

1.2 We require Safeguarding Risk Assessments to be carried out.

- 1.2.1 Risk is any situation in which you expose yourself or others to probable or potential danger or harm. Within Safeguarding, our greatest concern is to mitigate the risk of anyone being subject to any form of abuse.
- 1.2.2 A key step towards understanding Safeguarding risk is for those who work with vulnerable groups to participate in specific training so that they can view people, places and activities through the lens of potential Safeguarding risk. Having a good understanding of Safeguarding risk will enable those who have responsibility for activities to identify any risk and to put in place measures to manage outcomes positively.
- 1.2.3 The starting point for any Safeguarding Risk Assessment is to ensure that there has been full compliance with the mandatory requirements when recruiting supervising adults (see Standard 2.1).
- 1.2.4 Also essential is the deploying of supervisor-to-participant ratios suitable to the specific activities, in line with national guidance. Particular supervision ratios for children and adults who have additional support needs should be taken into account, as appropriate.
- 1.2.5 Safeguarding risk assessments of activities and locations should be routine both in on-going activities and when preparing for new ones. Parish groups working with vulnerable groups should conduct Safeguarding Risk Assessments, then action and record them. Diocesan Safeguarding Advisory Groups must ensure that there is discussion of such Risk Assessments in DRAMT meetings.
- 1.2.6 Diocesan and Parish groups must be able to evidence a robust management of Safeguarding risk to ensure that:
- every reasonable step has been taken to protect participants from harm
 - where a participating child's parent is not present to supervise the child during an activity, the parent's written consent for the child to participate has been obtained
 - Safeguarding risk assessments have been completed, using an appropriate pro forma¹⁵
 - all Safeguarding policies and procedures have been followed
 - where unanticipated risks have occurred, these are recorded on a *Risk Register*¹⁶ and reviewed to reduce or eliminate potential re-occurrence.

¹⁵ Section C: Risk Assessment for Activities and Places pro forma

¹⁶ Section C: Risk Register

1.3 We advise on Safeguarding risks for those with additional support needs.

- 1.3.1 Children, young people and adults with additional support needs are at greater risk of abuse and harm. For some, who might have significant disabilities and little or no ability to communicate, the risk of abuse and harm may be high.
- 1.3.2 Consideration should be given to other factors which impact upon the lives of those who have special needs within faith communities:
- reduced or limited ability to communicate and therefore report abuse
 - cognitive problems.
 - physical disabilities
 - life-limiting conditions
 - limited access to those who can listen and encourage disclosure of concerns
 - significant reliance on others for personal and intimate care
 - limited ability at times to understand personal boundaries
 - for some, an experience of increased isolation
 - inability to defend against bullying
 - previous experience of abuse.
- 1.3.3 Particular care must be taken to ensure the safe recruitment of volunteers, rigorous training and the implementation of Safeguarding risk assessments before planning any activity involving those with special needs. Such due diligence must not become a barrier to participation but should, indeed, support the participation of those with additional support needs in the life of the Church.
- 1.3.4 The Catholic Church in Scotland is committed to ministering to those with additional support needs within a Diocesan or parish context, including those in such groups such as HCPT, SPRED, ALMA and OZANAM.¹⁷

¹⁷ Details of these groups are provided in the Glossary.

1.4 We promote the safe use of Information Technology by Church personnel.

- 1.4.1 While Information Technology brings many benefits in supporting the Church's work, it also brings numerous risks and threats to privacy. From the sharing of child pornography to cyber bullying, to facilitating child sex exploitation, the mis-use of the Internet has enabled perpetrators to cause harm.
- 1.4.2 Use of the Internet in a parish context should be carefully monitored, in line with Diocesan policy. Where computers are available for the use of parishioners or volunteers with specific roles, appropriate security settings must be put in place. The Internet must not be used on Church property for the viewing or transmission of inappropriate images.
- 1.4.3 Ultimate responsibility for the content of any website or social media account established by, or on behalf of, a parish or Church organisation rests with the Parish Priest or leader of the organisation. Where someone else is appointed as a trusted administrator of such an account, the person holding ultimate responsibility for the account must agree a protocol for moderating and agreeing content. If a parish website allows for the "live streaming" of parish services, it is critical that agreed procedures are followed with regard to permissions and notifications, in line with Diocesan policy.
- 1.4.4 When emailing/texting on Church business, these points should be noted:
- Careful use of language and images in all communications is advised.
 - Sharing personal information about others (including email addresses) requires their permission.
 - Emails and texts can be used as evidence in criminal proceedings.
 - Deleted emails and texts can be retrieved, if necessary.
 - To ensure privacy, access to email accounts when using Church equipment should be limited.
- 1.4.5 In the use of any social media account established on behalf of a parish, diocese or Church organisation, attention must be paid to privacy settings, as these can have a great bearing on who can access photographs. Care must be taken in regard to these key points:
- Photographs of children must only be displayed with the written consent of parents. (See *Child Photograph/Video Permission Request* ¹⁸.)
 - It is preferable that children should not be identified by their full name in photographs.
 - Details of someone's home address must not be posted.
- 1.4.6 If anyone replies to a post from a parish social media account and indicates that harm has been done, or if someone appears to be at risk, the account holders must report this immediately to the Diocesan Safeguarding Adviser. He/she must immediately report this matter to the Police.

¹⁸ Section C: Child Photograph/Video Permission Request

1.5 We promote the safe use of CCTV & webcams on Church premises.

- 1.5.1 When considering the use of CCTV and webcams, parishes must be guided by the Data Protection policies of their own Dioceses. It should be noted that the use of CCTV may raise particular Safeguarding concerns in relation to broadcasting and recording images of vulnerable groups.
- 1.5.2 The use of webcams for live streaming and recording of Church services may enable anyone, using a computer or mobile device, to access images of a church service. The following points should be carefully considered:
- Have parents been asked to grant permission for the filming of children whose faces may be visible on-screen?
 - Are there times when audio access to live streaming would be sufficient?
 - How will any recorded events be stored?
 - Who will have access to these recordings?
 - Are there notices on display to advise those attending of the live streaming?

1.6 We require the use of contracts with Registered Sex Offenders who wish to attend religious services.

“Ministry to sex offenders, including those who have offended in the Church, is also important in the healing of the Church, as well as ensuring that the commitment to provide for a safe environment is clear and strong”.

(Pontifical Commission for the Protection of Minors)

- 1.6.1 Every Catholic has the obligation and the right to attend the public celebration of the Liturgy on Sundays and holy days of obligation. Where a Registered Sex Offender (RSO) expresses a wish to participate in a religious service in a parish, an assessment of potential risk of harm must be made by the statutory authorities. Police Scotland has agreed with each Diocese in Scotland an *Information Sharing Protocol*¹⁹ which is governed by the system known as the Multi Agency Public Protection Arrangements (MAPPA) which the police service, local authority, prison service, health service and others are statutorily obliged to operate on a multiagency basis, with the objective of protecting the public from the risks that may be posed by sex offenders.

¹⁹ Section C: Information Sharing Protocols with Police Scotland

- 1.6.2 In practical terms, this means that, when a convicted Registered Sex Offender expresses a wish to worship in a Catholic Church in Scotland, the relevant personnel from Offender Management or Criminal Justice will make contact with the appropriate Diocesan Safeguarding Adviser to discuss if appropriate safe arrangements can be made. It may be possible to create a safe context for the individual to worship with the implementation of a *Registered Sex Offender Contract*.²⁰
- 1.6.3 The key people to be considered when making such arrangements are:
- **children and others at risk:** whose care and protection must be our first priority
 - **Registered Sex Offender:** whose spiritual needs require to be addressed with due regard to the safety and well-being of others
 - **Diocesan Safeguarding Adviser:** the key person in creating the contract and acting as link between the Parish Priest and *Police Scotland*
 - **DRAMT:** whose members will make an informed recommendation about the best place for the RSO to worship, how and when
 - **Sex Offender Management Unit and/or Criminal Justice Social Worker:** will hold ultimate responsibility for monitoring the Registered Sex Offender in the community and assessing risk
 - **Parish Priest:** his responsibility is the safety of all in his church, as well as the spiritual care of the offender.
 - **Parish Safeguarding Co-ordinator:** whose role is to support the Parish Priest and to be vigilant to any potential or actual breach of the contract.
- 1.6.4 Personnel within *Police Scotland* know that their first point of contact should be the Diocesan Safeguarding Adviser. If ever a situation arises where initial contact is made with the Parish Priest, he must inform the Diocesan Safeguarding Adviser before any further steps are taken. There might also be a situation when the RSO makes direct contact with a Parish Priest and asks if he/she can worship in the Church. The Parish Priest must not make any agreement but immediately must contact the Diocesan Safeguarding Adviser who will inform the relevant personnel within *Police Scotland*.
- 1.6.5 Each request for such a contract must be considered by the DRAMT who will make an informed recommendation about the best place to worship, how and when. Each contract should be reviewed every six months. Contact between the statutory authorities and the Diocesan Safeguarding Adviser and Parish Priest must be maintained if there are any changes in circumstances, either for the RSO or in the parish. A meeting must be held with the Parish Priest, the Offender, the Diocesan Safeguarding Adviser (or designated representative, such as the Safeguarding Officer) and the relevant person from the Offender Management Unit or Criminal Justice.

²⁰ Section C: Exemplar Contract for Sex Offender wishing to worship in Church

- 1.6.6 The conduct of the RSO will be monitored by someone allocated from the Offender Management Unit. If, during the time the person attends a service, it is clear that he/she is not abiding by the agreed contract, then the Parish Priest must contact the Diocesan Safeguarding Adviser who must inform the Offender Management Unit immediately.
- 1.6.7 In all cases, the Contract must indicate the RSO's level of actual or potential risk. The Contract should be written by the Diocesan Safeguarding Adviser, in discussion with the Sex Offender Management Unit personnel who will be fully aware of the details of the offences and also how that might impact in relation to risk in a parish context.
- 1.6.8 In most cases, agreement should be reached so that the individual can attend a specified Mass each weekend. In some circumstances and, again relating to potential risk, the individual might be required to sit in a specific area of the church, possibly accompanied by a nominated person. More unusually, it might not be possible to permit high-risk offenders to worship in the parish church. Arrangements can then be made for the individual to have his/her spiritual needs met privately. The Parish Safeguarding Co-ordinator must also be made aware that a sex offender is attending Church and has signed a contract. The PSC should be able to identify the RSO, in case of the Parish Priest being replaced by another priest for some reason or other (e.g., holidays). There might be circumstances when a Registered Sex Offender might seek to worship in other contexts, such as a Retreat Centre that celebrates a public Sunday Mass. Again, this can only be considered in consultation with the Retreat Centre Director, the Diocesan Safeguarding Adviser and Offender Management Unit.
- 1.6.9 It is essential that appropriate confidentiality measures are put in place when it has been arranged for a Registered Sex Offender to attend a parish service. However, any breaches in the contract or any risk, whether potential or actual, must only be shared between the Parish Priest, Parish Safeguarding Co-ordinator, Diocesan Safeguarding Adviser, the designated department within Police Scotland and a Criminal Justice Social Worker, if one has been assigned to the RSO.