



SAFEGUARDING POLICY FOR CHILDREN AND ADULTS AT RISK OF HARM

POLICY OVERVIEW

The British Province of Carmelites is committed to safeguarding and promoting the welfare of children and adults at risk. This commitment directly relates to the fact that we are all made in the image of God and the Church's common belief in the preciousness, dignity and uniqueness of every human life. We start from the principle that each person has a right to expect the highest level of protection, love, encouragement and respect. Following on from the safeguarding reviews in 2020 we are committed to the One Church Approach to safeguarding by implementing the changes needed and ensuring we respond to victims/survivors promptly and compassionately. This policy outlines our approach to ensuring their safety and well-being in all our activities and interactions.

The British Province of Carmelites is committed to acting in accordance with civil legislation and associated civil requirements and good practice. The British Province of Carmelites is fully compliant with the policies and guidelines issued by the Roman Catholic Church in England and Wales. The safeguarding arrangements for the British Province of Carmelites are to be read in conjunction with the international Policies and Procedures for Safeguarding as set by the Carmelite General Council in Rome. The policy and procedures are compliant with the Standards set by the National Catholic Safeguarding Standards Agency (CSSA) and are subject to regular auditing by the CSSA.

The British Province of Carmelites is supported by the Religious Life Safeguarding Service (RLSS) to ensure good safeguarding practice is in place.

PURPOSE

The purpose of this policy is to provide a clear framework for safeguarding children and adults at risk of harm, ensuring that all Friars, Third Order, staff, volunteers, and stakeholders understand their responsibilities and act accordingly.

SCOPE

This policy applies to all those involved with the British Province of Carmelites and any of its works – Friars, Third Order, Lay Volunteers or Employees, regardless of their role or the activities they undertake.



It is the responsibility of all Friars, Third Order, Lay Volunteers or Employees to prevent abuse, whether by action or omission. Abuse in this policy refers to: physical, sexual, emotional, spiritual, neglect, self-neglect, organizational, psychological, financial, domestic or verbal. Additionally, behaviour which effectively results in modern day slavery, or where there is evidence of discrimination or radicalisation, needs to be recognised and addressed as a safeguarding issue, in accordance with the procedures outlined.

DEFINITIONS

Definition of a child:

In law in England and Wales, and in accordance with the Children Act 1989/2004, a child or young person is defined as a person under the age of 18 years.

All children and young people, whatever their age, culture, ability, gender, language, ethnic origin, religious belief, and sexual orientation, have the right to protection from abuse.

Safeguarding Children implies:

- Protecting children from maltreatment and significant harm
- Preventing impairment of children's health or development
- Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all children to have the best outcomes.

Definition of an adult at risk:

An adult at risk is someone who: is aged eighteen years or over; may have care and support needs due to age, disability, illness, infirmity, physical or mental deficiency, or social circumstances; is at **risk** of or experiencing abuse, or neglect, and as a result of their care and support needs is unable to protect themselves against that (risk of) abuse, or neglect.

Safeguarding an adult at risk implies:

- Protecting the rights of adults to live safely, free from abuse and neglect.
- People and organisations working together to prevent and stop both the risks and experience of abuse or neglect.



- People and organisations making sure that the adult's wellbeing is promoted by, where appropriate, taking fully into account their views, wishes, feelings and beliefs in deciding on any action.
- Recognising that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear, or unrealistic about their personal circumstances and therefore potential risks to their safety or wellbeing.
- Vulnerability is variable and is specific to, the situation a person finds themselves in; the capacity of the individual to keep themselves safe; how others view that vulnerability. It is usually a combination of these three factors

SAFEGUARDING ROLES AND RESPONSIBILITIES

1. Prior Provincial and Council/Trustees of the Carmelite Charitable Trust:

- maintain appropriate governance and oversight of safeguarding, ensuring policies are in place and in line with national guidelines and safeguarding standards.
- Ensure safeguarding policies and procedures are reviewed annually.
- Promote a culture of safeguarding within the organisation, with effective leadership through resourcing and scrutinising arrangements for high-quality safeguarding practices and outcomes.
- must communicate effectively the Safeguarding message and encourage and support a culture of transparency
- set out clearly the responsibilities of all Friars, Third Order, Staff and Volunteers to enable effective adherence to the agreed standards.
- develop and publish a Safeguarding Implementation Plan for the Order with an annual review and update.
- provide adequate resources, recruitment, and support suitably trained and experienced safeguarding personnel to deliver their safeguarding services

2. Safeguarding Coordinator (Designated Safeguarding Lead DSL):

- Act as the main point of contact for safeguarding concerns. This includes direct oversight of safeguarding policy and guidance, including management and oversight of documentation, case



progression/management and the secure, legally compliant storage of safeguarding reports and related material.

- Provide support and guidance to Friars, Third Order, staff and volunteers on safeguarding issues.
- Ensure all Friars, Third Order, staff and volunteers receive appropriate safeguarding training.
- Will facilitate the process for DBS checks.
- Maintain the relationship with and input into the work of the RLSS.
- The Designated Safeguarding Lead may delegate some of this responsibility to the RLSS by referring the case to them but will remain as key contact for the case duration unless another individual is identified to assume responsibility.
- Will coordinate the work of the Safeguarding Team

3. The Safeguarding Team:

- Will work alongside the DSL to ensure safeguarding policies and procedures are in place
- Will be a first point of contact for safeguarding concerns at local level, i.e. in Aylesford and the Young Adults Community, and will liaise with the DSL regarding any safeguarding concerns.
- Will support with the processing DBS checks
- Ensure they have undertaken relevant training.

4. Friars, Third Order, Staff and Volunteers:

- Be aware of and know how to follow the safeguarding policies and procedures.
- complete the required DBS check
- Attend regular safeguarding training.
- Report any concerns about the welfare of a child or adult at risk to the DSL or a member of the Safeguarding Team.

5. General

- Everyone involved in the work of the British Province of Carmelites has a duty to disclose to the Designated Safeguarding Lead any safeguarding concerns that have been raised about them.



COMMUNICATION AND PROMOTION

Effective communication of safeguarding policies and procedures ensures their successful implementation. Throughout the Carmelite Order we must employ a range of methods to communicate our safeguarding commitment to all audiences.

The British Province of Carmelites must have a communications plan in place to ensure universal access to all elements of the safeguarding strategy of the Order that is embedded in our ministry.

To achieve this the British Province of Carmelites will:

- Develop and review regularly a written communications plan which identifies the target audience, what information needs to be shared with the identified audience, how that information will be shared, by whom and within what timeframe
- Include accessible information about how to make an abuse allegation or a complaint.
- Display the name and contact details of the local safeguarding delegate in all Carmelite churches, shrines, schools and publicly accessed Carmelite spaces
- Interact with other relevant safeguarding agencies to implement and promote quality safeguarding practices

PRACTICE GUIDANCE

In accordance with Article 19 of Pope Francis' Apostolic Letter, "Vos Estis Lux Mundi", 7 May 2019 [3], It is the policy of the Catholic Church in England and Wales, as agreed by the Bishops Conference, April 2020, to report to the statutory authorities all allegations of abuse made against those working in the name of the Church, regardless of whether the allegations or concerns relate to a person's behaviour in relation to their role within the Church or another setting.

This policy must be applied in all situations where it is alleged, or there are reasonable grounds to believe, that a member of the Religious Community, lay persons, or associated volunteer or employee, has acted in one of the following ways:

- Has behaved in a way that has harmed or is likely to have caused harm to a child or an at-risk adult. This would include any at-risk adult irrespective of the cause of that vulnerability or whether the vulnerability is temporary or permanent.



- Has or is suspected to have committed a criminal offence against or related to a child or an at-risk adult (including an at-risk adult as indicated above.)
- Has behaved towards a child or at-risk adult in a way that indicates they may pose a risk of harm to children or at-risk adults.
- Has behaved in a way or made statements indicating that they may not be suitable to work with children or at-risk adults.
- Has behaved in such a way that, by actions or omissions, their conduct has been intended to interfere with, prejudice, undermine or avoid a criminal, civil or canonical investigation, against any person associated with or who is a member of a contracting congregation.

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

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

Additional guidance is also provided in relation to adults disclosing abuse outside the context of the Church. If a competent adult explicitly refuses the making of a referral about abuse that occurred outside of the Church, consideration must be given to whether the accused person has access to children who may be at risk. In these circumstances, the name of the accused and details of the allegation must always be referred to the statutory authorities. This can be done without disclosing the name of the victim/survivor where they have refused consent to do so, or where it is not possible to obtain consent.

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

- Someone who is at serious risk of harm from self or others
- Someone who poses a serious risk of harm to someone else
- A concern about a child or at-risk adult at risk of harm from someone else
- Concerns over someone's mental capacity



MANAGEMENT OF CONCERNS AND ALEGATIONS

If the British Province of Carmelites becomes aware of a safeguarding issue, they should contact the RLSS Safeguarding Team and pass the concern and all associated documentation immediately. The Carmelites will ensure the person who raised the concern knows they are doing this.

The RLSS or Carmelite Safeguarding Lead who takes the case should:

- Ensure the victim/survivor or individual has been informed of the next steps
- Explain what will happen, give them options if possible and an indicative timescale
- Contact any relevant bodies
- Complete the safeguarding paperwork and ensure appropriate record keeping of all communications including phone calls, meetings and discussions in relation to the case.
- Inform the Prior Provincial and Council that there has been a new safeguarding referral.
- All referrals / reports outside of the RLSS should be made within 24 hours of receiving the information, unless there are exceptional circumstances to postpone making this referral/report
- The decision to delay a referral/report must be authorised by the Prior Provincial

When the concern needs to be reported to a statutory agency, the individual reporting the issue must be informed that the information will not be kept confidential, and that the details will be passed on to the police and any other appropriate statutory body. All Friars, Third Order, staff and Volunteers should be supportive of the individual making the disclosure but should not seek more details than necessary for an initial statutory referral.

When to report:

Allegations or safeguarding concerns – When abuse is suspected, witnessed or a disclosure of abuse is received by the British Province of Carmelites there is a requirement to report these allegations of abuse, and other relevant safeguarding



concerns to the appropriate statutory authority including social services/the police within 24 hours.

In case of emergency – If a child or adult is in immediate danger, at imminent risk or requires medical attention, the relevant emergency service must be contacted via 999. Local Social Services should also be contacted at the earliest opportunity in the case of a child or at-risk adult.

In case of non-emergency – In a situation when there is no immediate risk to a child or at-risk adult and no requirement to make a statutory report, the British Province of Carmelites or the RLSS on their behalf will work with the individual to agree desirable outcomes in line with this policy.

Making a referral to the statutory authorities:

Safeguarding bodies (not exhaustive)

- Internal Safeguarding Structures within the Catholic Church
- Local authority Safeguarding team – Adults
- Local authority Safeguarding team – Children
- Police 999
- Police 101
- GP
- Crisis Team
- RLSS Out of Hours Team
- Community Psychiatric Nurse
- Charity Commission
- CSSA
- Local Safeguarding Commission
- Local Authority Designated Officer (LADO)
- NSPCC
- DBS



In the case of a child - Referrals should be made to children's social care for the area where the child is living or is found. If a crime has also been committed, the police in that area should also be contacted. The referrer should confirm any verbal and telephone referrals in writing, within 48 hours, and obtain social care /police report reference details for inclusion on the relevant case file.

In the case of an adult - a person over 18 - Referrals should be made to the relevant body. If a crime has also been committed, the police in that area and if applicable the LADO, should also be contacted. The referrer should confirm any verbal and telephone referrals in writing, within 48 hours, and obtain any report references for inclusion on relevant case file.

When a person's conduct towards a child or an adult may impact on their suitability to work with or continue to work with children or adults, the allegation must be referred to the Local Authority Designated Officer for safeguarding within 24 hours. Additionally, restrictions may need to be placed on the person's role and remit while the matter is investigated, for example they may be 'stepped down' from ministry or other conditions may be imposed pending the outcome of an investigation

Where it is believed that a criminal offence may have taken place, regardless of whether the accused person is living or deceased, the allegation should be referred to the police within 24 hours

Boundary Violations

The codes of conduct for interactions with those with whom we minister should be adhered to at all times. Those ministering with children and adults at risk must be aware of the boundaries, parameters and limits of these relationships. Inappropriate behaviour that does not meet the threshold of abuse must always be taken seriously and addressed.

RESPONDING TO VICTIM/SURVIVORS

Those that report having suffered harm should receive a compassionate, caring and timely response, and are provided with access to appropriate support, advice, and pastoral care.

The British Province of Carmelites seeks to provide a compassionate, caring, and respectful response to all individuals who are victims/survivors of abuse within a Carmelite setting, and who seek its help and healing. All reasonable efforts will be made to ensure that support is offered to those who seek it, confidentially, quickly, and effectively. Support will be focused on the best interests and welfare of children and adults at risk, reporting both current and historical allegations of abuse, and where support is provided, it will be done in a manner which respects the individual's dignity,



privacy and safety, and which ensures so far as possible that particular needs relating to race, culture, age, language, religious beliefs, gender, sexual orientation or disability are addressed

The British Province of Carmelites seeks to reflect on any disclosures that it receives with a view to drawing learning from them to inform any future safeguarding practice

Where civil agencies are involved, all arrangements for the provision of support will be undertaken in close liaison with these agencies

RESPONDING TO ALLEGED PERPETRATORS

A proper balance should be struck between protecting children and adults at risk and respecting the rights of respondents. Where there is conflict, **the welfare of a child or adult at risk must come first**. The rights of respondents are important and are given due weight, once the safety and protection of children and adults at risk have been assured. Respondents have a right to a fair process in the investigation and management of any child or adult at-risk adult abuse concerns or allegations.

The British Province of Carmelites will:

- appoint trained personnel with defined roles to analyse and assess the available information, provide support to, and monitor the respondent
- establish a protocol to inform a respondent that an allegation has been made against them
- have a sustainable procedure to determine what, if any, safeguarding measures need to be implemented
- have a protocol for reporting allegations within the Church system and, where applicable to the local civil authorities
- instigate the preliminary investigation/collecting of proofs, where applicable, resuming the preliminary investigation when civil authority investigations and assessments have been completed
- When there is a case to answer, implement suitable arrangements for the monitoring of a respondent until they are no longer responsible for monitoring the respondent
- Where civil agencies are involved all arrangements for the provision of support will be undertaken in close liaison with these agencies



TRAINING:

Induction Training:

- All new Friars, Third Order, staff and volunteers will receive safeguarding training as part of their induction.

Ongoing Training:

- Regular safeguarding training will be provided to all Friars, Third Order, staff and volunteers.

All members of the British Province of Carmelites will undergo Safeguarding Training in relation to both Children and Adults relevant to their role. The list below outlines the **minimum** standards for training in each role:

1. Prior and Provincial council – RLG Lead Training
2. Trustee – Trustee Training
3. Safeguarding Lead – Safeguarding Lead Training
4. Local Safeguarding Representatives – Safeguarding Lead Training
5. Community Members who work with public – Advance Safeguarding Training
6. Community members who don't work with public – Basic Safeguarding Training
7. Third Order, Staff and volunteers – Basic Safeguarding Training

Those Friars working in Aylesford or in a Parish setting are also required to complete the appropriate diocesan safeguarding training.

All members of the British Province of Carmelites are expected to undertake yearly refresher Training.



WHISTLEBLOWING

The British Province of Carmelites will encourage and enable anyone with a serious concern, to raise that issue without fear of victimisation, or disadvantage.

If that concern is regarding malpractice, illegal acts, or omissions, within the British Province of Carmelites or other religious institution relating to safeguarding, then the RLSS should be made aware.

The action taken by the RLSS will depend upon the nature of the concern referred. However, an investigation will be undertaken if appropriate, followed by appropriate action and written feedback will be provided, including a rationale documenting the reasons why identified actions have been taken. This can be delegated to the RLSS.

ANTI-BULLYING POLICY

The British Province of Carmelites recognises the devastating effects and long-term damage that bullying can have on an individual and we strive to create safe 'bullying-free' environments for everyone. Bullying is a form of interpersonal aggression when one individual - a bully - intentionally and repeatedly aggresses against another and does so in part because the bully has more power or status than the person they seek to harm. (Hymel & Swearer 2015b).

RECORDING AND STORAGE OF SAFEGUARDING CONCERNS AND CASE FILES

Primary responsibility for the management of documents and safeguarding case files lies with the Designated Safeguarding Lead/RLSS, who will ensure an accurate, auditable, and secure record of any safeguarding concerns or allegations referred to the British Province of Carmelites are maintained.

This record will include:

- Relevant contact details
- Details of how/when the concern or allegation was received.
- Details of the concern itself



- Relevant historical information
- Identified past and present risk factors
- Any actions or investigation undertaken including those by the British Province of Carmelites/RLSS and from statutory agencies.
- Rationale for actions and or outcome of case

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

SAFER RECRUITMENT PRACTICE GUIDANCE

The British Province of Carmelites acknowledges that safeguarding starts with the appointment of suitably qualified, skilled and vetted personnel who have the desired competencies and skills to carry out their function in an effective, efficient and safe manner. All personnel employed by the Order, either in a pastoral or voluntary role, must be recruited safely and deemed suitable for the role that they are being asked to undertake.

Safe recruitment commitment

- All reasonable steps are taken to ensure that the British Province of Carmelites eliminates applicants who might pose a risk to children and adults at risk
- Those engaged in the recruitment process are suitably trained and experienced to undertake this task
- The British Province of Carmelite's recruitment procedures are transparent, adhere to best practice and comply with the rules of natural justice, appropriate record-keeping and human resource management
- The British Province of Carmelites is committed to inclusion and equality

The British Province of Carmelites will ensure that Friars, Third Order, staff and volunteers are subject to the appropriate Disclosure and Barring Service (DBS) checks (including enhanced DBS) in line with both statutory and Catholic Church requirements.

Appointments will be based on the person's experience, skills and ability to meet the set criteria and job specification for the specific role. It is essential to ensure that all documentation relating to the applicant is stored in a secure place and remains confidential.

Appointment to a role will not be confirmed until a satisfactory DBS Disclosure check has been received and previous employment references confirmed as being acceptable.



On appointment, all new Friars, Third Order, staff and volunteers should be provided with, and sign to say they understood, all relevant policy and procedures, including a copy of this document and their responsibilities within it highlighted.

All persons seeking to work with children or at-risk adults whether in a paid or unpaid capacity must be provided with the opportunity to self-disclose relevant conviction information. This is a DBS Code of Practice requirement and applies to anyone being asked to have an Enhanced Disclosure.

Safeguarding Procedures for Visiting Friars

The British Province of Carmelites through the Prior Provincial has a responsibility to take measures to ensure the safety and welfare of children and adults at risk. Therefore, any Carmelite friar coming from a different jurisdiction to perform public ministry in a Carmelite community is required by canon law to provide proof of their good standing to the Carmelite Provincial Office which they intend to visit.

Code of Conduct for Adults

A code of conduct is a clear and concise guide to what is and is not acceptable behaviour and practice when working with children and adults at risk. It is an essential part of the safeguarding procedures of any Church body that has ministry with children and adults at risk. Adults working with children and adults at risk have a duty of care to them. All Carmelite personnel who work with children must sign a code of behaviour to indicate that they have read the code and agree to follow it.

REVIEW AND MONITORING

This policy is approved by the Prior Provincial and Council and the Trustees of the Carmelite Charitable Trust. The policy will be reviewed annually or more frequently if required, to ensure it remains effective and up-to-date with current legislation and best practices.

Reviewed and approved by the British Province of Carmelites' Trustees (CCT) on 29th June 2026

Signed on behalf of the CCT Trustees
Prior Provincial

Next Review June 2027