



The Well Safeguarding Policy

thewell

Bethel United Church of Jesus Christ Apostolic – The Well

All Saints C of E Primary, School Hall, Upper Beulah Hill, London SE19 3LG

Policy Updated: March 2026 | Policy Review: March 2027

This policy has been updated to reflect Working Together to Safeguard Children 2026 (March 2026) and Keeping Children Safe in Education September 2025.

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Section 1: Church and Charity Details

Organisation:

Bethel United Church of Jesus Christ
Apostolic – The Well

Place of Worship:

All Saints C of E Primary, School Hall, Upper
Beulah Hill, London SE19 3LG

General Email:

safeguarding@thewellbethel.com

Senior Leader:

Pastor Dean J Wright

Senior Leader Email:

pastor@thewellbethel.com

Designated Safeguarding Lead (DSL):

Minister Deborah Myers

DSL Contact Email:

safeguarding@thewellbethel.com

Deputy DSL:

Sister Lorna Lewin

Safeguarding Co-ordinator (Trustee):

Pastor Dean J Wright

Safeguarding Co-ordinator Email:

pastor@thewellbethel.com

Organisation (District 8) Safeguarding Officer:

Bishop Nathan Simmonds

Charity Number:

1206449

Insurance Company:

Integra Insurance Solutions Ltd

Insurance Address:

Suite 2B, West Village, 114 Wellington Street,
Leeds, LS1 1BA

2.1 Introduction

Good governance is essential to preventing abuse and ensuring that concerns are responded to promptly, transparently and with integrity. At The Well: Bethel, safeguarding is embedded into our leadership, culture and decision-making. The Governance Board (Board of Trustees) holds independent authority and legal responsibility for the church's safeguarding arrangements.

The culture of an organisation can protect or harm. A positive safeguarding culture promotes openness, accountability, respect and vigilance. A negative culture can silence concerns, minimise harm or allow unsafe practice to continue.

The Well: Bethel is committed to fostering a culture where safeguarding is understood as everyone's responsibility, and where children, young people and adults are seen, heard and understood.

2.2 Positions of Trust

All adults working with children, young people or adults with care and support needs within The Well: Bethel are in a position of trust. This includes officers, trustees, ministry leaders, Sunday school teachers, youth workers and volunteers.

Those in positions of trust must:

- understand the power and influence their role carries
- maintain professional boundaries at all times
- avoid behaviour that could be misinterpreted
- never misuse their position for personal gain or inappropriate relationships

Since April 2022, it is illegal in England, Wales and Northern Ireland for an adult in a position of trust within a faith setting to engage in sexual activity with a 16- or 17-year-old under their care or supervision. The Well: Bethel upholds this legal requirement.

2.3 Our Commitment

At The Well: Bethel, we are committed to providing a safe, caring and respectful environment for children, young people and adults. We affirm the principles of the UN Universal Declaration of Human Rights, the International Covenant of Human Rights, and the UN Convention on the Rights of the Child.

In line with Working Together to Safeguard Children (2026) and Keeping Children Safe in Education (September 2025), we commit to:

- safeguarding the welfare of all who engage with our church
- promoting a culture of vigilance, transparency, accountability and anti-discriminatory practice
- ensuring that safeguarding is integral to leadership, governance and ministry
- working in partnership with statutory and voluntary agencies
- ensuring that children and adults are listened to, respected and supported
- recognising and actively challenging racism, discrimination and disproportionality in our practice

2.4 Anti-Racist and Anti-Discriminatory Practice

NEW — WT2026 Requirement

Working Together to Safeguard Children 2026 (Chapter 1) places a stronger and more explicit duty on organisations to embed anti-racist and anti-discriminatory practice. Leaders must create inclusive organisational cultures. Workers must be able to identify and CHALLENGE racism and discrimination — not merely be aware of it.

The Well: Bethel holds to the Biblical understanding of marriage and sexuality as set out in Scripture. This theological position is openly and honestly held. It does not, however, alter our duty of care to every child and young person who comes through our doors. Safeguarding is about protecting people from harm, it is not a statement of theological affirmation.

Young people who are perceived to be LGBT+ can face particular vulnerabilities, including honour-based abuse, family rejection, online targeting and exploitation. Where any such young person is at risk of harm within our church community or beyond it, The Well: Bethel will respond with the same promptness, compassion and commitment as we would for any other child. Our theological convictions and our safeguarding duty are held separately and both are taken seriously.

Workers must never allow their personal beliefs, or the beliefs of the church to prevent them from recognising or reporting a safeguarding concern involving an LGBT+ young person. Any such concern must be reported to the DSL in the usual way.

The Well: Bethel is committed to anti-racist and anti-discriminatory safeguarding practice. We recognise that racism, discrimination, inequality and historic trauma can affect how children and families engage with services, and that these factors must be understood and actively addressed.

We commit to:

- creating an inclusive organisational culture at every level — in practice, policies, training and external engagement
- ensuring workers are equipped to identify and challenge racism, discrimination and bias — not merely to be aware of them
- recognising how trauma, racism and past negative experiences with services can affect a family's willingness to engage, and adapting our approach accordingly
- respecting diverse cultural models of parenting and family life, while maintaining a clear focus on the child's safety and wellbeing
- analysing our safeguarding practice to identify any patterns of disproportionality, and taking action where found
- embedding culturally competent practice into all training and supervision

2.5 Leadership Responsibilities

The Leadership Team and Trustees ensure that:

- safeguarding is a standing agenda item at leadership and trustee meetings
- the DSL and Deputy DSL are supported, trained and resourced
- safeguarding concerns are responded to promptly and appropriately
- safer recruitment, training and supervision are consistently applied
- safeguarding culture – including anti-discriminatory practice – is monitored and strengthened
- statutory guidance is followed and regularly reviewed

The Well: Bethel undertakes to endorse and follow all national and local safeguarding legislation and procedures, provide ongoing safeguarding training for all workers, and support the DSL in any action required to protect children, young people and adults.

2.6 Culture and Conduct

The Well: Bethel promotes:

- respectful, safe and appropriate behaviour
- openness and willingness to challenge unsafe practice – including racism and discrimination
- professional curiosity
- accountability and transparency
- a zero-tolerance approach to abuse, including child-on-child abuse, honour-based abuse, and faith-based abuse
- inclusive, anti-discriminatory practice in all interactions

3.1 Prevention

The Well: Bethel is committed to preventing abuse by creating a culture of vigilance, transparency and accountability. Safeguarding is everyone's responsibility. All ministry leaders, Sunday school teachers, youth workers, officers, trustees and volunteers must remain alert to the possibility of abuse and respond in line with this policy.

3.2 Understanding Abuse and Neglect

Abuse is complex and can take many forms. A person may abuse by inflicting harm or by failing to prevent harm. Children may be abused within their family, within a faith setting, in the community, online, or by other children. Abuse is often carried out by someone known to the victim or in a position of trust.

NEW — WT2026 — Multiple and Simultaneous Harms

Working Together 2026 explicitly states that children often experience multiple and simultaneous harms. Our practice must recognise overlapping risks and not address concerns in isolation. Workers should consider the child's whole lived experience and exercise professional curiosity.

We follow the definitions of abuse and neglect set out in Working Together to Safeguard Children (2026), Keeping Children Safe in Education (September 2025), and Croydon Local Safeguarding Partnership procedures. See Appendix 1 for full definitions.

Forms of abuse include:

- Physical abuse
- Emotional abuse
- Sexual abuse
- Neglect
- Child sexual exploitation (CSE)
- Child criminal exploitation (CCE)
- Domestic abuse (including coercive and controlling behaviour, and teenage relationship abuse)
- Online abuse (including grooming via AI platforms, gaming and social media)
- Child-on-child abuse (see Section 3.4)
- Honour-based abuse (HBA) — including forced marriage and female genital mutilation (FGM)
- Faith-based abuse (misuse of religious authority or practice to harm a child)
- Group-based child sexual exploitation
- Financial abuse
- Trafficking and modern slavery
- Radicalisation and extremism (see Appendix 2)

- Abuse of infants and pre-birth concerns (see Section 3.2.1)

3.2.1 Safeguarding Unborn Children and Infants

NEW — WT2026 — Pre-Birth and Infant Safeguarding

Working Together 2026 explicitly requires organisations to consider help, support and protection for unborn children where concerns are present. Infant abuse must be kept on the radar for all families. Workers should be aware of any pregnant person in the congregation who may need support.

Where a worker becomes aware that a pregnant person may need help or support to provide safe care for their unborn child — including concerns about domestic abuse, substance misuse, mental health, or risk from others — this must be shared with the DSL immediately. The DSL will seek advice from Croydon Children's Social Care as appropriate. Workers must be especially alert to signs of abuse of babies and very young children.

3.2.2 Honour-Based and Faith-Based Abuse

NEW — WT2026 — Honour-Based, Faith-Based and Belief-Based Abuse

Working Together 2026 strengthens expectations around honour-based, faith-based and belief-based abuse. These forms of abuse are particularly relevant to faith communities and must be explicitly recognised and addressed in this policy.

Honour-based abuse (HBA) is a collection of practices used to control behaviour to protect perceived family or community honour. It may include forced marriage, FGM, physical violence, emotional coercion and enforced isolation. HBA is a crime in England and Wales.

Faith-based abuse occurs when religious authority, belief or practice is misused to harm a child. This may include: accusations of 'witchcraft' or spirit possession; harmful religious rituals or exorcism; spiritual coercion; misuse of clerical authority; or denial of medical care on religious grounds.

Workers must:

- never dismiss concerns about HBA or faith-based abuse as 'cultural' or 'religious' matters
- report immediately to the DSL without confronting the family
- not attempt mediation between victim and family
- understand that FGM is a mandatory reporting duty

3.2.3 Domestic Abuse

Domestic abuse — including coercive and controlling behaviour, emotional abuse, physical violence, sexual abuse and economic abuse — has a profound impact on children, even where they are not directly targeted. Under the Domestic Abuse Act 2021, children who witness or are aware of domestic abuse are recognised as victims in their own right. Teenage relationship abuse is included within this definition.

3.3 Safer Recruitment

The Well: Bethel is committed to safer recruitment as a key part of preventing abuse. We commit to:

- providing ongoing safeguarding training and development for all workers
- ensuring all workers receive this safeguarding policy and understand their responsibilities
- requiring annual safeguarding training updates
- maintaining a record of all DBS checks, training dates and references (equivalent to a Single Central Record)
- requiring enhanced DBS checks for all workers in regulated activity with children or adults at risk
- ensuring DBS checks are renewed at least every three years
- ensuring children and adults know where to seek help, advice and support

Where a valid enhanced DBS certificate cannot be obtained immediately, at least one enhanced-DBS-checked worker must be present at all youth activities until full checks are completed. No individual may begin work with children or youth without the permission of the Elders and the DSL.

3.4 Child-on-Child Abuse (Peer-on-Peer Abuse)

The Well: Bethel recognises that children are capable of abusing other children. Child-on-child abuse is never tolerated, minimised or dismissed as 'banter', 'just having a laugh' or 'part of growing up'. This may include:

- bullying or cyberbullying
- sexting or sharing of sexual images (a criminal offence)
- sexual touching or sexual violence
- coercion, intimidation or threats
- harmful sexual behaviour
- initiation rituals or hazing
- online harassment or exploitation
- teenage relationship abuse

Children who harm others may themselves be experiencing abuse, trauma or unmet needs. Both the child who has been harmed and the child who has caused harm will be supported appropriately. Any disclosure must be reported to the DSL immediately. Under no circumstances should any adult request or view nude images of a child.

3.5 Online Safety

NEW — KCSiE 2025 & WT2026 — Online Safety

KCSiE 2025 expands online safety to include misinformation, disinformation and conspiracy theories as safeguarding harms, and references generative AI as a new and emerging concern. WT2026 explicitly links online harm to offline risk — they are not separate concerns.

Online risks include:

- grooming via social media, gaming platforms and messaging apps
- child sexual exploitation facilitated online
- sharing of nude or sexual images of children (a criminal offence)
- cyberbullying and online harassment
- exposure to radicalising or extremist content
- misinformation, disinformation and conspiracy theories that may cause or increase risk of harm
- use of generative AI to produce harmful content, including deepfakes
- online criminal exploitation, including cuckooing and county lines

Workers who become aware of online activity raising a safeguarding concern must report immediately to the DSL. See Appendix 3 for further guidance.

3.6 Promoting a Safe Culture

The Well: Bethel promotes a culture where safeguarding is openly discussed, concerns are raised without fear, children and adults are listened to and taken seriously, professional curiosity is encouraged, and unsafe practice – including racism and discrimination – is challenged. Workers are expected to model the character and conduct described in Galatians 5:22–23.

4.1 Principles

The Well: Bethel is committed to responding promptly, transparently and lawfully to all safeguarding concerns. No worker should ever investigate concerns themselves. All concerns must be reported immediately to the DSL or Deputy DSL.

We follow the principles of Working Together to Safeguard Children (2026):

- Children must be seen, heard and understood – direct work with the child is essential
- Concerns must be acted on at the right time
- Information must be shared appropriately and without delay
- Professional curiosity must be exercised
- The child's welfare is paramount
- Multiple and simultaneous harms must be considered together, not in isolation

4.2 Information Sharing

NEW – WT2026 – Information Sharing

Working Together 2026 reinforces that the Data Protection Act 2018 and UK GDPR do not prevent information sharing where a child or adult is at risk. GDPR is never a reason to withhold information that could protect a child. Refer to the DfE Information Sharing Advice for Safeguarding Practitioners (2024).

All workers must share safeguarding information promptly, lawfully and proportionately. Workers uncertain about sharing information should consult the DSL, or seek advice from Thirtyone:eight: 0303 003 1111 (option 2).

4.3 Immediate Action

If a child or adult is in immediate danger, workers must call 999 and inform the DSL as soon as possible. If urgent same-day intervention is required, workers may contact Croydon MASH directly and then notify the DSL.

4.4 Reporting Concerns Within the Church

4.4.1 Primary Contact

All allegations, disclosures or suspicions of abuse must be reported as soon as possible to:

Minister Deborah Myers – Designated Safeguarding Lead (DSL)

Section 4: Responding to Concerns, Disclosures and Allegations

The DSL will inform the Elders, the Safeguarding Co-ordinator (Elder Dean Wright), and statutory agencies as required. The DSL is responsible for making referrals to Croydon MASH (children), Police Child Protection Team, and Adult Social Services.

4.4.2 If the DSL is Unavailable or Implicated

Sister Lorna Lewin – Deputy DSL

The Deputy DSL will inform the Safeguarding Co-ordinator and Elders. If both DSL and Deputy are implicated, report directly to the Local Authority Designated Officer (LADO).

4.5 Contacting Statutory Agencies

4.5.1 Children (Croydon MASH)

MASH Consultation Line:
020 8726 6464

Urgent Action (same day):
020 8255 2888

Out of Hours:
020 8726 6400

Emergency:
999

4.5.2 Adults with Care and Support Needs

Adult Social Services:
020 8726 6500

Out of Hours:
ask for the Duty Social Worker

Non-urgent referrals:
referral.team2@croydon.gov.uk

4.5.3 Independent Advice

Thirytwoeight:
0303 003 1111 (option 2)

NSPCC Helpline:
0800 800 5000

Childline (for children):
0800 1111

Croydon LADO:
020 8726 6464

4.6 Record-Keeping

All concerns must be recorded promptly and factually on the church's Record of Concern form, stored securely, shared only on a need-to-know basis, and retained in line with UK GDPR and the Data Protection Act 2018. Data protection legislation is not a barrier to sharing information where a child or adult is at risk.

4.7 Escalation

If a worker believes that safeguarding concerns have not been handled appropriately, they may:

- escalate to the Safeguarding Trustee (Pastor Dean Wright)
- contact Children's Social Care directly
- contact the district overseer
- contact the Charity Commission – charities are required to report serious safeguarding incidents
- use the NSPCC Whistleblowing Advice Line: 0800 028 0285

4.8 Role of the DSL and Deputy DSL

The DSL and Deputy DSL will:

- clarify the details of the concern
- ensure the 'Record of Concern' form is completed
- check for previous concerns
- make referrals to statutory agencies
- seek advice from Thirtyone:eight where needed
- ensure no one speaks to parents/carers unless advised by Social Care or Police
- consider whether the child may be experiencing multiple or simultaneous harms

4.9 Responding to Specific Types of Abuse

4.9.1 Physical Injury, Neglect or Emotional Abuse

- complete the Record of Concern
- contact Children's Social Services, LADO or Thirtyone:eight for advice
- not inform parents unless advised
- seek medical help if required
- contact Police if a crime has been committed
- call 999 in a medical emergency

4.9.2 Sexual Abuse

- contact Children's Social Services or Police Child Protection Team immediately
- not speak to the parent/carers or alleged perpetrator

- follow advice from Thirtyone:eight
- in cases of CSA, follow WT2026 expectations for strategy discussions and direct work with the child

4.9.3 Honour-Based Abuse, Forced Marriage or FGM

- contact Police immediately — these are criminal offences
- NOT attempt mediation between the child and family
- NOT inform the family before consulting Police or Social Care
- for FGM in girls under 18, make a mandatory referral to the Police (statutory duty for Teachers in schools)

4.9.4 Adults with Care and Support Needs

- contact Adult Social Services
- call emergency services if the adult is in immediate danger
- follow safeguarding partnership procedures

4.10 Allegations Against Workers (Paid or Volunteer)

If an allegation is made against a worker, the Safeguarding Co-ordinator will:

- liaise with Children's Social Services regarding suspension
- refer to the LADO — Croydon LADO: 020 8726 6464
- refer to the Disclosure and Barring Service (DBS) where appropriate
- notify the Charity Commission if the allegation constitutes a serious incident

5.1 Supporting Those Affected by Abuse

The Well: Bethel is committed to offering compassionate, confidential and appropriate support to anyone affected by abuse. Support may include pastoral care from the pastor, officers and those trained in counselling, signposting to specialist services, working in partnership with statutory agencies, and ensuring the individual is listened to, believed and respected. Support will always be offered in a way that does not compromise any statutory investigation.

5.2 Working with Known Offenders

When someone attending The Well: Bethel is known to have abused children or adults, or is assessed as posing a risk, the church will:

- work closely with statutory agencies
- provide pastoral support and accountability
- implement a written safeguarding agreement outlining clear boundaries
- ensure the individual is supervised appropriately at all times when on church premises
- prioritise the safety of children, young people and adults above all other considerations

Safeguarding agreements are reviewed regularly and must be adhered to at all times.

5.3 Local Church Guidelines and Safe Practice

5.3.1 Expectations of Workers

All Sunday school teachers, youth workers, assistants and ministry leaders must:

- be members of The Well: Bethel
- behave in a manner consistent with Christian character and conduct (Galatians 5:22–23)
- uphold the values and safeguarding culture of the church, including anti-discriminatory practice
- maintain professional boundaries
- follow the Code of Conduct

5.3.2 Parental Permission and Information

Parents who are not members must provide written permission for their child to attend Sunday school or youth activities, and share relevant information enabling workers to support their child safely (e.g. allergies, medical needs, SEND information and learning differences). The term 'learning differences' is used to be inclusive and to reflect current guidance on neurodiversity.

5.3.3 Photography and Filming

The Well: Bethel will not take or publish photographs, videos or digital images of children without explicit written consent from parents or guardians. See Appendix 4 for the full policy.

5.4 Working with Visitors and External Organisations

All visitors, guest speakers, and external organisations must comply with the church's safeguarding expectations. Where external groups use church premises for activities involving children or adults with care and support needs, written assurance of their safeguarding arrangements will be required. The church reserves the right to refuse or withdraw permission for any activity that does not meet safeguarding standards.

5.5 Family Help and Early Support

NEW — WT2026 — Family Help Model

Working Together 2026 introduces a 'Family Help' model, combining early help and Section 17 (children in need) support into a single, more integrated offer. The Well: Bethel will work alongside statutory partners to support families early, before problems escalate.

Where workers identify that a child or family may benefit from additional support — but there is no immediate safeguarding concern — they should discuss this with the DSL. The DSL can support signposting to Croydon's Family Help provision and early help services.

5.6 Promoting a Culture of Safety and Accountability

The Well: Bethel is committed to maintaining a culture where safeguarding and anti-discriminatory practice are openly discussed and modelled; workers can raise concerns without fear; children, young people and adults are listened to; supervision, support and training are provided; and safeguarding practice is reviewed regularly. Safeguarding is not simply a set of procedures — it is a culture shaped by our values, our leadership and our commitment to protecting the vulnerable.

Section 6: Safeguarding Declarations

I have read and understood The Well's Safeguarding Policy for children and vulnerable adults.

I am fully committed to The Well: Bethel's safeguarding policy and hereby agree to abide by it.

Role: Designated Safeguarding Lead (DSL)

Name: Minister Deborah Myers

Signature: DMyers Date: 11.10.2026

Role: Deputy DSL

Name: Sister Lorna Lewin

Signature: LELewin Date: 12.10.2026

Role: Safeguarding Co-ordinator (Trustee)

Name: Pastor Dean Wright

Signature: PDeanWright Date: 11.10.2026

Policy Updated: March 2026 | Policy Review: March 2027

The following definitions are based on Working Together to Safeguard Children (2026), the Children Act 1989 and 2004, and the Care Act 2014 (for adults). Workers should familiarise themselves with these definitions and their indicators.

Physical Abuse

Deliberately hurting a child. Includes hitting, slapping, punching, kicking, biting, burning, shaking or throwing a child; physical restraint; withholding food, medical attention or sleep; drugging; fabricating or inducing illness (FII/Munchausen Syndrome by Proxy).

Emotional or Psychological Abuse

Persistent emotional ill-treatment of a child causing severe and persistent adverse effects on the child's emotional development. May involve conveying that the child is worthless, unloved or inadequate; imposing age-inappropriate expectations; causing a child to feel frightened or in danger; or exploitation or corruption of children.

Sexual Abuse

Forcing or enticing a child to take part in sexual activities, whether or not the child is aware. Includes contact abuse (touching, rape, penetration, forcing sexual acts) and non-contact abuse (grooming, exploitation, sexual acts online, showing pornography, making or distributing child abuse images).

Neglect

Failure to meet a child's basic physical, emotional, social or psychological needs. May involve failing to provide adequate food, shelter and clothing; failure to protect a child from harm; failure to ensure access to appropriate medical care; or neglect of a child's basic emotional needs.

Spiritual / Religious Abuse

Abuse administered under the guise of religion, including harassment, humiliation or coercion resulting in psychological trauma. Also includes misuse of religious authority for selfish or ideological ends, such as abuse of a clerical position.

Honour-Based Abuse (HBA)

Practices used to control behaviour to protect perceived family or community honour. Includes forced marriage, FGM, physical violence, emotional coercion and enforced isolation. HBA is a criminal offence. FGM is subject to a mandatory reporting duty for professionals.

Faith-Based Abuse

Misuse of religious authority, belief or practice to harm a child. May include: accusations of 'witchcraft' or spirit possession; harmful religious rituals or exorcism; spiritual coercion; misuse of clerical authority to silence or isolate a child; or denial of medical care on religious grounds. This is always abuse and must always be reported.

Child Sexual Exploitation (CSE)

Sexual abuse where a child is sexually exploited in exchange for something they need or want (money, gifts, food, affection) or through force, manipulation or deception. Can involve a single perpetrator or an organised group and can occur online or offline.

Child Criminal Exploitation (CCE)

Where a child is coerced, manipulated or deceived into participating in criminal activity. Includes county lines (drug trafficking), carrying weapons, and other criminal acts for the benefit of others. Children are victims, not criminals, in these circumstances.

Group-Based Child Sexual Exploitation

Exploitation carried out by groups of individuals who come together to exploit children sexually in an organised or opportunistic way. As defined in the WT2026 Glossary, it involves the use of children for sexual purposes by multiple perpetrators who may operate in person or online.

Domestic Abuse

Including coercive and controlling behaviour, emotional abuse, physical violence, sexual abuse and economic abuse. Under the Domestic Abuse Act 2021, children who witness or are exposed to domestic abuse are recognised as victims in their own right. Teenage relationship abuse is included within this definition.

Financial Abuse

Includes theft, fraud, pressure about money, and the misuse or misappropriation of financial resources.

Child Trafficking

Recruiting, moving, receiving or harbouring children for the purpose of exploitation — a form of modern slavery (Modern Slavery Act 2015). Children may be trafficked for criminal activity, forced marriage, domestic servitude, forced labour, sexual exploitation or illegal adoption.

Online Abuse

Encompasses grooming via social media, gaming and messaging platforms; cyberbullying; sharing of sexual images of children; contact with strangers online; exposure to harmful content including extremism, self-harm and sexual content; exploitation facilitated through generative AI or deepfake technology; and misinformation or disinformation that may cause or increase risk of harm.

Upskirting

Taking photographs of under-clothing with intent to view genitals or buttocks — a criminal offence under the Voyeurism (Offences) Act 2019. Can lead to up to 2 years in prison and placement on the Sex Offenders Register. Must be reported to the DSL and Police immediately.

Female Genital Mutilation (FGM)

Comprises all procedures involving the removal or injury of female genital organs for non-medical reasons, as defined by the WHO. Practiced on girls under 18. FGM is not prescribed by any religion and has no health benefits. It causes lasting physical and psychological trauma. Professionals have a mandatory duty to report FGM in girls under 18 to the Police.

Cyberbullying

Use of digital technologies to bully, harass, threaten or humiliate another person. Unlike face-to-face bullying, it can occur 24 hours a day. It is unacceptable and may constitute a criminal offence. Childline: 0800 1111.

Peer-on-Peer / Child-on-Child Abuse

Criminal exploitation and sexual abuse — both directly and through grooming — are among the biggest concerns. Includes physical and sexual abuse, sexual harassment and violence, emotional harm, on- and offline bullying, teenage relationship abuse and gang activity. Both perpetrator and victim are typically under 18.

Gang Activity and Youth Violence

Children can be exploited sexually and/or criminally by a gang. Gangs typically comprise people aged 13–25 taking part in criminal activity. Children may be forced to carry out an initiation process. Where abuse takes place in a gang environment, members may perceive the abuse as normal.

NEW — Relevance to The Well: Bethel

The Prevent duty (Counter-Terrorism and Security Act 2015) applies to a range of bodies. While not directly statutory for all faith organisations, the Prevent principles are highly relevant to The Well: Bethel as a faith community. WT2026 includes radicalisation within its expanded coverage of harms outside the home.

Radicalisation is a process by which a person comes to support or become involved in extremism or terrorism. Children and young people can be radicalised online or in person.

Signs that a child may be at risk of radicalisation include:

- sudden changes in behaviour, friends or online activity
- withdrawal from family and usual social networks
- accessing extremist content or expressing extremist views
- becoming secretive about online activity
- expressing hatred of particular groups

Workers who are concerned that a child may be at risk of radicalisation should speak to the DSL immediately. The DSL can make a referral to Channel — the multi-agency programme designed to provide support to individuals at risk of radicalisation — via the local Police or local authority.

The Well: Bethel is committed to promoting British values of democracy, the rule of law, individual liberty, and mutual respect and tolerance — while also honouring our Christian faith and values.

NEW — KCSiE 2025 — Four Categories of Online Risk

KCSiE 2025 categorises online safety risks into four areas: Content, Contact, Conduct, and Commerce. It now explicitly includes misinformation, disinformation and conspiracy theories as content risks, and references generative AI as a new and emerging safeguarding concern.

The four categories of online risk are:

- **Content** — being exposed to illegal, inappropriate or harmful material, including pornography, extremism, violence, self-harm content, misinformation, disinformation and conspiracy theories
- **Contact** — being contacted by an inappropriate person, including grooming, harassment, exploitation and recruitment into criminal or extremist activity
- **Conduct** — behaving in a way that puts a child at risk, including cyberbullying, sharing nude images, hacking or sending abusive messages
- **Commerce** — financial risks including gambling, online fraud, scams, inappropriate in-app purchases or financial exploitation

Workers should also be aware of:

- **Generative AI** — AI tools can be used to produce harmful content including deepfakes and grooming conversations; children may also share personal information with AI chatbots
- **Gaming platforms** — online games with chat functions can be used by adults to groom children
- **Social media** — children may share personal information, encounter harmful content or be contacted by strangers

If a worker becomes concerned about a child's online safety, they must report to the DSL immediately. Workers must never contact a child directly via personal social media accounts.

The Well: Bethel is committed to protecting children from the misuse of their images. The following rules apply at all church events and activities:

- Photographs and videos of children may only be taken with prior written parental consent
- Images must only be taken on church-owned devices or devices approved by the DSL
- No images of children may be shared on social media, websites or other public platforms without explicit written parental consent
- Children must never be photographed or filmed in a state of undress
- If a child or parent asks for images to be deleted, this must be done immediately
- If a worker becomes aware of inappropriate photographs or filming of children, this must be reported immediately to the DSL
- Workers who take photographs in a personal capacity at church events must follow the same rules

Low-Level Concerns

A low-level concern is any concern — including a 'nagging feeling' — that a worker may have acted in a way inconsistent with the church's Code of Conduct or that may pose a risk to children or adults. Low-level concerns include behaviours that fall below the threshold for LADO referral.

Examples of low-level concerns include:

- being over-familiar or using inappropriate language with a child
- meeting with a child without another adult present
- taking photographs of children on a personal device
- sharing personal contact details with a child
- behaviour that appears to challenge professional boundaries

Workers should share any low-level concern with the DSL without delay. Sharing a concern is not the same as making an allegation. It allows the church to identify patterns and act before harm occurs. No worker should feel they need to be certain before raising a concern.

Whistleblowing

Whistleblowing is the reporting of wrongdoing, illegal activity or dangerous practice. The Well: Bethel is committed to creating an environment where workers feel safe to raise concerns without fear of retaliation.

If a worker believes safeguarding concerns are not being acted on appropriately, they may:

- raise concerns directly with the DSL or Deputy DSL
- raise concerns with the Safeguarding Trustee (Pastor Dean Wright)
- contact the NSPCC Whistleblowing Advice Line: 0800 028 0285
- contact the Charity Commission if they believe the church is failing in its safeguarding duties
- contact Croydon MASH directly if they believe a child is at immediate risk

Retaliation against a worker who raises a genuine safeguarding concern is not acceptable and will itself be subject to the church's disciplinary procedures.