

# Annex 4

## Schedule of evidence from religious organisations about external regulation

Organisation	Experience of the disclosure and barring regime	Charity Commission (CC) registration	Charity Commission (CC) and possible regulation	Common standards and common training	Mandatory reporting	Statutory guidance documents	Regulation of out-of-school settings
<b>Bahá'í Community of the UK</b>	<p>Challenges in ensuring vetting and barring of all who work with children:</p> <ul style="list-style-type: none"> <li>Some think that the DBS checks they have from their professional role are sufficient, and further checks are not required.</li> <li>It is difficult to be aware of every under 18 activity that is taking place in local communities.</li> <li>Individuals not renewing their DBS certificate on time.</li> </ul> <p>Definition of 'regulated activity' is sufficiently clear to know who should be checked and on what basis.</p>	National Spiritual Assembly of the Bahá'ís of the UK is registered as a charity.	It should be mandatory that religions have in place certain minimum standards and/or have certain practices and policies.	<p>It would be helpful to have access to a set of common training materials and model policies – especially a model set of questions and answers dealing with common child protection issues.</p> <p>Auditing would be best done by a non-religious body.</p>	Agree that there ought to be mandatory reporting. Bahá'í policy states that allegations should be reported to the police.	Not stated – though parts of <i>Working Together to Safeguard Children (Working Together)</i> are written into the safeguarding policy.	<p>Agree that in the interest of safeguarding and child protection there should be registration of those religious settings that provide religious instruction for those under the age of 18.</p> <p>The voluntary code is “very comprehensive and the content and advice clearly set out and accessible”. The proposals seem to be very adequate and the Bahá'í community of the UK would not have any concerns or objections to the introduction of the Department for Education's (DfE) code.</p>
<b>BAPS Shri Swaminarayan Mandir (BAPS)</b>	Not addressed in witness statement.	BAPS is a registered charity.	<p>BAPS has had no interaction with the CC. It has not been the subject of any compliance action and it has not referred any matters to the CC in relation to child protection issues.</p> <p>Views on CC/regulation are not addressed in witness statement.</p>	Not addressed in witness statement.	Not addressed in witness statement.	Not addressed in witness statement.	Not addressed in witness statement.

Organisation	Experience of the disclosure and barring regime	Charity Commission (CC) registration	Charity Commission (CC) and possible regulation	Common standards and common training	Mandatory reporting	Statutory guidance documents	Regulation of out-of-school settings
<b>Baptist Union of Great Britain (BUGB)</b>	<p>Ongoing challenge to ensure that all those who should be checked are submitting to a DBS check.</p> <p>Common messages from churches who do not want to check their workers and volunteers are:</p> <ul style="list-style-type: none"> <li>• a sense that requiring a DBS check is doubting someone's integrity or trustworthiness;</li> <li>• a worry about the disclosure of old offences that are not relevant to their suitability to work with children (eg petty theft offences);</li> <li>• unfamiliarity with up-to-date safeguarding requirements and practices;</li> <li>• a desire to keep doing things 'the old way'.</li> </ul> <p>Current definition of 'regulated activity' is sufficiently clear. Need for greater clarity as regards to whether it is necessary for checks to be done on all church trustees. Does not find the current DBS checking system to be onerous and has valued the move to an efficient online checking system.</p>	<p>BUGB is an unincorporated association that is registered with the CC.</p> <p>BUGB is in the process of changing its legal structure and transferring its assets, liabilities, etc to a Charitable Incorporated Organisation (CIO), which will be a registered charity.</p> <p>BUGB is an umbrella body. Each local Baptist church is autonomous and is a separate charity in law. Around 1,400 of the Baptist member churches are exempt from registration with the CC.</p>	<p>Do not wish to make any comment about the effectiveness of the CC in regulating religious communities. Have not had sufficient contact with the CC to be able to come to an informed view.</p> <p>Considers that the current arrangements for regulation of child protection in religious organisations and settings are adequate, with one exception: the need to extend the position of trust legislation to cover the work of ministers, other paid church workers, and volunteers who hold positions of authority. Distinction drawn between (i) ministers and paid workers in positions of authority and (ii) unpaid workers and volunteers in positions of authority. The position of trust legislation should be extended to cover the work of all ministers and paid church workers who hold positions of authority or leadership.</p> <p>Regarding registration and inspection service, whilst the rationale for this is understood, BUGB thinks that the necessary bureaucracy of such a service would prevent many churches from starting new children and youth programmes. It would mean that many existing activities would cease.</p>	<p>BUGB has a suite of training materials. They are happy to share these with other organisations if it will help them move forward in their safeguarding practices.</p> <p>Many smaller religious organisations do not have the money or resources to carry out work developing safeguarding materials. BUGB sees the value of the availability of a 'default' training programme and materials. However, BUGB would not want to replace its own bespoke training and materials with a generic set. BUGB has worked hard to tailor its materials and training to fit the way that Baptist churches operate and to work in line with Baptist church governance arrangements.</p> <p>Regarding common policies, procedures and information, BUGB sees that there would be real value in models and templates specifically constructed for use in religious organisations and settings. However, the way to make sure these are used is to design them in such a way that they can be tailored and shaped to fit the particular organisation in question.</p>	<p>Agree with mandatory reporting and that concealment of abuse is a criminal offence if admission has been made/if there are internal disciplinary findings. BUGB's own disciplinary code for accredited ministers makes it clear that failure to report/ concealing abuse will lead to removal of accreditation.</p>	<p>BUGB continues to find <i>Working Together</i> and <i>Keeping children safe in education</i> to be helpful guidance on good practice and safer recruitment.</p>	<p>Supports a voluntary code in respect of child protection in out-of-school settings that provide tuition in someone's religious faith.</p> <p>The draft version of the voluntary code is helpful and well written in terms of supporting those in smaller organisations. The main sections are already covered in BUGB's own safeguarding guides, and BUGB would be happy to support the extension of this voluntary code to religious organisations.</p>

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Baptist Union of Great Britain (BUGB) - <i>continued</i>			Strongly supports the extension of the current positions of trust definitions to include accredited ministers and other paid workers in churches whose roles involve working with children and young persons.	Regarding common qualification, it would be helpful to have a set of qualifications that are suitable for those who take on senior national or regional responsibilities for safeguarding in their religious organisations.  Regarding minimum standards, these would be helpful. There are already standards that apply in terms of statute and in guidance from the CC.			

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Chabad Lubavitch UK (CL)	<p>Within the wider charity sector, not just within CL, there is a tendency to err on the side of caution and seek DBS checks in any case where it is felt that they might be needed. Less well understood and less frequently used is the Update Service. The concern is that a DBS check, unless it is updated and can be checked in real time online by an employer, is just a snapshot of a person's fitness for a role at a given time and can become outdated. It would be better if it was always possible to see updated records as a matter of course.</p>	<p>CL is a registered charity.</p>	<p>It is recognised that the CC is known to be under-resourced and is already responsible for every aspect of charity regulation, from registration to ongoing governance.</p>	<p>It is not clear how uniform or standardised a set of training materials could be for religious organisations that, even in the case of CL, operate across so many different spheres. A one-size-fits-all approach would not be effective, even if targeted at religious organisations, and paradoxically may lead to organisations adopting policies and practices that are less well suited to their particular circumstances than currently. That said, there are common themes that could be the subject of broad guidelines and workshops.</p> <p>Religious organisations should be subject to the same minimum standards as any other organisation. There does not seem to be a lack of regulation, but it is important that what currently exists is made applicable and relevant to the different ways in which organisations of all types engage with children and child protection.</p>	<p>Not addressed as part of witness statement.</p>	<p>It would be helpful to have workshops that make these documents less daunting for religious organisations. These sessions could be run by organisations like the NSPCC, Reshet and Interlink. Funding should be made available to such organisations.</p>	<p>The DfE consultation makes important recommendations for promoting an understanding of child protection issues. CL has already implemented these recommendations by adopting safeguarding policies, recruitment, vetting and training regimes – but it welcomes the extension of this best practice to other out-of-school settings where children may be at risk.</p> <p>The size and scope of such guidelines, taken together with the existing statutory guidelines, can be overbearing and inaccessible to exactly the kinds of small and less well-resourced organisations that need them the most. Thus facilities should exist for locally organised and affordable workshops and training.</p> <p>These should relate not simply to the training required for designated safeguarding leads (DSLs) or frontline staff but also for management/trustees to understand which regulations apply to them and what they must and should do as a matter of best practice.</p>

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Christian Congregation of Jehovah's Witnesses (JW)	The current definition of 'regulated activity' in the Safeguarding Vulnerable Groups Act (SVGA) 2006 is sufficiently clear.	Yes.	<p>In the past 10 years JW has made 24 serious incident reports to the CC. In some cases, the CC initially replied demanding information and threatening action against the congregation charity, but when the charity replied and provided the requested information there was no response for many months or years. <i>"This unfortunate delay by the [CC] has the effect of stigmatising the congregation charity and trustees, leaving them in a position of perpetual uncertainty"</i>.</p> <p>JW is critical of the two statutory inquiries. Regarding Watch Tower Bible (WTB) inquiry: states that internal memos circulated within the CC described the inquiry as a 'fishing' exercise or a 'look-see' inquiry. Allegedly premised on unidentified complaints, which have never been disclosed to WTB. During the inquiry, the CC sought to investigate a broad range of non-inquiry issues. Inquiry process has been spasmodic. WTB received no substantive correspondence from the CC for nearly one year from October 2018 to September 2019.</p>	<p>JW does not consider that a 'common qualification' for all faith leaders related to 'child protection within a religious organisation' would be necessary for elders in the congregation, given that congregations do not provide any activities that separate children from their parents.</p> <p>JW believes that congregation elders must meet the ecclesiastical qualifications set out in the Bible. Sufficient training is provided to elders in the child safeguarding policy, commensurate with their congregation role. JW would carefully consider any common set of training materials, model policies or question and answer sheets that the Inquiry may recommend.</p> <p>JW does not provide services that separate children from their parents and is therefore unable to comment meaningfully on mandatory minimum standards, practices and policies and on the question of compulsory training for volunteers providing such services.</p>	JW defers to the Inquiry's expertise on this question and will comply with any mandatory reporting law.	JW does not provide services that separate children from their parents and is therefore unable to comment meaningfully on the current statutory guidance documents.	JW does not provide services that separate children from their parents and is therefore unable to comment meaningfully on the DfE code.

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<p>Christian Congregation of Jehovah's Witnesses (JW) - <i>continued</i></p>			<p>There have been five different lead investigators on the inquiry.</p> <p>There are serious questions regarding whether CC is well suited to dealing with child safeguarding issues. Issues with the WTB inquiry:</p> <ul style="list-style-type: none"> <li>i) CC has never disclosed the specific allegations against WTB;</li> <li>ii) no allegations have been brought against the trustees themselves or members of WTB regarding safeguarding;</li> <li>iii) the inquiry has consumed an inordinate amount of charitable time and resources; and</li> <li>iv) inordinate length of inquiry has caused and continues to cause reputational damage.</li> </ul>				

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The Church of Jesus Christ of Latter-day Saints (CJCLDS)	Not addressed in witness statement.	Yes – CJCLDS is a registered charity.	CJCLDS is supportive of the role and approach of the CC in dealing with safeguarding issues in charities. The CC is clear in its declared aim, shared by CJCLDS, to make sure that charities that work with or provide services to vulnerable beneficiaries comply with their legal duties, and take reasonable steps to protect them from harm and minimise the risk of abuse.	CJCLDS would welcome the opportunity to explore with other religious organisations in England and Wales common sets of training materials, model sets of policies and the like, provided that any model procedure or uniform child protection policies, procedures and training are consistent with the theologies, practices and procedures of the individual faiths by whom they are adopted and applied. Given the breadth of religions, it may be that agreed training materials etc are available for use by religious organisations on a voluntary rather than a mandatory basis.	CJCLDS will implement and follow any compulsory requirement on it to refer allegations or suspicions of child sexual abuse to statutory authorities. The preference of CJCLDS would be to work cooperatively with local safeguarding partners to keep children safe. It is the experience of CJCLDS, anecdotally, working with children in jurisdictions around the world, that where reporting to the authorities by the bishop or stake president is mandated, then the incidence of disclosure to the bishop or stake president by the victim/the victim's family/the perpetrator is negatively impacted, ie the ability of CJCLDS to protect and promote the welfare of children, including identifying children at risk, is reduced as disclosure of abuse to CJCLDS is curtailed for fear of immediate disclosure to the authorities.	The guidance in <i>Working Together</i> 2018 is welcomed by CJCLDS, in particular the guidance on information-sharing with the designated officer and making referrals to children's social care or the police.	Not addressed in witness statement.

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Church of Scientology (CS)	Not addressed in witness statement.	CS Religious Education College Inc is a charity registered with the Australian Charities and Not-for-profits Charity Commission (ABN). It owns and is responsible for Churches of Scientology in England.  CS does not fall under the remit of the CC for England and Wales.	Not addressed in witness statement.	CS would welcome some common materials and some common training requirements, provided these were not too heavy handed.  It is important that children themselves receive some education on what adult behaviour is unacceptable and have a safe way of reporting this. This would best be done through schools rather than religious organisations.	Not addressed in witness statement.	Not addressed in witness statement.	Not addressed in witness statement.



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<b>The Council of African and Afro-Caribbean Churches UK (CACC)</b>	<p>'Regulated activity' should be simply listed. Churches are not lawyers. Law quotes do not help understanding. All should be vetted for the safety of the communities.</p> <p>The speed of the process is an issue. One application took three months – it is not clear why.</p>	<p>CACC is not yet registered – it is in the process of doing so.</p> <p>Members are normally registered charities or companies limited by guarantee.</p>	<p>CACC does not think that the CC understands the spiritual aspect of religious organisations, especially churches.</p> <p>CACC has never seen the CC as regulators of child protection in the Church. However, the fact that the CC makes CACC produce and think about a safeguarding policy is a good thing.</p> <p>CACC believes that the CC only regulates its money and properties, which sometimes upsets CACC.</p> <p>CACC does not know what regulatory oversight is provided by the CC, apart from the CC making sure that a policy is in place.</p> <p>CACC considers that a body that is religious in nature – a body ecumenical enough to understand other traditions in a religious environment – should be set up to audit and inspect when necessary.</p>	<p>The main barrier to training is financial. It would help if training could be sponsored.</p> <p>Religious organisations are already inundated with registrations and inspections. CACC does not want any more additions.</p> <p>The Church needs to be trained in auditing and inspection. Many are very ignorant of what is required, apart from being referred to a website to read laws and regulations. Training sessions carefully planned for the ministers and officers in charge would help. Then, if and when inspectors or auditors were sent periodically, CACC would be ready because it would already know what is required of it.</p> <p>CACC would certainly appreciate not only a common set of training materials but also practical training for all religious organisations and settings on identifying and preventing child sexual abuse. A model set of policies on managing child protection and dealing with allegations would be greatly helpful and highly appreciated.</p>	<p>It should not be mandatory to report on the basis of an allegation or suspicion. If an allegation has been proved and admitted then it must be mandatory to report it. It should then be a criminal offence to conceal the matter and the evidence.</p>	<p>Good and helpful, though quite elaborate.</p>	<p>CACC does not have the experience to advise on the DfE Code.</p>

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The Council of African and Afro-Caribbean Churches UK (CACC) – <i>continued</i>				<p>A model question and answer sheet dealing with common issues in respect of child protection (eg data protection, information-sharing) would also be very helpful. A common qualification for all faith leaders to undertake on child protection within a religious organisation and that should incorporate all the requirements mentioned above would be helpful and appreciated.</p> <p>As regards minimum standards, CACC already has the Bible, which binds it to a very high standard in all that it does. The only standard that would make sense would be going through all the training and acquiring the certificate needed, which will certify a person's ability to do the work required of him or her.</p>			

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<b>Council for Mosques (Bradford) (CFM)</b>	<p>Challenges arise from the voluntary nature of member organisations and the impact this has on consistency and quality of resources available to member organisations. There is varied understanding, approach and practice among member organisations towards safeguarding requirements.</p> <p>CFM does not feel it is best placed to comment on the appropriateness of the current system of vetting and barring in respect of its member organisations.</p>	No. But one of its delivery arms, Khidmat Centres, is a registered charity. Its other delivery arm, CfM (Bereavement Services), is in the process of being registered with the CC.	CFM does not feel it can comment on this given the absence of interaction between CFM and the CC in connection with child protection issues.	<p>There are already a number of mandatory checks and standards in respect of child protection and safeguarding that apply to the CFM's member organisations. The CFM has no oversight role in respect of its member organisations. In practice, it seems sensible to ensure that CFM's member organisations that provide services to and interact with children are subject to the same standards as other organisations in this situation.</p> <p>Institutions intended to provide facilities and services to the public should be subject to meeting minimum standards prior to being operational. It would be a good idea to try to find common standards that can be introduced for these institutions. This may help CFM's member organisations due to the voluntary nature of how they are run and staffed. If more members of the wider Islamic community are familiar with these standards in the context of their jobs, it may make these standards and responsibilities easier when they are required to follow them in a voluntary role at their mosque.</p>	CFM cannot see why there should not be compulsory obligations to refer allegations or suspicions to the relevant authorities, provided those referrals are handled with the appropriate confidence.	CFM feels unable to comment.	CFM feels unable to comment.

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The Druid Network (DN)	Anyone with unsupervised access to children within any organisation should/ must have an enhanced DBS check, with supervision by a person holding a current enhanced DBS certificate.	Yes, in September 2010 DN was registered as a charity.	An independent inspecting/auditing body would be able to hold religious communities and their leaders to account if registration was to be put in place and become law. This body should include those with experience of child protection issues and may include members of various religious beliefs. If such a body was to be developed, training would be needed for consistency and policies put in place to deal with all eventualities.	In the general interest and for consistency, it would be beneficial to all religious communities to have access to formal training as regards child protection, with emphasis on being able to recognise signs of abuse in all its forms, and have a knowledge of how to elicit the information while making the child feel safe and how to report such information. Clear guidelines should be formulated to reflect this.	Concealment of allegations of abuse should be made a criminal offence.	Not addressed in witness statement.	Not addressed in witness statement.

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Evangelical Alliance (EA)	<p>EA is generally supportive of the current system of vetting and barring. The current system is not particularly onerous, and the portability of DBS checks is helpful. The main issue is the lack of definition relating to who should be checked and at what level.</p> <p>EA considers that the term 'regulated activity' is not sufficiently clear. The guidance seems to have been designed with workplace and educational settings in mind.</p> <p>EA is supportive of the idea that there should be checks on the minister or staff members ultimately responsible for a regulated activity.</p>	EA is registered as a charity.	<p>In EA's view, the CC is as well placed as any statutory body to understand the nature of religious organisations, and is reasonably effective in this role. In EA's view, the CC is currently well respected and broadly commands the trust and confidence of EA's evangelical constituency members.</p> <p>Difficult for EA to make a categorical assessment of specific strengths/weaknesses of CC as a regulator in relation to child protection arrangements. However, a number of members have mentioned to the EA experiences of delayed response time and lack of support from the CC when contacted.</p> <p>The CC would benefit from better funding to enable it to discharge its current obligations with greater efficiency.</p> <p>Charities are already under significant regulatory burden and requirements on trustees increase year on year. Rather than introduce more codes, public resources would be better invested in properly resourcing the CC to provide helpful,</p>	<p>The focus should be on the nature of the work rather than on the religious settings. It is difficult to see how compulsory policies, qualifications or training could sufficiently reflect the diversity of roles within faith-based organisations.</p> <p>The EA has sought to work with the Ministry of Housing, Communities and Local Government on a package of training for faith leaders that includes child protection. EA raised the concern that 'faith leader' is a broad term and that there is a wide variety of roles of responsibility within faith groups.</p> <p>In light of the diversity of faith communities in the UK, a common set of policies, training and qualifications may be difficult to establish and coordinate. There may be merit in considering core modules that are applicable to all settings, and specific modules that relate to education, sporting or religious settings.</p>	<p>EA would be supportive in principle of moves towards mandatory reporting of allegations, but would have concerns as to how this is practically defined and applied across all aspects of civil society. Do not believe that religious leaders should be treated any differently in this regard from other leaders.</p> <p>Regarding mandatory reporting of suspicions of abuse, this is a more fraught area as suspicions are by definition more subjective. EA would be supportive of clearer guidance for all volunteers and staff as to how to respond to suspicions.</p> <p>Concealment of child sexual abuse following an admission or an internal disciplinary finding should be a criminal offence. There are practical concerns in defining who would be covered by this offence.</p>	<p><i>Working Together</i> lays a strong foundation from which all organisations can together work to safeguard children.</p> <p>While not directly applicable to charities and/or religious organisations, <i>Keeping children safe in education</i> sets out important best practice, particularly in the area of safer recruitment.</p>	<p>System of registration and inspection of religious settings that provides for those under 18 could be deeply problematic:</p> <ul style="list-style-type: none"> <li>i) Nature of religious organisations and settings vary widely.</li> <li>ii) Discriminatory to treat religious organisations and other civil groups differently.</li> <li>iii) Would become a de facto requirement to register with the state to practise one's faith.</li> </ul> <p>Definition of 'setting' within the Code was unclear. Core problem with the Code as currently drafted is that it fails to distinguish between how large/small settings fulfil their obligations.</p> <p>Code conflates issues of child protection with contested issues like extremism/fake news. These terms should be removed.</p> <p>Not in favour of a mandatory code.</p>

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Evangelical Alliance (EA) - continued			<p>tailored, specific guidance on charities' existing legal obligations and how trustees should comply, and in clarifying the current DBS regime.</p> <p>There should be consistent and equal treatment by the state of all charities and civil society organisations. Religious organisations should be subject to the same standards and rules as all other groups in civil society.</p> <p>EA does not think that auditing or inspection by an external body is a good idea.</p> <p>EA has not seen evidence that a further statutory regulator would necessarily enhance compliance with existing law. Rather, EA is concerned that it might add unnecessary costs and bureaucracy without increasing effectiveness.</p>				

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<b>The Federation of Synagogues (FoS)</b>	<p>The key challenge in vetting and barring is that FoS is unable to vet people running activities involving children, because they do not do it frequently enough – eg someone who runs a children's service every other Shabbat (Saturday) morning for less than an hour does not meet the threshold for regulated activity, even if they do it all year round. In such cases, FoS encourages synagogues to take other measures, eg ensuring parents of the children or other adults are present, and making sure doors, windows and blinds are open so others can see and hear what is happening.</p> <p>The definition of 'regulated activity' in relation to children is sufficiently clear for FoS to know who should be checked and on what basis.</p> <p>Those who have pastoral authority over members of a religious organisation should be required to be vetted even if they do not fulfil the requirements of regulated activity. The current system of checking is not excessively onerous on FoS. It may be more problematic for religious organisations that carry out more children's activities. FoS would be happier if the definition of regulated</p>	FoS is a registered charity.	<p>It is difficult to comment on the CC's effectiveness as a regulator of child protection as FoS has had no contact with it on this issue.</p> <p>Registration and inspection of religious settings might help enforce good child protection practice in some cases. Effective safeguarding is more likely to be achieved through supporting religious communities in their efforts to educate their members (particularly staff, volunteers and parents) by raising awareness and encouraging responsibility. The results of efforts achieved through collaborative working with the community, rather than through an attempt to impose this from the outside, will be most effective in achieving lasting change in community attitudes and practices.</p> <p>It is difficult to envisage what type of external auditing or inspection body would be best placed to succeed. A close understanding of and sensitivity to the particular institutions and communities being</p>	<p>FoS would find general training materials on identifying and preventing child sexual abuse, model policies and Q&amp;A sheets to be useful. Updates as to best practice progress would also be helpful. Ideally they would come in a format that religious communities could modify to accommodate their specific cultural sensitivities.</p> <p>A common qualification for all faith leaders may be of some use. It should not be mandatory as it would not be necessary for faith leaders whose congregations do not include children. If such a qualification became available, resourcing for the training would be helpful. There will likely be content that is common to all faiths, probably the more practical parts such as implementation. There might not be many specifically religious issues that apply across all faiths.</p> <p>All staff working in religious organisations should be made aware of their organisation's safeguarding policies, and how to apply these policies in their roles.</p>	<p>There is an obvious imperative to encourage everyone – not just religious leaders – to refer suspicions and allegations of child sexual abuse to statutory authorities. FoS fears that requiring religious leaders to report these matters will have the unintended consequence of deterring complainants, victims and survivors from disclosing them to their religious leaders. If someone is not yet ready to go to the authorities, but needs to confide in their Rabbi, they will be reluctant to do so if they know the Rabbi is required by law to report their conversation. This closes off a route to pastoral care for the victim. It also means that the Rabbi may remain unaware of the situation in their community and will thus be unable to take measures to prevent the perpetrator from continuing to abuse, or to bring them to justice.</p>	<p>FoS has not used <i>Working Together or Keeping children safe in education</i>.</p> <p><i>Working Together</i> is extensive; a shorter summary document would be more useful to an organisation like FoS.</p>	<p>The DfE's proposed voluntary code for child protection in out-of-school settings, which includes those providing religious and cultural tuition, is a useful tool to help educate people in providing services for children in out-of-school settings in the basics of child protection.</p> <p>The code should not be compulsory. Some small-scale tuition providers will find the advice an effective guide but may not have the resources to implement the code fully.</p>

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The Federation of Synagogues (FoS) - <i>continued</i>	activity was altered so that people working regularly with children for fewer hours could be vetted.		<p>inspected would be crucial, so this suggests a body of a religious nature. Even for the relatively modest numbers in the UK Jewish community, it would be difficult to set up such a body that would be accepted by the range of institutions with their various religious and cultural traditions and practices.</p> <p>Many religious organisations are registered charities and have mandatory standards, policies and practices. It is worth considering whether all religious organisations should be subject to these, regardless of charitable status.</p>	<p>Those who work with children and young people and those in positions of authority should have more detailed training.</p> <p>This should apply to volunteers as well as staff. Those working with children should be trained in how to recognise signs of child sexual abuse, how to respond to issues that may be raised and who to report them to.</p>	FoS would be against making concealment a criminal offence for religious leaders.		



Organisation	Experience of the disclosure and barring regime	Charity Commission (CC) registration	Charity Commission (CC) and possible regulation	Common standards and common training	Mandatory reporting	Statutory guidance documents	Regulation of out-of-school settings
General Assembly of Unitarian and Free Christian Churches (GAUFCC)	<p>GAUFCC faces little in the way of challenge when it comes to DBS checks. There is capacity to manage the process (in the form of the Lead Recruiter). The support offered by thirtyone:eight is very good. Potential volunteers understand the need to carry out DBS checks.</p> <p>Within the wider membership, issues arise when safeguarding leads are not sufficiently informed of best practice and the need for DBS checks. Some safeguarding leads are uncomfortable asking volunteers to undergo checks, especially when there is a longstanding relationship with the volunteer. Some see the process as bureaucratic and may be intimidated by the official systems/process. It can generally be seen as an onerous step and is not typically framed in a way that motivates people to do it.</p> <p>GAUFCC recommends that the term 'regulated activity' could be defined simply as 'any activity which involves supporting children and vulnerable adults'. It is easier to understand. All those who meet the definition should be subject to vetting checks – clear and simple for volunteer safeguarding leads to understand.</p>	<p>Yes, since 1967.</p> <p>Most members have excepted status.</p>	<p>GAUFCC has had no interactions with the CC in relation to child protection. It thus feels unable to comment on the effectiveness of the organisation as a regulator on child protection issues.</p> <p>In principle, the GAUFCC is open to the idea of religious settings being inspected in relation to best practice in protecting those under 18 from child sexual abuse.</p> <p>Ideally, GAUFCC would like any regulation to be carried out by a body independent of any particular faith/religious/spiritual group. That body should have a good understanding of faith communities more generally and the particular challenges they face.</p>	<p>GAUFCC sees upstream investment in education and training on child protection matters for religious organisations as a greater priority than setting up an inspection regime. Many religious organisations are heavily dependent on volunteers who may not know what child protection best practice looks like.</p> <p>GAUFCC would be highly supportive of, and welcome, any additional training in relation to child protection. GAUFCC feels that its members would benefit from such training. Ideally these training programmes would go beyond simply informing on best practice in relation to child protection but also include information on safeguarding vulnerable adults. It would be important not just to think about training materials but also how such training would be implemented.</p> <p>GAUFCC is not opposed in principle to the idea of minimum standards. For many small congregations additional standards may feel onerous to the volunteers running them, and if the processes involved in meeting the standards are not simple and streamlined,</p>	Not addressed in witness statement	<p><i>Working Together and Keeping children safe in education</i> are useful starting points in adopting best practice in keeping children safe. However, the documents are very long and understanding them requires the reader to be competent. A more useful approach would be to produce a number of short videos that could be viewed online.</p> <p>The voluntary safeguarding code of practice is a much better document in that it is shorter and easier to understand. Again, it would be useful to have an online video library of some kind with quick guides on the various areas discussed in the document. It would also be useful to have model documents that users could download and adapt according to their needs.</p>	See previous column.

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General Assembly of Unitarian and Free Christian Churches (GAUFCC) – <i>continued</i>	Face-to-face provision may help guide volunteers through the DBS process. There is an assumption that safeguarding leads have the literacy/IT levels to access DBS. This is not always the case.			<p>it may mean they cannot manage the additional workload. It may help if funds are made available to help organisations improve their policies and procedures.</p> <p>GAUFCC considers that those working in religious organisations or settings should only be required to undergo some form of compulsory child protection training if their roles involve them working with children. General awareness training may be helpful for all, however.</p>			
Green Lane Masjid and Community Centre (GLMCC)	Not addressed in witness statement.	Yes – GLMCC is a company limited by guarantee and is registered with the CC.	There could always be improvements in respect of regulation of child protection within religious organisations. This needs to be balanced to ensure we do not create endless bureaucracy and paperwork that does not better the situation and that puts undue strain on faith institutes, particularly small organisations that already find it hard to operate with limited resources.	<p>GLMCC would find the following useful:</p> <ul style="list-style-type: none"> <li>• A common set of training materials for all religious organisations and settings on identifying and preventing child sexual abuse.</li> <li>• A model set of policies on managing child protection and dealing with allegations.</li> <li>• Some form of compulsory training for those working with children, with clarity around who should be checked and on what basis. The training could also act as a form of vetting individuals.</li> </ul>	It should be compulsory for religious leaders/ those in positions of responsibility in religious communities to refer allegations or suspicions of child sexual abuse to statutory authorities, and concealment of such abuse should be a criminal offence.	The content of <i>Working Together</i> and <i>Keeping children safe in education</i> should provide adequate guidance concerning the duties and responsibilities of religious organisations.	The content of the DfE consultation on managing out-of-school settings and its proposal regarding the introduction of a voluntary code for such settings seem quite comprehensive.

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Guru Nanak Gurdwara Smethwick (GNGS)	Not addressed in witness statement.	Yes, since October 2013.	Not addressed in witness statement.	<p>Trustees working within a religious organisation or setting with children should be required to undergo compulsory safeguarding training. It would be beneficial for organisations to roll out sessions in different languages if required.</p> <p>A common set of training materials for religious organisations on identifying and preventing child sexual abuse would be helpful to GNGS. A model set of policies on managing child protection and dealing with allegations, together with a model set of Q&amp;A sheets dealing with common issues in respect of child protection, could also be a good idea and would likely be a useful reference point for GNGS in the event that it was faced with allegations.</p> <p>A model set of policies may not suit the mould of all religious organisations. Different religious organisations are governed in different ways. Some are hierarchical. Even across the same faiths, different organisations may operate differently.</p>	Not addressed in witness statement.	Not addressed in witness statement.	The DfE's proposal to introduce a voluntary code for out-of-school settings is a good idea. The introduction of such a code would provide organisations with reference material for how to operate in accordance with best practice to ensure that children who participate in activities in out-of-school settings do so in a place that is safe for them. At the same time, it would not be overly cumbersome and would allow flexibility for organisations to implement their own child protection practices in a way that complements their belief system.

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Islamic Cultural Centre and London Central Mosque (ICC and LCM)	Enhanced DBS checks should be available as a minimum to those with access to children and vulnerable individuals.	ICC and LCM are registered as a charity with the CC as the LCM (Algame) Fund.	<p>The CC's role as the registrar and regulator is to ensure that registered charities have charitable aims that are for the public benefit. The CC is not a regulator in terms of religion itself or how faith is taught. As such the CC cannot make subjective or value judgements as to the truth or worth of religion or religious belief. Nor can it regulate how centres are run.</p> <p>As far as ICC is aware, the CC as a regulator does not have any measures or procedures in place to monitor any issues relating to child sexual abuse. This is most likely due to lack of resources available.</p>	<p>Given the limited resources available to the organisation it would be helpful if there was a common set of training materials available for all religious organisations and settings on identifying and preventing child sexual abuse. Once in place, compliance should be mandatory. An effective way of monitoring compliance would be for there to be spot checks.</p> <p>In addition to a set of training materials it would be helpful if a model set of policies was provided in relation to managing child protection and dealing with any allegations made. It is important that all individuals with access to children and vulnerable individuals should have the necessary training to avoid any situation where allegations of abuse can arise.</p> <p>There is no reason why a certain minimum standard should not be in place on a mandatory basis.</p> <p>All religious organisations would benefit from a common set of training materials on identifying and preventing child sexual abuse.</p>	Not addressed in witness statement.	<i>Working Together and Keeping children safe in education</i> provide some helpful advice to religious organisations.	Not addressed in witness statement.

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<b>Liberal Judaism (LJ)</b>	<p>LJ has some specific issues relating to vetting and barring with overseas volunteers. The current law in Israel is that it is not legal to ask a woman to be vetted and this means that we cannot get DBS checks for female Israeli staff on tour. LJ is working with other diaspora organisations to pressure the Israeli government to change the policy.</p> <p>LJ finds the definition of regulated activity to be unclear and unhelpful when it relates to youth workers. LJ would like a change in the law to reflect that youth work offers opportunities for privileged access to young people. LJ considers that anyone with pastoral or spiritual authority should be subject to vetting checks, with no exceptions, regardless of the current boundaries of regulated activity.</p>	LJ is a company limited by guarantee and is a registered charity.	LJ believes that the CC has the potential to regulate practice within the religious charity sector by offering support to check policies and procedures. LJ's perception of the current situation is that more funding and expertise is required.	LJ would find common training materials, resources, policies and procedures helpful. LJ would also support a common qualification for all leaders in faith settings, which should consider the variety of environments – from one-to-one tuition to large religious schools – and be renewable every three years. There should be compulsory training for all staff and volunteers in religious settings.	LJ believes that it should be mandatory for religious leaders or those in positions of authority to refer allegations or suspicions of child abuse to statutory authorities and that concealment of such should be a criminal offence. LJ would go further and say that this should apply to all staff and volunteers if child abuse is to be tackled properly and consistently.	Not addressed in witness statement.	LJ supports the idea of a registration system for religious settings, organised by a governmental body. LJ would also support the introduction of a code relating to child protection. LJ believes that the role of this body should be to offer guidance and support and to keep best practice current.

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Masorti Judaism (MJ)	<p>Two key challenges regarding DBS checks:</p> <ul style="list-style-type: none"> <li>Smaller, less formally constituted communities struggle with the administrative burden. MJ aims to address this challenge in the future by offering these small communities a vetting service through MJ.</li> <li>MJ does not have a centralised information-sharing system to prevent individuals barred by one synagogue being taken on by another. MJ plans to resolve this by setting up appropriate information-sharing processes in the context of a movement-wide safeguarding policy.</li> </ul> <p>MJ does not have concerns over the current system of vetting and barring, and considers it to be suitable for the needs of religious organisations. The definition of regulated activity seems to be sufficiently clear. People who have pastoral authority over members of a religious organisation should be the subject of vetting checks, even if they do not fulfil the requirements of 'regulated activity'.</p>	<p>MJ is a registered charity and a company limited by guarantee. Registered since 2006.</p>	<p>MJ has not had any interaction with the CC in relation to child protection. Given this, MJ is not in a position to comment on whether the CC has an understanding of religious organisations and settings, the CC's strengths and weaknesses as a regulator, or whether the oversight provided by the CC in respect of child protection is sufficient. It is important that the CC has a good understanding of the religious settings it regulates.</p> <p>Child protection within the faith sector currently seems to be under-regulated. Some form of registration and light-touch inspection would be helpful. Any regulatory scheme needs to take account of the following:</p> <ol style="list-style-type: none"> <li>It should be attuned to the wide variation in size of religious organisations and, in consequence, the widely varying levels of resources they are able to devote to safeguarding. In particular, any regulatory regime should be careful not to impose unmanageable administrative burdens on smaller, volunteer-led organisations.</li> </ol>	<p>MJ would find the following useful, so long as they were relevant to the specific organisational culture of MJ's communities:</p> <ul style="list-style-type: none"> <li>a common set of training materials for all religious organisations and settings on identifying and preventing child sexual abuse;</li> <li>a model set of policies on managing child protection and dealing with allegations;</li> <li>a model set of Q&amp;A sheets dealing with common issues in respect of child protection;</li> <li>a common qualification for all faith leaders to undertake on child protection within a religious organisation.</li> </ul> <p>MJ agrees that religious organisations should be subject to certain minimum standards and certain mandatory practices and policies. MJ considers these should be: a light-touch framework that should relate to basic rules for how young people should be treated within religious settings; procedures for dealing with and reporting allegations of child abuse; recruiting, vetting and barring of staff; record keeping and information sharing; and training of staff and volunteers.</p>	<p>MJ considers that it should be compulsory for religious leaders or those in positions of responsibility in religious communities to refer allegations or suspicions of child sexual abuse to statutory authorities. MJ has not taken a position on whether failure to report should be made a criminal offence.</p>	<p><i>Working Together</i> is not suitable for voluntary and religious organisations – the vast majority of the document relates to statutory organisations and presents information at a level of technical detail that is unlikely to be of use to practitioners in the voluntary and religious sector, particularly within smaller organisations.</p> <p>The document <i>Keeping children safe in education</i> is, despite being intended for the education sector, a far more useful guide for voluntary and religious organisations. We would find a reworked version of the document specifically aimed at voluntary and religious organisations very useful.</p>	<p>MJ agrees that there needs to be a code in respect of child protection in out-of-school settings, and believes that the current proposals in the DfE consultation are adequate. In line with MJ's position that some form of appropriate regulation and inspection regime should be introduced, it seems reasonable that such a code should be compulsory and should form the standards against which any inspection ought to be carried out.</p>

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Masorti Judaism (MJ) – <i>continued</i>			2. Whether any proposed auditing or inspecting body is internal or external to the religious community, it needs to have a thorough understanding of the nuanced, culturally specific factors relevant not only to faith groups overall but to particular subsections of these faith communities. This will require deep, thorough partnership with representatives of the faiths being audited and inspected.	Those working with young people in religious organisations/settings should be required to undergo some form of mandatory training. This should relate minimally to basic rules for how young people should be treated within religious organisations and settings, and procedures for dealing with and reporting allegations of child sexual abuse. There should be the option to carry out this training internally or choose an external training organisation that understands the needs and cultural context of the trainees.			

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<b>The Methodist Church in Great Britain (MCGB)</b>	<p>There are a number of challenges MCGB faces in relation to DBS checks:</p> <ul style="list-style-type: none"> <li>Looking back over past behaviour can appear to run contrary to the theology of forgiveness, which may prove challenging for some in local churches.</li> <li>Given the volume of checks required, it is challenging to ensure consistent and legitimate decision-making is applied, both to the level of check and the risk assessment of any circumstances.</li> <li>The majority of DBS applications are completed not by HR specialists but by ministers or volunteers who complete the online application and verify documents. Despite the guidance issued by both Due Diligence Checking Ltd (DDC) and the DBS, it is a complex process and not ideally suited to the volume of applications required by an organisation that relies so heavily on volunteers.</li> <li>Anxiety about information-sharing: some employers are anxious about passing on DBS certificates, even with the consent of the applicant – especially post General Data Protection Regulation (GDPR).</li> </ul>	Yes.	<p>MCGB's current requirements of safeguarding training and its procedures give it confidence that work with children is well organised and supervised. MCGB would not resist external inspection but it would support the implementation of a system that is proportionate to the diversity of children's provision and that recognises the small size and scale of activities, often run by volunteers.</p> <p>A regulatory framework might be helpful in developing and improving safeguarding across religious organisations. It might help provide a focus for audit work and permit improved cooperation between statutory and non-statutory organisations through an understanding of common standards and expectations. Any regulatory framework should be built on a foundation of assisting and encouraging religious organisations to develop their practice with due regard to the size of the organisation and its resources, in terms of expectations and the time frame to implement changes.</p>	<p>MCGB does not consider that a common set of training materials across faith groups would enhance current training provision. While much of MCGB's training would be similar to other religious and non-religious organisations working with children, the advantage of its bespoke training is that it references the Methodist structures and governance arrangements. This helps to set the context within which children's work is undertaken and how concerns can be raised.</p> <p>MCGB's current provision of Foundation and Advanced training might be a good model for other faith organisations, with content appropriately adapted.</p> <p>As regards common training, consideration could be given to subjects that go beyond familiar forms of abuse, eg online bullying and grooming, mental health in young people, the Prevent agenda, female genital mutilation (FGM), the impact of gang membership, contextual safeguarding, peer-on-peer abuse, child sexual exploitation, LGBTQ+ safeguarding concerns, county lines drug dealing, and modern slavery and human trafficking.</p>		<p><i>Working Together:</i> MCGB safeguarding policy makes direct reference to <i>Working Together</i>.</p> <p>There is a more extensive entry about voluntary organisations in the faith community in <i>Working Together 2018</i> than there was in the previous version. However, voluntary organisations are still a secondary focus in the guidance in comparison with statutory agencies, in terms of responsibilities and involvement.</p> <p><i>Working Together 2018</i> requires those who work with children and families to report suspected abuse to the local authority. This guidance is highly valued by safeguarding officers within the church. It provides a requirement for appropriate arrangements to be put in place in voluntary, charity and faith-based organisations.</p>	<p>In July 2019, those involved in youth work in MCGB were invited to participate in a consultation regarding the DfE Code.</p> <ul style="list-style-type: none"> <li>82% of respondents were in favour of the introduction of a voluntary code.</li> <li>86% of respondents were positive about the scope of issues covered in the draft.</li> </ul> <p>Opinions were divided on whether the code should be compulsory.</p> <ul style="list-style-type: none"> <li>34% were fully supportive and identified that this would raise standards.</li> <li>46% were very concerned about the impact of a compulsory code, worrying that small, voluntary groups would be the hardest hit.</li> </ul>



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The Methodist Church in Great Britain (MCGB) - <i>continued</i>	<ul style="list-style-type: none"> <li>There are sometimes concerns about the scope of 'regulated activity' and the application of the DBS requirements. It would be helpful if the frequency criteria were removed from the test, and a similar approach was applied as in place for vulnerable adult checks.</li> <li>Some safeguarding officers feel strongly that those who direct and manage safeguarding operations should also be subject to the highest levels of checks. Under current regulations, in most cases this is not possible as they do not have sufficient direct contact with those in vulnerable groups.</li> <li>While there are provisions for checks for certain roles, such as trustees of children's charities or governors, these do not seem to envisage faith charities or multi-charity organisations where some of the smaller charities may or may not be engaging with children.</li> <li>There is a need for greater clarity regarding a variety of terms, eg 'supervision' and 'day-to-day management'. What is the proximity of supervision envisaged for regulated activity: in sight throughout the day, occasional oversight during a day, or line</li> </ul>		Any inspection regime should be focussed on encouraging learning and providing developmental feedback rather than fear of excessive sanction and public shaming as a first response. Further consultation would be appropriate before introducing any regulatory framework.	<p>Free online resources could be provided to all churches in some key areas by subject experts. Support could be provided to develop more accessible training options via digital platforms. An accreditation process for faith organisation training to accompany required standards might encourage participation through professional recognition of skills development.</p> <p>Any proposal for a common qualification for faith leaders would need to have clear parameters about the level of study and what type of children's work was being envisaged. Requiring those who are already skilled and trained to undertake an additional general qualification may be hard to justify. A leadership qualification could be focussed towards organisational risk management and decision-making related to safeguarding incidents.</p> <p>MCGB has procedural and policy standards in the following areas and would suggest these might be useful minimum standards for other faith organisations:</p> <ul style="list-style-type: none"> <li>i) safer recruitment for staff and volunteers;</li> <li>ii) training;</li> </ul>		<p>However, as regards the role of MCGB when working in partnership with statutory agencies, the guidance states that they "can be asked to cooperate with local arrangements". This results in some districts having extensive involvement and effective interaction with multi-agency public protection arrangements (MAPPAs), but it can vary significantly from district to district. There needs to be a recognition of the growing professional nature of safeguarding within religious environments, particularly in the management of those who present a risk and an expectation that agencies will work with those from faith groups as equal partners.</p> <p><i>Keeping children safe in education</i>: Valuable source of practical guidance. The document is written in an accessible and easy-to-understand style and provides guidance that is not included in other documents,</p>	

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The Methodist Church in Great Britain (MCGB) - <i>continued</i>	<p>management oversight with daily reporting at a distance?</p> <ul style="list-style-type: none"> <li>Churches are places of safety and those in roles such as caretakers or key holders may be viewed as trustworthy. It would be prudent to consider whether checks for all caretakers, key holders or staff who work alone on church premises should be required to be subject to enhanced checks.</li> <li>The use of the update service is limited due to unfamiliarity and limitations in the terms of use. It should be possible to request lesser checks or limit the check to one workforce where the previous certificate covered both. It would also be helpful if the costs of sign up for the update service were reconsidered or an opt-out by exception, rather than opt-in.</li> <li>While processing is usually prompt by DBS, where there are delays, the 60-day waiting period prior to escalation is very lengthy.</li> </ul>			<ul style="list-style-type: none"> <li>iii) supervision and oversight;</li> <li>iv) effective responses to allegations of child sexual abuse;</li> <li>v) risk assessment and management of those who pose a risk within churches; and</li> <li>vi) promotion and development of safeguarding culture within MCGB.</li> </ul> <p>Q&amp;A sheets dealing with common issues may be useful but consideration should be given to using material that is already available.</p>		such as extensive safer recruitment information, advice on safeguarding themes applicable to children and young people, and guidance on homestays and trips away, for example.	

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Muslim Council of Britain (MCB)	No challenges identified in the witness statement.	No. It is not a requirement for affiliates of the MCB to be registered charities, but many are.	The regulatory oversight provided by the CC in respect of child protection is sufficient.  The MCB feels that supplementary schools that work with children in the community in providing religious classes, eg Qur'an evening/weekend classes, need to be regulated. There should be a requirement that they undertake training in child protection, including issues of child sexual abuse. This may be managed through local authorities or by a designated body. There should be a register of all organisations providing organised classes in the community that is accessible to the public.  Religious organisations that can understand the activities of the organisations concerned will be able to work better with them. Thus MCB considers that the organisation should be religious in nature. MCB has the potential to undertake the role so long as funding is available.	MCB believes that carefully produced material that is sensitive in nature and presented in a culturally respectful manner will be beneficial to the community.  Regarding minimum standards, the MCB considers that the minimum standards ought to be DBS checks and the completion of a course that addresses issues of safeguarding and child protection in a position of trust.	MCB believes that it should be compulsory for religious leaders or those in positions of responsibility in religious communities to refer allegations or suspicions of child sexual abuse to statutory authorities, and concealment of such abuse, if an admission has been made/ if there have been internal disciplinary findings, should be a criminal offence.  In the context of the Muslim community, there is a complication in that anyone can appoint themselves as an imam so long as they can justify to the audience their claim. While some institutions will insist on certain religious qualifications, in self-appointed institutions this is more difficult to regulate.	MCB is familiar with the documents. It does not recommend any changes.	MCB believes that, due to the informal nature of these settings, it will be difficult to regulate. Nevertheless, there needs to be a voluntary code in respect of child protection in out-of-school settings that provide tuition. MCB thinks it best to leave it non-compulsory.

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Pagan Federation (PF)	<p>The current system of vetting is clear once understood, but could be better explained and easier to understand on a first reading. PF would support extending vetting checks to those with pastoral authority, even if they are not engaged in regulated activity, although care would be needed with the definition.</p> <p>The current £25 fee for a basic DBS check for volunteers can hit small organisations and their less well-off volunteers hard, particularly if they include their chain of line management or pastoral responsibility as well as those who actually work with children, young people and vulnerable adults.</p>	No, although they wish to hold themselves to the standards required of one. PF have not had dealings with the CC as regards child protection.	<p>PF would be very concerned about regulation of small religious groups or family life beyond general statutory powers to intervene to protect children, young people and vulnerable adults. Regulating families and small groups of friends in this way is difficult, may conflict with human rights law, and carries the risk of victimisation by selective enforcement.</p> <p>PF would also be concerned if legislation or regulation was brought into force in a way that discouraged religious bodies from providing appropriate support to 16–17-year-olds, partly because of the impact on their freedom of religion but also because it could make them more isolated and vulnerable to emotional abuse.</p> <p>PF would support more regulation and guidance for organisations that run residential or other after-school activities for children. In principle, religious settings that provide youth services or religious instruction for those under 18 should register and be subject to inspection by an external body.</p>	<p>In parts of sub-Saharan Africa and other places the term ‘witchcraft’ has connotations of malevolent sorcery and children suspected of being witches are often tortured or killed. This can spill over into the UK where it is often reported as ‘child abuse linked to witchcraft’, which can trigger folk memories of the satanic ritual abuse moral panics of 30 years ago.</p> <p>A document from the DfE dated 2012 contains the title ‘National action plan to tackle child abuse linked to faith or belief’ and contains phrases like ‘abuse linked to witchcraft’. It would help the Pagan community if phrases similar to this in official documents were replaced by something closer to ‘abuse caused by fear of witchcraft’, which would not point suspicion at the Pagan community.</p> <p>PF would find a common set of training materials on identifying and preventing child sexual abuse to be useful and beneficial, as would a model set of policies and information sheets. A common qualification for faith leaders covering child protection would strengthen interfaith dialogue and offer a framework that enabled faith communities to apply best practice in ways appropriate to the nature of the work and activities carried out by each respective community.</p>	<p>PF feels it would be better if those making the allegations or expressing the suspicions referred them to statutory authorities, while accepting that children may need support in doing so, and it is entirely proper for that support to be provided by those in positions of responsibility. Obstructing that process of referral could properly be made a criminal offence. Concealment of an admission or internal disciplinary findings could again properly be made an offence, although care would be needed with the definition.</p>	<p>PF has no issues with <i>Working Together</i> or <i>Keeping children safe in education</i>.</p>	<p>The proposed code appears to be adequate. It should be made compulsory and should extend to religious faith and related cultural or linguistic tuition.</p>

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Pagan Federation (PF) – <i>continued</i>			That body should be independent and, while being sympathetic to religion, it should not be affiliated to any religion.	<p>There should be a mandatory requirement for religious organisations to have a safeguarding policy covering children and young people, with clear guidance on the steps to take if there are concerns and an equally clear decision process and record retention policy, which should be available for independent inspection and audit. Clear guidance on the impact of GDPR and other data protection laws on keeping and retaining records would be beneficial.</p> <p>Compulsory training on child protection for those working in religious organisations would be a good idea, provided there are adequate independent safeguards around its quality.</p>			

Organisation	Experience of the disclosure and barring regime	Charity Commission (CC) registration	Charity Commission (CC) and possible regulation	Common standards and common training	Mandatory reporting	Statutory guidance documents	Regulation of out-of-school settings
Reform Judaism (RJ)	The current definitions of 'frequency' and 'intensity' regarding DBS checks limit who can be checked, and there may be people with pastoral roles or other 'regulated activity' with children who are ineligible for a check. Similarly 'specified establishments' does not apply and again limits who can be checked. Increased flexibility on this would be welcomed.	RJ is a registered charity.	Due to the limited interactions RJ has had with the CC, it does not know if the CC understands the varying nature of infrastructure organisations within faith communities and their relationships with their communities.	<p>RJ would welcome access to common resources for faith and other organisations in order to provide a basis for best practice across faith-based organisations, including training materials, model policies and answers to common questions.</p> <p>Model resources would provide a strong basis for ensuring best practice, and organisations should understand that these models need to be adapted to meet local standards and have ownership over local practices and procedures.</p> <p>RJ would welcome a common qualification for faith leaders, incorporating a solid understanding of safeguarding and abuse, statutory procedures, their role within faith organisations and how to meet the challenges of working within faith communities. Widening the training to lay and professional leaders within communities would be beneficial. Accreditation would be welcomed to ensure consistency. It is important that the system is affordable to ensure even small organisations can access it. Accredited training for DSLs would be welcome. An accredited Train the Trainer programme would be helpful.</p>	Not addressed in witness statement.	Not addressed in witness statement.	The draft Code provides clear and appropriate guidance for RJ and for synagogues, and RJ would welcome its introduction and dissemination.

Organisation	Experience of the disclosure and barring regime	Charity Commission (CC) registration	Charity Commission (CC) and possible regulation	Common standards and common training	Mandatory reporting	Statutory guidance documents	Regulation of out-of-school settings
Religious Society of Friends (Quakers) in Britain	<p>It is a challenge to decide on eligibility of roles for DBS in some cases. Advice from the DBS and the CC has conflicted at times – particularly on the need for checking trustees. The online eligibility tool provided by the DBS is only adequate to answer very basic cases.</p> <p>Challenging to decide what qualifies as ‘regulated activity’. Sometimes volunteers work with children only once a month and thus do not meet the threshold for a check – this is a potential failing of the system.</p> <p>Checks are not sufficiently regular – an offence may not be picked up until rechecking three years later.</p> <p>In summary, “the current rules feel overly complicated and lack clarity, possibly leading to incorrect checks being made”.</p>	<p>Britain Yearly Meeting (BYM) – yes, since 2009.</p> <p>Area meetings: of the 70 area meetings, 49 are registered charities; 21 are excepted because of their low income.</p>	<p>BYM has no routine interaction with the CC and the CC does not place any special requirements on it. Once a year, it has to complete an annual return, which includes confirmation that it has a safeguarding policy.</p> <p>Author of statement’s personal views:</p> <p>The CC’s approach to regulation is onerous and burdensome for small charities. Increase in burden of compliance makes it less likely that trustees can focus on most important issues, eg safeguarding. The CC’s approach tends to be punitive rather than supportive. The CC’s determination in its recent guidance on safeguarding to broaden its definition to ‘protecting people from harm’ (rather than ‘children and vulnerable adults from abuse’) dilutes the important focus on child abuse/abuse of vulnerable adults. The CC’s guidance sometimes uses</p>	<p>Author of statement’s personal views:</p> <p>Do not feel additional minimum standards would be appropriate for religious organisations.</p> <p>Religious organisations should be held to the same standards as other organisations working with children.</p> <p>Diversity of religious organisations would make it difficult to provide a common set of training materials. Would be hard to produce anything that goes beyond high-level materials already available elsewhere. Model set of Q&amp;As dealing with common issues: data protection, information-sharing etc would be very helpful.</p> <p>Common faith qualification unlikely to be appropriate. Requirement for mandatory training is a good idea in principle, but needs to take into account voluntary nature of many roles and be sufficiently tailored to the context to be meaningful.</p>	<p>Author of statement’s personal views:</p> <p>No objection to mandatory reporting: “I would have no objection to making it compulsory for religious leaders to disclose allegations”.</p>	<p>Author of statement’s personal views:</p> <p>Comprehensive statutory documents, eg <i>Working Together</i>, are good, but also needed are short accessible guides, eg for volunteers who only work with children occasionally.</p>	<p>Regarding DfE document on out-of-school settings: it covers areas beyond safeguarding, eg broader Health &amp; Safety matters. While these are important, it is unhelpful to confuse them with safeguarding. It would be difficult to make the Code compulsory – there may be a lack of clarity regarding when each requirement should be applied.</p>

Organisation	Experience of the disclosure and barring regime	Charity Commission (CC) registration	Charity Commission (CC) and possible regulation	Common standards and common training	Mandatory reporting	Statutory guidance documents	Regulation of out-of-school settings
Religious Society of Friends (Quakers) in Britain – <i>continued</i>			terminology that is not clearly defined, eg 'position of trust'.  Regarding registration of non-residential activities: this would be disproportionate – could lead to it taking place outside regulated settings/being withdrawn altogether.				
Salvation Army (SA)	SA considers that the definition of 'regulated activity' is sufficiently clear.	The Salvation Army (Central Funds) Trust is registered as a charity.	SA has a good relationship with the CC with respect to the sharing of information.  SA regards it as important that the CC has an understanding of the nature of the SA. Those SA personnel who interact with the CC consider that the CC is able to ask pertinent questions in order to effectively carry out its work.  SA does not consider that religious organisations or settings should be subject to auditing or inspection by external bodies.	SA does not consider that a common set of safeguarding materials would be beneficial. SA has a comprehensive training suite. The opinion of the Safeguarding Lead is that materials and training should be bespoke and refer to unique governance structures and settings in order to reach the highest standards.  SA would welcome a common quality assurance tool to assist with policy review and a model set of guidance to be considered and incorporated into child protection training, policy and processes.  SA does not consider a common qualification for faith leaders is necessary. SA would support a common quality assessment framework to be applied to training elements.	SA does not support the view that the concealment of abuse if an admission has been made and/or if there have been internal disciplinary findings of such should be a criminal offence.	<i>Working Together:</i> the six paragraphs afforded to the voluntary community and social enterprise (VCSE) faith-based organisations and private-sector organisations appear to be written for the reference of statutory authority personnel.  <i>Keeping children safe in education:</i> the SA considers that safeguarding leads should be familiar with this publication and considers the requirement to implement the safeguarding practice within policy, procedure and processes pertinent to the particular setting.	SA does not consider it necessary for there to be independent registration and inspection of its settings that provide youth services and religious instruction.  SA does not consider there is a need to make the DfE code compulsory.



Organisation	Experience of the disclosure and barring regime	Charity Commission (CC) registration	Charity Commission (CC) and possible regulation	Common standards and common training	Mandatory reporting	Statutory guidance documents	Regulation of out-of-school settings
The S&P Sephardi Community (S&PSC)	Current statutory processes are incompatible with general community/faith settings that are outside of standard education, eg schools. One cannot easily apply for an enhanced DBS check, for example, unless one works in a regulated setting. Therefore, for the general staff in S&PSC who are not in direct contact with children, there is no provision for applying the Enhanced DBS check using the strict criteria currently used for registration.	Yes.	All organisations in which lay leaders, volunteers and/or faith leaders have access to children should be overseen by a statutory body that is able to ensure children are adequately protected and that, when allegations are made or a suspicion of wrongdoing is detected, the victims are listened to and treated with the seriousness that the allegations deserve.	<p>Currently there are dozens of Jewish faith organisations. It would make sense to have a common approach to child protection and safeguarding with a common set of policies and processes and training materials, and even training sessions would be well received if there is a partnership approach. To be able to collaborate at a senior level to share concerns or good practice can only be a more efficient and effective way to operate.</p> <p>From S&amp;PSC perspective, the community would benefit from a common set of training materials and policies. If a qualification was developed that was bespoke to faith leaders and a prerequisite for taking up a post, that would be very welcome.</p> <p>Jewish religious organisations, like other faith organisations, are diverse, uncoordinated and operate separately, with different standards, processes and approaches to dealing with allegations of child sexual abuse. There must be a set of minimum standards, which should be mandatory and subject to checks in the same way Ofsted perform their checks on schools.</p>	<p>The stigma and taboo attached to reporting allegations of child sexual abuse is definitely a problem in some elements of the wider community and other faith groups and absolutely must be addressed.</p> <p>The greatest challenge facing the wider Jewish community is not just the existing umbrella bodies, which still require improvement, but also the unregulated, unmonitored independent settings, and the more extreme religious settings in which there could be a misperception that it is wrong to disclose potential allegations to the authorities because of a misguided interpretation of Jewish law.</p>	Not addressed in witness statement.	Not addressed in witness statement.

Child protection in religious organisations and settings: Investigation Report

Organisation	Experience of the disclosure and barring regime	Charity Commission (CC) registration	Charity Commission (CC) and possible regulation	Common standards and common training	Mandatory reporting	Statutory guidance documents	Regulation of out-of-school settings
The S&P Sephardi Community (S&PSC) - <i>continued</i>				Perhaps the CEOs of all existing religious organisations, many of whom sit on the Jewish Leadership Council (JLC) CEO forum, could form part of a partnership task force in collaboration with local authorities to ensure common standards are being implemented and training is being delivered, and possibly even operate as independent 'inspectors' of other institutions to support the work of the local authority in a similar model to Ofsted and their relationship with Pikuach.			

Organisation	Experience of the disclosure and barring regime	Charity Commission (CC) registration	Charity Commission (CC) and possible regulation	Common standards and common training	Mandatory reporting	Statutory guidance documents	Regulation of out-of-school settings
Triratna Buddhist Order and Community (TBOC)	<p>The centres that TBOC advises are very unclear as to who needs DBS checks and it is not easy to get clear information.</p> <p>TBOC encounters the problem that far too few members of the Order, or those training for ordination, are eligible for DBS checks:</p> <ul style="list-style-type: none"> <li>• Since membership of the Order does not in itself involve working with children, members of the Order in general are not eligible for enhanced DBS checks.</li> <li>• As the ordination training course does not include work with children, those training for ordination are not eligible for enhanced DBS checks. This means that TBOC has no way of screening ordinands.</li> <li>• Although all are eligible for basic DBS checks, these are irrelevant to working with children as they do not include a check of the barred list.</li> </ul> <p>All Order members, and those training for ordination, should be eligible for DBS checks which check for sexual/violent crime, even if they are not necessarily going to be working with children.</p>	TBOC is not constituted as a single organisation. It consists of a number of trusts, centres and retreat centres, most of which are registered charities. These were founded at many different times, from 1967 to the present day.	<p>The law on position of trust should be extended to refer specifically to religious leaders, priests and teachers.</p> <p>External and regular auditing by a Buddhist or multi-faith external body could be very helpful. At present, the only option is to engage an external body such as the Social Care Institute for Excellence (SCIE), which is expensive/not tailored to a Buddhist group. Also, because it is not routine, when engaged it can give the impression that the organisation has a big problem.</p> <p>All religious charities/ places of worship should be recommended to have one or more safeguarding officers and a safeguarding trustee.</p>	<p>Common standards, training materials and model policies and qualifications could be helpful if drawn up by specialists, including Buddhists. Thirtyone:eight provides all these things but they are tailored to Christian needs and there is no parallel Buddhist body. Such standards would need to allow for the enormous variations between Buddhist traditions.</p> <p>TBOC would welcome a programme whereby Buddhists of various traditions could be trained to provide professional safeguarding training (child sexual abuse and adult) and deliver it to Buddhists in traditions other than their own.</p> <p>TBOC would welcome compulsory child protection training for those training for ordination in TBOC, and for any ordained person who teaches under the auspices of a TBOC charity. It would be impracticable to institute compulsory training for all those working in TBOC organisations or settings, as there are so many – working in so many ways – ranging from volunteers</p>	<p>It should be compulsory for TBOC leaders/those in positions of authority to report allegations, suspicions, disclosures or confessions of child sexual abuse to the TBOC safeguarding team, and for the team to report the matter to the external authorities.</p> <p>However:</p> <ul style="list-style-type: none"> <li>• The welfare of the child must come first and there must be provision for protecting their identity.</li> <li>• TBOC's safeguarding team reports all confessions, disclosures and suspicions to the police. But there is no agreement presently among the Order members more generally regarding what should be done when someone makes a formal confession regarding child sexual abuse – this is because many believe in the sanctity of the confessional.</li> </ul>	<i>Working Together</i> and <i>Keeping children safe in education</i> are the basis for all TBOC's safeguarding policies, practices, processes and advice.	The voluntary draft code is a useful checklist but needs to be rewritten to make it more directly relevant to faith groups. TBOC is not sure how useful it would be to make it compulsory – or what that would mean – given that TBOC already has safeguarding policies that cover the same material.

Organisation	Experience of the disclosure and barring regime	Charity Commission (CC) registration	Charity Commission (CC) and possible regulation	Common standards and common training	Mandatory reporting	Statutory guidance documents	Regulation of out-of-school settings
<p><b>Triratna Buddhist Order and Community (TBOC) - <i>continued</i></b></p>	<p>TBOC observes that many people, particularly newcomers, can look up those who are ordained, and that simply being ordained tends to give others who are much less experienced the impression that one is totally trustworthy in every respect. This is wide open to misuse by a few.</p> <p>Currently, the CC expects that everyone who is eligible for a DBS check will actually have one. So if all Order members are made eligible, the CC will have to allow for the fact that some of them do not actually need to have one, ie if they have no public or teaching role.</p> <p>All religious leaders and teachers, priests, ministers, etc should be eligible for enhanced DBS checks whether or not they are working with children, but only expected to have them if they have public or teaching roles.</p>			<p>who clean Buddhist centres to those who are trustees.</p>	<ul style="list-style-type: none"> <li>• There is a particular challenge where someone confesses to viewing indecent images of children, given the seriousness of this non-contact offence is underestimated and the criminal justice system does not yet offer a range of responses that discriminate between a one-off user and a habitual user. Rather than referring such cases straight to the police, it would be helpful to refer those confessing to viewing such images for psychological assessment by an external body that could then recommend either psychological treatment or referral to the police, eg the Swedish model.</li> <li>• There would be value in exploring how people who have a sexual interest in children, but who have not acted on it, can seek confidential support/therapy/guidance, eg the Dunkelfeld Project in Germany.</li> </ul>		

Organisation	Experience of the disclosure and barring regime	Charity Commission (CC) registration	Charity Commission (CC) and possible regulation	Common standards and common training	Mandatory reporting	Statutory guidance documents	Regulation of out-of-school settings
Union of Orthodox Hebrew Congregations (UOHC)	Not addressed in witness statement.	The UOHC is a company limited by guarantee and registered as a charity in October 2014.	<p>UOHC does not believe that regulation necessarily equates with compliance. Regulations could result in:</p> <ul style="list-style-type: none"> <li>• some provisions being driven out of existence because regulation is too daunting or costly for the organisers;</li> <li>• some provision continuing to exist but finding ways of escaping regulation, for example avoiding regulatory thresholds;</li> <li>• some provision evading the eye of the regulator and operating beneath the radar; it becomes much more difficult to engage such provision.</li> </ul> <p>The above are potential unintended consequences of regulation that is enacted without willingness of participants. That is why UOHC advocates a 'supportive approach' that persuades community settings of the importance of safeguarding. UOHC notes that, without 'buy in', regulation can be very perfunctory – paper-based compliance that has little meaningful impact on real safety.</p>	UOHC is not clear what benefit may arise to community settings by registration and a set of policies, resources or training specifically aimed at religious settings. Religious groups vary so greatly that UOHC questions the feasibility or usefulness of common standards. A wide range of resources already exists and communities can work with and adapt these resources to meet specific needs.	Not addressed in witness statement.	Not addressed in witness statement.	Not addressed in witness statement.

Organisation	Experience of the disclosure and barring regime	Charity Commission (CC) registration	Charity Commission (CC) and possible regulation	Common standards and common training	Mandatory reporting	Statutory guidance documents	Regulation of out-of-school settings
Union of Orthodox Hebrew Congregations (UOHC) – <i>continued</i>			UOHC believes that a supportive approach towards communities will be more productive than regulation.  Unable to comment on the role of the CC in regulation of child protection in religious settings.				
United Reformed Church (URC)	<p>The main challenges faced by URC in ensuring vetting and barring are within some of the local churches:</p> <ul style="list-style-type: none"> <li>This includes a reluctance to increase bureaucracy for those who are volunteering their time, and a genuine belief among some that ‘those horrible things could not happen here’.</li> <li>There is a tendency in some places to allow the familiarity of knowing a person for a considerable period of time to blind the congregation to potential risk.</li> <li>A desire in a community to forgive and to encourage new beginnings can increase risks if it thereby ignores the possibility of future offence or harm.</li> <li>Another challenge is the belief that undertaking a DBS check is sufficient to establish whether someone is ‘safe’ to work with children.</li> </ul>	<p>Yes, URC Trust is a registered charity. It was registered in 2009.</p> <p>Not every local congregation is a registered charity, but a large number of them are. All synods in England and Wales are registered charities.</p>	<p>URC considers that the current arrangements in respect of the regulation of child protection in religious organisations and settings are adequate.</p> <p>URC would be in favour of self-regulative arrangements, backed up by an audit framework from an external independent body. That would allow the Safeguarding Advisory Group (SAG) to review URC’s practices at a denominational level on a regular basis in alignment with URC’s updated safeguarding policy. The reason URC argues for a denominational approach reflects the diversity of practice at the synod level and the limited resources at the local church level.</p> <p>It is important that the framework on which URC evaluates its child protection practices</p>	<p>URC cannot comment on what other religious organisations should adhere to. But URC believes that some basic standards can enable each religious community to get child protection and safeguarding work right.</p> <p>An independent body (see previous column) could be a source of information sheets, procedures, training and awareness-raising material regarding identifying and preventing child sexual abuse tailored to the particularities of the religious settings. A common set of training materials for all religious organisations and settings could be valuable if they are workable and provide specific standards across all denominations, and encourage local churches and faith communities to pay more attention to child protection.</p> <p>A common qualification on child protection for all</p>	<p>URC considers it should be compulsory for religious leaders or those in positions of responsibility in religious communities to refer allegations or suspicions of child sexual abuse to statutory authorities.</p> <p>URC considers that concealment of child sexual abuse should be a criminal offence if an admission has been made and/or if there have been internal disciplinary findings of such abuse having taken place.</p> <p>URC is supporting a change in legislation relating to ‘positions of trust’ within the Sexual Offences Act 2003 to extend the definition of positions of trust and include religious leaders and children’s and youth workers.</p>	<p>Statutory guidance documents provide guidance on the duties and responsibilities of URC.</p> <p><i>Keeping children safe in education</i> does not apply directly to URC.</p> <p>It does apply to the 13 schools associated with URC, which are state-funded or independent schools subject to relevant regulatory authorities. URC expects that schools have regard to it when carrying out their duties to safeguard and promote the welfare of their students. As a denomination, URC has paid attention to the statutory guidance for schools and colleges because it contains useful information in</p>	<p>The proposals set out in the DfE consultation in respect of child protection are adequate. The code is both clear and helpful. URC did not identify anything in the code that was missing or needs major adaptation. URC liked the clear indications of what needs to be done in the summary of each section. It was a useful document for school support officers, children’s social care and local churches in general to take advice in setting up and reviewing their safeguarding policies, practices and arrangements, including health and safety and governance.</p> <p>URC considers that the voluntary safeguarding code of practice should not be compulsory. URC is positive in using and making this code available in its churches, once the final document is available, and providing them with further guidance on how they can integrate the code in their particular settings.</p>

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United Reformed Church (URC) - continued	<p>As regards the current system of vetting and barring:</p> <ul style="list-style-type: none"> <li>URC considers that the definition of 'regulated activity' is clear and helpful in setting up safer recruitment as well as vetting, disclosure and barring checks arrangements.</li> <li>In the religious context of the URC community, there are only some concerns about checking those few people who might not meet the threshold for carrying out a regulated activity, or who would have no direct engagement with children but are perceived as being in a position of trust and responsibility by members of the public. URC would therefore favour a system that enables each religious organisation to require people in certain roles to be the subject of vetting checks, even if they do not fulfil the requirements of 'regulated activity'.</li> <li>URC does not consider the current system to be onerous.</li> </ul>		<p>and procedures is robust and rigorous. It would be helpful if the auditing organisation understands the ethos and the structures of religious organisations and settings.</p>	<p>faith leaders within a religious organisation would be an incentive to raise their understanding of their duties and responsibilities to safeguard children in all activities that involve their spiritual development and education.</p> <p>As to whether the training should be compulsory, URC considers that each religious organisation should be able to decide on what is regarded as compulsory for their staff and volunteers with respect to their own organisational cultures, theologies, traditions and the roles and responsibilities that people are expected to carry out. URC considers the role and the potential of a role to engage in regulated activities with children (or adults at risk) as the key determinant on who is required to undergo compulsory training.</p> <p>All those working with children, as well as those responsible for their care, need to know how to work in a way that promotes the welfare of those children and reduces the likelihood of harm.</p>		<p>relation to eg dealing with sexual violence, harassment, unsupervised access and safer recruitment.</p> <p><i>Working Together 2018</i> sets out specific duties for faith-based organisations. URC's main safeguarding policy and guidance document draws extensively on <i>Working Together 2015</i>. The updated version follows the more recent guidance in <i>Working Together 2018</i>. URC's guidance clearly addresses inter-agency and multi-agency working, including the role of the faith sector in the protection of children. The guidance assumes that all faith-based organisations will be subject to charity law and regulated either by the CC or other 'principal' regulators. However, many faith-based organisations (eg small URC local congregations) might not be registered charities and have limited resources.</p>	

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United Reformed Church (URC) - continued				They also need to know how to respond effectively to concerns or allegations of abuse. It is important that safeguarding training emphasises the moral and legal commitments on people to act and protect children.		URC does not want to add more burden on its local churches.	
United Synagogue (US)	Given the varying roles of volunteers and the variety of tasks volunteers deal with, it is challenging to be sure that all those who do come into contact with children are DBS checked. One challenge is the fact that many volunteers will be substituted by another person at short notice on a temporary basis, and it is therefore difficult to monitor all those playing some volunteer role in the synagogue.	Yes – the US is registered with the CC.	Not addressed in witness statement. “With regard to future regulation and the state of the sector generally, we would like to defer until we have seen witness statements of other religious groups”.	Not addressed in witness statement. “With regard to future regulation and the state of the sector generally, we would like to defer until we have seen witness statements of other religious groups”.	Not addressed in witness statement. “With regard to future regulation and the state of the sector generally, we would like to defer until we have seen witness statements of other religious groups”.	Not addressed in witness statement. “With regard to future regulation and the state of the sector generally, we would like to defer until we have seen witness statements of other religious groups”.	Not addressed in witness statement. “With regard to future regulation and the state of the sector generally, we would like to defer until we have seen witness statements of other religious groups”.
Vishwa Hindu Parishad UK (VHP)	<p>The definition of regulated activity is sufficiently clear and enables the organisation to know who should be checked and on what basis.</p> <p>Those who have pastoral authority over members of a religious organisation should be the subject of vetting checks even if they do not fulfil the requirements of regulated activity.</p> <p>VHP does not consider that the current system of checking is excessively onerous on religious organisations and settings.</p>	Yes. It was registered in 1972.	It is important that the CC has an understanding of the nature of religious organisations. As VHP has not had any cases of child protection with the CC, VHP is unable to comment on the CC.	<p>VHP would find a common set of training materials for all religious organisations and settings on identifying and preventing child sexual abuse useful. Also useful would be a model set of policies on managing child protection and dealing with allegations. Also, a model set of questions and answer sheets dealing with common issues in respect of child protection would be useful to have.</p> <p>It would be difficult to make training compulsory as VHP’s members are volunteers.</p>	It should be compulsory for religious leaders or those in positions of responsibility in religious communities to refer allegations or suspicions of child sexual abuse to statutory authorities, and concealment of such abuse if an admission has been made or if there have been internal disciplinary findings should be a criminal offence.	The content and presentation of <i>Keeping children safe in education</i> and <i>Working Together</i> , in so far as they provide guidance concerning the duties and responsibilities of religious organisations, is very informative.	The current proposals set out in the DfE consultation in respect of child protection are adequate. The codes should be compulsory.