



Safeguarding Policy

Policy Author: Heather Tallents (HR and Administration Director)

This policy applies to: Staff, Voluntary Workers, On-site Families, Students and Guests

Approved by: Board of Trustees

Date of Issue: 11th December 2025

Date of next review: 11th December 2026

Capernwray Missionary Fellowship of Torchbearers

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Section 1 - Introduction to Policy

Capernwray is committed to safeguarding every individual in its care, recognising the biblical call to value and protect all people as those created in the image of God (Genesis 1:27). Following the example of Jesus, who welcomed, honoured and defended those who could not stand up for themselves, we seek to cultivate an environment marked by love, integrity and accountability. We believe that safeguarding is not only a legal and organisational responsibility, but a biblical mandate, reflecting Christ's command to care for "the least of these" (Matthew 25:40). Therefore, we are dedicated to promoting the welfare, safety and dignity of all.

Good governance helps an organisation prevent abuse and means it can respond quickly and with integrity when concerns arise. Central to this is the Board of Trustees.

The Board of Trustees is appointed to have independent authority and legal responsibility for an organisation or charity and to have a critical role in decision making and compliance as well as setting the values, standards and behaviours of the organisation.

The standards and behaviours may be referred to as the culture of the organisation or "the way we do things around here". Culture can be shaped in both negative and positive ways.

"The culture of a charity goes beyond mere compliance with legal and regulatory demands. Charity governance is most effective when it provides assurances not just that legal requirements are met, but that the behaviour of people working for the charity, and those who come into contact with it, is proper and ethical. Culture, alongside good governance, can be pivotal to whether a charity achieves its stated object" (ICSA The Governance Institute, 2017).

Definitions

Child, for the purpose of this policy, is anyone under the age of 18, regardless of their living arrangements, care needs, or level of independence

Safeguarding children (as defined in *Working Together to Safeguard Children 2023*) is safeguarding and promoting the welfare of children, defined as:

- Providing help and support to meet the needs of children as soon as problems emerge;
- Protecting children from maltreatment, whether that is within or outside the home, including online;
- Preventing impairment of children's mental and physical health or development;
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care;
- Promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children; and
- Taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework.

Adults at risk (as defined by the *Care Act 2014*) is a person aged 18 or over who:

1. Has needs for care and support (whether or not those needs are being met), and
2. Is experiencing, or is at risk of abuse or neglect, and
3. As a result of those care and support needs, is unable to protect themselves from either the risk of, or the experience of, abuse or neglect.

Adult to adult harm refers to situations where one adult causes harm to another. This may include violence, exploitation, financial abuse, or neglect

- If the adult who has been harmed meets the definition within this policy of an 'adult at risk', the matter will be treated as a safeguarding concern
- If the adult does not meet the criteria for safeguarding (i.e. they have no care and support needs making them unable to protect themselves), the incident may still require a response, but is not a safeguarding issue under this policy.
- An example can be found at the end of this policy in [section 4](#).

Workers refers to all paid staff and unpaid voluntary workers.

Scope

This safeguarding policy applies to:

- All staff, voluntary workers and contractors representing Capernwray;
- All work, activities, and services carried out in the name of Capernwray;
- All those who live within the grounds of Capernwray;
- All children and adults at risk who come into contact with the organisation, whether as students, holiday guests, visitors or members of the public.

This policy covers safeguarding concerns arising in:

- Organisational settings (e.g., services, events, online platforms managed by Capernwray)
- Interactions between staff/volunteers and service users
- Concerns of abuse, neglect, or exploitation within the community that are brought to the organisation's attention

It does not replace criminal investigations, civil proceedings, or HR/disciplinary procedures. Where safeguarding is not the appropriate route (e.g. harm between independent adults without care/support needs), concerns will be referred to the relevant authority.

Positions of Trust

All adults working with children and adults at risk are in a position of trust. All those in positions of trust need to understand the power this can give them over those they care for and the responsibility they have because of this relationship.

It is vital that all workers ensure they do not, even unknowingly, use their position of power and authority inappropriately. They should always maintain professional boundaries and avoid behaviour which could be misinterpreted.

It is illegal for those in Positions of Trust to engage in sexual activity with a 16 or 17 year old under their care or supervision. As of April 2022 (England and Wales)(Northern Ireland), Positions of Trust now include those in faith settings.

The following Safeguarding Policy and Statement (Appendix 1) aims, to not only meet the requirements of ensuring a safe environment for those accessing activities in our organisation but to also build an open culture where:

- those who lead do so by example;
- we are committed to the safeguarding of all;
- those who work or volunteer here are safely recruited and trained for their roles;
- there are accountability structures;
- there are codes of conduct;
- the values of the organisation are embedded in its day-to-day actions and behaviours of its people;
- there is open communication.

Our Commitment

As an organisation we recognise the need to provide a safe and caring environment for children and adults. We acknowledge that children and adults can be the victims of physical, sexual and emotional abuse, and neglect. We accept the UN Universal Declaration of Human Rights and the International Covenant of Human Rights, which states that everyone is entitled to “all the rights and freedoms set forth therein, without distinction of any kind, such as race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth or other status”¹. We also concur with the Convention on the Rights of the Child which states that children should be able to develop their full potential, free from hunger and want, neglect and abuse. They have a right to be protected from “all forms of physical or mental violence, injury or abuse, neglect or negligent treatment or exploitation, including sexual abuse, while in the care of parent(s), legal guardian(s), or any other person who has care of the child.” As an organisation we have therefore adopted the procedures set out in this safeguarding policy in accordance with statutory guidance. We are committed to build constructive links with statutory and voluntary agencies involved in safeguarding.

Our safeguarding statement for display can be found in APPENDIX 1.

The policy and any attached practice guidelines are based on:

Working Together To Safeguard Children 2023

Keeping Children Safe in Education 2025

The ten safeguarding standards published by Thirtyone:eight (thirtyoneeight.org/ten-standards)

Model Safeguarding Policy October 2025 from Thirtyone:eight (Safeguarding Advisory Service)

1. United Nations (1989) *Convention on the Rights of the Child*. Treaty Series, 1577, p. 3. Available at: <https://www.ohchr.org/en/instruments-mechanisms/instruments/convention-rights-child> (Accessed: [19/08/25]).

Section 2 - Prevention

Understanding abuse and neglect

Defining child abuse or abuse against an adult is a difficult and complex issue. A person may abuse by inflicting harm or failing to prevent harm. Children and adults in need of protection may be abused within a family, an institution or a community setting. Very often the abuser is known or in a trusted relationship with the child or adult.

To safeguard those in our organisation we adhere to the UN Convention on the Rights of the Child and have Article 19 as our starting point for a definition of abuse:

1. Parties shall take all appropriate legislative, administrative, social and educational measures to protect the child from all forms of physical or mental violence, injury or abuse, neglect or negligent treatment, maltreatment or exploitation, including sexual abuse, while in the care of parent(s), legal guardian(s) or any other person who has the care of the child.²

2. Such protective measures should, as appropriate, include effective procedures for the establishment of social programmes to provide necessary support for the child and for those who have the care of the child, as well as for other forms of prevention and for identification, reporting, referral, investigation, treatment and follow-up of instances of child maltreatment described heretofore, and, as appropriate, for judicial involvement.²

Also for adults we adhere to the UN Universal Declaration of Human Rights with particular reference to Article 5:

No one shall be subjected to torture or to cruel, inhuman or degrading treatment or punishment.³

Detailed definitions, and signs and indicators of abuse, as well as how to respond to a disclosure of abuse, are included here in our policy: [APPENDIX 5](#).

Safer recruitment

The Organisation will ensure all workers will be appointed, trained, supported and supervised in accordance with government guidance on safe recruitment. This includes ensuring that:

- there is a written job description / person specification for the post;
- those applying have completed an application form;
- those short listed have been interviewed;
- an employee with safer recruitment training (online iHASCO or Atlas training) will be present on every shortlisting/interview panel;
- a standard interview question is within every interview asking the candidates understanding of a charity's responsibility to care for children and adults at risk;

2. United Nations (1989) *Convention on the Rights of the Child*. Treaty Series, 1577, p. 3, Article 19. Available at: <https://www.ohchr.org/en/instruments-mechanisms/instruments/convention-rights-child> (Accessed: [19/08/25])
3. United Nations (1948) *Universal Declaration of Human Rights*. Paris: United Nations General Assembly. Available at: <https://www.un.org/en/about-us/universal-declaration-of-human-rights> (Accessed: [19/08/25]).

- for roles directly working with children or more pastoral in nature, scenario based safeguarding questions will also be asked at interview;
- written references have been obtained, and followed up where appropriate;
- a self-declaration form and disclosure and barring check (DBS) (Enhanced check and Barred list or international equivalent) has been completed for every worker (we will comply with Code of Practice requirements concerning the fair treatment of applicants and the handling of information);
- DBS and international equivalent checks are re-checked on a 3 year basis for paid staff and upon return for a Voluntary Worker (all are encouraged to join the update service in order to make this process easier);
- qualifications where relevant have been verified;
- a suitable training programme is provided for the successful applicant;
- there is a single central record of all workers which is checked quarterly to ensure qualifications, DBS and right to work checks are still in date;
- the worker completes a probationary period; and
- the worker is given access to the organisation's safeguarding policy and undergoes a safeguarding induction in their first week, including details on how to report concerns.

As a part of the course, students are required to participate in outreach. This may include working with children and/or adults at risk. As such all students are required to provide a self-declaration form and disclosure and barring check (DBS) (Enhanced check and Barred list or international equivalent). Students also receive Safeguarding training in the second week of term as part of a lecture and through the Safeguarding Handout. Following completion, students are required to agree to our policy before participating in outreach involving children or adults at risk.

Safeguarding training

The Organisation is committed to on-going safeguarding training and development opportunities for all workers, developing a culture of awareness of safeguarding issues to help protect everyone. All our workers will receive induction training (as part of the induction process) and undertake recognised safeguarding training on a regular basis (every 2 years online level 2 and annual in-house refresher) and before first contact with children or vulnerable adults.

All workers are trained in what to do in the event of a safeguarding concern or disclosure as outlined in section 4.

The Organisation will also ensure that children and adults with care and support needs are provided with information on where to get help and advice in relation to abuse, discrimination, bullying or any other matter where they have a concern.

Practice Guidelines

As an organisation working with children and adults with care and support needs we wish to operate and promote good working practice. This will enable workers to run activities safely, develop good relationships and minimise the risk of false or unfounded accusations. As a

residential community we operate and promote these practices in all areas of community life, including when not within working hours.

We have specific policies for our staff to follow as our programmes are delivered. These are listed in our Policies Related to CMFOT Safeguarding and Internal Operations: APPENDIX 2.

Unaccompanied children are guests at Capernwray for some holidays. It is therefore standard practice for all guests to have a Parental Consent Form completed at the time of booking by a parent or legal guardian before attending a holiday for unaccompanied children.

Management of workers – codes of conduct

As an organisation we are committed to supporting all workers and ensuring they receive support and supervision. All workers have been issued with a code of conduct which gives clear expectations on appropriate behaviour as representatives of Capernwray. They will receive further training as necessary.

Our handbooks for employees and volunteers state that all workers are expected to conduct themselves in a manner that honours God and is considerate to others. This includes how workers treat colleagues and makes clear that harmful, inappropriate or abusive behaviour between any adults at Capernwray is unacceptable.

Section 3 - Partnership Working

The diversity of organisations and settings means there can be great variation in practice when it comes to safeguarding children and adults. This can be because of cultural tradition, belief and religious practice or understanding, for example, of what constitutes abuse.

We therefore have clear guidelines with regards to our expectations of those with whom we work in partnership, whether in the UK or not. We will discuss with all partners our safeguarding expectations and have a partnership agreement for safeguarding. It is also our expectation that any organisation using our premises, as part of the letting agreement, will have their own policy that meets Thirtyone:eight's safeguarding standards.

We believe good communication is essential in promoting safeguarding, both to those we wish to protect, to everyone involved in working with children and adults and to all those with whom we work in partnership. This safeguarding policy is just one means of promoting safeguarding.

All contractors will undergo a contractor induction process which includes agreeing to our code of conduct which refers to Safeguarding.

Section 4 - Responding to a Safeguarding Concern

Under no circumstances should a worker carry out their own investigation into an allegation or suspicion of abuse. Detailed procedures are outlined below.

Roles

Charity: Capernwray Missionary Fellowship of Torchbearers ('CMFOT')

Address: Capernwray Hall, Carnforth, Lancashire, LA6 1AG, England

Telephone: 01524 733908 General Email: info@capernwray.org

Charity Number: 1073139

Regulator: The Charity Commission for England & Wales

Company Number: 3573958

CMFOT offers two residential Bible School courses each year for students who are 18 years of age and over. CMFOT's Holiday Programme runs between school terms and offers holidays to people of all ages. Some of these holidays have unaccompanied children as guests. All students and guests receive a warm welcome in a beautiful location and enjoy a varied programme. Following our Mission Statement we provide biblical teaching and practical training in a friendly and caring environment.

Insurance Company:

Ansvar (Policy No. CCP2246261)

Managing Director:

Brian Wickens

Telephone: 01524 738006

Email: brian.wickens@capernwray.org

Designated Safeguarding Leads and Deputies

The individuals named below are authorised to act on behalf of the organisation in dealing with cases of suspected neglect or abuse, including referrals to statutory authorities. Concerns must not be reported to any DSL/Deputies who are the subject of the concern.

Heather Tallents (hereafter the Senior Designated Safeguarding Lead)

Tel: 01524 738012 Email: heather.tallents@capernwray.org

Forest Paget (hereafter the "Deputy")

Tel: 01524 738020 Email: forest.paget@capernwray.org

Hester Martin (hereafter the "Deputy")

Tel: 01524 738022 Email: hester.martin@capernwray.org

Adam Campbell (hereafter the "Deputy")

Tel: 01524 738018 Email: adam.campbell@capernwray.org

Jayne Pugh (hereafter the "Deputy")

Tel: 01524 738018 Email: jayne.pugh@capernwray.org

The Organisation will support the DSL/Deputies in their roles and accept that any information in their possession will be shared in a strictly limited way on a need to know basis.

Individuals have the right to contact safeguarding agencies or seek advice from Thirtyone:eight directly. The organisation encourages the use of internal procedures, however, if the individual with the concern feels that the DSL/Deputies have not responded appropriately, or disagrees as to the appropriateness of a referral, they are free to contact an outside agency directly. We hope by making this statement that the organisation demonstrates its commitment to effective safeguarding and to the protection of all those who are vulnerable.

The DSL/Deputies collate and clarify the precise details of the allegation or suspicion and pass this information on to statutory agencies who have a legal duty to investigate.

Deputies will assume the role of DSL in their absence and will operate under the procedures within this policy.

Nominated Safeguarding Trustee:

Alan Wadsworth (alan.wadsworth@capernwray.org) is the nominated Safeguarding Trustee responsible for taking the lead to ensure that safeguarding is a key governance priority within the organisation. They work with the board and senior leadership to make sure that robust policies, procedures, and practices are in place to protect children, and adults at risk.

The Safeguarding Trustee should be informed without delay in the following circumstances:

- where concerns or allegations are made about a member of the senior leadership team and/or a member of the safeguarding team;
- when a safeguarding matter has been escalated to external agencies such as the local authority, police, or regulatory bodies;
- when there is a reputational risk to the charity; or
- when a concern or allegation reaches the threshold to be reported to the charity commission.

They can also be consulted by any individual should they feel the DSL or Deputy DSLs have not responded appropriately. If the Safeguarding Trustee is unavailable, the Chair of the Trustees can be contacted.

Referral Agencies:

Name of local authority:

Children's Social Services & Lancashire Safeguarding Children in Education Officer

Tel: 0300 123 6720 Out of hours Tel: 0845 602 1043

Adult Social Services

Tel: 0300 123 6720 Out of hours Tel: 0845 602 1043

Lancashire Child Protection Contact/LADO

Tel: 01772 536694

Lancashire Prevent Unit

Tel: 01772 413398 Email: concern@lancashire.pnn.police.uk

What is a Safeguarding Concern?

Safeguarding concerns may include any worries about the safety or wellbeing of a child or adult at risk, such as disclosures of harm, signs of concerning behaviour, indicators that an individual may have been harmed by an adult or child, or situations where an inappropriate relationship may be developing. They also include any concerns that the Safeguarding Policy or Code of Conduct has been breached, concerns about unsafe protocols or practices, and reports of past (historical) harm. Please see [Appendix 12 Safeguarding Handout](#) for more examples of types of Safeguarding concerns.

Documenting a concern:

All workers are trained in what to do in the event of a safeguarding concern or disclosure as below:

- The staff member or volunteer should make a report of the concern to a designated safeguarding lead or deputy.
- The worker (if able) should record the events/situation/conversation, ideally on the 'Logging A Safeguarding Concern' form: APPENDIX 6. The designated safeguarding lead or deputy involved can support them in this.
- If the suspicions implicate the Designated Safeguarding Lead and all Deputies, then the report should be made in the first instance to:

thirtyone:eight

Tel: 0303 003 1111. Option 2

Alternatively contact Social Services or the police.

Procedures for safeguarding leads:

The following outlines the steps The Safeguarding Team will take as best practice following a safeguarding disclosure. These steps will be taken by Capernwray's Designated Safeguarding Lead (DSL) or Deputies (Deputy DSL). They will be collectively referred to in this policy as The Safeguarding Team (ST).

Following the receipt of a safeguarding concern, the ST will:

1. If the report is coming from a 3rd party (i.e. not from the individual experiencing harm, neglect or abuse), ensure a written report is completed by the individual reporting, supporting them where necessary. If the disclosure comes directly to the ST, then the disclosure can be documented in the meeting if appropriate, or immediately after the meeting, using the same document.
2. Unless already involved, the DSL must be made aware of all safeguarding cases. Where a disclosure involves a staff member (paid or voluntary) the DSL must be told immediately.

3. At minimum, two members of the ST should meet to discuss the next steps. A response should be timely, but not rushed and where necessary should involve contacting the appropriate agency. Alternatively they may first ring the thirtyone:eight helpline for advice. They should then contact social services in the area the child or adult lives if necessary. Contact details for referrals can be found on the previous page. This step would also involve conducting an initial assessment to determine the nature of the issue e.g. child safety concern, a misconduct concern or a historical concern, before deciding on the most appropriate safeguarding response.
4. Strict confidentiality should be kept except where absolutely necessary and on a need to know basis. Suspicions should not be discussed with anyone outside the ST. The ST may need to inform others depending on the circumstances and/or nature of the concern:
 - a. The Nominated Safeguarding Trustee responsible for safeguarding who may need to liaise with the insurance company or the Charity Commission to report a serious incident.
 - b. Designated officer or LADO (Local Authority Designated Officer) if the allegation concerns a worker or volunteer working with someone under 18.
5. An action plan should be created outlining the next steps and who is responsible for each one. Ensure the following is included in the action plan:
 - a. Feedback to the individual the disclosure refers to. All feedback should acknowledge that the individual may have experienced trauma and responses need to be sensitive to this. Initial response should be within 24 hours, further responses to be dictated on a case by case basis;
 - b. If came through a 3rd party, ensure they also receive feedback, ensuring confidentiality is kept;
 - c. Who is responsible for each action and by when;
 - d. Where criminality is in question, the scope of the authority of the safeguarding team should be made clear. The ST holds no authority over deciding whether a case is criminal or not. This authority lies with the police. The individual reserves the right to independently go to the Police.
 - e. All involved should receive prompt (initial response 24 hours) emotional support and safeguarding feedback regardless of the actions taken toward the subject of concern.

NB: Whilst allegations or suspicions of abuse will normally be reported to the DSL, the absence of the DSL or Deputy should not delay referral to Social Services, the Police or taking advice from Thirtyone:eight.
6. All further meetings should be documented on the original report document.
7. If the Disclosure relates to a staff member (Paid or Voluntary) the DSL will complete a documented risk assessment that evaluates the broader impact of the community. In the case of some guests or students, this may also be necessary.

8. An individual member of the ST will be assigned per case to ensure monitoring, follow up and accurate documentation occurs per case.
9. The DSL will monitor all cases and maintain oversight ensuring all action plans are followed up.

Procedures for example scenarios

Detailed procedures where there is a concern about a child

Allegations of physical injury, neglect or emotional abuse.

If a child has a physical injury, a symptom of neglect or where there are concerns about emotional abuse, the DSL/Deputy will:

- contact Children's Social Services (or Thirtyone:eight) for advice in cases of deliberate injury, if concerned about a child's safety or if a child is afraid to return home;
- not tell the parents or carers unless advised to do so, having contacted Children's Social Services;
- seek medical help if needed urgently, informing the doctor of any suspicions;
- for lesser concerns, (eg poor parenting), encourage parent/carer to seek help, but not if this places the child at risk of significant harm;
- where the parent/carer is unwilling to seek help, offer to accompany them. In cases of real concern, if they still fail to act, contact Children's Social Services direct for advice;
- seek and follow advice given by Thirtyone:eight (who will confirm their advice in writing) if unsure whether or not to refer a case to Children's Social Services.

Allegations of sexual abuse

In the event of allegations or suspicions of sexual abuse, the DSL/Deputy will:

- contact the Children's Social Services Department Duty Social Worker for children and families or Police Child Protection Team directly. They will NOT speak to the parent/carer or anyone else until they have sort advice from Thirtyone:eight;
- seek and follow the advice given by Thirtyone:eight if for any reason they are unsure whether or not to contact Children's Social Services/Police. Thirtyone:eight will confirm its advice in writing for future reference. They will also advise as to whether to speak to a parent/carer depending on the circumstances.

Detailed procedures where there is a concern that an adult needs protection

Suspicious or allegations of abuse or harm including; physical, sexual, organisational, financial, discriminatory, neglect, self-neglect, forced marriage, modern slavery, domestic abuse.

If there is concern about any of the above, the ST will:

- contact the Adult Social Care Team who have responsibility under the Care Act 2014 to investigate allegations of abuse. Alternatively Thirtyone:eight can be contacted for advice;

- If the adult is in immediate danger or has sustained a serious injury, contact the Emergency Services, informing them of any suspicions.

If there is a concern regarding spiritual abuse

The DSL will:

- identify support services for the victim i.e. counselling or other pastoral support;
- contact Thirtyone:eight and in discussion with them will consider appropriate action with regards to the scale of the concern.

Allegations of abuse against a person who works with children

If an accusation is made against a worker whilst following the procedure outlined above, the ST will, in accordance with Local Safeguarding Children Partners Board (LSCB) procedures:

- liaise with Children's Social Services regarding the suspension of the worker;
- make a referral to a designated officer, formerly called a Local Authority Designated Officer (LADO) whose function is to handle all allegations against adults who work with children whether in a paid or voluntary capacity;
- make a referral to Disclosure and Barring Service (DBS) for consideration of the person being placed on the barred list for working with children. This decision should be informed by the LADO if they are involved and normally occurs after an investigation has been completed.
- Share information about the concern with the police.

Allegations of abuse against a person who works with adults with care and support needs

The ST will:

- liaise with Adult Social Services in regards the suspension of the worker;
- make a referral to the DBS for consideration of the person being placed on the barred list of working with adults with additional care and support needs. This should be done following the advice of Adult Social Services and normally occurs after an investigation has been completed;
- Share information about the concern with the police.

The Care Act 2014 places the duty upon Adult Services to investigate situations of harm to adults with care and support needs. This may result in a range of options including action against the person or organisation causing the harm, increasing the support for the carers or no further action if the 'victim' chooses for no further action and they have the capacity to communicate their decision. However, this is a decision for Adult Services to decide, not Capernwray.

Allegations of non-recent sexual abuse from an adult:

If an accusation is made of non-recent sexual abuse from a child, the procedure in relation to sexual abuse will be followed (please see above).

If an accusation is made of non-recent sexual abuse from an adult, the ST will:

- Give the adult the option to report this to the Police (England and Wales), Police Scotland or Police Service Northern Ireland (PSNI). If the adult does not wish to report this to the police, then the ST can pass on the information relating to the alleged perpetrator, however, must not share details of the survivor.
- If the alleged perpetrator is in a role working or volunteering with children, make a referral to the Local Authority Designated Officer - LADO (England and Wales), Children's Social Care (Scotland) or the Gateway Team (Northern Ireland) whose function is to handle all allegations against adults who work with children whether in a paid or voluntary capacity. If the alleged perpetrator is in a role working with adults with care and support needs, liaise with Adult Social Care (England, Wales, Scotland) or Adult Social Work Services (Northern Ireland) to establish whether this can be investigated under their safeguarding processes.
- If the alleged perpetrator is in a role within Capernwray, contact Thirtyone:eight and in discussion with them will consider appropriate action with regards to the scale of the concern.

Allegations of adult-to-adult harm within the Capernwray community

This would include allegations from a student/volunteer/employee against another student/volunteer/employee in relation to harms including inappropriate physical or sexual contact, assault, emotional abuse or coercive control.

Allegations will be addressed through the measures set out in the Disciplinary, Grievance, Whistleblowing, Anti-Bullying and Harassment Policy, or Complaints Policies, as appropriate depending on the nature and severity of the concerns. It may be necessary to suspend the subject of the allegations whilst investigations take place in order to preserve evidence, protect others from harm, and protect the subject from further allegations.

If the matter has been reported to the Police as a potential criminal offence, Capernwray will co-operate fully with their enquiries. Criminal or statutory procedures will take priority and Capernwray will defer any internal investigations pending either completion of those external enquiries or advice from statutory agencies confirming that internal processes can go ahead.

Given the residential setting of Capernwray, a risk assessment will be necessary to ascertain:

- Whether it is safe and appropriate for the subject of the allegations to remain on the site during an investigation.
- If the subject remains on site, whether any adjustments to accommodation / roles / activities are needed.
- Whether a behaviour contract is needed to set boundaries that the subject will adhere to.

In cases where an individual who is living on site is asked to leave whilst an investigation takes place, Capernwray will ensure that they have suitable alternative living arrangements to go to.

Section 5 - Pastoral Care

Supporting those affected by abuse

Capernwray is committed to offering pastoral care, working with statutory agencies as appropriate, and support to all those who have been affected by abuse who work, study, volunteer or are guests with us.

When undertaking investigations, we will be sensitive to the possibility that participants have experienced trauma and will take steps to ensure that the process does not exacerbate this or lead to re-traumatisation. We will ensure that appropriate pastoral care is provided to support the parties' engagement in what may be a difficult process for them. This includes but is not limited to:

- Meetings take place in a safe and private place.
- People are given time to tell their story in an unhurried manner, with breaks if needed to give space to process difficult emotions.
- All parties may have a support person of their choice present at meetings.
- Provision of information about relevant support services, counselling, other specialist help.
- Trauma awareness training for identified staff involved in HR/Disciplinary/Safeguarding investigations, hearings or panels.

Working with offenders and those who may pose a risk

When someone seeking involvement with Capernwray/CMFOT is known to have abused children, is under investigation, or is known to be a risk to 'adults at risk' with care and support needs, the organisation will consider the safeguarding risks of the potential involvement of the individual concerned. If recruited, Capernwray will offer pastoral care to the individual, but in its safeguarding commitment to the protection of children and adults with care and support needs, will also set boundaries for the individual, which they will be expected to keep. These boundaries will be based on a risk assessment and through consultation with appropriate parties.

Section 6 - Adoption of the policy

This policy was approved by the Board of Trustees and will be reviewed annually.

Section 7 - APPENDIX SECTION (linked files)

[Appendix 1 Safeguarding Statement for display](#)

[Appendix 2 Policies Related to CMFOT Safeguarding and Internal Operations](#)

[Appendix 3 Flow Chart: 'What to do if you are worried a person is at risk'](#)

[Appendix 4 Flow Chart: 'Procedure for Managing Allegations'](#)

[Appendix 5 Definitions, Signs, Indicators of Abuse & How To Respond](#)

[Appendix 6 'Logging a Safeguarding Concern' form](#)

[Appendix 7 Safeguarding Log](#)

[Appendix 8 Working Together to Safeguard Children 2023](#)

[Appendix 9 Keeping Children Safe in Education 2025](#)

[Appendix 10 'Our 10 Standards' from 31:8](#)

[Appendix 11 Capernwray Safeguarding Report to SLT & Board](#)

[Appendix 12 2025 Safeguarding Handout](#)