of victimisation, or disadvantage. If that concern is regarding malpractice, illegal acts, or omissions, at Jesuits in Britain or another religious institution relating to safeguarding, then the Safeguarding team should be made aware by the person designated in the Whistleblowing policy to receive these concerns.
- 8.2 The action taken by the safeguarding team will depend upon the nature of the concern referred. However, an investigation will be undertaken if appropriate, followed by

appropriate action and written feedback will be provided, including a rationale documenting the reasons why identified actions have been taken.

9. RECORDING AND STORAGE OF SAFEGUARDING CONCERNS AND CASE FILES

- 9.1 Primary responsibility for the management of documents and safeguarding case files lies with the Safeguarding and Professional Coordinator who will ensure an accurate, auditable, and secure record of any safeguarding concerns or allegations referred to the Jesuits in Britain are maintained.

This record will include:

- Relevant contact details
- Details of how/when the concern or allegation was received.
- Details of the concern itself
- Relevant historical information
- Identified past and present risk factors.
- Any actions or investigation undertaken including those by the Jesuits in Britain and from statutory agencies.
- Rationale for actions and or outcome of case

- 9.2 All records are potential evidence in a criminal proceeding, civil case or statutory/public inquiry and must be stored in a suitable and retrievable format with an auditable record of provenance and integrity.

10. SAFER RECRUITMENT PRACTICE GUIDANCE

- 10.1 The Jesuits in Britain will ensure that staff are subject to the appropriate Disclosure and Barring Service (DBS) checks in England and Wales and Disclosure Scotland PVG in line with both statutory and Catholic Church requirements.
- 10.2 Accepted HR practises are to be followed in all appointments to assist in avoiding unsuitable candidates being appointed into positions of trust. It is essential to ensure that all documentation relating to the applicant is stored in a secure place and remains confidential.
- 10.3 Appointment to a role will not be confirmed until a satisfactory DBS/PVG Disclosure check has been received and previous employment references confirmed as being acceptable.
- 10.4 On appointment, all new employees should be provided with copy of this policy and sign to say they understand the relevant policy and procedure,
- 10.5 All persons seeking to work with children or adults at risk whether in a paid or unpaid capacity must be provided with the opportunity to self-disclose relevant conviction

information. This is a DBS/PVG Code of Practice requirement and applies to anyone being asked to have an Enhanced Disclosure.

11. POLICY REVIEW

This policy is approved by the Jesuits in Britain Safeguarding Committee and Trustee Board and will be subject to an annual review or sooner, where there is a significant change to the organisational infrastructure, processes or to relevant legislation.

Policy last updated: March 2026

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Date of next review: Awaiting CSSA/SCSSA Policy Date: 03/03/2027