

Citation	Interim Safeguarding Policy for the Armed Forces Christian Union
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Comments to	General comments office@afcu.org.uk Liesel Parkinson LieselParkinson@afcu.org.uk
Last reviewed/updated	14 October 2025
To be reviewed/updated	Usually annually Next review due after Safeguarding Review completion
Reason for review/update	Safeguarding Review
Person reviewing/updating document	Liesel Parkinson
Implementation of the agreement	
Source	The policy and any attached practice guidelines are loosely based on the ten safeguarding standards published by Thirtyone:eight (thirtyoneeight.org/ten-standards)
Charity Number	Armed Forces Christian Union 1193977
Insurance Company	Ansvar Insurance policy ACV 2135982

He has told you, O man, what is good; and what does the Lord require of you but to do justice, and to love kindness, and to walk humbly with your God? (ESV – Micah 6:8)

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AFCU Safeguarding Policy

To be read in conjunction with AFCU Good Practice Guidelines for Events and Activities

Section 1

Organisation

1.1 Contact and organisational details

Armed Forces' Christian Union

Unit 24, Shrivenham Hundred Business Park, Majors Road, Watchfield SN6 8TZ

Tel: 01793 783123

The Armed Forces Christian Union (AFCU) is a Christian charity whose object is to extend the Kingdom of God in and through the Armed Forces of this country and internationally, and to promote the efficiency of the Crown. It does this by enabling, equipping and encouraging more than 3,000 members through discipleship, fellowship and prayer. The AFCU supports families and many of its events and activities are designed with children and young people in mind.

1.2 Related Procedures and Policies

- A. Safeguarding Good Practice Guide – Good Practice Guide for AFCU Events and Activities
- B. Action Following Receipt of AFCU SAFEGUARDING REPORT
- C. Modern Slaver – Trafficking – Ethics Policy and Code of Conduct
- D. Consultancy Agreement Policy
- E. AFCU Recruitment Policy
- F. Data Protection Policy and Record Management & Archive Policy
- G. Whistleblowing Policy, Grievance & Complaints Policy and Harassment Policy
- H. Risk Register and Volunteer Agreement

Section 2

Overview

2.1 Introduction

The AFCU believes that safeguarding is central to its mission and should be integral to all aspects of our work. We recognise the need to provide a safe and caring environment for children, young people and adults.

Our policy and the accompanying Good Practice Guidelines apply to all children, and to adults who need protection, whether or not they have a recognised vulnerability, as defined by the Care Act 2024 and its accompanying guidance. We acknowledge that anyone can be

the victim of, or at risk of harm from, abuse and neglect. Our **Board of Trustees (BoT)** holds legal responsibility for safeguarding governance and ensures high standards of conduct. The AFCU values a safeguarding culture that exceeds legal compliance and fosters safety, dignity, and respect in all our activities.

2.2 Terminology

All adults acting on behalf of AFCU with children or adults at risk are referred to as '**workers**,' whether paid or voluntary. For simplicity, anyone under 18 is included under the umbrella term, 'child'.

Spiritual abuse is a term that has yet to be formally defined. Our working definition (in line with the Church of England) is that it is a form of emotional and psychological abuse, characterised by a systematic pattern of coercive and controlling behaviour in a faith context.

2.3 Our commitment

We adopt the UN Universal Declaration of Human Rights and the Convention on the Rights of the Child, affirming everyone's right to protection from abuse. We aim to create an open and safe environment, promote leadership by example, maintain accountability, and ensure proper safeguarding through all interactions.

The following Safeguarding Policy aims not only to meet the requirements of ensuring a safe environment for those accessing AFCU activities but also to build an open culture where:

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

2.4 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 someone over 18 to have a sexual relationship or sexual activity with someone under 16. This age is raised to 18 if they are in a position of responsibility, care or supervision.

Section 3

Context and Practice

3.1 Safeguarding Culture

We are committed to fostering a healthy safeguarding culture in which every worker, volunteer, and member understands their shared responsibility to ensure everyone can feel safe, including identifying and reporting any low-level concerns they see, hear or learn about as a normal and positive part of safeguarding practice. In accordance with UK safeguarding law and statutory guidance, all individuals are empowered to act promptly on even minor worries or boundary issues, thereby preventing situations from escalating into significant risks.

This proactive approach ensures that everyone contributes to collective safety, protecting others from inadvertent mistakes, maintaining accountability, and strengthening a culture of vigilance and care across all AFCU activities and events. Multiple reports of low-level concerns are viewed as an indicator of a strong and open safeguarding culture and should significantly outnumber reports of serious incidents. Such openness reinforces our commitment to prevention, transparency, and the continual improvement of safeguarding standards within the organisation.

Each AFCU event will have a clearly identified safeguarding point of contact (POC) or delegated safeguarding lead, normally the Event Leader, who will act as the designated safeguarding contact in the absence of the Safeguarding Lead. The event safeguarding POC will provide on-the-ground support by managing very low-level concerns, ensuring they are formally recorded and reported as appropriate, and assisting or advising less experienced volunteers in distinguishing between trivial matters and those that require further action. This role is empowered to advocate for safeguarding values, promote a culture of care and accountability, and communicate to all attendees that AFCU actively manages safeguarding and that everyone has a role in maintaining safe spaces for all.

3.2 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 the members of the AFCU we adhere to the UN Convention on the Rights of the Child and have as our starting point a definition of abuse. Article 19 states:

- 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. 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.*

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

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

The Care Act 2014 lists ten specific categories of abuse and neglect. These are:

- neglect,
- self-neglect,
- physical abuse,
- sexual abuse,
- psychological or emotional abuse,
- financial and material abuse,
- organisational abuse,
- discriminatory abuse,
- modern slavery
- domestic abuse.

Our working understanding of child abuse is: any action by another person – adult or child – that causes significant harm to a child or young person is abuse. Abuse can be in any of the forms above, but the situation can just as often be about neglecting a child's need for loving care and attention. We know that neglect, whatever form it takes, can be just as damaging as physical abuse.

We understand adults at risk to be any adult aged 18 or over who, due to disability, mental function, age or illness or traumatic circumstances, may not be able to take care of, or protect themselves against the risk of significant harm, abuse, bullying, harassment, mistreatment or exploitation.¹

We recognise that because we are a Christian organisation it is in our nature to be positive thinkers and to give people the benefit of the doubt. We also have a culture of forgiveness that is in our Christian DNA and many of our faithful supporters are likely to be people who lead with the heart. We therefore recognise that those who are inclined to abuse will seek to exploit this nature of trust and so this is where we must be on our guard.

To that end, we need to ensure that the good will and love given by all workers does not blind us to the possibilities of abuse. We will do our very best to ensure that awareness is acute for all activities.

Detailed definitions, and signs and indicators of abuse, are included in our Good Practice Guidelines.

3.3 Safer recruitment

All workers will be recruited, trained, and supervised in accordance with government guidance on **safe recruitment**, including Disclosure and Barring Service (DBS) checks where appropriate. We follow the **Rehabilitation of Offenders Act 1974** and never require information about **spent convictions** unless legally entitled to do so. The way in which safer recruiting is carried out is given at **Appendix 1**. The lead director for implementing safer recruitment policy is the Operations Director.

¹ Thirtyone:eight

3.4 Safeguarding training

All staff and volunteers undergo regular safeguarding training which is renewed every three years. We have a process of induction for new workers and provide additional training to workers like the Safeguarding Lead, with a requirement for advanced safeguarding training. We maintain a culture of safeguarding awareness and signpost individuals to external support when needed. The lead director for safeguarding training is the Pastoral and Prayer Director.

3.5 Good Practice Guidelines

As an organisation working with children, young people 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.

We have risk assessments and good practice guidelines for every activity we are involved in. Specific risk assessments are available on request from the AFCU Office. (office@afcu.org.uk). The event leader must conduct a dynamic risk assessment for each event. Those involved in events will need to read the Good Practice Guide and sign to say they have read and understand it.

The Guide outlines how to recognise the types of abuse that may occur at AFCU events and gives definitions of physical, emotional and sexual abuse, and also, neglect. It also covers guidelines on electronic contact with children and adults at risk and actions to take in cases of cyber abuse. It gives the factors to consider to keep people safe; first aid and fire safety in this context; advised adult to child ratios for events; support to a child that is worried; and most importantly, the actions to take for incidents or allegations of abuse. These are conceptualised in the five Rs – namely Remember, Recognise, Respond, Record and Report incidents. The lead director for the Good Practice Guide is the Pastoral and Prayer Director.

The Good Practice Guidelines may be [found here](#)

3.6 Management of workers

Within the AFCU we are committed to supporting all workers and ensuring they receive support and supervision. In return, we expect them to follow the right procedures for dealing with children and adults at risk.

All workers are given clear guidance about what is expected of them both within their job role and outside and are issued with a Code of Conduct towards children and adults with care and support needs. The responsibilities of Children's Workers and those Working with Adults at risk are at **Appendix 2** and **3** respectively. The Code of Conduct is at **Appendix 4**. The lead director for the management of workers is the Operations Director.

3.7 Partnership Working and Communications

The AFCU recognises that the diversity of organisations and settings with which we collaborate can lead to variation in safeguarding practice, influenced by culture, tradition,

belief, or differing understandings of abuse. However, safeguarding standards must never be compromised.

We therefore set clear expectations for all external partners, whether in the UK or internationally, to ensure that children, young people, and adults at risk are consistently protected at AFCU events and activities. Before any partnership or shared activity is agreed, AFCU will discuss and confirm safeguarding responsibilities, ensuring that mutually compatible and written safeguarding arrangements are in place.

All partner organisations, contractors, or individuals using AFCU premises (whether under a formal letting agreement or on a casual basis) are required to:

- have a safeguarding policy that meets or exceeds AFCU's standards and complies with relevant UK law, **or**
- formally agree to adopt and comply with AFCU's safeguarding policy and procedures.

Safeguarding accountability must be clear at all times. AFCU reserves the right to suspend or withdraw from any partnership or arrangement where safeguarding standards are not met or where concerns arise that place participants at risk. Our priority is to ensure that every activity and environment associated with AFCU remains safe, transparent, and compliant with best practice.

The Safeguarding Partnership Check List is at **Appendix 6**.

3.8 Accessibility

This safeguarding policy is just one means of promoting safeguarding, and conversations agreeing on shared values and the safeguarding culture we wish to promote are an essential part of partnering with other organisations.

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. We provide an accessible version of this policy for children and adults with support needs at **Appendix 5**.

The lead director for partnership working and communications is the Operations Director.

Section 4

Responding to Concerns or Allegations of Abuse

4.1 Emergency response

IF YOU BELIEVE A PERSON IS IN IMMEDIATE DANGER, PLEASE CALL THE POLICE ON 999

If you suspect a child or an adult is being abused, you should always speak up. By identifying and reporting abuse, everyone can be kept safe. In a rare situation where you consider someone is in immediate danger you should call the police on 999 immediately.

4.2 Standard response

If you have any concerns because you think someone is being abused or has been abused in the past during or as a result of AFCU events and activities or by AFCU members, please make notes as soon as possible of the child or adult making a disclosure. Under no circumstances should you carry out your own investigation into an allegation or suspicion of abuse.

Remember:

- Ask questions to clarify facts only. Do not ask leading questions.
- When the person has finished telling you their account, reassure them that they were right to tell you and that you have taken what they said seriously. Tell them what you intend to do next. Keep them informed of your actions.
- To protect the confidentiality of the information you have heard.

As soon as you can reasonably do so, please report your concern to the AFCU Safeguarding Lead using [this form](#) :

Safeguarding Lead: Liesel Parkinson

Tel: 01793 783123 during office hours Monday-Fri 09:00-16:00

Email: safeguarding@afcu.org.uk

In the absence of the Safeguarding Lead or, if the suspicions in any way involve the Safeguarding Lead, then the report should be made to:

Deputy Safeguarding Lead: Adrian Campbell Black

Tel: 01793 783123 during office hours Monday – Friday 09:00-16:00

Email: adriancampbell-black@afcu.org.uk

If the concerns involve all of the aforementioned, please contact:

AFCU's Safeguarding Trustee: Andrew Thompson

Email: Andrew.Thompson175@mod.gov.uk

4.3 Bypassing the Safeguarding Lead

It is of course the right of any individual as a citizen to make a direct referral to a child or adult protection agency or to seek advice from Thirtyone:eight. If the individual with the concern feels that the Safeguarding Lead/Deputy has not responded appropriately, or where

they have a disagreement with the Safeguarding Lead(s) as to the appropriateness of a referral, they are free to contact an outside agency directly.

All concerns raised in good faith are protected under the Public Interest Disclosure Act 1998. AFCU will not retaliate against any person who reports abuse or unsafe practice.

Thirtyone:eight

Tel: 0303 003 1111

[Safeguarding Helpline](#)

Office hours 9am-5pm Monday-Friday

For concerns or incidents involving children:

Name of local authority for AFCU: Oxfordshire County Council Children's Social Services

Tel: Multi-Agency Safeguarding Hub (MASH): 0345 050 7666.

Office hours (8.30am - 5pm, Monday to Thursday, 8.30am - 4pm, Friday):

Out of hours Emergency Duty Team: **0800 833 408.**

Website Address: [Children's Social Services](#)

For concerns or incidents involving adults:

Adult Social and Health Care

Because the AFCU head Office is in Oxfordshire, our local authority for adults is the Oxfordshire Safeguarding Adults Board (OSAB)

Tel: 0345 050 7666

Office hours 8.30am - 5pm Monday – Thursday, 8.30am - 4pm Friday

Out of hours (Emergency Duty Team) 0800 833 408

A reporting form for members of the public may be found [here](#):

4.4 Reporting, Recording, and Monitoring Low-Level Concerns

Purpose

The purpose of this section is to clearly outline the AFCU's approach to identifying, reporting, recording, and monitoring low-level concerns in accordance with best practices. This is integral to fostering a robust safeguarding culture that prioritises the safety and wellbeing of all individuals involved in our activities.

Definition and Examples of Low-Level Concerns

A low-level concern is defined as any concern—no matter how small—that an individual's behaviour towards a volunteer, delegate or member of staff may be inconsistent with AFCU's culture or values and may indicate a need for additional support, training, or monitoring. These concerns do not meet the threshold for statutory intervention but are critical to address as part of our proactive safeguarding approach.

Examples of low-level concerns include, but are not limited to:

- Failing to act on and refer the early signs of abuse and neglect.
- Poor record keeping.
- Failing to listen to concerned individuals through the referral systems in place.
- Failing to re-assess concerns when situations do not improve.
- Not sharing information with the right people when requested from an appropriate member of staff.
- Sharing information too slowly.
- A lack of challenge to those who appear not to be taking action.
- Behaviour that is inconsistent with the AFCU staff values and standards, including inappropriate conduct outside of work.
- Behaviour that does not meet the harm threshold or is otherwise not serious enough to consider a referral to the Local Authority Designated Officer (LADO).

Examples of such behaviour could include, but are not limited to:

- Being overly friendly with members, staff, or those volunteering.
- Having favourites.
- Engaging with members staff, or those volunteering on a one-to-one basis in a secluded area or behind a closed door.
- Humiliation techniques
- 'Gaslighting' techniques²

The guide at **Appendix 7** is intended to assist you in making a judgement about the severity of the types of concerns/incidents which might arise at AFCU events. It is essential that we

² A form of psychological abuse where one person attempts to make another doubt their own reality, memory, and sanity to gain power and control

capture and record even low-level concerns. The guide is aimed at recording concerns and reporting incidents for adults but can be used as a benchmark for initial concerns for children. If in doubt, seek guidance from the Safeguarding Team or the relevant local authority.

Concerns should not be discussed with anyone other than those nominated above or an external professional agency such as Social Services or the Police.

Reporting Low-Level Concerns

All referrals are taken seriously by AFCU. Please include as much detail as possible when raising a low-level concern. You may do this in three ways:

- By contacting the nominated Safeguarding POC at an event, or if the concern involves the Safeguarding POC, either way below
- By sending an email to the Safeguarding Lead safeguarding@afcu.org.uk including the title LOW LEVEL CONCERN
- By telephoning the Safeguarding Lead

The safeguarding team will maintain a confidential, secure, and centralised register of all concerns, including low-level concerns. The record will be reviewed regularly by the safeguarding team to identify patterns or recurring issues. If a low-level concern escalates to a more serious issue, the Safeguarding Lead will initiate the appropriate safeguarding procedures, including notifying statutory authorities where required, and feeding back to the reporting individual if appropriate.

Section 5

Role of the Safeguarding Lead

The Safeguarding lead is essential in creating a safe environment for children and adults at risk. They ensure that safeguarding is prioritised and that appropriate measures are in place to protect those at risk. The AFCU Safeguarding Lead is to:

- Ensure the organisation adheres to the safeguarding policies and procedures
- Act as the main point of contact for safeguarding concerns
- Manage any incidents or allegations of abuse
- Ensure necessary safeguarding risk assessments are in place
- Pass information to statutory agencies who have a legal duty to investigate.
- Provide training and guidance to staff and volunteers
- Develop and review safeguarding policies and procedures
- Maintain accurate records of safeguarding concerns and actions taken

Should the Safeguarding Lead be unavailable, the Deputy will carry out the actions on their behalf.

5.1 Procedures that will be taken where there is concern about a child

The Safeguarding Lead is responsible for making decisions about notifying the relevant agencies if required and for considering alternative actions where necessary. The Safeguarding Lead/Deputy will:

- 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.
- Take advice from Thirtyone:eight or other relevant authority and speak to the nominated Safeguarding Trustee.
- Keep a written record of the concerns and subsequent actions and outcomes in accordance with these procedures and store in a secure place.

The Trustees will support the Safeguarding Lead/Deputy in their role and accept that any information they may have in their possession will be shared in a strictly limited way on a need-to-know basis.

5.2 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 Safeguarding Lead/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.
- Inform the parent/carer of the referral where appropriate and safe to do so.
- **Refrain from informing the parent/carer** if there is reason to believe doing so may place the child at increased risk of harm – including cases where the parent/carer may be involved in the suspected abuse or neglect.
- Ensure that any decision not to inform the parent/carer is documented, including the

rationale and any advice from statutory services.

- Seek medical help urgently if required, ensuring that the attending doctor is made aware of any safeguarding concerns.
- In cases of lesser concern (e.g. poor parenting), encourage the parent/carer to seek help – but only if this does not place the child at risk of significant harm.
- Where the parent/carer is unwilling to seek help, offer further support where feasible (e.g. accompanying them to services). If concerns persist and the parent/carer fails to act, contact Children's Social Services directly for advice.

Seek and follow advice given by Thirtyone:eight if unsure whether or not to refer a case to Children's Social Services.

5.3 Allegations of sexual abuse

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

- Seek and follow the advice given by Thirtyone:eight: they will confirm their advice in writing for future reference.
- Contact the Children's Social Services Department Duty Social Worker for children and families or the Police Child Protection Team directly.
- Inform the parent/carer of the referral where appropriate and safe to do so.
- **Refrain from informing the parent/carer** if there is reason to believe doing so may place the child at increased risk of harm, including cases where the parent/carer may be implicated or where the child could be put under pressure.
- Ensure that any decision not to inform the parent/carer is documented, including the rationale and advice received from statutory agencies.

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

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

If there is concern about any of the above, the Safeguarding Lead/Deputy will:

- Inform them they need to take the matter further and explain what they will do.
- Seek their consent unless they (or someone else) is in immediate danger.
- Contact Thirtyone:eight for advice.
- Contact the Adult Social Care Team who have responsibility under the Care Act 2014 to investigate allegations of abuse.
- 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 Safeguarding Lead will:

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

5.5 Allegations of abuse against a person who works with children/young people

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

- 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 and young people whether in a paid or voluntary capacity.
- Make a referral to the Disclosure and Barring Service for consideration of the person being placed on the barred list for working with children or adults with additional care and support needs. This decision should be informed by the LADO if they are involved.

The LADO for Oxfordshire is **Jo Lloyd**. The LADO and Assistant LADOs can be contacted via lado.safeguardingchildren@oxfordshire.gov.uk or call **01865 810603**.

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

The Safeguarding Lead/Deputy will:

- Liaise with Adult Social Services in regard to the suspension of the worker.
- Make a referral to the DBS following the advice of Adult Social Services.

The Care Act 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 the AFCU.

Section 6

Pastoral Care

6.1 Supporting those affected by abuse

The AFCU is committed to offering pastoral care, (working with statutory agencies as appropriate), to provide a level of support to all those in contact with or are part of the AFCU who have been affected by abuse. This may include offering regular texts and phone calls, prayer ministry, asking if the person would like to be added to the Confidential Intercessory Prayer List or signposting towards other organisations.

6.2 Working with those who may pose a risk

As an organisation, we welcome all who have found faith and are committed to a personal relationship with Jesus Christ. We recognise that every individual is complex and that each of us is on a journey through life. We acknowledge that temptation and human weakness are universal realities. By maintaining a mature and transparent safeguarding culture, we help to reduce opportunities for harm, support one another in accountability, and protect each other from personal vulnerabilities and oversights.

There may be occasions when an individual known to pose a potential risk to others seeks to attend an event or activity. In such cases, the organisation will undertake a carefully measured and robust safeguarding process designed to ensure the safety and wellbeing of all participants. Attendance will only be permitted where specific criteria are met, and where appropriate safeguards are in place. These may include comprehensive risk assessments, consultation with external safeguarding professionals, and the establishment of a bespoke Safeguarding Agreement outlining clear boundaries and monitoring arrangements.

Special attention will also be given to ensuring that individuals who are known to have experienced certain forms of abuse are not placed in situations where they may encounter those known to have perpetrated similar forms of harm, particularly in cases involving sexual abuse. Every decision and action taken will be deliberate, proportionate, and guided by a commitment to assure the provision of a safe environment for all who attend our events and gatherings.

Section 7

Information/Data Management

7.1 Data Protection and Lawful Processing of Safeguarding Information

We process safeguarding data in line with the **UK GDPR** and **Data Protection Act 2018** to protect children and adults at risk from harm.

We process safeguarding information under:

- **UK GDPR Article 6(1)(f)** – Legitimate interests
- **Article 9(2)(g)** and **Schedule 1, Part 2, paragraph 18** of the Data Protection Act 2018
 - Substantial public interest in safeguarding children and individuals at risk

We may also need to process criminal offence data where necessary for safeguarding purposes.

Safeguarding data is shared only on a need-to-know basis, and only with appropriate statutory agencies (e.g. police, social services) or designated safeguarding advisors. Information is always handled securely and proportionately, and we keep clear records of any disclosures made.

Safeguarding records are kept securely and are treated more sensitively than general records.

7.2 Review and Accessibility

- This policy is reviewed **annually** by the Safeguarding Lead and the Board of Trustees.
- A **child-friendly** and **easy-read** version of this policy is available to children and adults with support needs and can be seen at **Appendix 5**
- The full policy is available to all stakeholders upon request and is promoted during training and induction.
- The safeguarding processes and activities associated with this policy will also be reviewed annually.

End of main document-----

APPENDIX 1

And we know that in all things God works for the good of those who love Him, who have been called according to His purpose. Romans 8:28

Safer Recruitment

The AFCU places great importance on having a safer recruitment process in place. The safeguarding policy is one of the primary mechanisms for ensuring a safe environment for its ministry and activities.

The AFCU ensures that all of its staff and trustees go through a safer recruitment process. This means that they are interviewed, trained, supported and supervised in accordance with current government guidance on safe recruitment. That said, the safer recruitment process for paid employees and volunteers and post holders is slightly different. The differences are shown below.

A1:1 Volunteers (includes trustees and all nominated voluntary post holders such as ministry leads, children's workers at events, Summer Camp leaders, Issachar mentors, PST leaders etc).

- There are written terms of reference for the role.
- Volunteers are asked to sign the Volunteer Agreement which includes making a self-declaration regarding unspent criminal convictions / not being listed on the sex offenders' register.
- If the volunteer is previously unknown (or cannot be vouched for by one of the Directors), they will be asked to provide proof of identity and references will be obtained directly from their referees, usually in written form.
- A disclosure and barring check must be completed (we will comply with Code of Practice requirements concerning the fair treatment of applicants and the handling of information). We will accept DBS certificates supplied by other organisations. They must be less than three years old and must be enhanced if the volunteer will be working with anyone under the age of 18. DBS checks are valid for 3 years.
- Safeguarding training will be provided or evidence of safeguarding training supplied (this must be less than three years and is valid for three years from its completion)
- A signed code of conduct which states that they have read the safeguarding policy together with any other operational guidance notes and know how to report concerns. This is included in the [Good Practice Guidelines](#)

A1:2 Employees (whether paid or voluntary AFCU staff members)

- There is a written job description / person specification for the post.
- Those applying have completed an application form and a self-declaration¹ regarding unspent criminal convictions / not being listed on the sex offender's register. Where they have signed an employment (or e.g. contractor's) contract with the AFCU (which includes an unspent criminal conviction declaration), it will not be necessary to sign a second unspent criminal convictions form.
- Those short-listed have been interviewed.

- References have been obtained (normally directly from referees and in written form), and followed up where appropriate (e.g., for a person who is less well known to the AFCU).
- The appropriate disclosure and barring check has been completed. All staff who are membership facing or who have access to children must complete an enhanced DBS check. (We will comply with Code of Practice requirements concerning the fair treatment of applicants and the handling of information).
- Qualifications where relevant have been verified.
- A suitable training programme is provided for the successful applicant.
- The applicant completes a probationary period.
- The applicant has been given a copy of this safeguarding policy, together with the [Good Practice Guidelines](#), and knows how to report concerns.
- The applicant signs the Code of Conduct in the Good Practice Guidelines.
- Employees will be asked to provide proof of identity (as part of proving immigration status as well as verifying identity).

A1:3 Disclosure and Barring Services (DBS) checks and training

All workers involved in supervising children must hold a valid and clear DBS certificate³ prior to undertaking the activity. **(It is AFCU policy that the DBS certificate must be less than 3 years old to be considered valid)**. A Level 1 Safeguarding certificate or equivalent safeguarding training is also essential for all staff involved with the supervision of children⁴.

Additionally, all AFCU staff with access to ChurchSuite must hold a Level 1 Safeguarding certificate (or higher) from an agreed provider, and they must complete routine mandatory safeguarding training. For new joiners, this training must be completed successfully before initial access to ChurchSuite is given. This training should be repeated on a minimum of a three-yearly cycle.

Additionally, any worker involved in the provision of AFCU organised spiritual or pastoral care, should be DBS checked if regularly involved and/or in leadership positions especially where there is a likelihood of their having to deal with adults who are in any way 'vulnerable' such as emotionally or physically. Everyone involved with these activities must complete a Level 1 Safeguarding certificate or equivalent, unless they are assisting on an infrequent, one-off basis in which case they should be supervised by someone who has undertaken Safeguarding training.

DBS and enhanced DBS certificates will normally be applied for by AFCU, although we may accept an in-date DBS certificate (or equivalent) applied for by the individual from another organisation. This must be less than three years old and will happen on a case-by-case basis.

The AFCU has appointed a safeguarding team consisting of its Prayer Director to act as the Union's Safeguarding Lead, assisted by the Deputy Safeguarding Lead, AFCU's Families Co-

³ All connected to GoFish, Summer Camp and those directed by the office that volunteer with children at AFCU events have ENHANCED DBS certificates.

⁴ May be completed using online training, e.g. Church of England Level 1 online training certificate.

ordinator and the AFCU Admin Coordinator. The AFCU Safeguarding Lead will act as a focal point for the AFCU Safeguarding Policy.

All children's information on the Database is further protected by a firewall meaning only those with administrator rights have access to them to enable them to carry out their roles.

Furthermore, the AFCU's Data Protection policy makes it clear that access to personal data, including on ChurchSuite, MS 365 and elsewhere, should only be permitted on a strict 'need-to-know' rather than 'like-to know'-basis. This provides a further layer of protection.

APPENDIX 2

If anyone causes one of these little ones...to stumble, it would be better for them to have a large millstone hung around their neck and to be drowned in the depths of the sea. Matthew 18:6

Responsibilities of Children's Workers

Those looking after children (including here young people) at AFCU events have a dual responsibility; to do everything possible to prevent abuse from occurring while the child is under their care, and to act if they have concerns that a child is (or has been) abused whether under or outside of their care.

A2.1 Child Abuse

An abused child will often experience more than one type of abuse, as well as other difficulties in their lives. It often happens over a period of time, rather than being a one-off event. Increasingly, it can happen online⁵.

A2.2 Create a safe environment

- Ensure that the [Good Practice Guidelines](#) are always followed. Children's work is to be planned to minimise situations where abuse can occur. This also includes 'virtual' contact with children using online platforms.
- Complete risk assessments for activities.
- Ensure all adults running events where children's programmes are offered, as well as those working with the children, have read and signed to confirm understanding of this policy. A copy of a link to the policy will be sent to children's workers. The signed confirmation (code of conduct) should be returned to the Safeguarding Team prior to their participating in any AFCU children's programmes.⁶
- All children's workers must demonstrate that they have attended safeguarding training to level 1 or higher, e.g. Church of England level 1 online training. Copies of certificates to show training has been completed should be held in the AFCU office.
- Consent is to be gained by the parent/carer or individual before any photographs are taken. Details in the consent form will include the permission to use photographs on social media, advertising and any other use as determined by the AFCU. The storage and sharing of any photographs are to be strictly controlled.
- Medical consent should be obtained in advance of any activity or trip in the absence of the parent/guardian/carer, so there is no delay in care.
- If a child discloses abuse, the procedures in the Safeguarding Policy are to be followed.

⁵ NSPCC online June 2016

⁶ The signed Code of Conduct is valid for 3 years

APPENDIX 3

*Do nothing out of selfish ambition or vain conceit. Rather, in humility value others above yourselves.
Philippians 2:3*

Responsibilities for those working with adults at risk

A3.1 Adults at risk

The Care Act 2014 sets out the law relating to safeguarding adults at risk, the aims of which are⁷: empowerment, prevention, protection, proportionality, partnerships and accountability.

- **Empowerment:** People being supported and encouraged to make their own decisions and informed consent.
- **Prevention:** It is better to take action before harm occurs.
- **Proportionality:** The least intrusive response appropriate to the risk presented.
- **Protection:** Support and representation for those in greatest need.
- **Partnership:** Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse.
- **Accountability:** Accountability and transparency in safeguarding practice.

A3.2 What makes someone vulnerable?

Although everyone is vulnerable in some way and at certain times, some people by reason of their physical or social circumstances have higher levels of vulnerability than others. Some of the factors that increase vulnerability are:

- a sensory or physical disability or impairment
- a learning disability
- a physical illness
- mental ill health (including dementia), which could be chronic or acute
- addiction to alcohol or drugs
- age-related frailty
- a permanent or temporary reduction in physical, mental, or emotional capacity brought about by life events, for example bereavement, previous abuse, or trauma

Attention is drawn to the [Prayer Ministry Guide](#) for meeting with or praying with adults along with the [Prayer Ministry policy](#), which has been designed to safeguard adults at risk and the staff and volunteers who pray with them.

⁷ Department of Health & Social Care: *Care and support statutory guidance* (updated Oct 2018)

A3.3 Abuse of adults at risk and safeguarding

Adults have a general right to independence, choice and self-determination including control over information about themselves. In the context of adult safeguarding these rights can be overridden in certain circumstances.

Emergency or life-threatening situations may warrant the sharing of relevant information with the appropriate emergency services without consent.

If a person refuses intervention to support them with a safeguarding concern, or requests that information about them is not shared with other safeguarding partners, their wishes should be respected.

However, there are a few circumstances where the practitioner can reasonably override such a decision, including⁸:

- the person lacks the mental capacity to make that decision – this must be properly explored and recorded in line with the Mental Capacity Act
- other people are, or may be, at risk, including children
- sharing the information could prevent a crime
- the alleged abuser has care and support needs and may also be at risk
- a serious crime has been committed
- staff are implicated
- the person has the mental capacity to make that decision, but they may be under duress or being coerced
- the risk is unreasonably high and meets the criteria for a multi-agency risk assessment conference referral
- a court order or other legal authority has requested the information

If none of the above apply and the decision is not to share safeguarding information with other safeguarding partners, or not to intervene to safeguard the person:

- support the person to weigh up the risks and benefits of different options
- ensure they are aware of the level of risk and possible outcomes
- offer to arrange for them to have an advocate or peer supporter
- offer support for them to build confidence and self-esteem if necessary
- agree on and record the level of risk the person is taking
- record the reasons for not intervening or sharing information
- regularly review the situation
- try to build trust and use gentle persuasion to enable the person to better protect themselves

⁸ Taken from Social Care Institute

APPENDIX 4

Be alert and of sober mind. Your enemy the devil prowls around like a roaring lion looking for someone to devour. 1 Peter 5:8

Code of Conduct

AFCU's behaviour code for working with children, young people and adults at risk

Purpose

This behaviour code outlines the conduct expected of all workers (staff and volunteers).

The code of conduct aims to help protect adults at risk of harm, children and young people from abuse and inappropriate behaviour from those in positions of trust, and to reduce the risk of unfounded allegations of abuse being made.

The role of workers (staff and volunteers)

When working with children and young people or adults at risk of harm, you are acting in a position of trust for the AFCU. You will be seen as a role model and must act appropriately.

Good practice

- Treat everyone with dignity, respect and fairness, and have proper regard for individuals' interests, rights, safety and welfare
- Work in a responsible, transparent and accountable way
- Be prepared to challenge unacceptable behaviour or to be challenged
- Listen carefully to those you are supporting
- Avoid any behaviour that could be perceived as bullying, emotional abuse, harassment, physical abuse, spiritual abuse or sexual abuse (including inappropriate physical contact such as rough play and inappropriate language or gestures)
- Seek advice from someone with greater experience when necessary
- Work in an open environment – avoid private or unobserved situations
- Follow policies, procedures and guidelines and report all disclosures, concerns, allegations, and suspicions to the safeguarding co-ordinator
- Don't make inappropriate promises particularly in relation to confidentiality
- Do explain to the individual what you intend to do and don't delay taking action
- Any physical touch must be appropriate and acceptable
- Have access to a first aid kit and incident book

Unacceptable behaviour

- Not reporting concerns or delaying reporting concerns
- Taking unnecessary risks

- Any behaviour that is or may be perceived as threatening or abusive in any way
- Passing on your personal and/or social media contact details and any contact that breaches AFCU's social media policy⁹
- Developing inappropriate relationships
- Being under the influence of alcohol
- Smoking and illegal substances
- Favouritism/exclusion – all people should be equally supported and encouraged

Breaching the Code of Conduct

If you have behaved inappropriately, you will be subject to disciplinary procedures (particularly in the case of paid staff). Depending on the seriousness of the situation, you may be asked to leave AFCU. We may also make a referral to statutory agencies such as the police and/or the local authority children's or adult's social care departments or DBS. If you become aware of a breach of this code, you should escalate your concerns to the Safeguarding Lead.

Declaration

I agree to abide by the expectations outlined in this document and confirm that I have read the relevant policies (including the AFCU Safeguarding Policy and Good Practice Guidelines) that assist my work with vulnerable groups.

Name:

Signature:

Date:

⁹ Available from the AFCU Office

APPENDIX 5

Accessible Version for children and adults with support needs

AFCU Safeguarding: A Guide Just for You

Because your safety matters to us.

Who We Are

The **Armed Forces Christian Union (AFCU)** is a Christian charity that helps people in the Armed Forces and their families grow in their faith, enjoy friendship, and pray together. Some of our events include **children, young people, and adults who may need extra support.**

What Is Safeguarding?

Safeguarding means **keeping you safe** from harm, abuse, or anything that makes you feel scared or uncomfortable.

We want everyone to feel **safe, welcome, and respected** at our events.

Who Helps Keep You Safe?

We have **special people** whose job is to make sure you're okay:

- **Liesel Parkinson** – Our Safeguarding Lead
Call: 01793 783123
Email: safeguarding@afcu.org.uk
- **Adrian Campbell-Black** – Our Deputy Safeguarding Lead
Email: AdrianCampbell-Black@afcu.org.uk

If you don't feel safe, or someone has hurt you or made you feel uncomfortable, **tell one of these people** – or any trusted adult at the event.

What Should You Do If You Feel Unsafe?

If something doesn't feel right:

1. **Tell someone you trust** – a leader, helper, or adult you know.
2. **You won't get into trouble** for telling the truth.
3. We will **listen carefully** and take you seriously.
4. If needed, we might talk to the police or social workers to help keep you safe.

Everyone Has a Right to Be Safe

Whether you are:

- A child
- A young person
- An adult who needs support

You have the **right to feel safe** and to be treated with **kindness and respect**.

What the Adults Must Do

- All workers (helpers, leaders, and staff) must:
 - Be **checked** to make sure they are safe to work with children and adults.
 - **Follow rules** that protect everyone.
 - Treat everyone with **fairness** and **respect**.
 - **Never hurt, scare or embarrass you**.
 - Keep your personal information **private**, unless sharing it is needed to keep you or someone else safe.

You Can Always Speak Up

If something is wrong, **you are not alone**.

You can always:

- Talk to someone you trust.
- Ask for help.
- Say “no” to anything that makes you uncomfortable.
- Ask questions if you’re unsure.

Remember:

- You are **important**.
- You deserve to be **safe and cared for**.
- AFCU is here to **help and protect you**.

APPENDIX 6

Partnership Check List

1.	Discussed our Safeguarding Requirements	Yes/No
2.	Partner has a current safeguarding policy compliant with <i>Working Together to Safeguard Children (2023)</i> and <i>The Care Act (2014)</i>	Yes/No
3.	Partner's policy is compatible with ours, especially with regard to the safeguarding of children and adults at risk	Yes/No
4.	All partner's staff/volunteers have appropriate DBS checks	Yes/No
5.	Partner's staff have completed Safeguarding and safer recruitment training and it has been properly recorded	Yes/No
6.	Clear escalation and reporting routes agreed, including who leads on incident management	Yes/No
7.	Data protection and confidentiality arrangements comply with <i>UK GDPR</i> and the <i>Data Protection Act (2018)</i> .	Yes/No

OR

1.	Agreed to accept and comply with the AFCU Safeguarding Policy	Yes/No
2.	Agreed to comparable recruitment and training requirements	Yes/No
3.	Shared accessible version of the policy with partner	Yes/No
4.	Agreed to our data protection and confidentiality arrangements	Yes/No

Signed:

Position in AFCU:

Date:

APPENDIX 7

Guidance on how to handle concerns/incidents for Physical, Sexual or Psychological Abuse and Discrimination/Hate Crimes for adults

You should always use your common sense and use your judgement/curiosity: the following circumstances and key features are for guidance only. If in any doubt, consultation should be made with the AFCU Safeguarding Team.

You will need to determine if the concern is low risk, medium risk or high risk. To aid in that process examples are given below which are not exhaustive but are aimed at assisting you in your judgement. The colours indicate the level of concern/incident.

Low Risk – AFCU Response – Complete the form below

Medium Risk - Requires Consultation with AFCU and Thirtyone:eight and/or Oxfordshire Safeguarding Adults Board (OSAB)

High Risk - Always Reportable to AFCU & OSAB

Lower-level concern where threshold of further enquiries under safeguarding are unlikely to be met. However, you should keep a written internal record of what happened and what action was taken.

Incidents at this level must be reported to the safeguarding team.

Incidents at this level should be reported immediately to the safeguarding team and the OSAB. **NB:** You may need to contact the police/emergency services.

A7.1 Physical Abuse

The act of causing physical harm to someone else

- Error or accident by staff causing no/little harm, e.g. skin friction mark due to ill-fitting hoist sling
- Isolated incident by other adult causing no/little harm e.g. one adult strikes another but it leaves no mark and does not cause emotional distress lasting hours
- Unexplained very light marking/bruising found on one occasion
- Inappropriate restraint that causes marks to be left but no external medical treatment/consultation required
- Unexplained minor marking or lesions, minor cuts or grip marks on a number of occasions or on a number of members cared for by a specific team/Carer
- Serious bodily harm/assault with weapon leading to irreversible damage or death
- Intended harm towards an adult

- Deliberately withholding of food, drinks or aids to independence
- Unexplained fractures/serious injuries
- Assault by another adult requiring medical treatment

A7.2 Sexual Abuse

When an adult is forced or persuaded to take part in sexual activities. This doesn't have to be physical contact, and it can happen online.

Not committed by a person in a position of trust, AND:

- Isolated incident of teasing or unwanted attention, either verbal or physical (but excluding genitalia), where the effect on the vulnerable adult is low
- Isolated incident of teasing or low-level unwanted sexualised attention (verbal or by gestures) directed at one adult by another whether or not capacity exists - no harm or distress caused
- Non-contact sexualised behaviour which causes distress to the person at risk
- Verbal sexualised teasing or harassment
- Being subject to indecent exposure where the service user isn't distressed
- Any allegation of sexualised behaviour relating to a person in a position of trust against a person in their care
- Sex in a relationship characterised by authority, inequality or exploitation, e.g. staff and service user
- Sex without valid consent (rape)
- Voyeurism
- Sexualised touch or masturbation without valid consent
- Being made to look at pornographic material against will/where valid consent cannot be given
- Attempted penetration by any means (whether or not it occurs within a relationship) without valid consent

A7.3 Psychological Abuse

This is the ongoing psychological/emotional maltreatment of an adult

- Isolated incident where adult is spoken to in a rude or inappropriate way – respect is undermined but no or little distress caused
- Occasional taunts or verbal outbursts which do not cause distress between members
- Treatment that undermines dignity and damages esteem
- Repeated incidents of denying or failing to recognise an adult's choices or of failing to value their opinion, particularly in relation to a service or care they're receiving
- Occasional taunts or verbal outbursts which do cause distress between members
- Denial of basic human rights/civil liberties, overriding advance directive, forced marriage
- Prolonged intimidation
- Vicious/personalised verbal attacks
- Humiliation of service user

- Emotional blackmail e.g. threats of abandonment/ harm
- The withholding of information to dis-empower
- Allegations or concerns relating to 'cuckooing'

A7.4 Discriminatory/Hate Crime

Unequal or abusive treatment based on age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity

- Isolated incident of teasing motivated by prejudicial attitudes towards an adult's individual differences
- Isolated incident of care planning that fails to address an adult's specific diversity associated needs for a short period
- Recurring failure to meet specific care/support needs associated with diversity that cause little distress
- Denial of civil liberties e.g. making a complaint
- Hate crime resulting in injury/emergency medical treatment/fear for life
- Hate crime resulting in serious injury/attempted murder/honour-based violence
- Inequitable access to service provision as a result of diversity issue
- Being refused access to essential services
- Humiliation, threats or taunts on a regular basis
- Recurring failure to meet specific care/support needs associated with diversity that cause distress

For other concerns that may involve Neglect, Self-neglect, Domestic Abuse, Financial or Material Abuse, Modern Slavery, Organisational Abuse or Medical Abuse, including Trips and Falls, they should be raised with the Safeguarding Team and, as necessary, discussed with the OSAB.

AFCU SAFEGUARDING REPORT FORM

This form should be used to record safeguarding concerns relating to Children and/or Adults at risk.

In an emergency please do not delay in informing the police or social services.

All the information must be treated as confidential and emailed to the Safeguarding Lead (safeguarding@afcu.org.uk) as soon as possible and ideally within one working day or the next working day if it's a weekend.

1. Your details:

Name:

Position with AFCU:

Telephone number

Email Address

2. Details of the person affected including full name, age if under 18 and contact details:

3. Date and time incident occurred:

4. Details of the incident (please describe in detail using only facts). More information about how to fill in this form is included as a footnote¹.

5. Other present or potential witnesses

Please include full names and contact details where available

6. Additional relevant information (please detail anything else that you believe to be helpful or important)**Statement**

I have completed this form and provided information that is factual and does not contain my own views or opinions on the matter.

Signature:

Print name:

Date: