
RESPONDING TO SAFEGUARDING CONCERNS



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Responding to Safeguarding Concerns

All suspicions, concerns, knowledge, disclosures, or allegations of abuse should be reported immediately to the Church in Wales Provincial Safeguarding Team or, in an emergency to the statutory authorities.

If you have information about a safeguarding situation where a child or adult is in immediate danger or requires urgent medical attention, please call the emergency services on 999 – DO NOT DELAY.

If you think that a child or adult is at risk of harm but is not in immediate danger, please call the local authority social services department.

Introduction

Everyone who works for the Church, including clergy, employees, and volunteers, is likely to have contact with children and/or adults at risk and therefore needs to know how to respond to a safeguarding concern.

Anyone who has direct contact with children and/or adults at risk, works with parents or carers, or acquires knowledge about children or adults at risk by any means should:

- Be aware of potential indicators of abuse or neglect for children and adults at risk
- Be alert to the risk factors for children and adults at risk associated with adult carers, abusers, or potential abusers
- Be alert to the impact on the child or adult at risk of any concerns of abuse or harm
- Listen and respond promptly to concerns, disclosures or allegations of abuse or harm
- Report and record all safeguarding concerns, disclosures, or allegations

Safeguarding concerns, disclosures or allegations might relate to something that is going on now, something that may happen in the future, or something that happened in the past. Concerns, disclosures, or allegations about abuse in the past (called non-recent or historic abuse) should be treated as seriously as reports about abuse which may be happening now.

All safeguarding concerns should be reported to a Provincial Safeguarding Officer.

How to contact a Provincial Safeguarding Officer

Safeguarding concerns, disclosures or allegations should be reported to a Provincial Safeguarding Officer as soon as practicable. It is very important that no attempt is made to investigate the concern, disclosure or allegation. The concern, disclosure, or allegation should only be discussed with persons who need to know and respond to protect confidentiality and preserve the integrity of information. The Provincial Safeguarding Officer will provide advice and support in relation to how the concern should be managed and who should be informed.

Responding to a disclosure of abuse

A disclosure is when a child or adult shares their experience of abuse or information about abuse experienced by someone they know. More unusually, a child or adult might share that they are causing or have caused harm to someone else. A disclosure by someone who is sharing information about harm that they have caused is more likely to approach someone providing pastoral support, such as a cleric or lay minister. The initial response to a disclosure of any kind is very important because it might be the only time that the child or adult talks about the abuse.

If a child or adult at risk tells you that they or another child or adult at risk is being abused:

- Show them that you have heard what they are saying, and that you take their allegations seriously (this is not necessarily the same as believing)
- Avoid displaying shock or disbelief
- Encourage them to talk but do not prompt or ask leading questions (it is OK to check that you have understood what you have been told and to ask open questions that cannot be answered “yes” or “no”, such as who, what, where, when)
- Don’t interrupt when they are recalling significant events
- Don’t make them repeat their account
- Explain what actions you must take, in a way that is appropriate to their age and understanding
- Do not promise to keep what you have been told secret or confidential. Reporting concerns is not a betrayal of trust
- Do not try to examine them for injuries or take photographs or video recordings
- Write down as soon as you can what you have been told, using the exact words of the child or adult if possible, and make a note of the date, time, place and people who were present
- Support them to contact a GP or hospital if they need medical assistance
- Do not investigate or talk to potential witnesses
- Do not confront the alleged abuser(s)
- Ensure that your concerns are reported immediately
- Do not delay

Raising concerns about a person in a position of trust

It is known that the majority of abuse of children and adults at risk is perpetrated by people they know and trust.

What is a position of trust?

“Position of trust” is a legal term that refers to certain roles and settings where an adult has regular and direct contact with children or adults at risk. Examples of positions of trust include teachers, care workers, youth justice workers, social workers, and doctors.

There are many roles which are not currently legally defined as being positions of trust, such as faith group leaders, swimming coaches, or people running community activities for children.

All church workers including clergy, employees and volunteers are regarded by the Church in Wales as persons working in positions of trust within the church and as such are expected to adhere to the safeguarding policy and guidance.

What constitutes a breach of trust?

Any form of abuse or exploitation of a child or adult at risk constitutes a breach of trust. It is important that those in positions of responsibility, authority and trust are extremely careful to guard against the possibility of this trust being breached.

The definition of breach of trust is wider than an allegation involving significant harm or the likelihood of significant harm to a child or adult at risk. It applies to situations where concerns have been raised for the potential of harm to have taken place. It is important to note that any breach of trust, even in the absence of an allegation, advice will be sought from the statutory authorities.

Such behaviour would include, but is not limited to:

- failing to abide by safeguarding policies and procedures including failing to report safeguarding concerns in a timely manner or preventing, discouraging, or otherwise inhibiting others from raising any safeguarding concerns that they might have.
- befriending a child, or adult at risk by indulging or coercing them with inducements such as gifts, treats, money or drugs, or developing a trusting relationship with their family or using the internet etc. to develop a relationship in order to abuse or exploit them.
- engaging in a sexually intimate relationship with a young person over the age of 16 and under the age of 18.
- receiving gifts of money or items of value for personal gain.
- disclosure of any personal information relating to others without consent e.g., addresses, (personal, email or messenger), telephone numbers or bank details, unless this is a safeguarding matter or there is another legitimate reason
- sending emails or posting messages on any social media site or otherwise using ICT in such a way as to harass, threaten, intimidate, bully, humiliate or abuse any individual or group.

The concerns may appear to be relatively minor such as the failure to adhere to the safeguarding policy and guidance or there may be a clear act that represents a criminal offence.

It is important that individual actions, however well-intentioned, are not misinterpreted. Offering appropriate care and support is extremely important. Real care must be exercised in listening or offering advice to a child or adult at risk including selecting an appropriate location and setting for such an activity.

Care should be taken when entering into private or intimate conversations and should be avoided with children. Above all do not form relationships that abuse the trust that is implicit in the role that has been given by the church.

An allegation or concern may relate to activities within the church, home, or other setting. Concerns may be current or something that has happened in the past. It is important to remember that past events may have relevance for the safety of children or adults at risk in the present. Therefore, irrespective of when the incident is alleged to have taken place the same procedure should be followed, and the concern reported immediately to a Provincial Safeguarding Officer.

The Provincial Safeguarding Officer will liaise with the statutory authorities in all cases in which it is alleged that a person who works with children or adults at risk has:

- Behaved in a way that has harmed or may have harmed a child or adult at risk
- May have committed a criminal offence against a child or adult at risk or that has a direct impact on the child or adult at risk
- Behaved towards a child, children, or adults at risk in a way that indicates they are unsuitable to work with both children and adults

It can be difficult to determine what may fall into the category of "unsuitable to work with children or adults at risk". The employer should consider whether the subject of the allegation or concern has:

- Been the subject of criminal procedures that indicate a risk of harm to a child or adult at risk
- Caused harm or possible harm to a child or adult at risk and there is a risk in the working, volunteering, or caring environment
- Contravened or continued to contravene their agency's safeguarding Policy and Procedures
- Failed to understand or comply with the need for clear personal and professional boundaries in the workplace
- Behaved in a way in their personal life which could put children and adults at risk of harm
- Behaved in a way that undermined the trust placed in them by virtue of their position
- Children who are subject to Child Protection Procedures
- Has caring responsibilities for an adult who is subject to Adult Protection Procedures

How to respond to a concern about a person in a position of trust within the Church

If anyone suspects that a child or adult at risk is being abused or suspects another worker of using their position of trust inappropriately then there is a duty to report that suspicion to a Provincial Safeguarding Officer at the earliest opportunity. The Provincial Safeguarding Officer will provide advice and assistance, including in relation to whether the concern should be reported to the statutory authorities. If the person is worried about reporting their concerns because they are fearful of repercussions, they should use the Whistleblowing Procedure which will afford them protection.

Concerns sometimes arise in the context of the church worker's own family setting, for example where someone has accessed child abuse images at home or has in some way maltreated their own child or children. Such circumstances will have a bearing on how the church worker can carry out their role within the church. In such instances a Provincial Safeguarding Officer will work closely with local authority social care services and the police. At the same time the diocesan bishop will ensure that appropriate pastoral care is put in place to support the church worker and his/her family.

Where the concern relates to the protection of a child or adult at risk, then the agreed procedures and best practice guidelines should be followed.

Whatever the concerns are, the person who receives the information in whatever form must discuss the matter with a Provincial Safeguarding Officer as soon as is practicable.

Where the concern does not relate directly to the protection of a child or adult at risk or it is not clear then the matter should still be discussed with a Provincial Safeguarding Officer.

Where the criteria for a referral to the police or social care services are not met there may still be concerns about the behaviour of the adult having been inappropriate which will be referred to the

Provincial Safeguarding Panel for advice. That advice may include that the matter is of sufficient concern to warrant referral to a Regulatory Body such as Estyn, General Medical Council, Health and Care Professions Council, Care Inspectorate Wales, Social Care Wales or to the Disclosure and Barring Service (DBS).

In the case of clergy where a safeguarding investigation has deemed them to have abused their position of trust the matter will be referred to the diocesan bishop for attention and may include further investigation in accordance with the disciplinary rules of the Church in Wales. In the case of employees that matter will be referred to the designated church employer where appropriate action in accordance with their own disciplinary procedure will take place. In the case of volunteers, they may decide, following a concern or an allegation about them, to discontinue their service. Regardless of this, the advice of the Provincial Safeguarding Panel will be followed where the matter needs to be referred to the DBS.

The only exception to sharing information with a Provincial Safeguarding Officers is where the Provincial Safeguarding Officers is the subject of the allegations or concern or implicated in any way. In such circumstances the matter should be referred to the Director of Safeguarding.

The following must be adhered to at all times:

- I. At no time should the person about whom concerns have been raised be informed or alerted to the fact that concerns have been reported until such time that it is established either:
 - that a referral to the statutory authorities is not required

Or

- that specific permission to contact the person has been obtained from the statutory authorities.

In either case, contact with the person of concern should not be made without the express agreement of a Provincial Safeguarding Officer.

All records and notes taken must be provided to a Provincial Safeguarding Officer (or the Provincial Secretary if the concerns are regarding a Provincial Safeguarding Officer) as soon as practicable and if possible, by the next working day.

Recording and record keeping in cases relating to a breach of trust

Where a statutory investigation is undertaken regarding an adult in a position of trust and the investigations conclude that the adult is in breach of that trust, the records will be kept for 75 years.

Temporary removal from role

The Church in Wales has a responsibility to ensure that any member of the church community known to have, suspected of having, or alleged to have offended against a child or adult at risk or otherwise engaged in behaviour constituting a breach of trust is properly supported, appropriately supervised and that any necessary referrals are made.

The Church in Wales will apply the principles set out in relevant current government guidance in

relation to all allegations of child abuse, including allegations of child abuse images, both current and non-recent.

On the advice of the Provincial Safeguarding Panel or statutory authorities, the diocesan bishop or other church employers may be required to suspend a paid or volunteer worker pending an investigation and throughout the course of any investigation.

Suspension is intended as a neutral act to manage risk or enable an investigation to be undertaken

Duty to refer to the Disclosure and Barring Service (DBS)

The Disclosure and Barring Service (DBS) is the body tasked with the responsibility of maintaining records of those who may be unsuitable for work with children and adults at risk due to past behaviour. The DBS was established under the Protection of Freedoms Act 2012 and merges the functions previously carried out by the Criminal Records Bureau (CRB) and Independent Safeguarding Authority (ISA).

The Church in Wales has a legal duty to refer to DBS where there is a belief that a person has caused harm or poses a future risk of harm to children or adults at risk.

It is breaking the law to knowingly employ (in either a paid or unpaid capacity) anyone to engage in regulated activity with a group from which they are barred from working.

Reporting non-recent abuse

At some stage it is likely that a priest, or other person involved with worship or pastoral care, will be in the position where someone discloses abuse that happened to them when they were a child. As with best practice when hearing a disclosure from a child it is important to listen attentively and without judgement.

The person making the disclosure may tell you that they do not want this information to go any further. However, this is not best practice and may endanger others by keeping the disclosure confidential. The information disclosed must therefore be passed on to a Provincial Safeguarding Officer for their action.

Where the perpetrator is still alive

Where a person discloses non-recent abuse and the perpetrator is still alive, advice and support should be sought from a Provincial Safeguarding Officer so that the victim or survivor of this abuse can be encouraged to report the concern to police as this person could be continuing to abuse children or adults at risk.

In some situations, a Provincial Safeguarding Officer will contact the police even without the consent of the adult who has disclosed the non-recent abuse, if this appears necessary to protect children.

A Provincial Safeguarding Officer will take responsibility for contacting the police and will give the details of both the victim or survivor and the perpetrator to them. A Provincial Safeguarding Officer will advise the police as to whether the victim or survivor has given consent for disclosure or not.

If it is thought there are health or safety concerns for the victim by disclosing their name, this should be addressed with the police. However, it should be remembered that the police can insist on their identity being disclosed through a court order if they believe this information overrides other identified risks.

Wherever possible the wishes and feelings of the person making the disclosure should be respected. Forcing someone to give information against their will can result in the allegation being withdrawn and is therefore counterproductive.

It is important to ensure that where disclosures allege criminal activity, and/or there is an ongoing risk of significant harm to the victim or survivor, a child or adult, this information is shared with the police straight away. Where the victim or survivor does not wish to speak with the police it is highly unlikely that the police will enforce contact when they know that the person does not want this to happen. It is the police's role to decide what should happen to the information that is whether to note it for information or to investigate.

Where the perpetrator is deceased or unknown

In these circumstances the victim or survivor should be encouraged to give the information they know regarding the perpetrator, and this will be passed on to the police. It is important for the police to have this information even though the person is deceased as it may tie in with a wider network of victims and other ongoing investigations.

Responding to victims and survivors

Support for victims and survivors is important to the Church in Wales, particularly where it is believed that the abuse or harm took place within the church.

Victims and survivors can be signposted to Safe Spaces¹ or New Pathways² for independent specialist support.

The sense of healing from the pain and trauma of abuse is important for people who have experienced abuse and those who seek to minister alongside them have a potentially important role to play in providing support in this. Every individual's journey is unique to them, and the things that are important, that help them and that provide them with hope and sustenance will be different in every case.

Some victims and survivors of abuse have experienced further trauma when they have sought help in their healing journey. In some cases, and possibly with the best of intentions, people in churches have attempted to impose healing rituals or prayers on the person seeking help. Imposing anything or mistaking acquiescence for informed consent is always inappropriate, lacking in compassion and understanding and has the potential to re-traumatise an individual since it fails to recognise the importance of ensuring they have control over what happens to them, how they might be touched and by whom. On rare occasions further abusive acts have also occurred from the person seeking to offer care or healing.

However, for many the church has an important role to play in helping victims and survivors process and understand what has happened and help with their healing journey. Good practice in pastoral

¹ [Safe Spaces](#)

² [New Pathways](#)

care and guidelines in safeguarding need to apply to all situations where healing prayer, healing practices and deliverance ministry are offered in church life. The quality of pastoral care, personal conduct and ministry in these circumstances needs to be of the highest standard.

Sometimes those who have been abused have, within a church context, been urged to forgive unconditionally as if this was the right thing to do. Some Christian leaders have also explicitly or implicitly suggested that a victim of abuse has failed in some way if they do not forgive his/her abuser. This reflects poor theology, is extremely poor practice and serves only to further traumatise the individual. Forgiveness, like an individual's healing journey, is a personal matter. Whether or not the person chooses to forgive their abuser is a matter for that individual alone and they should not be judged nor found wanting, whatever their decision. For some it will be an important aspect of their healing, it may bring them peace and a sense of closure. For others forgiveness will not be something that they feel they need to do. They may, in any case, feel that the abuser has not shown remorse and cannot be forgiven, or that it is not down to them to forgive, but is a matter for God to forgive.

Whatever the victim or survivor's approach to forgiveness they should receive compassion and support for their individual choice.

Be mindful of the needs of victims and survivors to meet away from church related surroundings and the choice of where to disclose should be considered carefully.

Pastoral care and spiritual support

Pastoral care and spiritual support are different from counselling or therapeutic support. Whilst these can work alongside each other it is important that counselling is provided by those who are appropriately qualified. Where the abuse has alleged to have been made by a member of the church, then this should be discussed with a Provincial Safeguarding Officer who will be able to assist in ensuring that the most suitable support is sourced for the victim or survivor.

Those who are offering pastoral care and spiritual support to a victim or survivor should discuss this with a Provincial Safeguarding Officer to ensure that boundaries with respect to subject matter, confidentiality and duration are taken into consideration in order to manage the expectations and meet the needs of the individual who is seeking support. This is particularly so if the disclosure that has been made is in, or likely to be in, the court's domain.

Supporting Victims and Survivors

Where victims and survivors are asked to engage in internal processes such as giving evidence at tribunals, it is important that they are offered support at every level. Should they be requested to attend a tribunal they should be given the opportunity to take a supporter with them and to have their needs met. They should be protected from direct contact with their abuser or alleged abuser at any such meetings unless they specifically request otherwise.

The welfare needs of the victims and survivors throughout these processes should be paramount and their needs discussed at the outset.

Supporting Workers

The church has a unique opportunity to offer sensitive pastoral ministry to all who are involved in abuse cases. When, in a case of suspected abuse, the safety of the individual has been assured, it is vital that the church creates structures whereby workers can be counselled and supported. Providing pastoral ministry takes skill and is complex and demanding work and the stress of providing this over a protracted period, such as a court case, should not be underestimated. Those

undertaking it will need support, and possibly professional advice, guidance and possibly counselling and this should be made available on request.

Dealing with the aftermath of disclosure in a church community

Following the disclosure that a cleric or a responsible lay person in a parish has been responsible for the sexual abuse of children, the effect that this can have on the congregation is considerable. Not only will they have to cope with a significant person within their church community having to leave, but also how the next person appointed to cover that post is implicitly affected and how the members of the congregation might heal and grow from the experience.

The process that a congregation goes through after such a breaking of trust can be likened to that of bereavement. There will be initial shock then searching and bargaining, disorientation and eventually acceptance.

The initial response of individual members of the congregation will vary depending on many factors, these will include:

- The role of the person in church.
- The degree of trust inherent in that person's role.
- The degree to which the congregation member accepted the facts of the case.
- Whether the congregation member was in contact with either the victim or the offending cleric.
- The relationship of the member to the cleric. For example had they used the cleric to discuss intimate matters, had the cleric married them or been involved in other sacramental events. Or was the cleric someone who received their confession?
- The person's theology of priesthood and leadership.
- To what degree the member was dependent on the cleric.
- Whether the member had any suspicion there was something wrong and therefore has feelings of guilt.
- The way the abuse/misconduct was communicated to the congregation.
- How close the member's children were to the cleric.
- The age and values of the individual.
- Their own history of abuse or misconduct.

Initial feeling could be anger, disillusionment, disbelief, shame and/or sadness.

Some of the effects seen within the congregation as a whole may include:

- A loss of energy.
- Distrust of leaders continuing over time.
- Divisions within the congregation.
- Withdrawal of some members of the congregation either from positions of responsibility or completely.
- Withdrawal of financial support.
- Anger, perhaps displaced onto unrelated issues.
- Conspiracy of silence about the event (seen as protecting the offender or the victim)
- Despair regarding the future of the congregation.
- Blaming and distorting responsibility for the event on to somewhere else, such as the diocese.
- Difficulty making normal and necessary decisions.

If the congregation has not gone through a healing process these elements can continue over time and become more permanent. They can appear unrelated to the particular traumatic event. This can cause great difficulty for the next incumbent appointed especially if they have not been fully briefed.

Consideration should be given to appoint a minister for a limited period in this situation. An experienced but well supported person who can model spiritual maturity, healthy boundaries and hold the congregation in a safe place whilst they come to terms and are reconciled to what has happened.

The support of the Provincial Safeguarding Officers should be sought, and a plan put in place with other senior clerics in that diocese to deal sensitively and professionally with the situation.

The team will need to meet regularly during an investigation of abuse. It will need to ensure that the needs of the congregation are monitored. It is inevitable that during the investigation stage a high level of confidentiality is maintained. Those holding any information need to be supported by a senior person within the diocese.

As soon as possible and when information is about to become public, the congregation need to be told the facts, as far as possible and without identifying any victim. This may best be done at a parish meeting where senior members of the diocese and safeguarding team can be present together to facilitate the congregation processing the information.

The congregation should have an opportunity to express their feelings; these will be conflicting but should not be challenged. In addition, they should be allowed to discuss the repercussions of the event.

The congregation could discuss future plans such as what other meetings they need. What are the spiritual and pastoral needs of the congregation at this time and do some people require individual help, for example someone who has been previously abused themselves and who thought they had come to a safe place?

Probably at a later meeting the congregation will find it helpful to put the event in context, for example learning about sex offending, the abuse of power, grooming and exploitation. A victim or survivor of abuse (not the victim or survivor in the relevant case) and an offender (not the cleric or officer in the relevant case) could potentially help people understand what has happened.

The team involved in explaining the situation to the congregation will need to be de-briefed.

Overtime the congregation will reorganize themselves and hopefully come to a place of acceptance. The signs of a congregation beginning to accept may include:

- The responsibility for the offence will be rightly acknowledged.
- It will be accepted that the cleric will not return.
- The role of the cleric will be seen more realistically.
- The offending cleric will be seen for the good that was achieved as well as accepting the wrongdoing and the damage done.
- The victim will not be blamed but acknowledged to need support (even if the person is not known to the congregation)
- Communication within the congregation is open, roles and responsibilities are appropriately shared.

- The facts of the event need to be placed firmly within the parish's history and memory so that it is accepted and does not become a secret to cause problems later on.
- In troubled congregations developing a parish history or chronology could be the starting point for discovering the roots of dissension.
- The congregation may come to a point where a liturgical reconciliation event may help to reinforce the progress people have made towards healing.

Whistle-blowing (confidential reporting)

All organisations that provide services for, or work with, children or adults at risk must have appropriate whistle-blowing procedures, and a culture that enables safeguarding concerns and allegations to be addressed. There should be particular awareness that the welfare of children and adults at risk is paramount. Whistle blowing as part of the safeguarding procedures is intended to encourage and enable anyone with a serious concern, to raise that concern.

People who work within the Church in Wales, including but not limited to office holders, employees, or volunteers, may find it difficult to speak out and raise their concerns as they may feel they are being disloyal to their colleagues or to the church. They may also fear harassment or victimisation.

Whistle-blowers are protected by law from victimisation, subsequent discrimination or disadvantage provided the matter in question is raised with genuine concern. The Public Interest Disclosure Act 1998 gives workers legal protection against being dismissed or penalized as a result of publicly disclosing certain serious concerns. The policy extends this protection to volunteers.

Please refer to the Whistleblowing Guidance (Safeguarding) for further information.

Raising a concern

If an individual has any concerns that someone within the church is engaged in activities or behaviour that is contrary to any part of these safeguarding policies they should, in the first instance, contact a Provincial Safeguarding Officer.

If the individual feels unable to contact a Provincial Safeguarding Officer, or the allegation involves a Provincial Safeguarding Officer, then advice should be sought from the Director of Safeguarding. If the concern relates to the Director of Safeguarding, the Provincial Secretary should be informed.

Concerns may be raised verbally in the first instance however this should be followed up in writing detailing the history of the concern and providing as much detail as possible including any supporting evidence.

The earlier concerns are raised the easier it is to take action.

How the Church will Respond

The Church in Wales gives an undertaking to minimise any risk to the individual of raising a concern in good faith and will support any individual doing so. It will not tolerate victimisation, intimidation, or negative repercussion of anyone raising a concern in good faith and will take action to prevent this. It is possible that the whistle-blower may be called to give evidence in criminal or disciplinary proceedings. If this is the case, they will receive advice about the procedure and any necessary support that they may need.

Initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form

it should take.

Subject to legal constraints, the whistle-blower will be informed of the outcome of any investigation.

Confidentiality and information sharing

The Data Protection Act 2018 sets out clearly how personal information should be managed. The law is rarely a barrier to disclosure of information. There is no restriction in the Data Protection Act or any other legislation that prevents concerns regarding individuals being highlighted and shared between agencies for the purpose of protecting children or adults at risk.

Ensuring that, children and adults at risk are protected and safeguarded from significant harm as well as the broader requirement for safeguarding and promoting welfare depends fundamentally upon effective sharing of information, collaboration and understanding between agencies and professionals.

Sharing information safely

In order to share confidential information legally and safely there must be a legal basis for sharing information and a legitimate purpose for doing so. When deciding whether or not to share confidential information the following should be considered:

- is there a statutory obligation to disclose? That is to say, is disclosure required by a court order or other legal obligation such as a duty to refer to the Disclosure and Barring Service (DBS);
- is there express or implied consent from the persons involved.
- is there an overriding public interest in disclosing information such as where a child or adult at risk is at risk of significant harm?

The significance, or the potential significance of the information held should be considered. Information must be relevant to the purpose for which it is being shared and should only be shared with those practitioners or agencies that need to know.

There should be openness and honesty about the reasons why information needs to be shared and why particular actions need to be taken, unless doing so causes a safeguarding concern.

Consent to share information should be obtained unless it is not safe or possible to do so, or if it would undermine the prevention or detection of a crime.

Information should be accurate, held securely and kept for no longer than necessary.

If there is any doubt about whether information should be shared a Provincial Safeguarding Officer should be contacted for advice. Please see Church in Wales Data Protection Guidance at <https://www.churchinwales.org.uk/resources/privacy-statement> for further information.

Responding to the media

Allegations of abuse by clergy or church workers are likely to be the subject of media interest. In any case of alleged abuse where a case may go to trial it is essential that no information is given that might prejudice the outcome of any legal proceedings. Handling relations with the media needs to

take into account the wishes, needs and wellbeing of victims, public interest and risks to others, including the alleged or known offender. All communications with the media will be handled by the Director of Communications who should be contacted immediately in any case where media interest is possible or likely.