

# SOUL Church & SOUL Foundation Safeguarding Policy



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## 1. Organisation Details

**Name:** SOUL Church Ltd & SOUL Foundation (SOUL)

**Address:** Heartsease Lane, Norwich, Norfolk

**Tel:** 01603 488880

**Email:** [safeguarding@soulchurch.com](mailto:safeguarding@soulchurch.com)

**Senior Elders:** Jon and Chantel Norman

**Safeguarding Trustee:** Joe McKinney – [Joe.mckinney@soulchurch.com](mailto:Joe.mckinney@soulchurch.com)

**Voluntary Safeguarding Officer:** Emily Palmer – [safeguarding2@soulchurch.com](mailto:safeguarding2@soulchurch.com)

**Additional Safeguarding Officers:** Susan Horsley, Matthew Blount

**Safeguarding Memberships:** Thirtyone:eight

SOUL includes all services and ministries at Heartsease Lane and other ministry locations (e.g. Fun days, Camps, Connect groups).

## 2. Governance and Leadership

The Board of Trustees of SOUL Church has overarching responsibility for safeguarding. This includes ensuring compliance with statutory duties, charity regulator requirements, and fostering a safeguarding culture where policies are embedded in day-to-day behaviour.

We adopt the **ten safeguarding standards** from Thirtyone:eight and commit to:

- Trustees and leaders leading by example.
- Safe recruitment and training of staff and volunteers.
- Accountability structures and codes of conduct.
- Open communication, transparency, and safeguarding oversight.

## 3. Safety, Protection and Mission Statement

SOUL is committed to the protection, safety, and wellbeing of all children, young people, and adults at risk. We:

- Prevent abuse wherever possible.
- Promote a culture of love, encouragement, care, healing and justice.
- Uphold all relevant UK legislation and local safeguarding board guidance.

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#### 4. Aims

The purpose of this policy is to:

- Ensure every child and vulnerable adult is safe and protected from harm.
- Give clear direction to staff, volunteers, visitors, and parents.
- Promote welfare and respond to concerns without delay.
- Provide informed pastoral care to survivors of abuse.

#### 5. Introduction

This policy applies to all children, vulnerable adults, staff, volunteers, and visitors.

- **Child:** anyone under 18 years old.
- **Adult at risk:** 18+ who has care and support needs, is at risk or experiencing abuse or neglect and may be unable to protect themselves.

We adopt the principles of **prevention, early intervention, protection and support.**

#### 6. Ethos

SOUL will maintain an ethos where everyone feels secure, listened to, and able to share concerns. All staff and volunteers are trained to adopt the attitude that **“it could happen here.”**

#### 7. Prevention

##### a) Understanding Abuse and Neglect

We recognise physical, emotional, sexual abuse and neglect, and the contextual Safeguarding concerns that can arise in our areas of ministry and our community (Full definitions in Appendix 2)

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## b) Positions of Trust

All adults working with children, young people, and vulnerable adults are considered to be in positions of trust. We recognise that both employed staff and volunteers assume this position when serving in roles that support these individuals.

While we adhere strictly to safer recruitment practices, we also acknowledge and follow the guidance set by the Local Authority regarding the management of allegations against individuals in positions of trust. This includes making appropriate referrals to the Local Authority Designated Officer (LADO) for concerns relating to children and young people, and to Safeguarding Adults Data Sharing for concerns involving vulnerable adults.

We are committed to fully cooperating with the LADO and other relevant safeguarding authorities. This includes acting on their advice following an assessment, or, where responsibility is discharged back to us, conducting our own risk assessments and repeating relevant employment checks as necessary. (<https://norfolkscp.org.uk/about/policies-procedures/safer-workforce/83-allegations-against-persons-who-workvolunteer-with-children>)

## c) Safer Recruitment

We ensure we adhere to the principles of safer recruitment as recommended by [ThirtyOne:Eight](#) for churches, as well as the [NSCP Safer](#) Recruitment and NSAB guidance which draws on the legislative frameworks 'Safeguarding Vulnerable Groups Act', 'Equality Act' and 'Rehabilitations of Offender Act', requiring:

- Application forms, references, interviews, and DBS checks of those working or volunteering with children or adults at risk.
- Criminal declaration forms, qualification checks, and safeguarding induction.
- Probationary periods with line management/head of department support and additional safeguarding oversight when required.

## d) Safeguarding Training

- All employed staff: induction + basic training, refreshed annually.
- Volunteers working with children or adults at risk: induction + basic training, refreshed at a minimum every **3 years**.
- DSOs: advanced safeguarding training every **2 years**.

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- Trustees: specialist safeguarding training every **3 years**.
- In all areas above, we specify a **minimum** requirement of training, with additional bespoke training being provided to relevant areas of ministry for the upskilling of staff and volunteers.
- We reserve the right to take employment action or cease the activities of volunteers who do not engage with minimum expectations of training.

**e) Practice Guidelines & Codes of Conduct**

All staff/volunteers are issued with codes of conduct and must maintain professional boundaries. Good practice guidelines exist for all SOUL ministries and activities.

**8. General Procedures**

All new staff/volunteers receive a safeguarding induction, policy copy, and training. Parents are informed of safeguarding duties via registration processes and displayed information in children’s areas. Safeguarding policy is available on our website for public viewing.

**a) Safer Staff and Volunteers**

Recruitment procedures, as outlined in the *Prevention* section of this policy, apply to all roles within the organisation. We reserve the right to repeat employment checks for any staff member or volunteer if concerns arise regarding their conduct or if an allegation is made.

In such cases, individuals may be temporarily suspended or reassigned from their duties as a precautionary measure while appropriate risk assessments and information gathering are carried out. This includes assessments led by the Designated Safeguarding Officer and, where applicable, by external agencies.

**b) Grounds for Mandatory Refusal**

Anyone on barred lists will be refused. SOUL reserves the right to deny access to unsafe individuals in consultation with authorities.

**c) Records and Confidentiality**

Safeguarding concerns must be recorded promptly and securely. Any conversations or discussions around safeguarding should be held in a private space, such as the enclosed

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office space, to ensure information is not overheard. Information is shared only on a **need-to-know** basis, ensuring there is a clear purpose for sharing it and the information shared is both relevant and proportionate. We will uphold the principles of data protection, but recognise that safeguarding and Public safety overrides confidentiality to allow us to share information to the correct authority when significant risk is identified.

#### **d) Roles and Responsibilities**

##### **Safeguarding Team:**

Responsibilities of the Safeguarding Team include ensuring training is arranged and delivered, policies are reviewed and updated in line with emerging legislation and specialist training, reporting to statutory agencies is completed in a timely and professional manner, staff are supported when they are unclear on which safeguarding action to take, maintaining records, liaising with external stakeholders to share information and action received information appropriately, and embedding safeguarding culture.

- Board Trustee, Safeguarding: Joe McKinney
- Voluntary Safeguarding Officer: Emily Palmer
- Alternate DSOs: Susan Horsley, Matthew Blount

##### **Directional Leadership Team:**

The Directional Leadership Team is responsible for providing line management support to Heads of Department and acts as a point of escalation for significant, complex, or repeated safeguarding concerns. These matters will be reviewed in collaboration with the wider Safeguarding Team, including the Safeguarding Trustee and, where appropriate, the Church Lead Pastors, to ensure a thorough and accountable response.

##### **Head of Department:**

Heads of Department are responsible for ensuring that all staff and volunteers under their leadership comply with the recruitment and training requirements outlined in this policy. They are expected to maintain close oversight of safeguarding practices and procedures within their specific areas of ministry.

This includes monitoring whether safeguarding concerns are being appropriately identified and reported, and recognising where additional support, training, or a review of processes

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may be required. Their role is vital in embedding a strong safeguarding culture across all areas of ministry.

### **Employed Staff**

All employed staff are responsible for upholding a culture of safeguarding in every aspect of their work. This includes applying their training, following policy guidance, and embracing the principle that safeguarding is everyone's responsibility.

Staff are expected to report any safeguarding concerns to their line manager or Head of Department to enable joint planning of appropriate next steps. However, they also recognise their individual responsibility to share concerns directly with the Local Authority or other relevant safeguarding bodies if immediate action is required or if internal reporting is not possible.

### **Volunteers**

All volunteers are expected to follow SOUL's safeguarding procedures, complete relevant training, and adhere to policy guidance, recognising that safeguarding is everyone's responsibility.

Volunteers must report any safeguarding concerns to their line manager or team lead within the ministry area in which they serve. This ensures that concerns can be appropriately managed and, where necessary, shared internally or referred promptly to external safeguarding authorities.

### **e) Procedures for Handling Disclosures**

Staff must:

- Stay calm, listen, avoid leading questions, not promise confidentiality.
- Record as close to verbatim as possible.
- Pass immediately to Line Manager to agree on the next steps.
- Liaise with the Safeguarding Team to update records of concerns, but do not delay on reporting information to the local authority if you have identified someone is experiencing harm or abuse.

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Contact CADS (children) for concerns and advice around a child: **0344 800 8021**

or for someone over the age of 18, Adult Social Services: **0344 800 8020**

If you suspect imminent risk to public safety or life, contact the Police on **101** or **999** in emergencies.

#### **f) Allegations Against Staff or Volunteers**

Allegations are reported to the LADO within 24 hours. Staff must not investigate but only look to gather information relevant to sharing with the LADO. Allegations against Safeguarding Officers are reported directly to LADO by an alternative Officer or Directional Lead Staff Member .

### **9. Partnership Working**

SOUL expects all partner organisations, including those hiring premises, to have safeguarding policies meeting our standards. Partnership agreements will include safeguarding requirements.

SOUL will ensure that visiting organisations and guests who may have the opportunity to engage with children and adults at risk will be vetted and risk assessed as per our recruitment procedures.

### **10. Wellbeing Support and Pastoral Care**

SOUL commits to:

- Offering pastoral care to those in need, this can include those who have experienced abuse.
- We recognise that this area of ministry may involve the disclosure of present or past harm and that safeguarding training should be used to manage and report these appropriately.

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## 11. Policy Review and Adoption

This policy will be reviewed **annually** and updated in line with local and national safeguarding guidance.

**Signed:** \_\_\_\_\_ (Leadership)

**Signed:** \_\_\_\_\_ (Safeguarding Trustee)

**Date:** \_\_\_\_\_

## 12. Appendices

### a) Appendix 1:

#### Definitions and Key Terms of Abuse

This section outlines key definitions and categories of abuse as identified in the Children Act 1989 & 2004 and the Care Act 2014.

#### **Safeguarding Definitions**

Safeguarding Children and Young People defined in Working Together to Safeguard Children (2018) as: *“The action we take to promote the welfare of children and protect them from harm.”*

This includes protecting children from maltreatment, preventing impairment of their health or development, and ensuring they grow up with safe and effective care.

Safeguarding Adults as defined by the Care Act 2014, safeguarding means:

*“Protecting an adult’s right to live in safety, free from abuse and neglect.”*

This applies to adults who:

- Have care and support needs,
- Are experiencing, or at risk of, abuse or neglect,
- And are unable to protect themselves due to those needs.

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#### **Types of Abuse (Children) – As defined in the Children Act**

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1. Physical Abuse

The deliberate physical harm of a child. May include hitting, shaking, throwing, poisoning, burning, scalding, drowning, or suffocating.

2. Emotional Abuse

Ongoing emotional maltreatment that severely impacts a child's emotional development. May involve criticism, rejection, threats, or exposure to domestic abuse.

3. Sexual Abuse

Forcing or enticing a child to take part in sexual activities. This includes both physical contact and non-contact activities such as exposure to inappropriate material.

4. Neglect

The persistent failure to meet a child's basic physical and/or psychological needs, resulting in serious impairment of health or development. This may include lack of food, shelter, supervision, or medical care.

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**Types of Abuse (Adults) – As defined in the Care Act 2014**

1. Physical Abuse

Including assault, hitting, slapping, pushing, misuse of medication, restraint, or inappropriate physical sanctions.

2. Domestic Abuse

Includes psychological, physical, sexual, financial, emotional abuse; so-called 'honour'-based violence; and controlling or coercive behaviour. It applies to adults in personal relationships or family settings.

3. Sexual Abuse

Involves unwanted sexual activity or exposure, including rape, indecent exposure,

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sexual harassment, inappropriate looking or touching, and sexual exploitation.

4. Psychological/Emotional Abuse

Includes threats of harm, humiliation, blaming, controlling behaviour, intimidation, coercion, harassment, verbal abuse, and isolation.

5. Financial or Material Abuse

Theft, fraud, exploitation, pressure in connection with money or property, or misuse of someone's finances.

6. Modern Slavery

Encompasses slavery, human trafficking, forced labour, and domestic servitude.

7. Discriminatory Abuse

Unequal treatment based on age, disability, race, gender, religion, sexual orientation, or other protected characteristics. Includes harassment, slurs, or similar treatment.

8. Organisational/Institutional Abuse

Poor care practices within settings such as care homes, hospitals, or supported living. Can be through neglect or repeated poor practice.

9. Neglect and Acts of Omission

Includes ignoring medical, emotional, or physical care needs, failure to provide access to appropriate health or social care, and withholding necessities such as food or medication.

10. Self-Neglect

Covers a wide range of behaviours such as neglecting personal hygiene, health, or surroundings, and includes hoarding.

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## Additional Key Terms

- Position of Trust:

A role in which an adult has power or influence over a child or vulnerable adult, particularly in a setting of care, education, or faith.

- Disclosure:

When a child, young person, or adult shares that they are experiencing, or have experienced, abuse.

- Significant Harm:

A key threshold in child protection. Refers to ill-treatment or impairment that is sufficiently serious to warrant statutory intervention.

- Capacity:

Under the Mental Capacity Act 2005, adults are presumed to have capacity unless proven otherwise. Safeguarding adults must take capacity into account when deciding action.

### b) Appendix 2:

#### Specific Safeguarding Issues

This appendix outlines specific safeguarding issues that may arise within church settings. All staff and volunteers must be aware of these forms of harm and respond in accordance with SOUL's safeguarding policy and national guidance.

#### 1. Contextual Safeguarding

Definition:

Contextual safeguarding recognises that children and young people may be at risk of harm from individuals and situations outside their home. These risks can arise in schools, peer groups, online environments, neighbourhoods, or even within faith communities.

Church Consideration:

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Churches must be aware that abuse may occur outside the family setting, including through friendships formed during youth groups, online activities, or within community outreach. A holistic approach to safeguarding considers the broader context of a young person's life.

Examples:

- Peer-on-peer abuse within youth groups
- Online grooming during church engagement, the management of appropriate relationships and conduct in the online space
- Exploitation occurring during unmonitored community programmes, time and activity.

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## 2. Child Exploitation (CSE and CCE)

Definition:

- Child Sexual Exploitation (CSE): A form of sexual abuse where a young person is manipulated or forced into sexual activity, often in exchange for money, status, affection, or gifts.
- Child Criminal Exploitation (CCE): Where children are coerced into criminal activities (e.g. drug running, theft) often by gangs or organised networks.

Church Consideration:

Young people attending church may be victims of, or at risk of, exploitation. Leaders should be able to spot signs such as sudden changes in behaviour, unexplained possessions, absence from home or church, and secretive behaviour.

Church Response:

Concerns must be reported immediately to the head of department, safeguarding team and appropriate authorities. The church must not investigate but ensure disclosures are passed to statutory services.

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### 3. Modern Slavery and Human Trafficking

Definition:

Modern slavery encompasses slavery, servitude, forced or compulsory labour, and human trafficking. Victims are often deceived, threatened, or coerced into exploitative situations, including sexual exploitation, domestic servitude, or forced labour.

Church Consideration:

Churches may unknowingly encounter victims of trafficking, especially through outreach to vulnerable communities, asylum seekers, or those in poverty. Victims may present as fearful, withdrawn, or heavily controlled by others.

Indicators:

- Restricted freedom of movement
- Reluctance to speak without another person present, or concerns of conversations being heard or monitored
- Signs of physical abuse, exhaustion or malnutrition
- Living in overcrowded or substandard housing, or lack of control or documentation over leasing arrangements.

Church Response:

Suspicious must be reported immediately to the head of department and Safeguarding team. Concerns can also be referred to the Modern Slavery Helpline (0800 0121 700). At SOUL we work in partnership with Hope For Justice and can refer individuals to this service for support.

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### 4. Domestic Abuse

Definition:

Domestic abuse includes physical, emotional, sexual, financial, and psychological abuse between people in a close relationship. It also includes coercive control and honour-based violence.

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### Church Consideration:

Victims may approach the church for support, viewing it as a safe place. It is critical to handle disclosures with care, prioritising safety and confidentiality, and avoiding any response that pressures reconciliation.

### Church Response:

- Listen and believe survivors
- Avoid encouraging joint counselling in abusive situations
- Signpost to specialist services and authorities with the ability to assess safety and intervene where appropriate (NIDAS, Police)
- Report safeguarding concerns where children or vulnerable adults are involved (local authority)

Note: Domestic abuse is also a safeguarding issue when children are witnesses or at risk of harm due to abuse in the home, if an adult is making a disclosure consider if there are children in the home.

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## 5. Religious or Spiritual Abuse

### Definition:

Religious or spiritual abuse is the misuse of spiritual authority, power, or position to manipulate, control, or harm another person. This includes coercion, spiritual shaming, enforced obedience, or the use of religious beliefs to justify abuse.

### Examples:

- Using scripture to justify control or punishment
- Manipulating individuals into silence or secrecy
- Claiming divine authority to override safeguarding concerns
- Exorcisms or deliverance ministries used in harmful ways that may include harassing behaviours that persistently target an individual.

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#### Church Consideration:

Such abuse can be subtle and difficult to identify, particularly in charismatic or high-control environments. Safeguarding policies must ensure that theological practices never override the duty to protect vulnerable individuals.

#### Church Response:

- Foster an open, accountable culture based on informed consent of the individual requesting.
- Provide clear guidance on prayer, deliverance, and pastoral care that includes consideration for the physical and mental health of the person requesting deliverance.
- Train leaders to recognise misuse of power
- Report safeguarding concerns regardless of the context

## 6. Prevent, Radicalisation, and Terrorism

#### Definition:

Under the Prevent Duty (part of the Counter-Terrorism and Security Act 2015), organisations have a responsibility to safeguard individuals from being drawn into terrorism or extremist ideologies. Radicalisation is the process by which a person comes to adopt extreme political, social, or religious views that may lead to criminal or terrorist acts.

#### Church Consideration:

Churches must be aware of the potential for radicalisation within faith contexts. Individuals—particularly vulnerable young people or adults—may be targeted by extremist groups or online content promoting hatred or violence.

#### Warning Signs May Include:

- Expressing extreme views or hatred towards certain groups
- Isolation from peers or community
- Sudden changes in behaviour or appearance

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- Accessing extremist material online

Response:

Concerns about radicalisation or extremism should be reported to the Safeguarding Team and, where appropriate, referred to the local authority or police.

Important:

Prevent is not about criminalising individuals for their beliefs, but safeguarding them from harmful influence or criminal activity.

### Appendix 3:

#### Key Safeguarding Legislation and Guidance for Church Practice

Safeguarding in a church context must align with national legislation, statutory guidance, and local procedures. The following resources underpin our safeguarding policy and practice.

#### Safeguarding Children – Key Legislation & Guidance

1. Children Act 1989 & 2004

Provides the legal framework for the protection and welfare of children in England.

[Children Act 1989](#) | [Children Act 2004](#)

2. Working Together to Safeguard Children (2018, updated 2023)

Statutory guidance for all organisations working with children on how to work together to safeguard them.

[Working Together Guidance](#)

3. Keeping Children Safe in Education (KCSIE)

Government guidance for safeguarding in education settings, useful where churches partner with schools.

[KCSIE Guidance](#)

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4. Norfolk Safeguarding Children Partnership (NSCP)

Provides local safeguarding procedures, training, and referral pathways for Norfolk.

[NSCP Website](#)

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### Safeguarding Adults – Key Legislation & Guidance

5. Care Act 2014

Sets out duties for safeguarding adults with care and support needs.

[Care Act 2014](#)

6. Mental Capacity Act 2005

Provides the framework for supporting and protecting adults who may lack capacity to make decisions.

[Mental Capacity Act 2005](#)

7. Norfolk Safeguarding Adults Board (NSAB)

Offers local procedures, guidance, and resources for safeguarding adults in Norfolk.

[NSAB Website](#)

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### Cross Sectional Safeguarding Legislation

8. Prevent Duty (Counter-Terrorism and Security Act 2015)

Requires organisations, including faith groups, to prevent people from being drawn into terrorism.

[Prevent Duty Guidance](#)

9. Modern Slavery Act 2015

Establishes offences and responsibilities relating to slavery, forced labour, and human trafficking.

[Modern Slavery Act](#)

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## 10. Domestic Abuse Act 2021

Strengthens protection for victims of domestic abuse and recognises children as victims.

[Domestic Abuse Act](#)

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## Charity Commission Guidance for Faith Organisations

### 11. Charity Commission – Safeguarding and Protecting People

Sets out safeguarding duties for charity trustees and those working with children and adults at risk.

[Safeguarding Duties for Trustees](#)

### 12. Charity Commission – Safeguarding in Faith-Based Charities

Provides additional safeguarding guidance specific to religious organisations.

[Safeguarding for Faith Charities](#)

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## Other Useful Resources

- Thirtyone:Eight – Christian safeguarding organisation offering advice, training, and DBS checks.

[www.thirtyoneeight.org](http://www.thirtyoneeight.org)

- Church of England Safeguarding Resources – For churches aligned with the Church of England denomination.

[www.churchofengland.org/safeguarding](http://www.churchofengland.org/safeguarding)

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## Appendix 5:

# Key Safeguarding Contact Numbers – Norfolk

## Children’s Safeguarding (Norfolk)

Children’s Advice and Duty Service (CADS)

 0344 800 8020 (Monday to Friday, 8am–8pm)

Use this number to report concerns about a child’s safety or wellbeing.

Out of hours (evenings, weekends, and bank holidays), this number connects to the Emergency Duty Team.

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## Adult Safeguarding (Norfolk)

Norfolk County Council – Safeguarding Adults

 0344 800 8020

Report concerns about an adult who may be at risk of abuse or neglect.

Same number is used for both children and adults – choose the appropriate option when prompted.

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## Thirtyone:Eight Safeguarding Helpline

 0303 003 1111 (Option 2 for 24/7 safeguarding advice)

A confidential helpline offering advice and support for churches and faith-based organisations.

 [www.thirtyoneeight.org](http://www.thirtyoneeight.org)

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## Police (Emergency and Non-Emergency)

Emergency – Police, Fire, Ambulance

 999 – For immediate danger or risk to life.

Non-Emergency – Norfolk Police

 101 – For reporting non-urgent safeguarding concerns or seeking advice.

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