# CHRIST CHURCH, STONE, DIOCESE OF LICHFIELD SAFEGUARDING POLICY AND PROCEDURES

Version Revised		Ву	Notes	Approved by PCC
1.0	06/05/2014	A. Stone		07/05/2014
1.1	19/05/2014	A. Stone	Minor Corrections; renumbering of paragraphs and referencing Safer Recruitment document	
1.1	01/09/2015		Reviewed – no changes	
2.0	12/11/2016	A. Stone	Stone Updated to reflect CofE revisions and Diocesan use of Online provider for DBS Checks	
3.0	01/03/2019	A. Stone & Dr J. Merron	Updated to reflect new national requirements, including Training.	02/07/2019
3.1	22/09/2019	A. Stone & Dr J. Merron	Safeguarding Officer's changed due to personal circumstances	25/09/2019
4.0	25/10/2022	A. Stone	Updated to reflect new National 17/10/20 Policies & Training.	
5.0	10/01/2024	A Stone	Updated to reflect new DBS cycle for all	

The Parochial Church Council of CHRIST CHURCH, STONE, will take all reasonable care to ensure the safety of the children, young people<sup>1</sup> and vulnerable adults for whom it bears responsibility.

- Andrew Stone is our approved Safeguarding Co-ordinator as appointed at the APCM and they are the point of contact through which concerns about child protection will be channelled. They are responsible to the PCC for ensuring that these procedures are implemented.
- 2. In the event of the Co-ordinator being unavailable, David Beauchamp will act as deputy.
- 3. The PCC also appoint Susan Campbell-Kelly to assist with the DBS checking and administration.
- 4. This document should be read in conjunction with the Diocese of Lichfield; Safeguarding Policy and Guidance (2022) and The Parish Safeguarding Handbook (March 2019).
- Reference should be made to the diocese Safer Recruitment Policy; application of DBS and training policy as relating to safeguarding (revised 2022). <a href="https://d3hgrlq6yacptf.cloudfront.net/5f3ffdd147bb3/content/pages/documents/saferrecruitment-and-training-policy-v4-2022.pdf">https://d3hgrlq6yacptf.cloudfront.net/5f3ffdd147bb3/content/pages/documents/saferrecruitment-and-training-policy-v4-2022.pdf</a>

- 6. Online and Social Media are a growing concern with safeguarding, therefore the PCC also adopts the Lichfield Diocese Safeguarding - Social Media and Online Activities Policy and the two accompanying documents. PCC members should be familiar with the main points of this policy and all people involved in any form of media, email or social media presence for the PCC should adhere to it.
- 7. This document supports the Safeguarding Statement (Appendix i) adopted by the PCC.
- 8. The PCC will ensure full compliance with Health and Safety Guidelines.
- 9. The PCC is directly responsible for the following groups which include children and young people:
  - Weekly Childrens or Youth Groups, when running.
  - Weekly Sunday Morning children's groups
  - Weekly Monday Toddlers Group
  - Occasional Children's events e.g. Christingle, Holiday Club, etc.
  - Outreach in schools, such as Open Book.
  - Any new children's events or groups
- 10. The PCC requires groups within the Church to record and retain:
  - A list of its current leaders and their role
  - Provision for training and support
  - When and where the group meets, its normal meeting pattern and the age range it covers.
  - Attendance of leaders/helpers and children at each session
- 11. The PCC require church groups that are working with children and young people or vulnerable adults:
  - To agree clear roles for leaders
  - Set up structures to train and support their leaders in their roles
  - Agree statements of working practice within that group, which should reflect this policy and accompanying documents
  - Provide an up-to-date Risk Assessment
  - To have completed or attended training at the appropriate level
  - To have read The Parish Safeguarding Handbook
- 12. Records relating to safeguarding issues within a Parish should be securely retained for 75 years (in order to cover the likely lifespan of a survivor of abuse). Likewise, insurance documents should be kept for this period.

#### SAFER RECRUITMENT

- 13. The PCC must appoint a lead for Safer Recruitment.
- 14. The PCC will engage in, utilise and proactively ensure that those working with Children, young persons and vulnerable adults in churches and church activities are known, recruited via due process (including interview), have suitable references (that are checked), and are DBS checked as appropriate. This applies to employees, post-holders, trustees and volunteers.
- 15. Safer Recruiting also applies to other people, engaged by the PCC, for regular work in the church/centre e.g. cleaners, gardeners.
- 16. Leaders must be aged 18 or over working with children and young people, or vulnerable adults. (under 18's may assist with leadership roles but must be supervised at all times.)
  - Applicants will be required to complete the Thirty One Eight Confidential declaration which is stored locally.
  - Applicants should be required to provide two references using the church's safer recruitment/confidential declaration form.
  - Before appointment or the continuation of any appointment, appointees may need to apply for and supply clearance from the Disclosure & Barring Service.
- 17. Completed declaration forms and references will be confidential to and securely held on behalf of the Incumbent by the Benefice Office in a secure cabinet and accessible only by the Safeguarding Team and DBS Administrator or, in the event of a vacancy, by the Rural Dean or Archdeacon.
- 18. Only suitable and responsible people may become key holders, references will be taken up in accordance with Safer Recruitment guidance and they will be required to complete the Lichfield Diocese Declaration. Access and Usage of Church Buildings will be monitored as far as is reasonably possible. The churchwardens will be responsible for ensuring keyholders are suitable.
- 19. The PCC will use the Disclosure & Barring Service for checking leaders' criminal records where appropriate. The DBS application process for the Lichfield Diocese is now operated by Thirty One Eight which is operated through local ID Checking and online applications in accordance with guidance and instructions circulated and update by the Diocese
- 20. As of November 2023, DBS Validity is three-years for all DBS checks, regardless of when issued.
- 21. Volunteers who subscribe to the DBS Update Service will need to 'renew' their DBS Status by consenting to a check of the Update Service by the diocese.
- 22. All volunteers, workers, and PCC members must have completed the requisite training (appendix ii) for their role.

#### THE PCC

- 23. The PCC will provide leaders and those working in Safeguarding access to guidance and training in the understanding of child/vulnerable adult abuse.
- 24. The PCC will publish on the notice boards at the back of the church and in the Church Hall, a copy of the Diocesan Safeguarding Flow Chart (available on the Diocesan website) In addition, all validated leaders and key holders will be given a copy.
- 25. The PCC will carry public liability insurance and will insure all leaders and staff for personal accident.
- 26. The latest guidance dictates that all PCC members must have a valid DBS check. This guidance means that the DBS should cover both children and vulnerable adults.
- 27. ChurchSuite will be maintained to keep a record of current DBS certificate status and notify volunteers ahead of an impending renewal.
- 28. The PCC will check annually that the procedures are being followed.
- 29. The PCC will make a copy of this policy and its procedures available, if requested, at The Archdeacon's visitation and make a copy available on the church website.
- 30. This Policy and its procedures will be monitored by the Safeguarding Coordinator who will report to the PCC annually.
- 31. The PCC will review the policy and its procedures annually.

#### **EXTERNAL ORGANISATIONS**

- 32. Groups who hire the Church Hall who are involved in activities that are or appear to include Regulated Activities<sup>2</sup> or significant contact with children or adults at risk, must satisfy the PCC that they have a Safeguarding Policy, lodging an up-to-date copy as part of their hiring agreement.
- 33. Groups fitting these criteria should also include details of all their leaders along with their Safeguarding Policy.
- 34. The hiring body (i.e. the organisation hiring the premises) is required to ensure that children and adults who may be vulnerable are protected at all times, by taking all reasonable steps to prevent injury, illness, loss or damage occurring, and carries full liability insurance for this. The hiring body are responsible for following by their own child protection or safeguarding policy.

- 35. The Church Administrator should ensure these are submitted and check with the wardens and/or the safeguarding lead.
- 36. ChurchSuite Flows and Forms will be used to manage the recording of hirer's details, dates of insurance, etc. This will ensure the wardens approval is recorded.

### Summary of Requirements

Role	Safer	DBS	Training	Notes
	Recruitment		Modules	
Sunday School	Yes	Child Workforce	Basic	
Helper			Awareness +	
			Foundations	
Helper at Holiday	Yes	Child Workforce	Basic	
Club or Children's'			Awareness +	
Special Events			Foundations	
Anyone working	Yes	Child Workforce	Basic	Includes Parent
with Children in a			Awareness +	and Toddler,
Church related			Foundations	Open Book,
activity				and similar.
PCC Member	Yes	Child and Adult	Basic	
		Workforce	Awareness +	
			Foundations	
Churchwardens	Yes	Child and Adult	Basic	If in
		Workforce	Awareness +	interregnum,
			Foundations	Leadership
				Module also
				required.
Safeguarding Lead	Yes	Child and Adult	Basic	1
		Workforce	Awareness +	
			Foundations +	
			Leadership	
Pastoral Visitors	Yes	Adult Workforce	Basic	If this involves
			Awareness +	and is carried
			Foundations	out as part of
				church-led
				support.
				i.e. not is solely
				as a friend or
				family member.
Keyholders	Yes	N/A	Basic	Training
Reynoldere	100		Awareness	required as KH
			, waronooo	could be
				potential first
				point of contact.
General Helpers	Yes	N/A	Basic	e.g. Support for
	163		Awareness	counting,
			////	welcoming,
				cleaning, etc.,
				or other
				position with a
				degree of
				J
Pondoro and Clarger	Yes	Child and Adult	Basic	responsibility. Renewal
Readers and Clergy	162			
		Workforce	Awareness +	Responsibility
			Foundations +	of Diocese.
			Leadership	

### DEFINITIONS

#### Regulated Activity for children and young people is be defined as

(a) Unsupervised activities: teaching, training, instructing, caring for or supervising children, or providing advice/guidance on well-being or driving a vehicle only for children.

(b) Working for a limited range of establishments (known as 'specified places'), with opportunity for contact, e.g. schools, children's homes, childcare premises (but not work by supervised volunteers).
Work in (a) and (b) above still has to be carried out on a regular basis. The current definitions have not changed:

Frequently - at least once a week Intensively - 4 days in a 30 day period Overnight - between the hours of 2am and 6am.

(c) Relevant personal care, e.g. washing or dressing; or health care by or supervised by a professional, even if done once.

(d) Registered child-minding and foster carers.

#### **Regulated Activity with Vulnerable Adults**

The 2012 Act changes the definition of vulnerable adult to focus on activities rather than characteristics.

The focus is on the activities required by the adult and not on the setting in which the activity is received, nor on the personal characteristics or circumstances of the adult receiving the activities. There is also no longer a requirement for a person to do the activities a certain number of times before they are engaging in Regulated Activity' (*Changes to disclosure and barring: What you need to know – HM Government (2012)*).

There are broadly 6 activities listed:

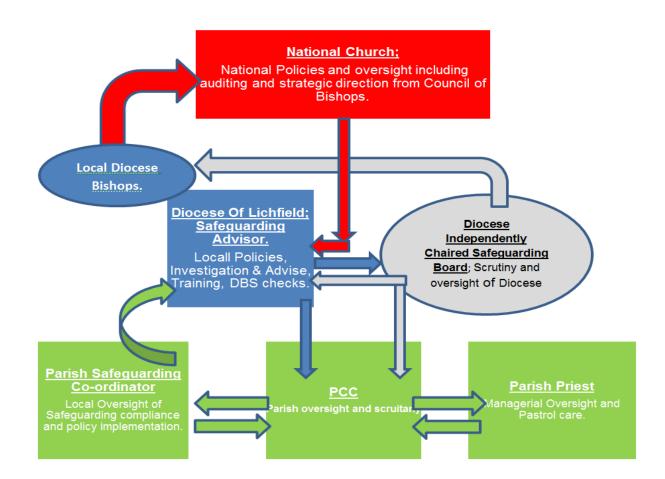
a)	The provision of health care by a health care professional, or by a person acting under the direction or supervision of a health care professional (such as a health care assistant in a hospital or care home);
b) <sup>-</sup>	The provision of relevant personal care (such as washing, dressing, toileting, eating and drinking);
b)	The provision of social work or community care services by social workers to adults who are clients or potential clients;
C)	The provision of assistance in relation to general household matters for an adult who needs that assistance because of age, illness or disability, (e.g. managing a person's cash, paying bills or shopping for someone);
d)	Any relevant assistance in the conduct of an adult's own affairs, (e.g. under an enduring power of attorney);
e)	Transportation in certain circumstances which is needed because of age, illness or disability, although the Government has pointed out that this will not include family and friends or taxi drivers.

c), d) & e) could come under certain pastoral roles **IF** part of formal or informal arrangement through the church

CC Safeguarding Policy V5.0 January 2024.docx

#### CHURCH OF ENGLAND SAFEGUARDING STRUCTURE AND FUNCTION/FLOW.

Below shows the generalised flow and function of primary safeguarding stakeholders within the church at National, Diocese and Parish Level;



## SAFEGUARDING STATEMENT

This statement was adopted by Christ Church, Stone at a Parochial Church Council meeting held on 24 January 2024.

- 1. This statement will be reviewed each year to monitor the progress which has been achieved. We recognize that everyone has different levels of vulnerability and that each of us may be regarded as vulnerable at some time in our lives.
  - We recognise that a position of power in relation to another creates a risk of vulnerability. As a consequence, we strive to ensure that we consider power when working and leading with people.
  - We recognise that children by virtue of legal status and dependency on adults for their emotional and physical needs will always be vulnerable and at a disadvantage. We commit to considering this in our children's activities– undertaking supervision of staff working with them and risk assessing activities and groups as a check and balance in our work.
  - We understand that illness, disability, race, mental health and other issues can put adults in a position of vulnerability. We accept that these can be long term (ongoing), or temporary. We commit to considering this in our adults activities and events – undertaking supervision of staff and risk assessing activities and groups as a check and balance in our work.
  - We commit to transparency in our actions and accountability for our work.

# 2. As members of this parish we commit ourselves to respectful pastoral care for all adults and children to whom we minister.

- We will consider issues relating to spiritual care in prayer activity, ensuring that members of our prayer team consider power, control and spiritual abuse issues in their ministry.
- We will ensure that leaders of our children's Sunday schools and house groups as well as other ministries that involve working with vulnerable persons have appropriate enhanced DBS checks.
- We will ensure that those who care for people in our parish attend appropriate safeguarding training.
- We commit to discuss safeguarding and support to of safeguarding as a standing PCC agenda item

# 3. We commit ourselves to the safeguarding of people who may be vulnerable, ensuring their well-being in the life of this church.

### 4. We commit ourselves to promoting safe practice by those in positions of trust.

- We commit to discuss safeguarding and support to of safeguarding as a standing PCC agenda item
- We will ensure that those in positions of trust (such as wardens), and those with remits or leadership of groups involving vulnerable children, etc. have appropriate enhanced DBS checks and that these are updated every 3-years.
- We will engage with appropriate training and seek to develop relationships with other agencies and the diocese on safeguarding.
- Safeguarding including revision of policy will be a regular PCC agenda item and agree that whilst we have a named co-ordinator, we will accept collective ownership for this important issue.

• We will be transparent, open and not have secrets.

# 5. The parish commits itself to promoting the inclusion and empowerment of people who may be vulnerable.

- We will consider the impact of power, disadvantage, inclusion, disability, age and race on how we provide and plan for our ministry.
- We will actively (but appropriately), challenge each other in our work in order to ensure we consider a wide range of perspectives and views– ensuring that we do not oppressively impose our own values or views to another's detriment.
- Where a person struggles with an activity due to disadvantage, disability or illness we will go the extra mile to assist them so they can participate and contribute as a full part of the church.

# 6. It is the responsibility of each of us to prevent the physical, emotional, sexual, financial and spiritual abuse of vulnerable people and to report any such abuse that we discover or suspect.

- We will not collude, keep secrets or make decisions when we have suspicion of abuse. We will seek through discussion the views of others an ensure through use of external agencies and the diocese safeguarding service that we engage and welcome external perspectives in order to promote a healthy accountable culture.
- We will report without being bias to our personal view. We will report and not investigate.
- We will record concerns factually in diocese suggested formats (as per recording with care policy 2017)
- We will not take chances with the welfare of children or vulnerable adults.
- We are open to scrutiny and encourage this in others.
- We have zero tolerance to abuse and put the welfare of vulnerable children and adults first.
- We take seriously training and activities relating to the safeguarding of Children and seek to engrain this in our congregational culture.

# 7. We undertake to exercise proper care in the appointment and selection of those who will work with people who may be vulnerable.

- We will ensure that those in positions of trust (such as wardens), and those with remits or leadership of groups involving vulnerable children etc have appropriate enhanced DBS checks and that these are updated every 3 years.
- We will engage with appropriate training and seek to develop relationships with other agencies and the diocese on safeguarding.
- Safeguarding including revision of policy will be a regular PCC agenda item and agree that whilst we have a named co-ordinator we will accept collective ownership for this important issue.
- We will be transparent, open and not have secrets.
- Our incumbent undertakes to ensure that to the best of their knowledge all PCC members, wardens and ministry leaders are of good standing.
- The PCC undertakes to appoint and upskill a dedicated Safeguarding co-ordinator.
- Safeguarding co-ordination undertakes to maintain a relationship with diocese level safeguarding team and endure that this policy is followed.

# 8. The parish is committed to supporting, resourcing, training and regularly reviewing those who undertake work amongst people who may be vulnerable.

- We will ensure that those in positions of trust (such as wardens), and those with remits or leadership of groups involving vulnerable children etc have appropriate enhanced DBS checks and that these are updated every 3-years.
- We will engage with appropriate training and seek to develop relationships with other agencies and the diocese on safeguarding.
- Safeguarding including revision of policy will be a regular PCC agenda item and agree that whilst we have a named co-ordinator we will accept collective ownership for this important issue.
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- Safeguarding co-ordination undertakes to maintain a relationship with diocese level safeguarding team and endure that this policy is followed.

### 9. The parish adopts the guidelines of the Church of England and the Diocese.

 The Parish will report and record in line with Diocese policies and comply with local guidance's for implementing national policies as defined in diocese polices. These include the diocese safeguarding policy, recording with care policy, social media policy and safer recruitment policy.

# 10. Each person who works with vulnerable people will agree to abide by these recommendations and the guidelines established by this church.

Those working with vulnerable adults or children will sign a declaration to state that they
have read and agree to abide by the points outlined in this Statement and the
accompanying Policy and Procedure.

# This church appoints Andrew Stone to represent the concerns and views of vulnerable people at our meetings and to outside bodies as Parish Safeguarding Co-ordinator.

Incumbent .....

Churchwarden .....

Churchwarden .....

DATE ......24 January 2024.....

### TRAINING REQUIREMENTS

The incumbent, Group Leaders and the Safeguarding coordinators will undertake to ensure staff involved with children, vulnerable adults and young people undertaking the appropriate National church training.

#### Training should be repeated every three-years

#### **Basic Awareness Module**

#### Who?

• All Church Officers & Anyone going on to complete any other safeguarding learning modules.

#### How?

• Online eLearning module which can be taken at own pace and at a convenient time (approx. 1<sup>1</sup>/<sub>2</sub> hours).

### **Foundations Module**

Prerequisites? Basic Awareness module.

#### Who?

- Clergy, Readers, Licenced Lay Ministers.
- PCC Members / Lay Chapter Members.
- Churchwardens.
- Anyone in a role which involves work with children, young people, or vulnerable adults.
- Anyone going on to complete any other safeguarding learning pathway.
- Pre-ordination or license students, prior to BAP or selection Panel.
- Vergers.

#### How?

• Online eLearning module which can be taken at own pace and at a convenient time (approx. 1<sup>1</sup>/<sub>2</sub> hours).

#### Basic Awareness and Foundations Modules are accessible via

https://safeguardingtraining.cofeportal.org/

### Leadership Module

Prerequisites? Basic Awareness & Foundations Modules.

#### Who?

Designed for those people who play a lead role in shaping the culture of the Church body concerned. This will always include:

- All clergy holding the Bishop's licence, commission, authorisation, or permission.
- Youth and Children's workers.
- All Readers and Licensed Lay Ministers holding the Bishop's licence or similar
- Safeguarding Officers / Leads in all Church bodies.
- Churchwardens leading a church in interregnum.

#### How?

Two 1½ hour face to face sessions delivered via zoom, with additional reflective work to complete outside of the sessions.

Those eligible for Leadership Training should contact the Diocesan Training Team and ensure they receive an invitation to attend.

CC Safeguarding Policy V5.0 January 2024.docx

### **GUIDELINES FOR SAFEGUARDING CHILDREN AND ADULTS**

#### Based on 'Protecting All God's Children,

# The Policy for Safeguarding Children in the Church of England' (written by The Church of England)

www.churchofengland.org/media/37378/protectingallgodschildren.pdf

#### **Guidelines for individual workers**

#### You should:

- treat all children and young people with respect and dignity
- ensure that your own language, tone of voice and body language is respectful
- always aim to work within sight of another adult
- ensure another leader is informed if a child needs to be taken to the toilet. Toilet breaks should be organized for young children.
- ensure that children and young people know who they can talk to if they need to speak to someone about a personal concern
- respond warmly to a child who needs comforting, but make sure there are other adults around
- if any activity requires physical contact, ensure that the child and parents are aware of this and its nature beforehand
- administer any necessary First Aid with others around
- obtain consent for any photographs/videos to be taken, shown or displayed;
- record any concerning incidents and give the information to the diocesan school's adviser. Sign and date the record.
- always share concerns about a child or the behaviour of another worker with your group leader and/or the safeguarding co-ordinator.
- As adults do not put yourself at risk. Make sure there are other adults present. A minimum of two persons should be present when directly undertaking work with a child, young person or vulnerable adult.
- All communication with children should be done appropriately and in a public way, e.g. Facebook wall posts rather than messages, group emails rather than texts. This should be age appropriate (note some Social Media have age restrictions; we should adhere to them even if the children don't!)
- Personal social media accounts should be kept distinct from accounts relating to church roles and
  responsibilities but should remember that their personal social media use can still reflect on their church
  role.

#### You should not:

- initiate physical contact. Any necessary contact (e.g. for comfort, see above) should be initiated by the child
- invade a child's privacy while washing or toileting
- play rough physical or sexually provocative games
- use any form of physical punishment
- be sexually suggestive about or to a child even in fun
- touch a child inappropriately or obtrusively
- scapegoat, ridicule or reject a child, group or adult
- permit abusive peer activities e.g. initiation ceremonies, ridiculing or bullying
- show favouritism to any one child or group
- allow a child or young person to involve you in excessive attention seeking that is overtly physical or sexual in nature
- give lifts to children or young people on their own or on your own

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- smoke tobacco in the presence of children or drink alcohol when responsible for young people
- share sleeping accommodation with children
- invite a child to your home alone
- Contact children by private messages or texts
- arrange social occasions with children (other than family members) outside organized group occasions
- allow unknown adults access to children. Visitors should always be accompanied by a known person
- allow strangers to give children lifts.

#### Touch

Church-sponsored groups and activities should provide a warm, nurturing environment for children and young people, while avoiding any inappropriate behaviour or the risk of allegations being made. Child abuse is harm of a very serious nature so that it is unlikely that any type of physical contact in the course of children and youth work could be misconstrued as abuse. **All volunteers must work with or within sight of another adult.** 

Very occasionally it may be necessary to restrain a child or young person who is harming her/himself or others. Use the least possible force and inform the diocesan school's adviser and/or a teacher from the child's school, as soon as possible. All such incidents should be recorded and the information given to the diocesan school's adviser. You should not restrain or restrict a child if there is no immediate harm to the child or to others.

All physical contact should be an appropriate response to the child's needs not the needs of the adult. Colleagues must be prepared to support each other and act or speak out if they think any adult is behaving inappropriately.

#### Additional guidelines for group leaders

In addition to the above the diocesan school's adviser and the group leader should:

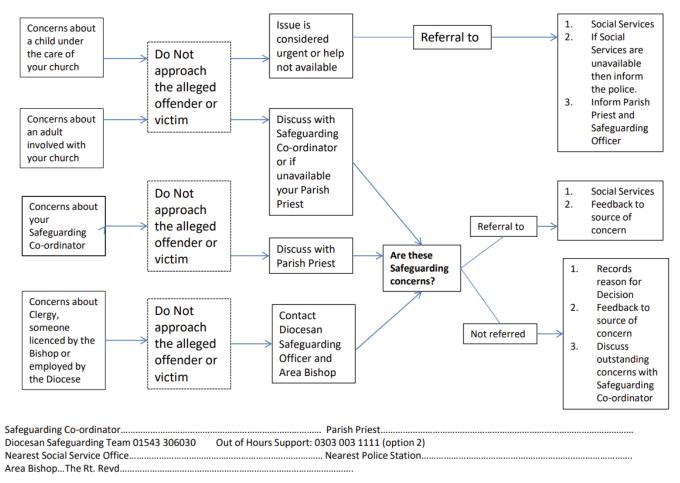
- ensure any health and safety requirements are adhered to
- undertake risk assessments with appropriate action taken and record kept
- ensure register and consent forms are up to date, and kept out of view of the public
- have an awareness, at all times, of what is taking place and who is present
- create space for children and/or adults to talk either formally or informally
- liaise with the diocesan school's adviser over good practice for safeguarding
- always inform the diocesan school's adviser of any specific safeguarding concerns that arise. The diocesan school's adviser will liaise with the diocesan safeguarding adviser.

#### Responding to child protection concerns

Do not try to deal with any child protection concern on your own. Always tell the diocesan school's adviser. Always make **notes** as accurately as possible, as soon as possible. These should **cover**:

- what has happened
- in what context
- anything that seemed particularly significant
- quote the child's words exactly where possible.
- sign the record
- add your name, role, date of incident and date of the recording.

IN THE EVENT OF A SAFEGUARDING ISSUE IN YOUR CHURCH



#### Safeguarding Issues Flowchart

https://d3hgrlq6yacptf.cloudfront.net/5f3ffdd147bb3/content/pages/documents/16063984121797452782.pdf

#### References

Parish Safeguarding Handbook (March 2019) <u>https://www.churchofengland.org/sites/default/files/2019-03/Parish%20Safeguarding%20Handbook%20March%202019.pdf</u>

#### Diocese Safeguarding Policy V1

https://d3hgrlq6yacptf.cloudfront.net/5f3ffdd147bb3/content/pages/documents/diocese-safeguarding-policyand-guidance-2021-v22.pdf

#### Diocese of Lichfield; Safeguarding Policy and Guidance (2017) as Amended (2021).

https://d3hgrlq6yacptf.cloudfront.net/5f3ffdd147bb3/content/pages/documents/diocese-safeguarding-policyand-guidance-2021-v22.pdf

#### Safer recruitment and training policy v3

https://d3hgrlq6yacptf.cloudfront.net/5f3ffdd147bb3/content/pages/documents/560dd33e193deea98097205a c123816289087c07.docx

#### Practice Guidance: Safer Recruitment 2016

https://d3hgrlq6yacptf.cloudfront.net/5f3ffdd147bb3/content/pages/documents/efa968600f349fd3c4607d3387f16e460f1 4ca6f.pdf

#### Social Media Policy 1.1

https://d3hgrlq6yacptf.cloudfront.net/5f3ffdd147bb3/content/pages/documents/dbb960579297ccf40b9c9299ceabb0546c ecf629.pdf

