

# Safeguarding Policy and Procedures

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*Date this version: July 2025*

*Agreed by Prayer & People Sub Committee: September 2025*

*Agreed by MAF UK Board of Trustees: September 2025*

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*This policy is non-contractual and as such can be changed at any time as required by regulations or best practice.*

## 1. INTRODUCTION

### A. Governance

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 who are appointed to have independent authority and legal responsibility for how an organisation or charity operates and have a critical role in decision making and compliance as well as setting the values, standards, and behaviours of the organisation.

### B. Scope

This policy applies to anyone who represents MAF UK including staff (part-time, full-time, paid or unpaid), interns, consultants, people on secondment to MAF UK, volunteers and trustees. (Collectively referred to as **staff** in this policy).

### C. MAF UK commitments

MAF UK's Board of Trustees and Senior Leadership Team are committed to ensuring that the children, young people and adults that we encounter are protected from all forms of harm and abuse, enabling them to live life with dignity, respect and security. All MAF UK staff must ensure that their behaviour promotes and encourages freedom from:

- Physical or mental violence
- Injury or abuse
- Neglect or negligent treatment or exploitation
- Sexual abuse

*(Definitions can be found in Appendix A)*

#### **MAF UK is committed to:**

- Providing a safe and caring environment for children, young people and adults
- Valuing children and adults with additional care and support needs
- Listening to, and acting upon, allegations and concerns relating to abuse and exploitation
- Creating a culture of openness enabling safeguarding concerns to be raised and discussed
- Forming accountability between staff so that inappropriate behaviour is challenged
- Providing appropriate, on-going safeguarding training and annually reviewing this policy
- Appointing and supporting the Safeguarding Lead in any action they may need to take to protect children and adults with additional care and support needs.

#### **MAF UK is committed to:**

A **zero tolerance** approach to the abuse and exploitation of children and adults with additional care and support needs. Where a case is raised the Safeguarding Lead or Deputy will collate and clarify the precise details of the allegation or suspicion and, if appropriate, pass information on to statutory agencies including the police. If there is evidence of behaviour contrary to this policy or our Conduct Policy it will be dealt with under our Misconduct Procedures which may lead to the termination of the employment or volunteer contract for gross misconduct.

## **2. PREVENTION**

### **A. Standards**

MAF UK is committed to ensuring that the wellbeing of children, and adults with additional care and support needs are given paramount consideration. This policy is based on principles encapsulated within the safeguarding standards published by thirtyone:eight as well as the:

- UN Universal Declaration of Human Rights and the International Covenant of Human Rights
- UN Convention on the Rights of the Child, 1989, its optional protocols (on Worst Forms of Child Labour; Forced Recruitment), and other international child-rights and human-rights instruments.

#### **England**

- Working Together to Safeguard Children 2023 (England and Wales)
- The Care Act 2014 (For adults in England and Wales)

#### **Scotland**

- Children and Young People (Scotland) Act 2014
- Protection of Vulnerable Groups (Scotland) Act 2007
- National Guidance for Child Protection in Scotland 2014
- Adult Support and Protection (Scotland) Act 2007 and the Code of Practice 2014

#### **Northern Ireland**

- Co-operating to Safeguard Children and Young People in Northern Ireland 2017
- Children (Northern Ireland) Order 1995
- Children's Services Co-operation Act (Northern Ireland) 2015
- Safeguarding Board Act (NI) 2011
- Adult Safeguarding: Prevention and Protection in Partnership key documents 2015

#### **Wales**

- Children (Scotland) Act 1995 and the Protecting Vulnerable Groups Scheme etc.
- Working Together to Safeguard Children 2018 (England)
- Working Together to Safeguard People 2018 (Wales)
- The Care Act 2014 (For adults in England)
- Social Services and Wellbeing (Wales) Act 2014

### **B. Recruitment**

Staff will be selected and appointed in accordance with government guidance on safe recruitment which ensures that:

- Job profiles refer to Safeguarding and the Code of Conduct

- Those applying to work for or volunteer with MAF UK complete an application form
- Gaps, discrepancies and anomalies in work history are scrutinised during interview
- Written references are obtained and followed up as appropriate
- Applicants complete a self-declaration form and disclosure and barring check as necessary
- Applicants receive a copy of the Safeguarding and Conduct Policies
- Checks regarding candidate's identity, employment history and qualifications are carried out before appointment.

### **C. Safeguarding training**

All staff receive training and a copy of the Safeguarding Policy during induction and are required to undergo annual refresher training. Staff directly involved in communicating with or taking responsibility for children or adults with additional care and support needs also receive a copy of the Vulnerable People Policy, the Volunteers Conduct Policy (where appropriate) and bespoke training every three years.

The Board of Trustees Safeguarding Lead, the MAF UK Safeguarding Lead and Deputy receive biennial safeguarding training through an appropriate provider.

### **D. Disclosure and Barring Service (DBS)**

As a matter of practice, staff do not routinely accept direct responsibility for children or adults with care or support needs. Responsibility remains with the hosting organisation who must always have an appropriate adult present. MAF staff are guest speakers only and as such we do not routinely require DBS checks.

MAF UK may however, at its discretion, request an enhanced DBS, Disclosure Scotland PVG or AcessNI check during recruitment or throughout employment.

However, where, an activity such as a trip or camp is specifically approved by a member of the SLT and staff are required to take direct responsibility for children or adults with additional care and support needs, the organisers must conduct a safeguarding risk assessment and ensure that accompanying staff have the appropriate DBS checks. The risk assessment must be signed off by the appropriate SLT member and provided to the Safeguarding Lead.

Other situations where a DBS, PVG, AcessNI check will be required:

- Where staff are required to regularly visit schools
- Where individuals take up a role as a MAF UK Trustees

As a matter of best practice concerning good governance, all trustees to the MAF UK board will be required to undergo a DBS check at appointment and subsequently at a 3 year interval.

A self-declaration form and the relevant Disclosure and Barring Service (DBS (England and Wales), Disclosure Scotland (Scotland) or AccessNI (Northern Ireland) will be completed where necessary (we will comply with Code of Practice requirements concerning the fair treatment of applicants and the handling of information).

### **E. Guidelines on acceptable and unacceptable behaviour**

All staff are required to understand and abide by our Conduct Policy and the guidelines of acceptable and unacceptable behaviour when working with children or adults with additional care

and support needs. For each activity we undertake a risk assessment to consider the activities' impact on children and adults with care needs. We will implement specific measures to reduce risk and staff must abide by these.

### **Acceptable Behaviour**

*Staff should:*

- Create a culture of openness and accountability allowing issues or concerns to be raised and discussed and inappropriate behaviour challenged
- Conduct a safeguarding risk analysis when organising new activities and programmes with the view to plan for ways to reduce the risk of harm
- Apply the 'two-adult' rule when working with children or adults with additional care and support needs.
- Ensure physical contact is always appropriate and not an invasion of privacy
- Use positive, non-violent methods to manage behaviour
- Raise any concerns of inappropriate behaviour immediately.

### **Unacceptable Behaviour**

*Staff must not:*

- Develop a physical or sexual relationship regardless of the age of consent
- Behave physically in a way which is inappropriate or sexually provocative
- Spend time alone away from others, behind closed doors or in a secluded area
- Visit the home of children or take children to their own home
- Sleep in the same room or bed
- Do things of a personal nature
- Be intoxicated because of alcohol or drug usage, prior to assuming responsibility
- Hit or otherwise physically assault or abuse them even where this may be culturally acceptable
- Use language, make suggestions or offer advice, which is inappropriate, offensive or abusive
- Condone, or participate in behaviour which is illegal, unsafe or abusive
- Act in ways intended to shame, humiliate, belittle, degrade or perpetrate any form of emotional abuse
- Show favouritism to a particular child or adult with additional care and support needs to the exclusion of others - for example, promising gifts, support and enticements
- Exploit them for their labour - domestic servitude - or for sexual purposes
- Take them alone in a vehicle unless it is appropriate given the context and with parental/guardian or managerial consent
- Conduct or be part of a harmful traditional practice, spiritual or ritualistic abuse.

#### **F. Office visits**

Children visiting our offices remain the responsibility of parents who must maintain age-appropriate supervision. If left alone they must remain in public areas or in rooms with doors open.

Staff must not accompany visiting children to the toilets, change clothing or nappies.

#### **G. Communicating and working with young people online**

Digital technologies present opportunities to connect with young people in groups or as individuals. Connecting through a smartphone or computer however opens opportunity to engage with young people behind the 'safety' of a screen. As such, this technology has risks which include:

- The opportunity for grooming/sexual exploitation
- Sharing of personal contact details of young people and staff
- Inappropriate conversations between young people and staff
- Potential allegations against staff.

Acceptable practice for staff:

- To minimise risk always consider if a password protected group call is possible
- Two staff members should be present on a call with an individual and if not, the meeting must be recorded with the child and parents' consent.
- Staff must not direct message any young person on any social media platform or send or respond to any private messages
- Contact with young people must always be via a MAF-UK profile and device and never on a personal device or account
- Staff should never share their own personal contact details or personally meet up with young people at their homes or at other locations
- Staff must not post content outside of work hours except when attending Youth events and relating to MAF competitions or stand times.
- Respect the minimum age requirements for video chat enabled platforms and do not invite young people to register for apps, software or platforms which are not age-appropriate for them. (*In most cases this is 13 years of age*)
- Ensure that parents/guardians are aware of who our Safeguarding Lead is and how to contact them to discuss any concerns.
- Obtain parental consent before sharing any personal data that could identify a child under the age of 13 and the permission of the individual above this age.

*Note: Staff should not be communicating with children under the age of 13 on social media platforms as they are under the approved age range to access many of these services.*

#### **H. Overseas field trips**

Staff who visit MAF overseas programmes will receive a briefing on safeguarding expectations and cultural considerations. They will also be briefed on our guidance on photography.

### **3. PARTNERSHIP**

When working in partnership with other organisations either overseas or in the UK, we will ensure that we have a shared understanding of safe practice in our interaction with children and adults with additional care and support needs. This will include expectations regarding policy stipulations, safe

recruitment practice, safeguarding training, working arrangements and reporting which will be in keeping with the standards of this policy.

## 4. RESPONDING TO ALLEGATIONS

Any allegation or concern regarding the abuse or exploitation of a child or adult with additional care and support needs will be treated seriously and with urgency. **Reporting concerns regarding the abuse or exploitation of children or vulnerable adults is mandatory** and can arise when abusive behaviour is observed or suspected; or when an allegation is made or disclosed or there are indicators (signs and symptoms) of suspected abuse on the victim.

***What to do if you suspect that abuse may have occurred:***

- Staff should not under any circumstances carry out their own investigation
- Report concerns as soon as possible to the MAF UK Safeguarding Lead who will liaise with thirty-one: eight regarding process.
- In the absence of the Safeguarding Lead or, if the concern in any way involves the Safeguarding Lead, then the report should be made to the Safeguarding Deputy.
- Staff will be asked to make a written record of their concerns which will be kept in a secure location.
- **Alternatively**, staff may contact their local Social Services in the area where the incident has taken place or is being reported or, outside office hours, contact the local police (Child Protection Team)

In Kent the contact numbers are:

Children's Social Services: Call 03000 41 11 11 (text relay 18001 03000 41 11 11) or email [social.services@kent.gov.uk](mailto:social.services@kent.gov.uk)

Adult Social Services: Call 03000 41 61 61 (text relay 18001 03000 41 61 61) or email [social.services@kent.gov.uk](mailto:social.services@kent.gov.uk)

If staff need to contact Social Services outside of normal office hours, for example during the night, call 03000 41 91 91.

**IF YOU THINK SOMEONE IS IN IMMEDIATE DANGER, CALL 999 FOR THE EMERGENCY SERVICES.**

You should not discuss your concerns with anyone other than those mentioned above.

The Safeguarding Lead or the Deputy will inform the CEO and will take advice and guidance from thirtyone: eight and refer the case to Social Services, or the Police as required. The CEO will inform the Board of Trustees -Safeguarding lead and MAF's insurer.

*(The process for handling an allegation is detailed in Appendix B and fuller process maps are found in Appendix C)*

**Staff members may make a direct referral to safeguarding agencies or seek advice from thirtyone: eight if they feel MAF UK has not responded appropriately to any allegation.**

## SAFEGUARDING TEAM

**Our Safeguarding Lead is: Johnathan Fell, Director of People and Culture**

**Email: johnathan.fell@maf-uk.org**

The role of the Safeguarding Lead is to collate and clarify the precise details of the allegation or suspicion, liaise with thirtyone:eight and where appropriate pass information on to statutory agencies.

**Our Safeguarding Deputy is: Chris Macrae, MiC (Scotland) Team Leader**

**Email: chris.macrae@maf-uk.org**

The role of the Safeguarding Deputy is, in the absence of the Safeguarding Lead, to collate and clarify the precise details of the allegation or suspicion, liaise with thirtyone:eight and where appropriate pass information on to statutory agencies who have a legal duty to investigate

## **5. PASTORAL CARE**

MAF UK is committed to offering pastoral care, working with statutory agencies as appropriate, and supporting those who have been affected by abuse. This would include pastoral support through our People Team, our Employee Assistance Programme and further counselling support as appropriate.

## **6. RELATED POLICIES**

**Whistleblowing and Disclosures Policy** - An important aspect of accountability and transparency is a mechanism to enable staff and other people associated with MAF UK to voice concerns in a responsible and effective manner.

**Fundraising and Vulnerable People Guidelines** – Specific guidance for those interacting with supporters who may be open to exploitation.

**Conduct Policy** – Guidance on expected behaviours both in and outside of work expected of representatives of a Christian Mission.

**The Misconduct Procedure** – A statement of the process and sanctions following misconduct.

**The Social Media Policy** – A statement of staff responsibility and practice when engaging with children and adults with additional care and support needs using social media platforms.

## APPENDICES

### Appendix A

#### DEFINITIONS AND INDICATIONS OF ABUSE

##### **A. Child:**

A child is anyone under the age of 18.

##### **B. Adults with additional care and support needs:**

Refers to anyone over the age of 18 who needs care and support for their daily living. This maybe by reason of disability, age, illness, or circumstance. Consequently, they may be unable to protect themselves from either the risk of, or the experience of, abuse or neglect, safeguard their own well-being, property, rights, or other interests.

Vulnerability cannot be defined by one factor - such as age, health, or location - but often occurs as a response to external changes. The vulnerability may last for a few days, months or be permanent. For example, bereavement, a change in financial situation, or physical or mental illness. A vulnerable adult may also include beneficiaries who, because of extreme poverty or desperation, are more susceptible to exploitation and abuse.

##### **C. Sexual Abuse**

Sexual abuse is forcing or enticing a child or adult with additional care and support needs to undertake sexual activity with an adult or another child which includes but is not limited to:

- **Verbal:** Remarks which include sexual threats, innuendoes, solicitation or sexually explicit language; inappropriate comments about a person's body or appearance or any verbal expression with intent to arouse or stimulate
- **Visual:** Indecent exposure, showing, making, taking or sending suggestive or pornographic pictures or films; showing a child or vulnerable adult pornographic material, unclothed persons, or any sexual activity or simulated sexual activity such as masturbation or intercourse; peeping, leering, or staring; or viewing child pornography.
- **Physical touching:** Physical contact with a child or adult with care and support needs' genitals, pubic area, buttocks, breasts whether they are wearing clothes or not **or** causing them to perform any of these acts: masturbation; rubbing, holding, or kissing for sexual gratification.
- **Exploitation:** Sexually exploiting a child or adult with care and support needs for money, power or status
- **Online:** Sending or posting sexually explicit images of themselves, children and vulnerable adults, or engaging in sexually explicit online conversations.

Online sexual abuse includes:

- persuading or forcing a child or adult with additional care and support needs to send or post sexually explicit images of themselves
- persuading or forcing a child or adult with additional care and support needs to take part in sexual activities via a webcam or smartphone
- having sexual conversations with a child or adult with additional care and support needs by text or online.

##### **D. Sexual Exploitation**

Sexual exploitation may take place where children or adults with additional care and support needs are coerced or groomed into exploitative situations and relationships. They may be given things such

as gifts, money, drugs, alcohol, status or affection in exchange for taking part in sexual activities. They may be tricked into believing they are in a loving, consensual relationship. They may depend on their abuser or be too scared to tell anyone what is happening. They might be invited to parties and given drugs and alcohol before being sexually exploited. They can also be groomed and exploited online. Sexual exploitation can involve violent, humiliating and degrading sexual assaults and involve multiple perpetrators.

#### **E. Physical Abuse**

Physical abuse is deliberately hurting a child or adult with additional care and support needs which may cause injuries such as bruises, broken bones, burns and cuts. It is not accidental - those who are physically abused suffer violence such as being hit, kicked, poisoned, burned, slapped or having objects thrown at them.

#### **F. Emotional Abuse**

Emotional abuse is a pattern of behaviour that risks or impairs the physical, mental, spiritual, moral or social wellbeing of an individual. It may involve conveying that they are worthless, unloved, or inadequate. It may feature age or developmentally inappropriate expectations being imposed or involve causing children and vulnerable persons to frequently feel frightened or in danger, exploitation or corruption. Those who are emotionally abused are often suffering from other types of abuse at the same time.

#### **G. Neglect**

Neglect is the persistent failure to meet a person's basic physical and/or psychological needs, likely to result in the serious impairment of their health, development or wellbeing. It may involve a parent or carer failing to provide adequate food, shelter or clothing, failing to protect them from physical harm or danger, or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's or vulnerable persons basic emotional needs.

#### **H. Domestic abuse**

Domestic abuse is any incident, or pattern of incidents of controlling, coercive or threatening behaviour, or abuse by one adult against another where they are or have been intimate partners or family members. It can be experienced by both men and women and may be inflicted by any member of the immediate or extended family.

#### **I. Abuse of power**

Abuse of power is coercion and control of a person by another which may include:

- Manipulation and exploitation
- Enforced accountability
- Censorship of decision making
- Requirements for secrecy and silence
- Controlling behaviour
- The abuser assuming a 'divine' position

An abuse of power, may also take place in the name of God and may involve manipulation to think, say or do things without respecting an individual's right to choose for themselves.

#### **J. Financial abuse**

Financial abuse is the attempted or actual misappropriation or misuse of a person's money, property, benefits or other assets, by means of intimidation, coercion, deception, or other ways to which the person does not or cannot consent to.

#### **K. Positions of trust**

All adults working with children, young people and vulnerable adults 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.

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

## POTENTIAL INDICATORS OF ABUSE

### Physical indicators

- Injuries inconsistent with the explanation given for them
- Injuries or bruises occurring to the body in places not normally exposed to falls, etc.
- Injuries which have not received appropriate medical attention
- Frequent inconsistent or unexplained injuries
- Cutting/slashing/substance abuse.

### Sexual indicators

- Any allegations concerning sexual abuse
- Excessive pre-occupation with sexual matters, detailed knowledge of adult sexual behaviour, or age-inappropriate sexual play
- Sexual activity through words, play or drawing
- Child who is sexually provocative or seductive with adults
- Inappropriate bed-sharing arrangements at home
- Severe sleep disturbances with fears, phobias, vivid dreams or nightmares, sometimes with overt or veiled sexual connotations
- Child who is frightened of or avoids being alone with a particular individual
- Discomfort when walking or sitting down

### Emotional indicators:

- Changes or regression in mood and behaviour,
- Struggle to control strong emotions or have strong outbursts
- Withdrawal, depression, self-harm
- Nervousness/frozen watchfulness
- Sudden under-achievement or lack of concentration
- Inappropriate relationships with peers and /or adults
- Fear of parents or other adults or children
- Lack of social skills and isolation

### Neglect indicators:

- Consistent hunger
- Poor hygiene
- Inappropriate dress
- Consistent lack of supervision, especially in dangerous activities for long periods
- Unattended physical problems or medical needs
- Abandonment

## Appendix B

# HANDLING DISCLOSURE INFORMATION

### **GENERAL PRINCIPLES**

As an organisation using the Disclosure and Barring Service (DBS) checking service to help assess the suitability of applicants for positions of trust, MAF UK complies with the code of practice and obligations under the General Data Protection Regulations (GDPR) regarding the correct handling, use, storage, retention and disposal of certificates and certificate information.

### **STORAGE AND ACCESS**

Certificate information will be kept securely, in lockable, nonportable, storage containers with access strictly controlled and limited to those who are entitled to see it as part of their duties. Electronic disclosure information is held on a secure password protected system accessible only to those authorised to view it in the course of their duties.

### **HANDLING**

In accordance with section 124 of the Police Act 1997, certificate information is only passed to those who are authorised to receive it in the course of their duties. We maintain a record of all those to whom certificates or certificate information has been revealed and it is a criminal offence to pass this information to anyone who is not entitled to receive it.

### **USAGE**

Certificate information is only used for the specific purpose for which it was requested and for which the applicant's full consent has been given.

### **RETENTION**

Once a recruitment (or other relevant) decision has been made, we do not keep certificate information for any longer than is necessary, considering the General Data Protection Regulation, Data Protection and Human Rights of the individual before doing so.

Throughout this time, the usual conditions regarding the safe storage and strictly controlled access will prevail.

### **DISPOSAL**

Once the agreed retention period has elapsed, we will ensure that any DBS certificate information is immediately destroyed by secure means, for example by shredding, pulping or burning. While awaiting destruction, certificate information will not be kept in any insecure receptacle (e.g. waste bin or confidential waste sack).

## Appendix C

### PROCESS FOLLOWING AN ALLEGATION

#### **Allegation of abuse against a person who works with children**

If an accusation is made against a staff member (whether a volunteer or paid member of staff) the Safeguarding Lead will, in the first instance contact thirtyone:eight for guidance.

Then in accordance with Local Safeguarding Children Board (LSCB) procedures:

- Liaise with Children's Social Services regarding the suspension of the staff member
- 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 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.

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

If an accusation is made against a staff member (whether a volunteer or paid member of staff) the Safeguarding Lead will, in the first instance contact thirtyone:eight for guidance. They will then:

- Liaise with Adult Social Services in regards the suspension of the worker
- Make a referral to the Disclosure and Barring Service following the advice of Adult Social Services

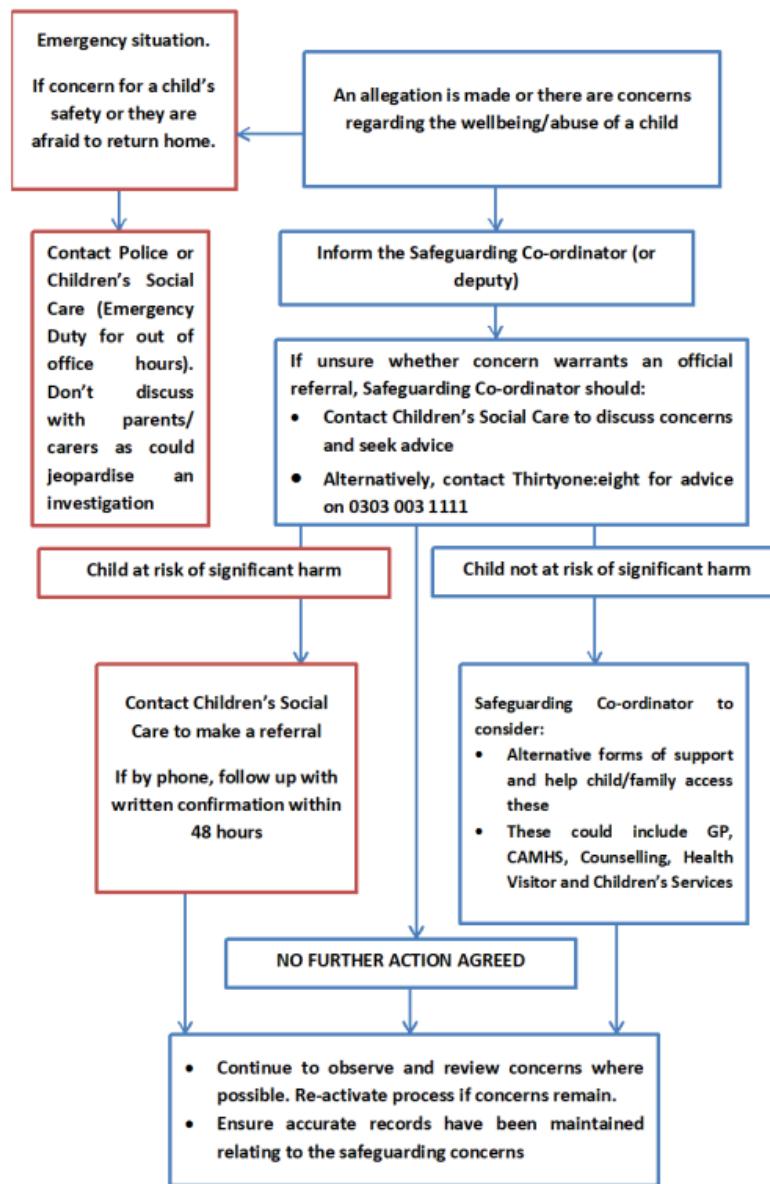
## APPENDIX D

### FLOWCHARTS

#### Flowchart for Action Children and Young People



This flow chart provides an overview of action to be taken when concerned about the welfare of a child. It is to be used in conjunction with written procedures.

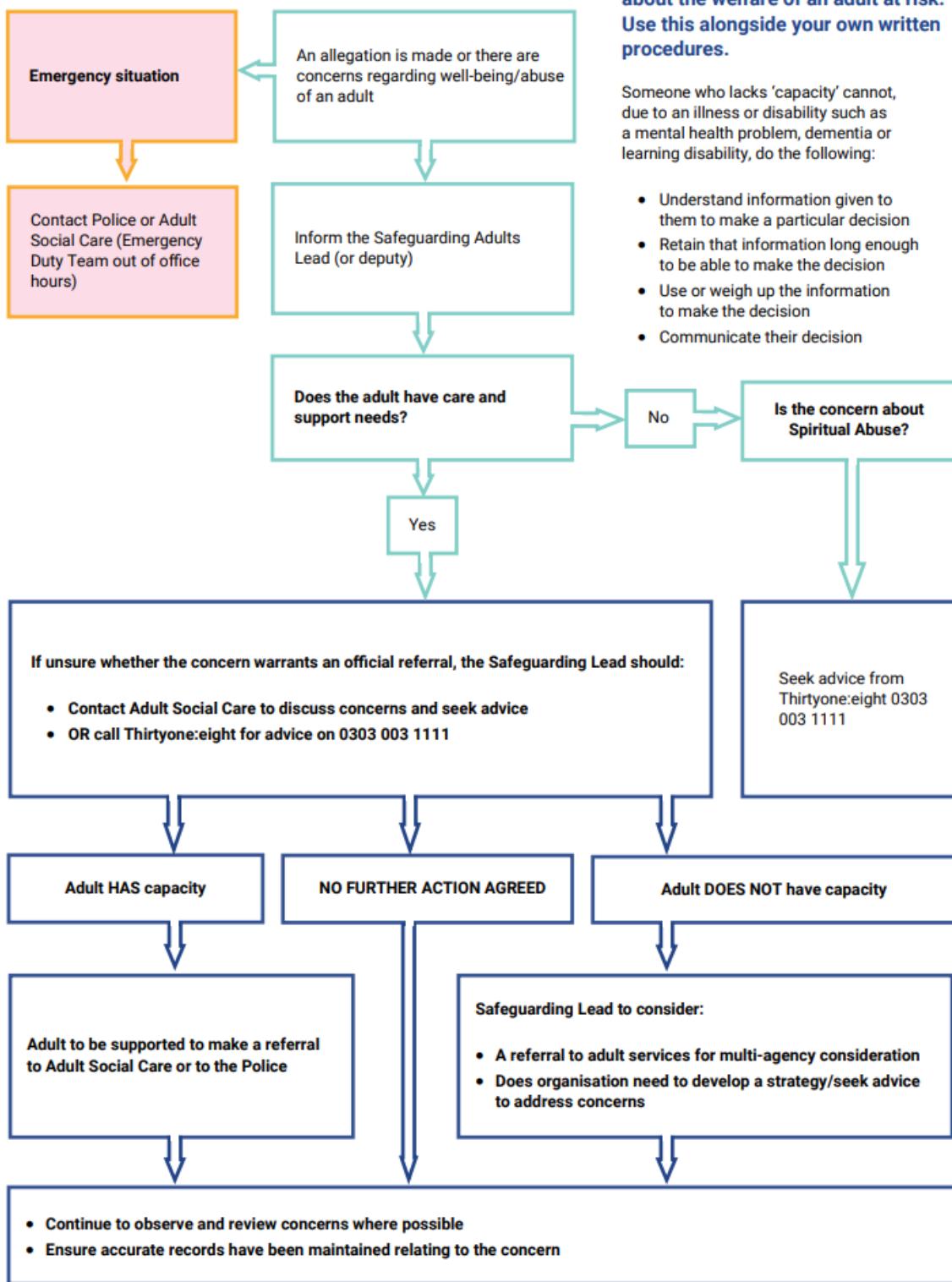


**Working Together to Safeguard Children defines significant harm as:**

“... any Physical, Sexual, or Emotional Abuse, Neglect, accident or injury that is sufficiently serious to adversely affect progress and enjoyment of life. Harm is defined as the ill treatment or impairment of health and development.”

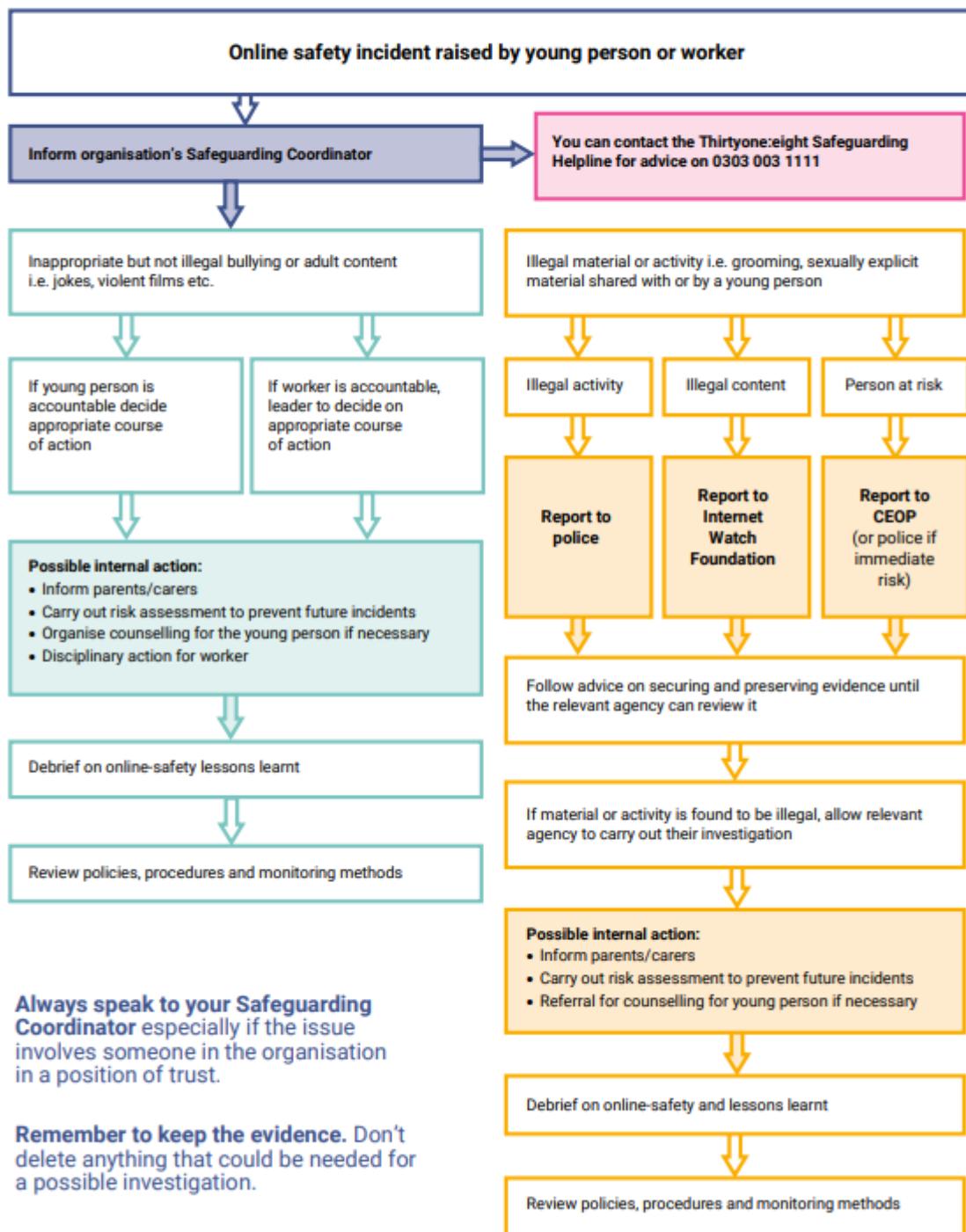
© Thirtyone:eight 2018 Flowchart for Action Children & Young People

## Action for Adults at risk flowchart



## Responding to online concerns

If you or the young people you're working with have any concerns it's important you raise these appropriately. Speak to your organisation's Safeguarding Coordinator to find out what the process is for your organisation. Below is our suggested flowchart for responding:



## APPENDIX E

### RISK ASSESSMENT

<b>Planned activity and description</b>	
<b>Location/s</b>	
<b>Date of activity</b>	
<b>Date of assessment</b>	
<b>Assessor name &amp; role</b>	

<b>Names of staff / leaders attending</b>	<b>DBS Checked - Yes or No</b>

<b>What are the SG risks</b>	<b>Existing safeguards</b>	<b>Additional preventative measures</b>	<b>Responsible for Action</b>	<b>Action by when?</b>	<b>Date Completed</b>

<b>Assessment and Authorisation</b>			
<b>Assessors Name</b>		<b>Team</b>	
<b>Signature</b>		<b>Date</b>	
<b>SLT Authorisation Name</b>			
<b>Signature</b>		<b>Date</b>	