

Witness Name: Rachel Elizabeth Mary Stone
Statement No: 1
Exhibits: 48
Dated: 15 November 2019

THE INDEPENDENT INQUIRY INTO CHILD SEXUAL ABUSE

Witness Statement of Rachel Elizabeth Mary Stone

I, Rachel Elizabeth Mary Stone, People Support and Safeguarding Manager of the Baptist Union of Great Britain, will say as follows:-

Section 1

Background and overview of the Baptist Union of Great Britain

1.1 BUGB Structure and Governance

- 1.1.1 Diverse from their beginning, those identifying as Baptists today differ widely from one another in what they believe, how they worship, their attitudes toward other Christians, and their understanding of what is important in Christian discipleship. There are several groupings of Baptists in the UK, with differing histories and organisational practice. Local Baptist churches will tend to belong to only one Baptist organisation in the UK or remain as a completely independent church.
- 1.1.2 The Baptist Union of Great Britain (“BUGB”, “the Union”) is the largest of the organised Baptist structures. Originally founded as the Baptist Union in 1813, the Union became an umbrella organisation for Baptist churches in England and Wales in 1832. Currently, over 1,900 Baptist churches in England and Wales are members of BUGB, together with 13 Regional Associations, which are regional groups of Baptist churches, and 5 Baptist Colleges, which prepare men and women for ministry and offer ongoing training and development. BUGB does not represent all Baptist churches in England and Wales.
- 1.1.3 BUGB is an unincorporated association which was registered with the Charity Commission on 16 September 2008 with charity number 1125912, having previously had exempted status. Its charitable object is the advancement of the Christian faith and its practice, especially by the means of and in accordance with the principles of the Baptist Denomination in particular, but not exclusively, through any or all of the following means:
1. To cultivate among its own members respect and love for one another, and to all who love the Lord Jesus Christ.
 2. To spread the Gospel of Christ by ministers and evangelists, by establishing Churches, forming Sunday schools, distributing the Scriptures, issuing religious publications, and by such other methods as the Council shall determine.

3. To afford opportunities for conference, and for united action on questions affecting the welfare of the Churches, the support of the ministry, and the extension of the Christian faith, both at home and abroad.
4. To promote good relations between Baptists in this and other countries.
5. To obtain and disseminate accurate information respecting the organisations, labours and sufferings of Baptists throughout the world.
6. To confer and co-operate with other Christian communities as occasion may require.

1.1.4 A copy of the current Constitution for BUGB is provided at Exhibit 1. As a charitable unincorporated association, BUGB operates through its charity trustees who have the general control and management of the administration of the charity, including its staff and operations. The charity trustees are responsible for ensuring the Union fulfils its charitable objectives and complies with legal and regulatory requirements.

1.1.5 As a membership organisation, the Union holds an annual Assembly at which member churches are represented through their delegates, alongside ministers and members of the Council of the Baptist Union. The Council helps to set the broad strategic direction of the Union. The Baptist Steering Group also offers collaborative leadership through co-ordinating the effective development and implementation of the broad strategy discerned by Council and the trustees. See Exhibit 2 for a diagram of key governance structures.

1.1.6 BUGB is currently in the process of changing its legal structure and transferring its assets, liabilities and activities to a Charitable Incorporated Organisation ("CIO") with registered charity number 1181392. The transfer to the CIO is expected to complete on 31 December 2019 and the Constitution for the BUGB CIO is provided at Exhibit 3.

1.1.7 As part of the world-wide Christian Church, Baptists form one of the largest families of faith, alongside other Trinitarian Christian traditions such as Anglicans, Methodists and Reformed. The Church is not so much a particular place or building, but rather a family of believers, committed to Christ, to one another and to the service of God in the world. The concept of family is important to Baptists. Baptists have always believed in associating with one another - and so the churches come together in regional, national and international spheres to promote and support the fellowship of Baptists everywhere. The Baptist Union is not a denomination but rather a movement of local churches, supported by Specialist Teams of staff employed by BUGB, together with the Regional Associations and Colleges, collectively known as 'Baptists Together'. Our vision as a movement is to grow healthy churches in relationship for God's mission, which is supported by the Baptist Union of Great Britain charity. Further information about the wider Baptist family can be found on our website www.baptist.org.uk.

1.1.8 The basis of Baptists Together gives local churches complete autonomy in their decision making; there is no organisational hierarchy, as illustrated in the diagram on the following page. In this Baptist family everybody is equal, for everybody has a part to play in the service of God. There is no hierarchy of bishops or priests exercising authority over their churches or individual members in the congregation. Each local Baptist church is autonomous and is a separate charity in law; its primary charitable purpose being the advancement of religion. Approximately 1400 of our Baptist

member churches are still excepted from registration with the Charity Commission under The Charities (Exception from Registration) (Amendment) Regulations 2014, as their annual income is below the £100,000 threshold required for registration. Furthermore, the vast majority of BUGB member churches are still unincorporated associations and operate through their charity trustees.

1.1.9 Baptists are grass-roots people, with a particular emphasis on the local church. These local churches are self-governing and self-supporting, ranging in size from twenty or so members to many hundreds. Church members share in the process of making key decisions in Baptist churches; congregational governance is a fundamental Baptist principle, which is reflected in the governance structures of the Baptist Union charity.

1.1.10 Each member church appoints their own ministers to have particular responsibility for preaching, teaching and pastoral care. Working alongside these ministers are also elders and deacons, who together with the minister(s) form the leadership team of the local Baptist church and collectively are the managing or charity trustees of the church charity. It is important to reiterate that each Baptist church, Association and College is an independent charity and is responsible for its own governance, including meeting its safeguarding obligations.



1.1.11 Baptist churches tend to be actively involved in services for their local communities. Many of our churches provide events and activities for children and young people, including Sunday Schools, youth clubs, children’s holiday clubs, breakfast clubs and children’s Bible study groups. These are mainly staffed by volunteers, although our larger churches may also have paid children and youth workers/ministers in place. Many Baptist churches work collaboratively with other local churches in terms of children and youth events and activities, and some work to provide services on behalf of local authorities. Many Baptist churches run church services and events for the whole family, and support this with family events such as Messy Church, and the provision of marriage and parenting courses.

1.2 The location of the 13 Baptist Regional Associations



1.3 Number of children and young people connected with our churches, and the average numbers in attendance at weekly worship services.

As at our last information gathering exercise in December 2018, the geographical spread of churches and church attendees is as follows:

Regional area	Total no of churches	Those who completed 2018 annual return	Church members	Children (0-11s)	Young People (11-18s)
Central	149	142	9,280	5,836	2,559
Eastern	174	168	10,562	7,463	2,661
East Midlands	147	143	6,610	3,656	1,335
Heart of England	158	150	9,840	5,624	2,205
London	303	257	23,785	8,936	4,582
Northern	50	49	2,632	1,229	425
North Western	162	151	6,995	4,346	1,789
Southern Counties	156	145	10,262	6,852	2,463
South Eastern	151	146	11,828	6,657	2,526
South Wales	136	121	5,804	3,307	1,172
South West	93	85	5,181	3,148	1,001
West of England	117	102	5,770	4,144	1,738
Yorkshire	104	97	4,128	3,388	1,572
Scotland	3	3	164	23	,32
Welsh churches	62	49	1,936	580	1,69
Other (*unassociated)	31	21	2,698	995	26,691
TOTAL	1996	1829	117,475	66,184	26,691

*Unassociated churches are those that are members of BUGB, but who have not joined as members of a regional Association.

1.4 Average attendance at main weekly worship service (latest figures from December 2018)

Regional area	No of churches	No of attendees	B/A	Children (0-11s)	Young People (11-18s)	Young Adults (18-30s)	Other Adults (30-65)	Seniors (65+)	Total
Central	149	131	87.9%	1444	962	697	4,629	3,240	10,972
Eastern	174	152	87.4%	1,578	887	819	4,838	4,343	12,465
East Midlands	147	130	88.4%	946	514	427	2,741	3,046	7,674
Heart of England	158	129	81.6%	1,242	776	833	4,002	3,403	10,256
London	303	202	66.7%	2,628	1,633	1,500	7,328	4,000	17,089
Northern	50	41	82.0%	351	185	213	1,085	866	2,700
North Western	162	119	73.5%	1,071	507	586	2,763	2,264	7,191
Southern Counties	156	127	81.4%	1,638	865	793	4,918	3,279	11,493
South Eastern	151	137	90.7%	1,810	964	896	5,073	4,191	12,934
South Wales	136	98	72.1%	623	345	298	1,688	2,167	5,121
South West	93	79	84.9%	849	406	448	2,255	2,157	6,115
West of England	117	94	80.3%	897	404	452	2,533	2,287	6,573
Yorkshire	104	84	80.8%	1,059	458	781	2,410	1,648	6,356
Other	96	49	51.0%	160	103	79	507	756	1665
TOTAL	1,996	1,572	78.8%	16,296	9,009	8,822	46,830	37,647	118,604

1.5 Safeguarding responsibilities

1.5.1 Each church has the responsibility to put in place the safeguarding policies, structures, procedures and working practices that it believes to be legally compliant and to make sure that a safeguarding trustee and Designated Person for Safeguarding (“DPS”) are appointed and equipped to carry out their responsibilities.

1.5.2 In the majority of our churches, the church safeguarding policy will be based on the model published by our National Safeguarding Team with any appropriate local adjustments or additions (see Exhibit 4). A church is required to have a safeguarding policy in place or to be committed to adopting an up to date safeguarding policy as part of its application to join The Baptist Union of Great Britain. Example role profiles for church Safeguarding Trustees and the Designated Person for Safeguarding are shown in Exhibits 5 and 6.

1.6 Working together across the organisations that form part of Baptists Together

1.6.1 The roles and responsibilities of each of our member organisations and Union structures in terms of safeguarding are described below. Please note these commitments come from our recent work on a safeguarding covenant between BUGB organisations, which is still ongoing.

1.6.2 As a local church:

- *We will put in place and regularly review and update clear and robust safeguarding policies and procedures, and take responsibility for ensuring that all the necessary people are familiar with them, and that they are being implemented effectively;*
- *We will provide and refresh Level 1 training for the whole congregation at regular intervals, to promote good basic awareness throughout our whole church;*
- *We will ensure that our all leaders receive BUGB Level 2 & 3 safeguarding training on a regular basis, and in particular when first taking up a leadership role, so they are able to understand their responsibilities and the importance of safeguarding in a church context;*
- *We will ensure that all our workers and volunteers who work with children, youth or adults at risk receive at least BUGB Level 2 training on a regular basis (recommended every four years) so they know how to respond if a concern arises;*
- *We will appoint a Safeguarding Trustee (deacon) who oversees our safeguarding provision across all church activities and acts as a liaison between the leaders and the workers/volunteers;*
- *We will appoint two people as our Designated Persons for Safeguarding who will act as the point of contact for anyone who wants to report or discuss a safeguarding concern, and who will liaise with statutory authorities on behalf of the church where necessary;*
- *When a safeguarding concern is identified we will respond in an appropriate and timely manner, implementing our agreed procedures and seeking external advice where appropriate;*
- *If a significant safeguarding concern arises, we will not seek to deal with it alone but will seek advice and support from the Association team;*

- *We will co-operate fully with the Baptist Union, Association and statutory authorities where required in any investigations;*
- *We will do our utmost to provide sensitive and informed pastoral care to all those who may be affected by issues of abuse, and to provide a caring environment where survivors of abuse can feel listened to and supported;*
- *As a Christian community we recognise that if a safeguarding concern arises there will be times when full information cannot be shared with us because of legal constraints of confidentiality;*
- *As a Christian community we recognise that at times there may be amongst us those who wish to belong but have been convicted or accused of safeguarding offences. We will welcome in the name of Jesus all those who wish to worship with us, but fully expect those persons to accept and abide by the restrictions that it will be necessary to put in place for their own protection and the rest of our church community;*
- *As a Christian community we believe that God, in His immeasurable grace, forgives all sins for those who are truly repentant. We will strive to recognise and understand that matters of abuse and harm are extremely complex and that the consequences of abuse affect those who are abused, perpetrators of abuse, and their families and churches in the long term. We commit ourselves to listening to voices from the wider world and the Baptist family when faced with complex pastoral situations.*

1.6.3 As an Association we will:

- *Ensure our Regional Ministers, other staff where appropriate, and Trustees complete BUGB Level 2 & Level 3 training, to be updated every four years;*
- *Provide a contact and first line advisory service where churches can find advice and support for safeguarding questions and queries;*
- *Provide regular BUGB Level 2 & Level 3 training sessions around our region for all church personnel;*
- *Offer ongoing pastoral support to church leaders, including the Designated Person for Safeguarding, if they find themselves dealing with a safeguarding situation;*
- *Participate in the Baptist Union's National Safeguarding Contacts Group and in collaborative work on safeguarding within the Baptist family;*
- *Urge and encourage all our churches and member organisations to strive for Excellence in Safeguarding, and do all we can to assist them in this;*
- *Appoint a Safeguarding Trustee and keep safeguarding as a regular matter on our agendas and working tasks;*
- *Offer pastoral support to any minister accused of a safeguarding offence, and their family, without prejudice to the formal investigation that will be required;*
- *Co-operate fully with the Baptist Union and/or any statutory authorities where required in any investigations.*

1.6.4 As a Baptist College we will:

- *Ensure our Ministers-in-Training receive BUGB safeguarding training Level 2 & Level 3 in the first year of their ministerial training;*
- *Develop and maintain up to date safeguarding policies and procedures in relation to our staff and students;*

- *Work collaboratively with Associations and with the National Safeguarding Team to respond to any safeguarding concerns raised about students, whether in college or in placement;*
- *Appoint a Safeguarding Trustee and keep safeguarding as a regular matter on our agendas and working tasks;*
- *Offer pastoral support to any student who has experienced abuse, and their family, without prejudice to the formal investigation that will be required;*
- *Offer pastoral support to any student accused of a safeguarding offence, and their family, without prejudice to the formal investigation that will be required;*
- *Co-operate fully with the Baptist Union and/or any statutory authorities where required in any investigations.*

1.6.5 As the National Safeguarding Team working on behalf of all BUGB member organisations we will:

- *Develop and regularly update relevant and practical policies, procedures, training and resources for the use of our churches and member organisations which enable them to comply with the law and maintain high levels of safeguarding provision;*
- *Provide suitably experienced personnel who can advise churches and member organisations on safeguarding matters and give support when complex or challenging situations arise;*
- *Offer specific training, development and support for Association and College teams;*
- *Conduct robust investigations when safeguarding concerns arise in relation to an accredited minister, and take appropriate disciplinary steps in response to the outcome of those investigations, including removal of accreditation when required;*
- *Provide leadership to the National Safeguarding Contacts Group;*
- *Listen compassionately to survivors and alleged victims of abuse by a Baptist minister, and seek to support them on their road towards recovery;*
- *Monitor developments, trends and statistics at organisational level and seek to respond appropriately;*
- *Urge and encourage all our churches and member organisations to strive for Excellence in Safeguarding and do all we can to assist them in this.*

1.6.6 As the Trustee Board of the Baptist Union of Great Britain we will:

- *Review and approve the strategic and operational plans that move us towards our commitment to Excellence in Safeguarding;*
- *Appoint a suitable safeguarding trustee to take a particular interest in the work of the National Safeguarding Team and the National Safeguarding Contacts Group;*
- *Constitute a safeguarding group of three trustees: the Moderator, General Secretary and Safeguarding Trustee to have oversight of the case work carried out by the National Safeguarding Team;*
- *Urge and encourage all our churches and member organisations to strive for Excellence in Safeguarding and do all we can to assist them in this.*

1.7 Collective worship in Baptist churches

- 1.7.1 Collective worship is a core part of our Baptist life together. Services will usually be led by the minister of the church who is an appointed office holder, and whose appointment and terms are set by a decision of the church members meeting. However, many of our churches do not have a Baptist Union accredited minister as the minister for their church, and the minister may be a minister who is accredited by another denomination or an individual who the church has appointed as a pastor or leader without any formal accreditation or training. We encourage each church to have a formal role description for their minister or pastor that details their safeguarding responsibilities, and to use our safer recruitment processes in appointing to any leadership or staff role.
- 1.7.2 A typical worship service at a Baptist church will involve music and singing, corporate prayer, an all age talk suitable for children, a sermon or talk aimed at adult members of the congregation, Bible readings and a time for fellowship and conversation. Many Baptist churches will run Sunday school/junior church lessons during the church service, and children will leave the service to attend these groups, usually in the church building.
- 1.7.3 Most churches will offer two services each Sunday, but will also run a range of other groups, activities and events, including house-groups, Bible studies, Alpha courses, breakfast meetings, prayer meetings, and a wide range of social events.

1.8 Consistency in safeguarding structures in Baptist churches

- 1.8.1 Each church will appoint elders or deacons to act as the leadership team of the church. The leadership team will also include the minister or ministers. This leadership team are the charity trustees for the church and, as such, church deacons, elders and trustees should be/are DBS checked and are expected to attend Level 2 and 3 safeguarding training.
- 1.8.2 Each church will have its own safeguarding policy and procedures and we recommend that these are reviewed annually at a church members meeting.
- 1.8.3 The minister, paid staff and volunteers who work with children and young people will have attended our safeguarding training at either Level 2, or Levels 2 and 3, depending on their roles.
- 1.8.4 Our model safeguarding policy and procedures for churches (Exhibit 4) lays out our expectations in terms of safeguarding practices in churches. This includes:
- Safer recruitment processes for all those who will work with children and young people
 - DBS checks completed before anyone works unsupervised with children and young people
 - Details of staff and volunteer ratios for different age groups, together with guidance on toileting, support for those with special needs, handling medication, etc.
 - Guidance on spotting signs and symptoms of abuse and who to report this to
 - Special arrangements for events, residential trips, etc.

- Clear process for responding to allegations or disclosures of abuse
- Pastoral care arrangements

1.8.5 Where needed, we use external specialists to review our risk assessment or safeguarding reports, or to provide guidance on particular points of policy or practice. During our historic case review of accredited ministers, all identified cases were set before independent safeguarding panels made up of external safeguarding specialists. For example, our panels included LADOs, police officers with child protection experience, senior social workers, senior members of children’s services teams, and independent safeguarding consultants with expertise in specific areas.

1.8.6 The recommendations of these panels were implemented in terms of each case they considered and in terms of the broader learning points relating to our policies and procedures.

1.9 National oversight of safeguarding

1.9.1 BUGB Trustee Board safeguarding sub-committee

A sub-committee of our main Trustee Board, comprising of the General Secretary, the Moderator of the BUGB Trustee Board and the BUGB Safeguarding Trustee receive regular reports from the safeguarding team on any proposed changes to our template policies, procedures and guidance to churches. This committee also receives detailed information on current casework and any matters that attract significant media attention. The terms of reference of the safeguarding sub-committee are attached as Exhibit 7.

1.9.2 National Safeguarding Contacts Group

In terms of developing policy across all areas of safeguarding and working to ensure consistency and quality of our safeguarding practices, the National Safeguarding Contacts Group (“NSCG”) is made up of the Association Safeguarding Leads from each Association, the members of the National Safeguarding Team and those who train our safeguarding trainers. This group meets three times a year, including a residential for training purposes to which external safeguarding specialists and researchers are invited to speak. (For example, our June 2019 meeting included a training workshop from Dr Lisa Oakley on spiritual abuse, and our November 2019 meeting will include a training workshop from Marcus Erooga on his work on types of sex offenders and creating healthy organisational culture). The terms of reference for the NSCG is shown at Exhibit 8.

1.10 Accredited ministers and those in leadership positions in BUGB

1.10.1 For the purposes of defining leaders in BUGB, we have considered those who are:

- Accredited Baptist ministers – this will include regional ministers and team leaders, and our college principals
- Senior members of staff working as part of our Specialist Teams.

1.10.2 Accredited ministers

- 1.10.2.1 All accredited Baptist ministers are required to comply with our safeguarding policies and procedures, and to comply with the Ministerial Recognition Rules (“MR Rules”) laid down nationally (see Exhibit 9).
- 1.10.2.2 DBS checks are required for all ministers and leaders in our churches, and BUGB organises and pays for the provision of a DBS checking service for all our member churches. This service is provided by Due Diligence Checking Limited, and a formal contract has been in place with DDC Ltd since November 2015. Previously a similar service was provided by the Churches Advisory Service.
- 1.10.2.3 DBS checks for accredited ministers and workers are carried out by our Association staff, and all other checks are carried out by a DBS verifier in the church. Blemished disclosures in relation to DBS checks for accredited ministers and workers are referred to our National Safeguarding Team, who liaise with the Ministries Team about suitability and will carry out risk assessments as necessary. Our Guide to DBS Checks is included as Exhibit 10.
- 1.10.2.4 All accredited ministers and workers are required to have an up to date DBS check and to attend our safeguarding training programmes as a condition of their ongoing accreditation. In addition, since 2018 we require all accredited ministers to complete an annual online safeguarding training module to update and refresh their understanding of different areas of safeguarding. The first module in 2018 focused on understanding the impact of domestic abuse, and the 2019 module focuses on understanding spiritual abuse.
- 1.10.2.5 Whilst unaccredited ministers and pastors are not under the jurisdiction of BUGB’s accreditation system, each church is required to carry out DBS checks for its minister, pastor and leaders, and is encouraged to send them through our safeguarding training programmes.
- 1.10.2.6 Personnel files are kept on every accredited minister and these are stored on our Ministries Information Exchange (“MIX”) database. These records can be accessed by the Ministries team staff and by nominated individuals in each of our Associations and colleges. Different levels of security access are in place, which means that disciplinary and safeguarding records can only be seen by those staff with a legitimate reason to do so in the course of their role responsibilities.
- 1.10.2.7 Access rights to safeguarding records for accredited ministers and workers are determined by role. For example, the National Safeguarding Team and Ministries Team Leader can view all levels of safeguarding data. Regional Association Team Leaders can see general safeguarding data and can also see where a file has been ‘flagged’ to indicate that there is further confidential information.
- 1.10.2.8 There are two types of flags: ‘confidential data’ and ‘confidential activity.’ The ‘confidential data’ flag tells the user that the file contains confidential information but does not specify if it is safeguarding information. The ‘confidential activity’ flag tells the user that there is confidential activity going on about a minister (which is usually

an investigation). This warns the user to contact the Ministries Team before contacting the minister. The MIX system enables users to make notes on individual files. These are akin to 'comments' in Microsoft Word and are visible to anyone who views that file. The note may state simply that the minister has been suspended pending the outcome of an investigation.

1.10.2.9 Where an accredited minister moves from one church to another, or to a role in a Specialist Team, any relevant safeguarding information will be reviewed as part of this process. This is done by using the confidential 'flag' system to indicate to the Ministries Team that there is safeguarding information on the file. In this instance, the Ministries Team Leader will review the file, liaising with the National Safeguarding Team, and communicate as necessary with the organisation with whom the minister is intending to work.

1.10.3. **Ministers in training**

Before a minister is accepted for ministerial training, they are required to go through a safer recruitment process, including the taking up of references and a DBS check in relation to the church-based placements they will undertake as part of their training.

Before starting their studies, they will also complete a confidential self-disclosure form (Exhibit 11) that requires them to declare any safeguarding allegations made against them in relation to children or adults at risk. Any disclosures on this form will automatically trigger a risk assessment process before they are accepted for ministerial training.

The risk assessment process is carried out by the National Safeguarding Team within BUGB. That team is separate to the Ministries team and assess each referral independently. On occasion if required the team liaise with external specialists.

Ministers in training are required to attend our Level 2 and 3 safeguarding training before they start their studies or at the latest, by the end of their first term at college.

1.10.4 **Leadership positions at BUGB**

All potential appointees to Trustee Board roles are taken through a safer recruitment process, including the taking up of references and DBS checks. This process is led by the Key Roles Nominations Group (terms of reference attached as Exhibit 12, and recruitment guidelines attached as Exhibit 13).

If an allegation was made in relation to a trustee, then this would be handled through our formal complaints process, with different routes for those who are also accredited ministers.

Those in senior employee or appointed posts at The Baptist Union of Great Britain are DBS checked as required for the nature of their roles. Job descriptions clearly lay out any safeguarding responsibilities attached to each role. A personnel file is kept for each of our employed or appointed staff. In the event of safeguarding allegations about a member of our staff, our own disciplinary procedures would be invoked, with advice

from the National Safeguarding Team, who would also act as our liaison with the statutory authorities.

In the event of safeguarding allegations about a member of our National Safeguarding Team, the General Secretary would appoint an external specialist to investigate and to report back. In this instance, the General Secretary would also appoint a separate liaison to carry out any contact with statutory authorities.

1.11 Safeguarding staff and trustees working at national or regional level

1.11.1 Copies of the job descriptions for the National Safeguarding Team roles, the BUGB Trustee Board Safeguarding Trustee are included at Exhibits 14 to 17.

1.11.2 Each of our Regional Associations has a safeguarding lead and a safeguarding trustee and an example of the job descriptions for these posts are shown at Exhibits 18 and 19.

1.12 Links to other organisations

1.12.1 BUGB has regular contact with the Baptist Union of Wales (“BUW”), as many of our Welsh churches are members of both organisations. It is our agreed protocol that where a safeguarding issue arises in a Baptist church with membership of both BUGB and BUW, then the BUW safeguarding team will investigate, and BUGB will provide whatever additional support is necessary to implement the findings of their investigation. (Exhibit 20 defines our safeguarding requirements for ministers accredited with both BUGB and BUW and working in Wales).

Section 2

Activities involving unsupervised access to children

2.1 Community based activities

Baptist churches across England and Wales are actively involved in children's and youth work in their local communities. This includes:

Activity or event	Description	Where it takes place
Sunday School	Age appropriate groups in which children can hear about Jesus, learn from the Bible and do activities together	Church rooms or halls
After school clubs	Provision of after school activities for 1 or 2 hour periods at the end of the school day	Church rooms or halls
Uniformed organisations, including Scouts, Guides, Boys Brigade and Girls Brigade	Youth organisations providing social and learning opportunities. Often includes occasional parades and service.	Church rooms or halls Parades in local community.
Pre-school	Education and learning for children under school age	Either in the church building or in an adjacent building
After church evening groups	Social and study groups, usually for older children and teenagers	Church rooms or halls/meeting in the home of a church member
Holiday clubs	Activity days for children during school holidays	Church rooms or halls plus use of outside space for activities
Messy Church	Craft and social time for families	Church rooms or halls
Sports clubs	General or specific sport activities for children	Church rooms or local leisure facilities
All age services	Church worship services designed to appeal to children and families	Church rooms
Summer provision of lunches	Providing lunch for children from deprived families during school holidays	Church rooms or halls
School pastors	Providing pastoral care for children as part of a school's pastoral team	School
Taking school assemblies	Visiting schools to provide Christian input to assemblies and RE lessons	School
Hosting local school visits to church premises	As part of the RE curriculum, hosting groups of school children and their teachers to see what a Baptist church looks like. The baptistry is always a point of great interest!	Church
Music group practices/ children's choirs/ church choirs	Music group or choirs to perform in church services or giving occasional performances	Church or local halls

Church camps and festivals	Events for church attendees, including children and families. This can range from a weekend to a full week of activities.	Hotel or campsite.
Youth clubs	Evening social activities for local children and teenagers	Church rooms or halls
Bible study groups	Study groups for children or teenagers to learn more about the Bible	Church rooms or halls, or at a leader's home.

2.2 Child protection arrangements for these activities and events

2.2.1 We expect all Baptist churches to follow their own safeguarding policies and procedures in relation to each activity and event that they operate that includes children and young people.

Our model safeguarding policy and procedures for churches (Exhibit 4) provides details on how to provide activities and events for children safely, including information on:

- Pre event planning and risk assessment
- Appropriate age and activity specific ratios for leaders and helpers
- Health and safety provisions
- Specific guidelines for residential trips and visits
- Safer recruitment processes
- Safer behaviour guidelines
- Children with special needs
- Visiting children at home
- Peer group activities
- Physical contact
- Online and digital communications
- Children with no adult supervision
- Abuse of trust
- Pastoral care
- Bullying.

Section 3

Incidents of allegations of child sexual abuse within the religious community

3.1 Current data on incidents of allegations

3.1.1 Currently, we do not gather information from each Baptist church about the number and type of safeguarding allegations made, including those in relation to allegations of child sexual abuse. This is because of the governance structures of Baptists Together; each church is a separate charity in law and carries the responsibility for effective management of safeguarding.

3.2 Future plans for information gathering from churches

3.2.1 We recognised in our 2018-21 safeguarding plan that this information would be valuable in terms of planning and using resources effectively and to enable us to target education and support where it is most needed. We are scheduled to start gathering this information from the end of 2020 onwards.

3.3 Information on cases with regional and/or national safeguarding involvement

3.3.1 We do gather information on the number of cases where churches seek support from our regional and/or national safeguarding teams and this information is shown below. Please note that before 2014 there was not a central record of safeguarding cases raised through association and national safeguarding teams. For this reason, our data is for the last 5 years only.

3.4 Information from our 2017 historic case review of accredited ministers

3.4.1 Please note that the cases raised during our historic case review, which was completed in November 2017, have been counted separately as they affect the case numbers significantly. Our historic case review of accredited ministers looked back as far as 1940, and thus created a sudden spike in our case numbers as we reviewed and took action where needed in relation to these historic cases. These numbers can be found in Exhibit 21.

3.5 Statistics on allegations of child sexual abuse and liaison with the statutory authorities

The table below sets out the number of recorded allegations of child sexual abuse where churches have requested the involvement of the regional or national safeguarding teams within the Baptist Union in the last 5 years. Since this table reflects our advisory work, rather than the actual number of cases in Baptist churches, we are unable to provide information on the outcomes of cases.

Type	2014	2015	2016	2017	2018	2019 (to 07/19)
Safeguarding contract – guidance on contract terms for those convicted or charged with child sexual abuse offences	7	8	7	9	10	5
Cases referred to the police, social services or LADO	11	11	11	17	29	23
Cases where the police, social services or LADO informed us/Cases referred to us by the police, social services or LADO	8	4	11	11	11	6
Self-disclosure of ongoing investigation or court proceedings	0	0	2	0	2	1
Self-disclosure by adult of historical sexual abuse as a child	2	0	5	0	2	1
Blemished disclosure risk assessments	0	0	2	0	2	2
General advice	3	5	6	3	4	0

3.6 Investigations and external reviews of BUGB by police or social services

3.6.1 To the best of our knowledge, there are no current police or social services investigations into The Baptist Union of Great Britain, our Associations or colleges. We do not have information on any investigations going on at church level that have not been reported to the association or national safeguarding team.

3.6.2 We have not been subject to any imposed external review through a statutory body.

3.7 Historic case review of accredited ministers

3.7.1 In 2014-2016 we carried out a historic case review of all safeguarding cases involving accredited Baptist ministers and workers. The full report of this review, which was completed in November 2017, is attached as Exhibit 21.

3.7.2 In summary, we reviewed the files of 4,370 accredited ministers going back to files from the 1940s. Of these 4,370 files, 111 were identified as relating to safeguarding allegations.

3.7.3 Each of these files was then reviewed by an independent consultant (a retired police officer with significant experience of child protection). Immediate action was taken to report to police or social services where needed, or to convene an internal review if the matter did not need to be reported.

3.7.4 Safeguarding review panels of three external specialists were used to review each file and their recommendations and feedback were used to make decisions about whether each case needed to be sent to a meeting of the Ministerial Recognition Committee's disciplinary sub-committee. In all cases, we acted on the advice of police and social services and responded to the recommendations of the safeguarding review panels.

3.7.5 As a result of the historic case review process, 14 cases were referred to the police, 25 went to a specialist safeguarding panel, 3 accredited ministers were removed from the accredited list, 3 resigned (with a record kept on their files of safeguarding concerns), and a further 9 were required to undertake training and supported learning.

3.7.6 The findings of the historic case review were used to make significant improvements to our safeguarding and disciplinary policies and practices. These improvements were made as the review progressed so that there was no delay in implementing the procedural and practical recommendations of the safeguarding review panels.

Section 4

Training and understanding of child sexual abuse

4.1 Training available to all Baptist churches

4.1.1 Our template safeguarding policy and procedures for churches makes it clear that attending an appropriate level of safeguarding training is compulsory for those who work with children and young people. Our Association teams work hard to encourage all churches to send all relevant workers and volunteers through our training.

4.1.2 BUGB has offered safeguarding training tailored for its churches since 1994 when our child protection policy, Safe To Grow, was first published for churches.

The latest versions of our Levels 1, 2 and 3 training were designed in 2016 and rolled out from the start of 2017.

We run safeguarding training at three levels:



4.1.3 Level 1 – creating awareness

4.1.3.1 Level 1 is a short, 8 minute film designed for use in all age services or events. To complement this film there is a set of children and young people's study materials based around the parable of the Good Samaritan. This material involves a variety of age appropriate activities for children in school years Reception to 9 which help to get the message of safeguarding across to the children and young people of the church.

4.1.3.2 A second version of this film, designed for use in church members meetings is also available. Churches may choose to use this as part of their annual review of safeguarding policy.

4.1.4 Level 2 Training

4.1.4.1 Level 2 is designed to be delivered by a BUGB safeguarding trainer. The course is designed for the minister, deacons/trustees, the Designated Person for Safeguarding and all those who work with children, young people and adults. It covers the following points and takes about 3 hours:

4.1.4.2 Level 2 aims to help attendees:

- to have confidence in responding to safeguarding concerns about children, young people and adults at risk within the church and know what support is available if needed
- to build a greater understanding of safeguarding and why it is important within the church context
- to be aware of different types of abuse
- to be champions in safeguarding

4.1.4.3 There is also a short booklet called Gateway to Excellence in Safeguarding which is available for volunteers and workers to read before they attend a Level 2 Excellence

in Safeguarding Course. Please note that this is not an alternative to attending a level 2 course.

4.1.5 **Level 3 training**

4.1.5.1 Level 3 is also designed to be delivered by a BUGB safeguarding trainer and is for all church leaders including the minister, deacons/trustees, and the Designated Person for Safeguarding. Level 3 is designed to follow on from Level 2 and you should attend the Level 2 Course before accessing Level 3.

4.1.5.2 Level 3 aims to:

- help attendees understand the key safeguarding responsibilities of church leaders
- build confidence in responding to concerns and supporting all those affected by abuse
- provide time to reflect on how your church safeguarding policies and procedures are working

4.1.5.3 Level 2 and Level 3 training is delivered by a network of BUGB trainers, all of whom have attended Train the Trainer events to learn to deliver these programmes. Each association coordinates its own team of trainers and takes steps to ensure that new trainers receive adequate support in their early sessions and that all trainers have the chance for review and feedback.

4.1.5.4 In terms of costs, most delegates will pay between £10-15 for their safeguarding training session. Usually this cost is met by their church. This small fee is used by Associations to cover the costs of materials and venue hire.

4.2 **Training numbers since 2017**

4.2.1 Since new training was launched in early 2017, we have encouraged all churches to send their ministers, leaders, trustees, and all those who lead or help with work with children young people and/or adults at risk.

4.2.2 Information from our Association training teams shows a significant increase in the numbers of people attending our training over the last three years.

Training programme	2017 Delegates	2018 Delegates	2019 Delegates (pro rated for full year)
Level 2	2,410	5,980	6,320
Level 3	1,580	2,560	2,300
Total	3,990	8,540	8,620

4.2.3 We are currently training an average of 8500 delegates each year, including 2500 people who hold leadership roles in their churches. We do not hold information on the number of leaders and volunteers working with children in each of our churches.

4.2.4 However, based on our statistics for those in formal membership of Baptist churches, at least 1 in 6 of all church members have been through our new safeguarding training in the last 3 years. Our statistics also show that approximately 93,000 children and young people come to a Baptist church led activity or event during the year of whom only 1 in 4 attend church on a regular basis. At present 21,000 church leaders, staff and volunteers have received recent training in the last three years.

4.3 Training for ministers

4.3.1 It is a formal requirement of accreditation that accredited Baptist ministers complete our safeguarding training to Levels 2 and 3 every 4 years. Ministers are given six months' notice of the need for them to attend followed by regular reminders. Since 2018 there is an additional requirement for accredited ministers to complete an online training module of safeguarding each year (in 2018 this was focused on domestic abuse).

4.3.2 Ministers who do not attend training are warned that failing to complete the training will lead to the removal of their accreditation. In the very rare circumstances that a minister fails to complete their Level 2 and 3 training, their accreditation will be removed. This has only happened on one occasion to date. Regional Associations keep a record of a minister's attendance at a training on the national database.

4.4 Training for church leaders

4.4.1 Those who serve as trustees, elders or deacons are actively encouraged to attend Levels 2 and 3 whether or not they are involved in regulated activity. Our template policies state that it is a requirement that all trustees attend Level 2 and 3 training. We emphasise the importance for those in church leadership to understand the responsibilities and risks of working with children, young people and adults at risk, as collectively, they have the oversight of the administration and management of the church charity. However, in practice it is difficult for BUGB to enforce this, as it ultimately remains a decision for the autonomous Baptist member church charities to make.

4.4.2 We also note that it is a requirement of the main insurers who insure Baptist churches that trustees participate in safeguarding training as part of their training for the role of trustee.

4.5 Training for Regional Association teams

4.5.1 In addition to attending Level 2 and 3 training, Regional Ministers and Team Leaders also benefit from training specifically designed for them in their regional roles. This focuses on giving them a more detailed understanding of how to handle safeguarding concerns raised by churches, and how to best provide pastoral support to those involved. An outline agenda of these training days is shown in Exhibit 22.

4.6 Review and updating of safeguarding training

- 4.6.1 Our core safeguarding training is reviewed annually, with scheduled full review every 3 years.
- A new Level 1 film will be written and produced during the first six months of 2020.
 - A review of Level 2 training will take place in the first half of 2020, with the updated programme available to churches in September 2020.
 - A review of Level 3 training is currently underway and the updated programme will be available to our churches at the end of 2019.
- 4.6.2 Updated programmes are reviewed by our National Safeguarding Contacts Group before release, and we gather feedback from our trainers after 6-12 months of working with revised or updated training materials.

Section 5

Policies and procedures

5.1 List of policies and procedures

5.1.1 Our full current set of safeguarding policies and procedures are shown below:

Policy or guidance note	Last issue date	Versions	Exhibit number
BUGB Model Safeguarding Policy and Procedures for Churches	2018	2	4
Safe To Grow – child protection guidance	2011	7	23
Safe To Belong – adults at risk guidance	2015	2	24
BUGB Guide to DBS Checks	2015	3	10
BUGB Guide to Cyber Safety	2015	1	25
BUGB Guide to Understanding Self Harm	2016	1	26
BUGB Guide to Supporting Those Who Have Experienced Abuse	2019	1	27
BUGB Guide to Understanding Domestic Abuse	2018	1	28
Safeguarding in church life – the role of the Designated Person for Safeguarding	2016	1	6
BUGB guide to record keeping for local Baptist churches	2018	1	29
Safeguarding Audit Tool for Churches	2019	1	30
Using images of Children and Young People	2012	2	31
Safeguarding Incident Reporting Form	2019	3	32
Gateway to Level 2 Excellence in Safeguarding	2018	1	33
Example Association Safeguarding Policy and Procedures - London Baptist Association	2019	1	34
BUGB safeguarding policy statement	2019	1	35

5.2 National, regional and church policy co-ordination

- 5.2.1 Safeguarding policies are in place at national, regional, college and church level and have been reviewed and amended to ensure that they work effectively together. The key role of the national and regional teams is to support the safeguarding work of churches, so our policy documents are written to reflect the supportive and advisory nature of our roles.
- 5.2.2 It is compulsory for staff working in the national and regional teams to follow the safeguarding policies for their teams. Failure to do so will result in disciplinary action including the possibility of dismissal.
- 5.2.3 Each church adopts its own safeguarding policy, normally based on the BUGB template policies and procedures. It is for each church to decide on the action it takes if a worker or volunteer does not comply with the church's safeguarding policy.
- 5.2.4 In terms of theological guidance, the BUGB template policies and procedures, and our two publications *Safe to Grow* and *Safe to Belong*, both contain sections outlining our theological perspective on the importance of safeguarding children and adults at risk.

5.3 Chaplains

- 5.3.1 Accredited ministers serve as chaplains in a variety of organisations, including hospitals and hospices, prisons, schools, higher education, and the armed forces. Chaplains are required to undertake safeguarding training which is relevant to their context and often provided by their employer. Where the employer provides training on a regular basis as a requirement of employment, we require the chaplain to sign a document confirming that this is the case. We work collaboratively with their employer when safeguarding concerns are raised either with us or the employer. The same processes of assessment and discipline apply as for other accredited ministers.
- 5.3.2 Further information on enhanced disclosures and safeguarding training requirements for accredited ministers working in chaplaincy roles is given in Exhibit 36.

Section 6

Information sharing

6.1 Our data protection framework

6.1.1 The Baptist Union is committed to protecting the personal data and respecting the rights and freedoms of the individuals whose personal data we collect and use. We are registered as a data controller with the Information Commissioner's Office (ICO) with registration number Z5717589 and process the personal information of individuals in accordance with our Constitution. Our Data Protection Officer is our Legal Services Manager, Caroline Sanderson. Our Data Protection Policy is produced at Exhibit 37 and the BUGB Data Retention Schedule at Exhibit 38.

6.2 Data processing

6.2.1 The processing carried out by the BUGB Safeguarding Team is primarily for the purpose of the protection of children and individuals at risk from harm, neglect or abuse but it is also of benefit to Baptist member churches and organisations and to the Baptist denomination as a whole and has a wider public benefit to society at large. BUGB has Privacy Notices specifically for the processing carried out by the Safeguarding Team and the Ministries Team, which are provided at Exhibits 39 and 40.

6.2.2 To fulfil the purpose of safeguarding children and adults at risk we carry out the following processing operations which are all undertaken for this common purpose:

1. Processing DBS Checks, including making recommendations about blemished disclosures
2. Reviewing blemished disclosure information and storing risk assessment information.
3. Managing and/or investigating safeguarding concerns in churches, Associations, Colleges and in our Specialist Teams and at the Baptist Assembly
4. Managing offenders in churches, Associations, Colleges and in our Specialist Teams and negotiating the terms of their safeguarding contracts
5. Maintaining and reviewing details of the Designated Person(s) for Safeguarding and DBS Verifiers in BUGB member churches
6. Maintaining and reviewing details of approved Safeguarding trainers, and Safeguarding Contacts and Advisers in Associations and Colleges
7. Referring concerns to statutory authorities (Police, LADO, Adults and Children's Services) and responding to concerns raised by statutory authorities
8. Raising concerns with other denominational safeguarding teams at local and national level and responding to concerns raised by them.

6.2.3 To fulfil our role of supporting nationally recognised, non-accredited and accredited ministry on behalf of BUGB, we carry out the following processing operations which are all undertaken for this common purpose and are similar in terms of their nature, context, purpose and risk:

1. Processing applications for Ministerial Accreditation or Recognition.
2. Maintaining Ministerial Accreditation or Recognition status.

3. Facilitating the Settlement Process (helping ministers settle in churches and assisting churches in filling a pastoral vacancy)
4. Providing pastoral support to accredited and recognised people, their immediate families, and in the event of their death, their survivors.
5. Dealing with complaints, concerns and disciplinary matters.
6. Facilitating the re-instatement process.
7. Processing waivers in line with a church's property trusts.

6.3 Special category or criminal offence data

6.3.1 The scope of the work of the Safeguarding Team means that it is often of high risk in relation to data protection because it involves processing of data of a highly personal and sensitive nature, including special category or information relating to criminal convictions, offences and allegations of offences ("criminal offence data"). It may also involve collecting data from a source other than the individual without their knowledge or consent, known as invisible processing. We have therefore prepared an Appropriate Policy Document under Part 4 of Schedule 1 of the Data Protection Act 2018. This forms Schedule 2 of the Data Protection Policy, and in addition to the Safeguarding Privacy Notice, the Appropriate Policy Document sets out the lawful bases for the processing of special category and criminal offence data (see Exhibit 41).

6.3.2 A separate Data Protection Impact Assessment for the Safeguarding Team is also in place (see Exhibit 42), which is designed to protect the privacy of the individuals known to us who are experiencing or have experienced abuse, or those individuals who have been reported to us by an official authority or another individual and we are under an obligation to act upon that information for the protection of children and adults at risk in our Union.

6.3.3 We also have a Data Protection Impact Assessment for the Ministries Team (see Exhibit 43). This aims to protect the privacy and rights of the individuals who are in nationally recognised, non-accredited or accredited ministry where their personal information will be processed by the Ministries Team in fulfilment of its obligations, including processing personal information for safeguarding reasons.

6.4 Information sharing

6.4.1 Data Sharing Agreements are in place with all of the 13 Regional Associations, 5 Baptist Colleges and other partner organisations, with whom we work closely to carry out investigations and provide advice and guidance to member churches. A template Data Sharing Agreement for Regional Associations is provided at Exhibit 44. We do not have information sharing agreements in place with LADOs, police or other statutory organisations but these bodies are referenced as being third parties with whom we might share personal data in the Safeguarding and Ministries Privacy Notices and in the Appropriate Policy Document, which is annexed to our Data Protection Policy and is publicly available on the BUGB website.

Section 7

Allegation management

7.1 Allegation management in churches

- 7.1.1 Where an allegation of child sexual abuse is made in a church setting, the church is required to follow its own safeguarding policy and procedures.
- 7.1.2 All church workers, members and attendees are expected to report any safeguarding incident to the church's Designated Person for Safeguarding and to then follow the guidance given by the DPS. In instances of allegations of child sexual abuse, this would automatically involve reporting the matter to the police or LADO.
- 7.1.3 Full details of our reporting process for churches is given in our model safeguarding policy and procedures for churches (Exhibit 4).

7.2 Allegation management in relation to church failure to follow safeguarding policies and procedures

- 7.2.1 Where a complaint is made about the failure of a church to follow appropriate safeguarding policies and procedures, this would usually be dealt with by the church leadership team in the first instance, advised by the church DPS. Where the complaint is made about the leadership team or the church DPS then the matter would normally be referred to the Association Safeguarding Lead, who would act as the point of contact for the complainant from that point on.

7.3 Allegation management for accredited ministers and accredited workers

7.3.1 Complaints about accredited ministers and other accredited or nationally recognised workers

At national level, BUGB manages safeguarding allegations and investigations about accredited ministers or workers, and nationally recognised pastors and pioneers. There is a formal complaints process in place for complaints about accredited ministers (see exhibit 45) and this is used to structure and manage our responses to safeguarding concerns. Our Ministerial Recognition Rules include detailed guidance on the disciplinary processes that are used to look at a minister's ongoing accreditation (see Exhibit 9).

7.3.2 Accreditation and church office considerations

The BUGB procedures apply to dealing with a minister's accreditation whether a minister is an office holder in a church or organisation or employed in a seconded ministry or retired or otherwise whose name is on the Register of Nationally Accredited Ministers. There are separate procedures recommended to be applied to the minister's relationship with the church in which office is held.

7.3.3 Receiving an allegation

- 7.3.3.1 If a serious safeguarding concern is raised with the Ministries Team Leader or Deputy Team Leader by the National Safeguarding Team, a statutory authority or another

professional person with relevant information (counsellor, etc) then the safeguarding investigation process will be put into action.

7.3.3.2 This investigation may be carried out by statutory authorities, and all child sexual abuse allegations would be reported to the police in the first instance. Whilst a police investigation is underway, we would follow instructions from the police about the necessary risk management steps to take in relation to the alleged offender, the victim(s) and the church's activities and meetings.

7.3.3.3 If the police do not decide to investigate, or if they complete their investigation and inform us that the allegations do not meet their threshold for passing the case to the CPS, then we start our own investigation process.

7.3.4 **The investigation team and consideration of suspension**

7.3.4.1 An investigation into complaints of child sexual abuse will usually be led by an investigator reporting to the Ministries Team Leader, and with a member of the National Safeguarding Team.

7.3.4.2 The team appointed to investigate, will consider with the Ministries Team Leader and the Safeguarding Manager, whether the minister concerned needs to be suspended from the Register at the outset and during the course of the investigation. The decision to suspend will be taken by the Ministries Team Leader and reported to the Moderator (Chair).

7.3.4.3 Suspension from church office would be a decision for the Church Officers, usually guided by the appropriate Regional Minister.

7.3.5 **The investigation**

7.3.5.1 The investigators will carry out all necessary information gathering in relation to the allegations, giving priority to an early meeting with the complainant and the alleged victims. This will also include interviewing or taking statements from other witnesses as well as asking for references from previous churches where the minister has served.

7.3.6 **Investigation reports**

7.3.6.1 The investigators will write a report of their investigations and findings and send it to the Ministries Team Leader and the Safeguarding Manager. If the Ministries Team Leader or their deputy concludes that there is a case to answer that a serious fault or gross misconduct may have taken place, the minister will be given 14 days to accept the finding. 'Serious fault' and 'gross misconduct' are defined in the MR Rules provided at Exhibit 9.

7.3.7 **Disciplinary findings**

7.3.7.1 If the minister accepts the findings of the investigation they will be required to attend a meeting with the Ministries Team Leader, or their deputy, who will explain the implications of the findings.

7.3.7.2 If gross misconduct is accepted they will be asked to consider resigning from the Register. If serious fault has been accepted appropriate requirements may be imposed, for example supervision or training.

7.3.7.3 Where the person does not accept the findings of the report or fails to follow through on any actions required of them, they will be invited to a disciplinary hearing before a subcommittee of the Ministerial Recognition Committee (“MRC”) to consider whether serious fault or gross misconduct has taken place and whether a final warning or removal from the Register of Nationally Accredited Ministers is appropriate. For safeguarding offences, the panel will include a panel member with significant professional safeguarding experience.

7.3.3.4 An appeals process is in place to challenge a decision of the MRC.

7.3.3.5 If a minister chooses to resign partway through an investigation then the Ministries Team Leader in consultation with the Moderator of the MRC will have the discretion to record a decision about future accreditation, which may include presentation of the information at that point to the MRC or consideration by a sub-committee. On an application for reinstatement to the Register, this information would be made available to the Reinstatement Committee.

7.3.8 Reporting to the DBS and Charities Commission

7.3.8.1 Where an accredited minister is removed from the Register for serious safeguarding offences, a report would be made to both the DBS and a serious incident report to the Charity Commission.

7.3.9 Church office

7.3.9.1 Where an accredited minister is removed from the Register for serious safeguarding offences, this decision would be communicated to the church in which they serve, and BUGB would expect the church to go through its own removal process to remove the minister from post. Where BUGB has the power to insist on removal, for example where the church property trust deed requires an accredited minister, we always do so.

7.3.9.2 Support is made available from our national and regional teams to guide churches through this process and to ensure that all necessary steps are taken to review and improve safeguarding policies and procedures in the church.

7.3.10 Risk assessment of accredited or nationally recognised ministers or workers

7.3.10.1 There are situations where it is necessary for a safeguarding risk assessment to be undertaken to determine the suitability of an individual either to be enrolled or remain as an accredited or nationally recognised person. This would include but is not limited to:

1. Receipt of a blemished enhanced disclosure
2. Receipt of a blemished self-disclosure
3. Information from a reference
4. Information from the police or social services

5. Information obtained during a complaint process

7.3.10.2 The Ministries Team Leader will consult with our National Safeguarding Team and will if necessary ask them to undertake a risk assessment following the process laid down for assessing blemished enhanced disclosures. (Blemished enhanced disclosures are always reviewed.) The National Safeguarding Team produce a risk assessment report outlining the impact of the safeguarding concern on the suitability of the individual to engage in ministry and if they are considered suitable, any requirements for managing and monitoring which need to be put in place. If a blemished enhanced disclosure has been considered, the MR Rules only permit the individual to become or remain accredited/nationally recognised if the report concludes that they are 'not unsuitable to work with children, young people and adults at risk'. This phrase is used to emphasise the fact that a DBS check alone cannot confirm that an individual is 'suitable'.

7.3.10.3 Following receipt of the report the Ministries Team Leader will take one of the following courses of action:

1. If the individual is accredited/nationally recognised and no longer suitable for ministry, the MRC will remove their name from the register.
2. If the individual is applying and is considered unsuitable for ministry, the Association will be informed that the application cannot progress.
3. If the recommendation is that actions need to be taken to manage and monitor the individual to enable them to engage in ministry, they will be given the opportunity to accept the outcome. If they fail to accept or abide by the recommendations, the Ministries Team Leader will convene a sub-committee of the MRC to consider the situation. They will also consider suspending accreditation/national recognition pending the outcome of the process.
4. If there is a need to manage and monitor the individual, appropriate steps will be taken to make sure that there is local knowledge and accountability and that this can be sustained over time.
5. Where the minister wishes to appeal the risk assessment, the appeals process will normally follow the Blemished Disclosure Appeal Process. The actions above will be subject to the outcome of any appeal.
6. Those who are already in ministry and therefore at risk of no longer being accredited, can ask the Ministries Team Leader to arrange for an independent safeguarding specialist, to review the risk assessment, at their own expense. This would replace the process of two members of the National Safeguarding Group undertaking the appeal. If the reviewer disagrees with the conclusions of the original assessment, the National Safeguarding Team will re-consider their original conclusion. If there continues to be a divergence of opinion the matter will be referred to a sub-committee of the MRC for decision over the question of accreditation and any conditions being put in place.

Section 8

Complainants, victims and survivors

8.1 Pastoral work with complainants, victims and survivors of child sexual abuse

8.1.1 Our policies and procedures encourage Baptist churches to put in place pastoral care and support for those who have experienced abuse. Our guide to supporting those who have experienced abuse (Exhibit 27) offers churches advice and signposts a number of providers of pastoral care.

8.2 Pastoral care at church level

8.2.1 We encourage our churches to respond with care and grace to support those who have experienced abuse, whether recently or historically. Our accredited ministers are trained to provide pastoral care to all those in need in their congregations, but we also recognise the need for specialist counselling and support. The Designated Person for Safeguarding can contact the Association Safeguarding Lead for their area to find recommendations for professional counsellors, charitable organisations and social care contacts. The Association Safeguarding Lead can also act as a link to ministers or counsellors in other Baptist churches who may be able to support an individual and their family. The Churches' Ministerial Counselling Service is available for ministers and their families and can also be offered to others when required.

8.3 Statistical data on pastoral care

8.3.1 We do not have statistical data on the type or frequency of provision of pastoral care to those who have experienced abuse in Baptist churches.

8.3.2 At national and regional level, the offer to provide or source appropriate pastoral care is made to every individual who brings an allegation. The offer of appropriate pastoral care is also made to ministers and their families where allegations are brought against them.

8.4 Financial redress

8.4.1 BUGB does not operate a formal financial redress scheme concerning child sexual abuse. This is mainly because of our structure, where each church is a separate charitable body with separate governance responsibilities. We encourage all Baptist churches to have a good level of insurance, including support in the event of a claim by someone who has experienced abuse in a Baptist church or by a Baptist minister or worker.

8.5 Dealing with unsubstantiated complaints

8.5.1 BUGB does not have authority to remove individuals from the membership of their Baptist church. This is a decision for the church members' meeting. BUGB will always ensure that appropriate action is taken to investigate complaints and that they are referred to appropriate agencies. BUGB would continue to take that approach even where an individual had made previous complaints which were found to be unsubstantiated. Where a complaint has been fully investigated and has found to be unsubstantiated, a complainant who repeatedly raises the same concern may be informed that the repeated complaint will no longer receive a response. We would

always consider whether new information has been made available which requires the complaint to be reconsidered.

8.6 Insurance claims

- 8.6.1 BUGB is insured by the Baptist Insurance Company for any claims in relation for child sexual abuse where the claim states that the actions of BUGB's staff or trustees have created harm. Our insurance policy covers claims made in respect of child sexual abuse. No claims have been made against BUGB since 2000.

Section 9

Relationship with other statutory organisations

9.1 Relationship with LADOs

- 9.1.1 We are pleased to say that at national and regional level we have developed good working relationships with LADOs in different parts of England and Wales, and we include LADOs in our Privacy Notices (Exhibits 39 and 40)
- 9.1.2 The National Safeguarding Team has contacted the relevant LADOs 38 times in the last 5 years as part of its support for churches with complex cases involving children and families.
- 9.1.3 We recognise that each LADO will have knowledge of some sectors and areas of the community more than others, and we work to explain both our faith-based organisations and the peculiarities of the Baptist church governance processes.

9.2 Relationship with the police

- 9.2.1 BUGB's Privacy Notices for Safeguarding and Ministries cover sharing information with the police, LADOs and other statutory agencies (Exhibits 39 and 40). Our model safeguarding policy and procedures (Exhibit 4) make clear to churches the need to report allegations to the police and to follow police advice in terms of next steps and communications.
- 9.2.2 At national, regional and church level we understand that police investigations take priority and that any internal investigation must wait to ensure that we do not taint a police investigation or tip off a potential offender to the interest of the police.
- 9.2.3 In the last 5 years, the national and regional safeguarding teams have referred cases directly to the police on 60 occasions.
- 9.2.4 In 2017, as part of our historic case review we referred one matter about the management of a safeguarding case to Thames Valley Police, who investigated but took no further action.

Section 10

Vetting and barring

10.1 DBS checks for all those working with children and young people in our church settings

10.1.1 Our policy for churches makes it clear that all those who will work with children and young people on a regular basis must have completed a DBS check satisfactorily before they can start work in this capacity. A guide for churches on DBS checks, including who to check and what type of check to use, is available free of charge on our website and is included as Exhibit 10.

10.1.2 In addition, our DBS service provider operates a telephone helpline for all our churches so that verifiers can seek advice in real time as they process a check.

10.2 DBS checking service

10.2.1 BUGB arranges, manages and pays for a DBS checking service that is free to all BUGB member churches. Our current contract is with Due Diligence Checking Ltd, who we have used for the past four years. The system is primarily designed for online use, with more than 98% of our checks carried out online. However, a small number of paper checks are also processed each year.

10.2.2 11,600 DBS checks were carried out last year under our service contract.

10.2.3 Each church appoints one or more DBS Verifiers, and they are given a telephone tutorial and a written guide to help them understand their responsibilities, the guidelines for DBS checks and the processes they will be using. We also provide guidance on handling confidential information, storing such information and keeping records of the renewal date for checks.

10.3 Dealing with blemished disclosures

10.3.1 The National Safeguarding Team handles all blemished disclosures for DBS checks carried out on ministers, workers and volunteers in BUGB member churches. A blemished disclosure is reviewed by a member of the team and then a risk assessment process is carried out, with the involvement of the church Designated Person for Safeguarding and the church minister. The individual is also given the right to present any information they believe to be helpful in assessing them for the role for which they are being checked.

10.4 DBS challenges

10.4.1 It has been an ongoing challenge to make sure that all those who should be checked are submitting to a DBS check. We have been working hard alongside our churches to help people understand what a DBS check is and why it is important.

We require all accredited ministers to undertake a DBS check every five years. There is a multi-stage process to confirm accredited ministers comply with the process.

- (1) The Association verifier receives an automated email from our DBS provider reminding it that a minister needs to undertake a new disclosure. The Association then contacts the minister.

- (2) If the minister fails to comply with that reminder within the set period, the Association then sends a reminder to the minister.
- (3) If the minister fails to comply again, the Association contacts the Ministries Team Leader who sends them a formal written warning making it clear that failing to undertake the disclosure will result in removal.
- (4) Finally, if the minister still refuses to comply, this is referred to the Ministerial Recognition Committee which has the power to revoke the minister's accreditation.

The Ministries Team Leader has had to refer an accredited minister to the Ministerial Recognition Committee for removal following the minister's failure to complete the required ministerial safeguarding training. In the same way, a persistent failure or refusal to complete a DBS check would likewise be referred to the Ministerial Recognition Committee for removal of the minister's accreditation. This has been necessary on two occasions in the last four years.

It is the responsibility of each church to monitor DBS compliance for staff other than accredited ministers. BUGB does not actively monitor compliance for non-ministers. However, if BUGB become aware that a church is non-compliant, we involve the Regional Association to encourage the church to comply. If the church refuses to comply, we have two options available to us to sanction the church. We can consider removing the church from membership of the Union, which to date we have not had to do. We may also consider reporting the church to the Charity Commission.

10.4.2 Some of the common messages received from churches who do not want to DBS check their workers and volunteers are:

- A sense that requiring a DBS check is doubting someone's integrity or trustworthiness
- A worry about the disclosure of old offences that are no relevant to their suitability to work with children and young people (e.g. old shoplifting or petty theft offences)
- An unfamiliarity with up to date safeguarding requirements and practices
- A desire to keep doing things 'the old way'.

10.4.3 We work to overcome these primarily through our training programmes, which equip church leaders to understand and explain why DBS checks, safer recruitment and good safeguarding procedures are vital for their church's work with children and young people. Our Regional Ministers also visit churches on a regular basis and emphasise the importance of keeping up to date with DBS checks.

Section 11

Resources

11.1 Staffing at national level

11.1.1 At national level, the National Safeguarding Team consists of the People Support and Safeguarding Manager, National Safeguarding Adviser, National Safeguarding Caseworker and a Team Administrator. My time as the People Support and Safeguarding Manager is split equally between HR and Safeguarding responsibilities.

11.1.2 Copies of the job descriptions for the National Safeguarding Team roles, the BUGB Trustee Board Safeguarding Trustee are included at Exhibits 14 to 17.

11.1.3 At national level, there is a separate budget for the work of the National Safeguarding Team. For 2019 this budget is set at £233,000, including the annual cost of our DBS checking service.

11.2 Staffing at regional level

11.2.1 Each of our Regional Associations has an Association Safeguarding Lead appointed on a part time basis. These individuals come from a range of backgrounds, with the majority having professional backgrounds in safeguarding roles, together with a smaller number of Regional Ministers who have developed specialist skills in safeguarding.

11.2.2 Each of our Regional Associations has a Safeguarding Lead and a Safeguarding Trustee and an example of the job descriptions for these posts are shown at Exhibits 18 and 19.

11.2.3 At regional level, the combined safeguarding budget for the 13 Association Safeguarding Leads and safeguarding training provision is £165,000 for the current year.

11.3 Staffing at College level

11.3.1 Our Baptist Colleges have a Safeguarding Officer or lead and a Safeguarding Trustee. An example of a job description for the Safeguarding Lead is shown at Exhibit 46.

11.4 Safeguarding project work

11.4.1 A separate projects budget is put in place to run alongside our strategic safeguarding plans and is based on the additional costs required over and above the team operational budgets. This varies significantly from year to year and the BUGB Trustee Board look at project costing on a case by case basis. By way of example, the projects budget for the 2015-2018 strategic safeguarding plan was approximately £35,000.

11.5 Church safeguarding

11.5.1 Each church has a Designated Person for Safeguarding. This will usually be a volunteer from amongst the church members and is often someone with a professional background or understanding of safeguarding. In some churches, one of the paid workers of the church will take on this role as part of their overall duties. At individual

church level, any expenditure on safeguarding will normally focus on payment of delegate fees for attendance of church leaders, workers and volunteers on the BUGB safeguarding training courses. The guidance note on the role of the DPS is included as Exhibit 6.

Section 12

Interfaith work

12.1 Involvement with inter faith groups – national involvement

12.1.1 At national level, BUGB participates in two inter-faith groups that deal with child protection and safeguarding issues:

- The Christian Forum for Safeguarding is a group consisting of the senior safeguarding leaders from Christian denominations operating in the UK. BUGB has been a member for many years, and we continue to value the regular opportunities to share best practice, work jointly on significant policy and project work, and to hear from leading experts in the field of child protection and safeguarding.
- The Inter Faith Network for the UK works to promote understanding, cooperation and good relations between organisations and persons of different faiths in the UK. This includes work on understanding safeguarding requirements and sharing examples of good practice.

12.2 Regional and college level

12.2.1 At regional and college level, several of our Association Safeguarding Leads are involved with local Christian ecumenical groups, meeting with other area safeguarding officers to talk about best practice. However, there is little work going on to develop inter-faith links.

12.2 Local church level

12.2.1 At local level, many of our churches are active members of local inter-faith network groups, as well as linking in to other Christian denominations through Churches Together and several other cross-denominational organisations. Baptists also play a key part in the leadership teams of some of the biggest Christian events in the UK, including Spring Harvest and the Greenbelt festival.

Section 13

Charity status and interaction with the Charity Commission

13.1 Charitable status

13.1.1 BUGB is a registered charity (1125912) and is currently in the process of changing its legal structure and transferring its assets, liabilities and activities to a Charitable Incorporated Organisation with registered charity number 1181392.

13.2 The Charity Commission

13.2.1 We understand our responsibility to report any significant child protection issues to the Charity Commission. To the best of our knowledge, four serious incident reports relating to child protection issues have been made in the last 5 years. Two of these were submitted in 2015 and a further two submitted in 2019 and all relate to investigations into the behaviour of accredited ministers where we believed there was a reputational risk to the Union.

13.2.2 As part of our historic case review of accredited ministers, we met with the Charity Commission in 2017 to talk about the review itself and the reporting arrangements of any historical cases. We reported as required on all significant cases.

13.3 Inquiries or investigations into BUGB

13.3.1 To the best of our knowledge we have never been asked to supply details of our child protection policies or practices to the Charity Commission nor has BUGB been the subject of any compliance action relating to child protection. Neither the Charity Commission or any other regulatory body has opened a Statutory Inquiry or investigation into BUGB over the last 10 years.

13.3.2 Please note that we do not gather information on child protection issues in each of the churches who belong to BUGB, so we cannot provide information on whether such inquiry or investigations have taken place in individual Baptist churches. However, we would expect that a church facing such an investigation would be in contact with their regional or the National Safeguarding Team, and we have no records of any such church inquiries in the last 10 years.

13.3.3 We do not wish to make any comment about the effectiveness of the Charity Commission in regulating religious communities as we have not had sufficient contact with the Commission to be able to come to an informed view. We would comment that our discussions with the Commission in relation to the process and outcomes of our historic case review of accredited ministers was helpful and positive in nature.

Section 14

Culture and challenges

14.1 Strategic review

14.1.1 In 2014 BUGB began work on a strategic safeguarding review, looking at the systems, policies and procedures that were in place at the time, and aiming to compare this to examples of good practice. The action plan produced as a result of this review was approved by trustees in early 2015 and then delivered through the work of the National Safeguarding Contacts Group over the following three years. A copy of this review is included as Exhibit 47. The current BUGB Strategic Safeguarding Review Report 2018-2021 is included as Exhibit 48.

14.2 Identified challenges

14.2.1 We continue to work to move our safeguarding practice towards our stated aspiration of 'Excellence in Safeguarding'.

14.2.2 Our culture and structure provide some specific challenges that we address on a regular basis:

- Our non-hierarchical structure means that it can be difficult to implement changes in a consistent way across the churches of our Union. We use the National Safeguarding Contacts Group as a way to ensure that both national and regional teams are taking the same messages to churches and church leaders.
- It is easy for safeguarding training to become diluted or diffused as each church uses the safeguarding training that seems useful to them. To this end, we have worked hard to develop a high-quality set of training materials and a pool of 135 BUGB trainers to deliver the training in a consistent way to our churches.
- There is still a tension between the desire to act pastorally and informally with the need to follow formal safeguarding processes. We continue to talk about the value of both formal processes and pastoral care as the best way forward.
- We recognise that church members and attendees still find it difficult to deal with safeguarding issues that involve church leaders and ministers. By dealing with this issue through the national ministries and safeguarding teams we have tried to reduce the decision making about reporting that might otherwise prevent appropriate process taking place.
- The work of the Truth Project shows that those who experience child sexual abuse in a church setting find it extremely difficult to talk about the abuse at the time that it takes place, and often wait many years before disclosing what has happened to them. We are working to develop an improved set of safeguarding materials and messages for children and young people attending our churches so that it is easier for them to feel able to report and to trust that they will be taken seriously.

Section 15 Other matters

IICSA have asked for the view of BUGB on a number of key points in relation to the safeguarding of children in religious organisations and settings. Our responses are set out below and represent the views of our main Trustee Board.

15.1 Adequacy of the current arrangements in respect of the regulation of child protection in religious organisations and settings

15.1.1 It is our view that the current arrangements for child protection are adequate with one notable exception, that is, 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. We are aware of the current All Party Parliamentary Group looking specifically at this matter and have made representations to that group through its consultation process.

15.1.2 We recognise that ministers, elders, deacons, church leaders and many senior church staff will automatically be seen as having authority, power and influence. We also believe that a legal requirement to automatically refer cases involving adults in a position of trust within the church to the police would assist in the effective handling of investigations, and therefore the safeguarding of children and young people.

15.1.3 In commenting on this below, we have divided our comments into two groups of workers:

- Ministers and paid workers in positions of authority
- Unpaid workers and volunteers in positions of authority

15.1.4 Ministers and paid workers in positions of authority

It is our view that 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. Across our Union this would include:

- Ministers serving as leaders in our churches, including all those who are formally accredited by BUGB and other ministers from other denominations who now serve in Baptist churches, and ministers without formal ministerial training
- Ministers who serve in other capacities, including as part of our regional and national teams
- Ministers who serve as chaplains in a wide variety of settings, including schools, hospitals and prisons
- Paid church workers who hold positions of authority or leadership. For example:
 - Paid youth pastors and workers
 - Paid children's workers and children and family workers
 - Paid pastoral care workers or those in community outreach roles

- Paid office holders including Operations Managers, Church Managers, and others who manage practical aspects of church life

15.1.5 Church ministers are expected to deal with children and families in the most difficult of situations, where the requirement to be trustworthy, to act with integrity and to do no harm are paramount. Children, young people and their parents should be able to see that churches have comprehensive safeguarding policies and procedures in place and that these policies and procedures are used in practice in all related events and activities of the church.

15.1.6 Children, and their parents, guardians and carers, must expect the highest standards of behaviour from those in church leadership positions, and we believe that ministers and paid workers in roles that are seen to have authority or leadership responsibility should be included in the position of trust categories alongside others who work professionally in our communities. We accept that roles are not always defined to focus solely on young people. However, where an individual's role involves working with young people on a regular basis, we think it is fair that the same high standards should apply to them.

15.1.7 We recognise that a sound structure to provide training, information and support to ministers and paid workers around their safeguarding responsibilities is vital, and we already operate a training programme at Levels 1, 2 and 3. This is a requirement for all accredited ministers and we give clear guidance to those churches with unaccredited ministers that they should ensure their minister and leaders attend. Our Level 3 training for leaders already includes a section on leadership behaviours, including abuse of trust, based on our Christian beliefs and moral standards.

Unpaid volunteers

15.1.8 We recognise that volunteers lead much of the children and youth work carried out in and by our churches. Volunteers lead youth clubs, holiday clubs, Sunday School classes, Bible study groups, Baptismal preparation classes, after church evening groups and a wide range of other youth activities. Young people who grow up attending a Baptist church, or who join a particular group or activity will come to know and trust these volunteers. BUGB already provides guidance to all our churches on the importance of safer recruitment processes, including the use of DBS checks, for both paid and volunteer roles that work with children and young people.

15.1.9 In addition, the elders, deacons and trustees of Baptist churches are mainly unpaid volunteers. These people come from a wide range of business, professional and social backgrounds. There is an expectation that these leaders will be role models for Godly behaviour, and so we believe that they should also be covered by the positions of trust legislation.

15.1.10 There are differences in the level of training, support, education and monitoring of volunteers across our churches and we would see that a regime that recognises their limited professional training in this area is important. We depend heavily on the thousands of volunteers who step in to hold leader and helper roles in our churches as a way of expressing their faith and serving their church and their community.

15.1.11 We encourage all our churches to send those in leadership roles on our Levels 1, 2 and 3 training. Again, a section on leadership behaviour is included in our Level 3 course for church leaders.

15.2 Is there a need for a registration and inspection service?

15.2.1 We understand the rationale for a registration and inspection service but think that the necessary bureaucracy of such a service would prevent many churches from starting new children and youth programmes and mean that many existing activities would cease. Again, this is because so much children and youth work in churches is run by volunteers whose time is necessarily limited by their other commitments.

15.3 Is there a need for common training and information?

15.3.1 In participating in this Inquiry we have been reminded again of the very wide differences in safeguarding approach, resources and training available in different religious organisations and settings.

15.3.2 In our role as a support to almost 2,000 Baptist churches across England and Wales, the BUGB Trustee Board made a decision 5 years ago to put additional resources into safeguarding training, support and information to our churches. This decision was supported by all of the Team Leaders of our Associations, Principals of our Baptist Colleges and the Specialist Team Leaders.

15.3.3 This has allowed us to recruit additional safeguarding staff, build a better set of core policies, procedures and materials, re-design and re-launch our training, and deliver an ongoing plan of safeguarding support and improvement. We recognise that we are fortunate to have the financial resources to be able to do this.

15.3.4 We want to be clear that we are happy to share our materials and training with other organisations if that will help them to move forward in terms of their safeguarding practices. We do this humbly, recognising that other denominations, including the Salvation Army and the Methodists, have had strong safeguarding structures and training in place for far longer than us.

15.3.5 It is clear that many smaller religious organisations do not have the money or the resources to carry out this type of development work themselves. To that end, we see the value in the availability of a 'default' training programme and materials. However, we would not want to replace our own bespoke training and materials with a generic set. We have worked hard to tailor our materials and training to fit the way that Baptist churches operate and to work in line with Baptist church governance arrangements.

15.3.6 We can see that there is a significant challenge for anyone attempting to provide a 'one size fits all' safeguarding programme for religious organisations, as the structure and governance is so different across the range of faiths and beliefs, and the theological beliefs that underpin these organisations are also significantly different. For example, our BUGB Level 2 and 3 training is clearly based on a Christian perspective of what the Bible says about caring for the young and the vulnerable. We quote from the words of Jesus in our training and include a section that addresses the balance between

justice and forgiveness. This perspective would be quite different in another religious group.

15.4 Is there a need for common policies, procedures and information?

15.4.1 We see that each denomination or religious organisation need to develop a set of safeguarding policies procedures and practices that fully comply with all legal obligations, that look towards best practice and which are tailored to the way in which that organisation works. We see 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.

15.5 Is there a need for a common qualification for all faith leaders on child protection?

15.5.1 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. For example, BSc and MSc qualifications in child protection and safeguarding are already available at several UK universities, but are primarily aimed at those looking at a profession in statutory services. A similar course designed for safeguarding leaders in charitable and religious settings may well attract a sizeable group of students and create a peer group of senior safeguarding leaders across this sector. Alternatively, one of the universities may be prepared to offer a series of seminars or modules focusing on the needs of faith-based organisations.

15.5.2 At more local level, high quality training tailored to the culture, leadership styles and structures of local churches is more suitable in our view.

15.6 Should religious organisations be subject to certain minimum standards?

15.6.1 Yes. There are already standards that apply in terms of statute and in guidance from the Charity Commission. The Data Protection legislation also lays down clear requirements in terms of the handling of special category and criminal convictions etc data.

15.7 The current system of vetting and barring and whether it is suitable for the needs of religious organisations and settings

15.7.1 We think that the current definition of 'regulated activity' is sufficiently clear and has enabled us to write guidance for our churches on who should be checked and on what basis.

15.7.2 The only area where we have needed to come to a view above and beyond that currently given in the definitions has been in relation to the need for checks for church trustees. Recent guidance from the Charity Commission suggested that not all trustees of charities needed to be DBS checked and this generated questions from a number of our churches. We have taken the view that the vast majority of our churches operate significant children and youth work activities and events, as well as activities for adults at risk. Since the trustees are regularly in attendance at the church, and are visible in their leadership roles, we have advised that they should be DBS checked. It would be

helpful to have clarification on this as it is a point that is likely to affect many churches and other religious groups.

15.7.3 We do not find the current DBS checking system to be onerous and have valued the move to an efficient online checking system. Feedback from our churches has been positive about the need to check, the guidance on checking and the process by which they do so.

15.8 The content or presentation of the following statutory guidance documents, in so far as they provide guidance concerning the duties and responsibilities of religious organisations

15.8.1 We continue to find the Working Together to Safeguarding Children and Keeping Children Safe in Education documents to be helpful guidance on good practice and safer recruitment.

15.9 Should it 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 whether concealment of such abuse if an admission has been made and/or if there have been internal disciplinary findings of such should be a criminal offence?

15.9.1 We wholeheartedly agree with both of these points. Our own disciplinary code for accredited ministers makes it clear that failure to report, concealing abuse or attempting to deal with matters outside of our safeguarding policies are matters that will lead to the removal of accreditation.

15.9.2 Alongside this, we would strongly support the extension of the current positions of trust definitions to include accredited ministers and all other paid workers in churches whose roles involve working with children and young people. Primarily this is because we want our ministers and workers to be held to the same high standards as other professionals who work with children and young people. We also believe that the ability to automatically refer cases involving ministers and paid workers to the police would be helpful in the effective handling of investigations.

15.10 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
(<https://consult.education.gov.uk/regulatory-framework-unit/out-of-school-settings-voluntary-safeguarding-code/>):

15.10.1 We would support a voluntary code in respect of child protection in out of school settings which provided tuition in someone's religious faith. In Baptist churches, this would usually be in one of the following settings:

- Sunday School or junior church groups
- Children's or youth Bible studies or house-groups
- Baptismal preparation classes

15.10.2 The draft version of the voluntary code is helpful and well written in terms of supporting those in smaller organisations. We note that the main sections are already covered in our own safeguarding guides and would be happy to support the extension of this voluntary code to religious organisations (who are already mentioned as potential participants). We note that the key subject areas are relevant to all the children and youth activities that are run in Baptist churches:

- Health and safety
- Keeping a register and understanding the needs of each child
- Child protection policy
- Having a designated safeguarding lead
- How to refer to statutory authorities
- Awareness of types, signs and symptoms of abuse
- Reporting concerns
- Data protection
- Safer recruitment
- Governance and financial management

Section 16


Summary

- 16.1 BUGB recognises that there is a clear and urgent need for all religious organisations to put in the time, effort and education necessary to equip their churches and places of worship to meet recognised good practice in terms of the safeguarding of children and young people.
- 16.2 Within our own organisation, we have made significant moves forward in our safeguarding policies and practices and continue to work through a series of three year plans to improve all aspects of safeguarding in Baptist churches and in our Specialist Teams, Regional Associations and Colleges. We are heartened by the momentum we see amongst our churches and supporting teams and will keep pushing forward to our goal of 'Excellence in Safeguarding'.
- 16.3 As part of this process we value the opportunity for discussion and reflection that the IICSA Inquiry brings, and believe that the learning points of the review, for BUGB specifically and for the wider religious community in the UK, will provide much needed external perspective.
- 16.3 We are committed to working alongside the police, LADOs, and social services, and with schools, uniformed youth organisations, and families to safeguard children from harm and abuse.
- 16.4 We would re-state our willingness to share our experiences and work in safeguarding children with any of the other groups called to participate in the Inquiry. We will be actively looking to learn from the experiences and resources shared by other participants and are hopeful that the Inquiry process will create tangible change in the safeguarding climate in religious organisations across the UK.

Statement of Truth

I believe that the facts stated in this witness statement are true.

Signed:

A handwritten signature in black ink that reads "Rachel Stone". The signature is written in a cursive style with a large initial 'R' and a long, sweeping underline.

Dated: 15 November 2019

Witness Name: Rachel Elizabeth Mary Stone
Statement No.: 1
Exhibits: 48
Dated: 15 November 2019

THE INDEPENDENT INQUIRY INTO CHILD SEXUAL ABUSE

LIST OF EXHIBITS

Exhibit Number	Exhibit Title
1	Constitution for the Baptist Union of Great Britain
2	Diagram of key governance structures
3	Constitution for the Baptist Union of Great Britain CIO
4	BUGB model safeguarding policy and procedures for churches
5	Role profile - Church Safeguarding Trustee
6	Safeguarding in church life – the role of the Designated Person for Safeguarding
7	Terms of Reference for the Safeguarding Sub-committee of the BUGB Trustee Board
8	Terms of Reference for National Safeguarding Contacts Group
9	Ministerial Recognition Rules
10	BUGB Guide to DBS Checks
11	Confidential self-disclosure form
12	Terms of Reference for the Key Roles Nomination Group
13	Recruitment guidelines for the Key Roles Nominations Group
14	Role profile – People Support and Safeguarding Manager
15	Role profile – National Safeguarding Adviser

16	Role profile – National Safeguarding Caseworker
17	Role profile – BUGB Safeguarding Trustee
18	Role profile – Association Safeguarding Lead
19	Role profile – Association Safeguarding Trustee
20	Safeguarding requirements for Ministers accredited with both BUGB and BUW and working in Wales
21	Historic case review report of Accredited Ministers to the BUGB Trustee Board 2017
22	Outline agenda of training days for Regional Association teams
23	Safe To Grow – child protection guidance
24	Safe To Belong – adults at risk guidance
25	BUGB Guide to Cyber Safety
26	BUGB Guide to Understanding Self Harm
27	BUGB Guide to Supporting Those Who Have Experienced Abuse
28	BUGB Guide to Understanding Domestic Abuse
29	BUGB Guide to Safeguarding Record Keeping
30	BUGB Safeguarding Audit Tool for Churches
31	Using images of Children and Young People
32	Safeguarding Incident Reporting Form
33	Gateway to Level 2 Excellence in Safeguarding
34	Example Association Policy and Procedures – London Baptist Association
35	BUGB safeguarding policy statement
36	Enhanced Disclosures and Safeguarding Training for Accreditation
37	BUGB Data Protection Policy
38	BUGB Data Retention Schedule
39	BUGB Privacy Notice for the Safeguarding Team

40	BUGB Privacy Notice for the Ministries Team
41	BUGB Appropriate Policy Document
42	BUGB Data Protection Impact Assessment for the Safeguarding team
43	BUGB Data Protection Impact Assessment for the Ministries team
44	BUGB Template Data Sharing Agreement for Regional Associations
45	Complaints process for a complaint against an Accredited Minister
46	Role profile – College Safeguarding Lead
47	BUGB Strategic Safeguarding Review Report 2015-2018
48	BUGB Strategic Safeguarding Review Report 2018-2021