



Safeguarding Policy

The Safeguarding Policy outlines Westminster Abbey's commitment to the welfare of children, young people and adults at risk. The policy covers: responsibilities and expectations of individuals and leadership structures; the range of measures in place to prevent abuse happening; procedures for responding to and managing risks effectively and compassionately; the Abbey's commitment and support to those who have experienced or are experiencing abuse; and how the Abbey will resource, support and train staff. This policy applies to Westminster Abbey, St. Margaret's Church and the Chapel of St Mary Undercroft.

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Related Policies	• Disciplinary Policy • Data Protection Policy • Health and Safety Policy • Recruitment and Selection Policy • Visitor Care Policy • Whistleblowing Policy • Westminster Abbey Choir School Safeguarding Policy • Westminster Abbey Choir School Low-Level Concerns Policy

1. Policy Statement

- 1.1 The Dean and Chapter of Westminster Abbey is committed to safeguarding children and adults at risk, and to promoting the welfare of all who visit, worship, work or volunteer at the Abbey. Each year, we welcome over 1.5 million visitors and worshippers; we endeavour to safeguard so that all who visit can worship and grow safely in Christ.
- 1.2 Safeguarding is at the heart of the Abbey's community and runs through the three guiding principles of the Abbey's values:
- We are a **community**, so we are committed to being a safe, welcoming and inclusive church for everyone;
 - We are sustained by **hope**, so we seek a just world in which human dignity can flourish;
 - We strive to be **faithful** in all that we do, so we are committed to excellence and integrity in all our safeguarding activities.

As a community, and as outlined in this policy, we aim to promote the wellbeing of all children and adults, prevent harm through proactive safeguarding measures, and respond effectively to any concerns raised. It requires all those within our Abbey community to be alert and to make timely responses to concerns, acting together with mutual support and coordination.

- 1.3 The Abbey seeks to uphold best practice from statutory bodies and, whilst recognising its Royal Peculiar status, it adopts the National Safeguarding Standards of the Church of England to benchmark its safeguarding activity. The Abbey is committed to the five standards:
1. Culture, Leadership and Capacity
 2. Prevention
 3. Recognising, Assessing and Managing Risk
 4. Victims and Survivors
 5. Learning, Supervision and Support
- 1.4 The key legislation, guidance and policies supporting Westminster Abbey's Safeguarding Policy include:
- Care Act 2014
 - Care and Support Statutory Guidance 2025
 - Children Act 1989 and 2004
 - Data Protection Act 2018
 - Domestic Abuse Act 2021
 - Equality Act 2010
 - Prevent Duty Guidance 2023 (Counter Terrorism and Security Act 2015)
 - House of Bishops' Safeguarding Guidance and Codes of Practice
 - Human Rights Act 1998
 - Report from IICSA 2022
 - Keeping Children Safe in Education 2025
 - Mental Capacity Act 2005
 - United Nations Convention on the Rights of the Child
 - Working Together to Safeguard Children 2023

2. Purpose

- 2.1 The purpose of this policy is to:
- a) promote the welfare and wellbeing of all children and adults at risk;
 - b) explain how the Abbey will safeguard and protect children and adults at risk from abuse and minimise the risk of abuse to them;
 - c) outline the actions to be taken in the event of a safeguarding concern being identified.

3. Scope

3.1 Everyone who works¹ at Westminster Abbey is responsible for safeguarding of children and adults at risk of harm. This document guides the actions of all those who work at Westminster Abbey to make sure that the Abbey is a safe environment for everyone.

3.2 This includes the following:

- When our Choristers are in the Abbey or St Margaret's Church either singing or at Song School
- When schools are visiting, either supervised by our Learning Team or unsupervised
- When other groups of children attend the Abbey
- Children who are with their families
- Adults at risk visiting the Abbey
- Adult members of the Abbey congregation at risk
- Staff and volunteers who are at risk
- Survivors and victims of abuse
- Individuals attending the Abbey who have a safeguarding safety plan in place with the Abbey or Church of England

4. Policy Principles

4.1 The principles below guide all elements of safeguarding activity delivered by those working or volunteering for Westminster Abbey:

- The welfare of the child, young person and vulnerable adult is paramount
- We are committed to the prevention of abuse
- Pastoral care should be respectful and informed
- Safeguarding action should be timely, with advice sought and action taken within 24 hours
- We will promote a safe and healthy culture of informed curiosity
- Safeguarding should be embedded in all our activities
- We are committed to learning the lessons from past matters
- We will manage risk actively and proportionately
- We will act with integrity and show respect, listening to all
- We will act with transparency and openness
- We will only involve others on a need-to-know basis

We will regularly evaluate and review safeguarding matters to continually improve practice, raising review outcomes with the Safeguarding Delivery Group for their consideration and recommendation(s).

Section 1: Culture, Leadership and Capacity

This section shows how the Abbey is continuously building a safe and healthy culture through effective governance and leadership structures which are scrutinised through well-resourced safeguarding review arrangements.

5. Safeguarding Governance

5.1 The Abbey's safeguarding governance is designed to ensure accountability, best practice, and quality assurance across its safeguarding processes. This structure provides for internal and external scrutiny and challenge of safeguarding processes.

¹ This includes employees, volunteers and clergy

Dean and Chapter	• Provides strategic leadership for safeguarding across Westminster Abbey • Embeds a culture of safety and vigilance in all Abbey activities • Ensures resources and structures are in place for effective safeguarding • Appoints and ensure autonomy for the Abbey Safeguarding Officer (ASO) • Maintains accountability for safeguarding standards and compliance • Ensures all staff and volunteers are safely recruited and trained to understand the Abbey's safeguarding procedures • Ensures that Westminster Abbey Choir School has effective safeguarding resources
Safeguarding Reference Group	• Provides an independent and objective view of safeguarding across the Abbey • Undertakes strategic governance and scrutiny (test and challenge) of safeguarding processes, procedure and implementation • Reviews updated risk register/action tracker/audit responses and other outputs from the Safeguarding Delivery Group • Discusses relevant changes in law and legislation and lessons learned from high-level cases and related reviews (e.g. IICSA, the Independent Inquiry into Child Sexual Abuse), and determines the implications for Abbey policy and procedure • Ensures emerging national policy and best practice are identified and adopted
Safeguarding Delivery Group	• Provides operational focus for delivery of safeguarding matters • Uses a data-driven approach to suggest and implement changes to delivery, policy and procedure • Reviews actions and disseminates guidance to teams where necessary, ensuring clear communication about safeguarding processes • Reviews staff/volunteer training needs
Safeguarding Case Management Group	• Addresses high-risk or complex safeguarding cases • Reviews and determines action on high level cases which require a senior leadership group approach, ensuring that the interests of victims are at the centre of the decisions taken • Involves legal and communications teams as necessary
Westminster Abbey Choir School	• The School and the Abbey take a joined-up approach to safeguarding the Choristers of Westminster Abbey; they work closely to achieve this • Westminster Abbey Choir School has its own safeguarding policies and procedures, including a Low-Level Concerns Policy • Additionally, the School ensures compliance with all relevant legislation and statutory guidance • The School complies with statutory safeguarding guidance, operating with a nominated, trained Designated Safeguarding Lead and Deputy Designated Safeguarding Lead • The School is governed by the Westminster Abbey Choir School Governing Body with a designated safeguarding governor. • The Choristers of the school become the responsibility of an approved person (persons), agreed by their school leadership team, for the time they are in the Abbey until they return to the authorised staff from Westminster Abbey Choir School

6. Safeguarding Roles and Responsibilities

Chapter Safeguarding Lead	The Dean and Chapter has overall responsibility for safeguarding policy and its implementation across Westminster Abbey, including St Margaret's Church, Westminster Abbey Choir School and the Abbey's ancillary buildings and grounds. The Chapter Safeguarding Lead works closely with the ASO to ensure that consistent and up-to-date standards, policy and practice are in place at all times. The Chapter Safeguarding Lead is nominated by Chapter from time to time but is currently the Canon Steward and Archdeacon.
Receiver General	The Receiver General supports the ASO by ensuring sufficient resource, access to senior leadership, and the integration of safeguarding into business planning and risk management. The Receiver General participates in Safeguarding Reference Group scrutiny and helps remove operational barriers to timely action. He is also line manages the ASO.
Abbey Safeguarding Officer	The ASO is responsible for ensuring through the provision of specialist advice, support, training, and monitoring that Abbey safeguarding policy and procedures are up-to-date and are being effectively implemented. The ASO is responsible for the timely and effective management of any concerns about risks of harm to or by anyone in the Abbey community. The ASO's role is also to ensure that these are reported appropriately both to the statutory agencies and to the Dean and Chapter.
Human Resources (HR)	The Abbey's HR Department is responsible for managing all safer recruitment of both staff and volunteers at the Abbey. HR maintain the databases relating to DBS checks and training for staff and volunteers, managing the process of orientation and renewal of these aspects of safer recruitment.
Independent Chair of Safeguarding Reference Group (SRG)	This external expert leads the Safeguarding Reference Group and provides independent safeguarding advice to the Dean and Chapter and the ASO. The Independent Chair is charged with producing an annual report, covering all relevant strategic aspects of safeguarding at the Abbey, which is published on the Abbey's website once agreed by the Dean and Chapter
Diocese of London Safeguarding Team	The Abbey Safeguarding Officer will work with the Diocese of London Safeguarding Team to ensure the sharing of information as set out in the Memorandum of Understanding between Westminster Abbey and the Diocese of London
Clergy, Staff and Volunteers	All who work at the Abbey must ensure they understand their safeguarding responsibilities and must read this policy before commencing work at Westminster Abbey. They must attend safeguarding training as directed. They must follow safeguarding procedures, reporting concerns to the ASO as soon as possible and in any case within 24 hours, maintaining appropriate confidentiality at all times.

7. Key Terminology

7.1 Abuse

Abuse takes many forms, including physical abuse, emotional abuse (including spiritual abuse), sexual abuse or neglect or a combination of these. The following categories of abuse are relevant to children and adults at risk.

- Physical abuse
- Domestic violence or abuse
- Sexual abuse

- Psychological or emotional abuse
- Financial or material abuse
- Modern slavery
- Discriminatory abuse
- Organisational or institutional abuse
- Neglect or acts of omission
- Self-neglect

7.3 Child

The Children Act 1989 defines a child as any person who has not yet reached their 18th birthday. Therefore, the phrase 'children and young people' should be read as 'children' throughout this policy.

7.4 Safeguarding Children

Safeguarding children is defined in *Working Together to Safeguard Children* (2023) as:

- protecting children from maltreatment;
- preventing impairment of children's health or development;
- ensuring that children are growing up in circumstances consistent with the provision of safe and effective care;
- taking action to enable all children to have the best outcomes.

7.5 Adult at Risk (of abuse and neglect)

Someone aged 18 or over who has needs for care and support, who is experiencing, or at risk of, abuse or neglect and as a result of their care needs is unable to protect themselves.

7.6 Safeguarding Adults

Safeguarding adults is defined in the Care and Support statutory guidance issued under the Care Act 2014 as:

- protecting the rights of adults to live in safety, free from abuse and neglect;
- people and organisations working together to prevent and stop both the risks and experience of abuse or neglect;
- people and organisations making sure that the adult's wellbeing is promoted, including, where appropriate, taking fully into account their views, wishes, feelings and beliefs in deciding on any action;
- recognising that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear or unrealistic about their personal circumstances and therefore potential risks to their safety or well-being.

7.7 Positions of Trust

'Position of trust' is a legal term that refers to certain roles and settings where an adult has regular and direct contact with children. In the Abbey, this is pertinent to anyone who leads any religious instruction, teaching or training with children. It is against the law for someone in a position of trust to engage in sexual activity with a child in their care, even if that child is over the age of consent (16 or over).

7.8 Complainant

When managing a safeguarding concern or allegation, this is the individual who brings forward a safeguarding concern or allegation or is alleged to have suffered abuse as a result of their engagement in the Church. The use of this term seeks to ensure that a degree of objectivity is maintained throughout the safeguarding process. It does not imply that a 'complainant' is not a victim or survivor.

7.9 Respondent

When managing a safeguarding concern or allegation, this is the individual who is the subject of a safeguarding concern or allegation.

Section 2: Prevention

This section shows the range of measures which are in place at the Abbey to prevent abuse. It focuses on recruitment and people management, organisation-wide messaging and ensuring every activity is safe.

8. Code of Safer Working Practice

For Staff and Volunteers, the Code of Safer Working Practices must be read in conjunction with relevant Abbey policies.

8.1 The Code of Safer Working Practice is provided during staff and volunteers' inductions at Westminster Abbey to follow when working (including volunteering) with children and adults. The code represents the behaviours which constitute safe practice. As such it will assist those working with children and adults at risk to do so safely and responsibly, enabling them to monitor their own standards of integrity and good practice.

8.2 All clergy, staff and volunteers should:

- Treat all children and adults with respect and dignity, keeping their words, attitude and body language respectful
- Actively communicate with children and adults at risk and involve them in planning and running relevant activities where possible
- Avoid being alone with a child (wherever possible there should be two safer recruited adults with each child or group of children)
- Provide pastoral care in public spaces and not in their own homes. Never give or accept invitations to visit a home alone
- Conduct home visits only when signed off by line managers and risk-assessed with the ASO
- Sustain a culture where clergy, staff (paid and voluntary), children, and adults at risk feel comfortable highlighting inappropriate attitudes and behaviour in each other
- Make it clear who someone can speak to about a personal concern, and be proactive in addressing concerns and allegations
- Never use illicit drugs, abuse prescription medication, or consume alcohol when responsible for a child or adult at risk
- Keep any physical contact specific to the needs of the activity and always seek permission from the person first
- Obtain consent for any photographs/videos to be taken, shown or displayed
- Never take any photos or videos on personal devices, unless there is no other option available to them; if they do have to do so, then these should only be used for Abbey purposes and not retained on that device
- Act in accordance with the guidance on communicating electronically, avoid inappropriate on-line friendships
- Never use rough play, sexually provocative words and games, or any form of physical punishment
- Never 'scapegoat', ridicule or reject a child, group or adult or allow others so to do
- Avoid showing favouritism to any one child, adult, or group or doing anything to reinforce any inappropriate behaviours

- Do not give lifts to children unless authorised to do so in the course of your duties by an appropriate adult.
 - Never allow unknown adults access to children
 - Never share sleeping accommodation with children
 - Always operate within the Abbey's principles, procedures and guidelines, clarifying these when unsure
 - Never accept or give gifts that could be open to misinterpretation as an inducement to inappropriate action
- 8.3** The list above sets clear expectations of behaviour and codes of practice which serve to reduce the possibilities of positions of trust being intentionally or unintentionally abused or misused, or false accusations being made. It is not exhaustive and should be read in conjunction with other policies applicable to staff and volunteers at Westminster Abbey.
- 8.4 Prevent and Protection from Radicalisation**
 The Abbey is committed to the principles of the Prevent Duty and recognises that safeguarding against radicalisation is a vital element of protecting children and adults at risk from harm. We seek to identify early signs that an individual may be vulnerable to extremist influences or ideologies and respond proportionately and appropriately. All clergy, staff and volunteers are expected to remain vigilant, report concerns promptly to the Safeguarding Officer, and work in partnership with statutory agencies where necessary. We promote an ethos of inclusion, critical thinking, respect, and open dialogue to help reduce vulnerability, and we ensure our safeguarding practices reflect current national guidance on preventing radicalisation.

9. Safer Recruitment and People Management

9.1 Safer Recruitment

The Dean and Chapter of Westminster Abbey is committed to safer recruitment for all paid and unpaid roles at the Abbey. All roles are DBS checked at either Basic Level or Enhanced level (if the role involves regulated activity), with at least two satisfactory references and an identity check.

Prior to commencing work on site, contractors will be required to read and acknowledge the site rules relating to security, health and safety, and safeguarding, which advise them of their obligations whilst on site. The HR team at Westminster Abbey will oversee and direct on all recruitment of both paid staff and volunteers.

9.2 Disclosure and Barring Service

The HR Department is responsible for managing Disclosure and Barring Service checks through the approved provider for all clergy, staff and volunteers at Westminster Abbey. Furthermore, HR will maintain records of individuals subject to DBS checks to ensure compliance with this policy and other related relevant HR policies.

DBS checks will be renewed every 3 years, and the level of DBS will be dependent on the role and its involvement with children and adults at risk of harm and abuse, in line with legislation on regulated activity.

There is a legal duty to refer to the DBS, for consideration for potential barring, anyone that has been employed by, or volunteered for, the Abbey, where allegations have been received, referred to the appropriate authorities and found to have substance.

9.3 Managing Offenders

A risk assessment for 'Managing Offenders' must be completed for all those with cautions or convictions. These assessments will be prepared by HR in consultation with the ASO, and, where applicable, constraints will be put in place to mitigate risk. These agreements are to be reviewed every three years, or sooner, if necessary, to ensure that they remain appropriate and are being adhered to.

10. Managing Risks in Activities and the Environment

10.1 Risk assessments must be completed for any event which might involve children or adults at risk; this includes all special services and any offsite activities organised by the Abbey, including those overseas. All risk assessments should have a safeguarding section to ensure that safeguarding is prioritised. Those responsible for writing a risk assessment must liaise with the ASO for guidance and support. A completed risk assessment must be submitted to the ASO in sufficient time for review.

10.2 Safeguarding risks in and around the physical environment of the Abbey are recorded, assessed and managed through a risk register. This is maintained by the ASO in collaboration with the Health and Safety Adviser and distributed to the relevant managers.

10.3 Photography and Filming

The Abbey is principally a place of worship. The public are permitted access on the condition that they comply with all reasonable instructions given by staff working in the Abbey. Photography and filming (other than that authorised by the Abbey) is not permitted during any service. Filming of the Abbey and those within it is not permitted unless with express permission of a member of Abbey staff. Taking images of children within the Abbey is not generally permitted. If photography and/or filming of individual children is intended, the express permission of the parent/guardian of the relevant child must be obtained prior to the picture being taken. The Abbey streams services. Streaming coverage of people in the Abbey may include children and those moderating such coverage must take all reasonable steps to avoid producing images of individual children. A comprehensive risk assessment is in place, with clear instructions to those involved in producing and moderating streaming material.

If a staff member notices a visitor deliberately photographing a child or groups of children with whom that visitor has no connection, staff may intervene to try and stop this. If the person does not comply, the Marshals and/or Beadles should be contacted and requested to attend. The matter should be reported as soon as possible and in any circumstance within 24 hours to the Safeguarding Officer.

10.4 Unaccompanied or Lone Children

Unaccompanied children² are not permitted entry to Westminster Abbey or St Margaret's Church. However, their welfare is paramount. They will not be turned away from the Abbey in acknowledgement that they may be seeking sanctuary or escaping the risk of harm. Those working at the Abbey will be cognisant of the associated risks of a child who arrives alone. They will, where possible, ascertain the child's welfare and reason for their lone presentation. Where possible, staff should work in pairs when interacting with a child who is alone.

² The matter of children attending services alone will be subject to a separate policy and future inclusion in this overarching Safeguarding Policy

If there is a safeguarding concern, Abbey safeguarding procedures should be followed, Visitor Experience Staff and Beadles should lead any response, and consideration should be given to involving statutory services.

10.5 Missing Children or Adults at Risk

When a child or adult at risk is missing in the Abbey, the procedure for responding to this will be applied. This will be managed initially by a Visitor Experience Supervisor in collaboration with the Beadles. Where a child or adult at risk is found in the Abbey unaccompanied, the response will be the same. Consideration should be given to contacting the Police at the earliest opportunity.

10.6 Visiting Clergy and Lay Preachers Participating in Services

Visiting clergy, lay preachers or other invited guests who, where authorised by the Dean of Westminster, officiate, preach, process and/or robe will be subject to an assessment prior to any activity in the Abbey. This is managed by the Minor Canons' Office and supported by the ASO. A record of the checks carried will be maintained by the Minor Canons' Office for scrutiny by those persons having a legitimate reason for doing so.

10.7 Visiting Choirs Participating in Services

Visiting choirs will be subject to checks regarding their suitability to attend and sing at Westminster Abbey. Their Safeguarding Policies will be checked and their lead person, often the Director of the Choir, will need to certificate that all individuals are safe to attend the Abbey. This will include the undertaking to provide appropriate supervision of child choristers, with attention to suitable adult chaperone to child ratios. This process is managed by Westminster Abbey's Minor Canons' Office.

10.8 Visiting Organisations Participating in Services

Risk assessments will be undertaken for special services with attention to safeguarding protocols between the visiting organisation(s) and Westminster Abbey. Ensuring appropriate assessment and mitigation of risk is the responsibility of the nominated member of Westminster Abbey staff, in partnership with the visiting lead organisation.

10.9 Safeguarding concerns on email, post and online

Matters of a safeguarding concern, received in the post, on email or posted online within the Abbey's digital footprint including social media platforms should be referred to the ASO. Every effort should be made to preserve the original packaging/envelope. If by email, any attachment should not be opened, protocols for managing concerns and risk from online activities, are in place to reduce risk and support vulnerable individuals. The ASO will assess risk associated with these concerns, advise staff on next steps, and where appropriate, refer the matter to the most appropriate statutory service.

Section 3: Recognising, Assessing and Managing Risk

This section outlines how the Abbey ensures high-quality assessment and management of risk related to safeguarding.

11: Responding to Concerns and Allegations

- 11.1** Clergy, staff and volunteers should never attempt to investigate concerns themselves. If an individual informs a staff member or volunteer about abuse, neglect or harm, their role is to respond sensitively and inform the ASO within 24 hours. Clergy, staff and volunteers must do the same if they have a concern that someone is at risk of abuse, neglect or harm.

11.2 Clergy, staff and volunteers must respond sensitively to someone who speaks about their abuse by following the four Rs below:

- **Respond:** Stay calm, listen attentively, and take the concern seriously. Avoid judgmental reactions or showing shock. Where appropriate use open questions. Do not ask leading questions or attempt to investigate.
- **Reassure:** Reassure the individual that they have done the right thing by speaking to another person about it. Reassure them that their concern will be taken seriously, handled appropriately and only shared with individuals who have a professional responsibility for it. Do not promise confidentiality.
- **Record:** Write down what was said or observed as soon as possible, using the person's own words where possible and appropriate. Include dates, times, and factual details without personal opinions.
- **Report:** In emergency situations (where a staff member believes that someone will be further harmed if left in their current situation) the police, ambulance or social services must be contacted immediately. The concern must be reported to the ASO as soon as possible, always within 24 hours (see 12.1).

12: Reporting a Concern

12.1 Concerns about children and adults at risk will be diligently and promptly responded to, recognising the sensitivity it may hold for those involved. All concerns must be reported to the ASO immediately where possible, and in any case within 24 hours, using the approved online reporting form that can be found on the Abbey's website or on AbbeyNet (the intranet for Westminster Abbey). If there is immediate risk to an individual, emergency services should be called without delay. Additional supporting services' details can be found on the Safeguarding page of Westminster Abbey's website.

13: Managing Concerns and Allegations

This subsection explains what the ASO will do upon receipt of a safeguarding concern or allegation.

13.1 Assessment and Initial Response

On receipt of a safeguarding concern, the ASO will determine whether it meets the threshold for safeguarding action by assessing the risks of harm. Immediate risks will be addressed. The ASO will decide whether statutory referrals are required and ensure these are made where appropriate and without delay. Where the matter is not related to safeguarding, the ASO will endeavour to ensure the individual receives appropriate pastoral support, signposting to appropriate support services, where relevant, and/or log it as a low-level concern.

Where safeguarding concerns involve Abbey clergy, staff or volunteers, be they reported as a victim, respondent or person of concern, the ASO will lead the process of investigating, liaising with external agencies as appropriate and bringing concerns to the attention of the Chapter Safeguarding Lead. If the concern involves clergy or other key roles [as defined in the Memorandum of Understanding between the Diocese of London and Westminster Abbey], the ASO will additionally notify the case to the Diocesan Safeguarding Team for professional-support and guidance. If the concern involves the Dean, other dioceses, spans multiple dioceses and/or church organisations, is high-profile, or presents complex conflicts of interest, the ASO, following consultation with the Receiver General, may notify the National Safeguarding Team, Church of England. In all cases, the ASO will record the rationale for decisions on the Abbey's Safeguarding Case Management System.

13.2 Referrals

For all safeguarding concerns, the ASO must:

- consider whether any referrals to statutory services are needed;
- make any required referrals; and,
- keep a record of their decision and rationale for referring/not referring a matter to statutory services on the Safeguarding Case Management System.

The ASO will explore what information is held in respect of the respondent of a concern or allegation and, if that information could be relevant to a police or social services investigation, the ASO will share it with the relevant authorities. Where allegations concern the actions of someone who works or volunteers with children and meet the threshold, the Abbey will notify the Local Authority Designated Officer (LADO) within one working day and follow their process alongside any police referral.

13.3 Initial Contact and Support

The ASO will decide how and when to contact the complainant and respondent, ensuring the initial contact will prioritise support and wellbeing, explaining the safeguarding process, and outlining available support. Complainants will be offered pastoral and practical assistance, and respondents may be offered a nominated and agreed person for support, be it pastoral or therapeutic. Clear written information will be provided to both parties, including timescales and next steps.

13.4 Safeguarding Case Management Groups (SCMG)

For complex or high-risk cases, the ASO will convene an SCMG. This group provides oversight, ensures risk is managed effectively, and coordinates support for all parties. The chair will be appointed based on their capacity and capability following discussion between the Chapter Safeguarding Lead and ASO. Membership will include relevant staff and external advisors as needed, with strict attention to confidentiality and potential/actual conflicts of interest. Decisions will be documented and reviewed by the SCMG on a regular basis.

13.5 Concern Pathways for Different Roles

The Abbey recognises that safeguarding concerns may involve clergy, staff or volunteers. While the principles remain consistent, specific processes will reflect the individual's role and any associated legal or ecclesiastical requirements. For example, clergy cases may involve liaison with a Diocese where relevant, National Safeguarding Team and consideration of the Abbey's arrangements for clergy discipline and/ or the Clergy Discipline Measure (where relevant). Safeguarding concerns involving Abbey employees will follow the Abbey's HR policies and procedures, with the Head of HR working closely with the ASO to ensure risks are assessed, statutory referrals are made, support is provided to all parties, and decisions are documented.

13.6 Risk Assessment

Risk assessments will be carried out for all substantiated concerns, focusing on risks within the Abbey context. Where statutory assessments exist, these will be reviewed and supplemented if necessary. Recommendations will inform decisions on interim measures, such as suspension or restricted working arrangements.

13.7 Outcomes, Closure and Long-Term Risk Management

At the conclusion of a case, the Abbey will ensure appropriate actions are taken to manage ongoing risks, including the production of Safeguarding Development Plans or Safeguarding Safety Plans where required. Closure will include written communication to complainants and respondents, consideration of apologies, and arrangements for ongoing support. All cases will be recorded securely, and a reflective exercise will be undertaken to identify

lessons learned and improve future practice. Where relevant, the Abbey Safeguarding Officer will notify the Abbey's insurers, in line with agreed practices for notification of concerns.

14: Low-Level Concerns about Adults who work with Children or Adults at Risk

- 14.1** The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult working or volunteering with children or adults at risk, in or on behalf of the Abbey, may have acted in a way which is inconsistent with the Code of Safer Working Practices but which does not meet the threshold for referral as a matter of harm or abuse. In light of this, all clergy, staff and volunteers are expected to report any behaviour by another adult towards a child or adult at risk that may have concerned them. They should also self-report in any situation where they feel their behaviour to a child could be misinterpreted or misconstrued. These concerns should be reported the ASO through the online reporting process found on Westminster Abbey's website under safeguarding or on Abbey Net.
- 14.2** Clergy, staff and volunteers who are unsure of whether to complete a safeguarding concern report are encouraged to discuss the matter with the ASO on a no-names basis. However, following such a discussion, should it be felt that the matter reaches the threshold for action the member of staff will be expected to refer it. If in doubt, a referral should always be made.
- 14.3** All low-level concerns are logged centrally by the ASO, reviewed for patterns, and acted upon proportionately. It falls to the assessment of the ASO to decide when multiple low-level concerns meet the threshold for a safeguarding concern and for these to be treated as such.
- 14.4** Westminster Abbey Choir School manages low-level concerns related to adults who have contact with the boy choristers within the school environment through their own low-level concerns policy, which is accessible through their website. Where a concern reported in the Choir School relates to a member of Abbey clergy, staff or volunteer team who is not a member of staff of the school, the ASO, in consultation with the Receiver General, will assess that concern, where appropriate conducting an investigation into the circumstances, and provide a summary of action, for completion of records, on Westminster Abbey Choir School's case management system.

15: Pastoral Encounters

- 15.1** Staff and volunteers might encounter visitors who seek or require pastoral support, such as pastoral conversations or prayer, but do not present any safeguarding concerns. These pastoral encounters should be referred to the Duty Chaplain, or other available clergy if appropriate, who will offer support, including prayer, and record this information in the Pastoral Encounters diary which the ASO monitors frequently. The content of the diary is assessed and, where relevant, the ASO will take action and refer to other services. If staff are unsure whether to report an encounter as a pastoral or safeguarding concern, they should consult the ASO in the first instance. This procedure is outlined in Appendix 1.

16: Information Management and Record Keeping

- 16.1** A safeguarding concern that relates to Westminster Abbey should be reported using the e-form that is available on the Abbey's website or Abbey Net. Anyone who has a safeguarding concern should submit a report. This information is kept securely and confidentially with the understanding that it may be necessary to share some or all details of a concern with specific

people or organisations (including statutory services) Safeguarding children and vulnerable adults at risk will be the priority when considering sharing information with appropriate individuals and/or organisations. A database is used to record safeguarding concerns and cases. Access to this database is restricted to staff, and others where their role necessitates. This information is retained for a set period before it is deleted.

17: Confidentiality and Information Sharing

- 17.1** Protecting a child or adult at risk from harm takes priority over protecting privacy. UK GDPR and the Data Protection Act 2018 do not prevent sharing personal information where necessary to safeguard children or adults. Disclosures must be necessary, proportionate, relevant, accurate, timely, and secure.

* Currently in development (June 2026)

- 17.2** Information sharing at the Abbey is underpinned by the following principles:
- Confidentiality is an important principle that enables people to feel safe in sharing their concerns and to ask for help. However, the right to confidentiality is not absolute. Sharing relevant information with the right people at the right time is vital to good safeguarding practice.
 - It is inappropriate to give assurances of absolute confidentiality in cases where there are concerns about abuse, particularly in those situations when others may be at risk.
 - Information will only be shared on a 'need to know' basis.
 - In respect of adults, informed consent should be obtained, but if this is not possible and individuals are at risk of abuse or neglect, it may be necessary to override the requirement.
- 17.3** Regarding adult safeguarding, it is appropriate to ascertain the wishes of the adult at risk as to what they want to do about the situation, explaining the boundaries of confidentiality. However, care should be taken in telling the adult at risk what you are going to do if it could make them more vulnerable or at further risk.
- 17.4** The ASO will need to consider whether it is appropriate to inform a child's parent/carer of any suspected abuse. In some circumstances this may increase the risk of harm to the child and jeopardise any future police investigations.

18: Whistleblowing

- 18.1** The Whistleblowing Policy provides a confidential process for employees, volunteers, and stakeholders to report wrongdoing, such as criminal acts, legal breaches, or unethical behaviour. Whistleblowers are protected from victimisation, and disclosures will be investigated impartially. Anonymous reporting is allowed, though open communication is encouraged. The policy aligns with the Public Interest Disclosure Act 1998 and outlines appeal rights, external reporting options, and disciplinary consequences for false claims, promoting a culture of integrity and accountability.

19: Casework Management

- 19.1** The Abbey Safeguarding Officer is responsible for recording, maintaining and retaining effective records of safeguarding cases. Their case management will be discussed with the Abbey's Safeguarding Lead monthly or more regularly as the case dictates.

Section 4: Victims and Survivors

This section outlines the Abbey's commitment to ensuring that victims and survivors receive timely, compassionate, and effective responses to concerns. It also describes the support provided to meet their individual needs, promote healing, and uphold their pursuit of justice.

20: Our commitment to Victims and Survivors of Abuse

- 20.1** The Dean and Chapter of Westminster Abbey endeavours to ensure that their approach to safeguarding and related policies are survivor centred. Recent statutory reports and independent reviews into abuse involving the Church of England have highlighted past failings and significant lessons to be learned to improve safeguarding. The Abbey is committed to truth, healing, learning and the prevention of any form of abuse or neglect.
- 20.2** Dean and Chapter is committed to learning from both our own past failings and those of the wider church, by ensuring that lessons learned are used to improve our response to future safeguarding concerns and the support offered to all those with a role to play in ensuring a safer Abbey.
- 20.3** Westminster Abbey will seek to support all known victims/survivors of abuse with a careful and considerate ministry. This may be through the support of a clergy member or through conversation with the Abbey Safeguarding Officer. Alternatively, the Abbey will help the victim/survivor to identify appropriate, external, professional support if required. The Abbey has a service level agreement with the Diocese of London so that any victims/survivors can receive support from an Authorised Listener from the Diocese of London.

Section 5: Learning, Supervision and Support

This section outlines the Abbey's commitment to ensuring all individuals involved in safeguarding activities receive appropriate and ongoing learning, professional development, supervision, and support. This enables them to respond effectively and compassionately to safeguarding concerns and events.

22: Training and Learning Framework at the Abbey

- 22.1** All staff and volunteers will receive the Church of England's National Safeguarding Team's (NST) safeguarding training at the relevant level; they are required to complete it within three months of taking up a post, and to refresh this training every three years. Dean and Chapter will complete the Church of England's leadership training. The Abbey will facilitate and/or provide Safer Recruitment training for all HR staff and recruiting managers and ensure that this training is refreshed every three years. Compliance with training requirements is overseen by the HR Department.

23: Support for Clergy, Staff and Volunteers

- 23.1** Those who are the first point of contact for safeguarding concerns might be distressed by the support they are required to provide. In these instances, the individual will be offered support from the HR team and the ASO.

24: Supervision, CPD and Work of ASO

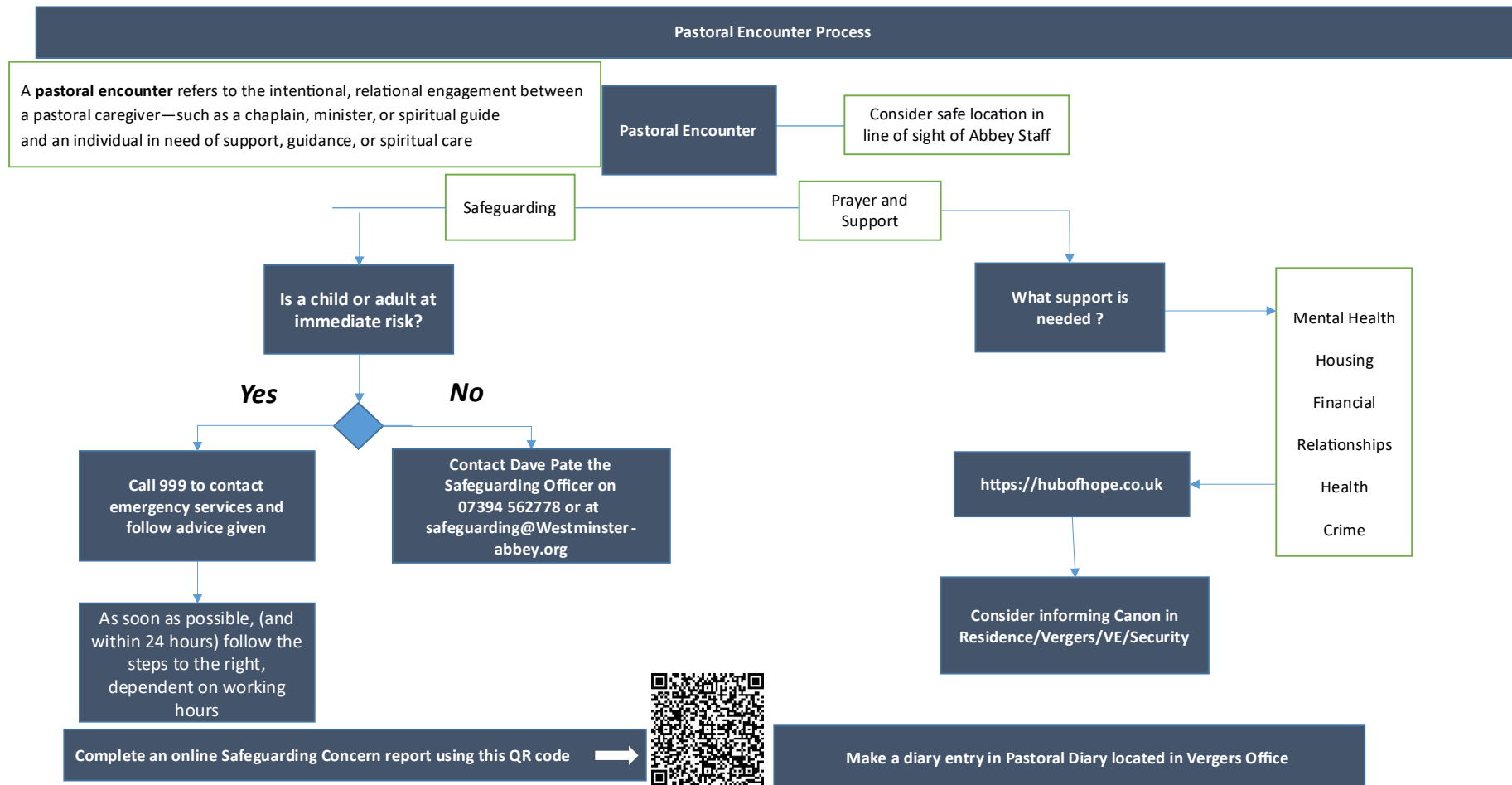
- 24.1** The Abbey Safeguarding Officer is line managed by the Receiver General and reports to the Chapter Safeguarding Lead for all safeguarding matters. The ASO receives external clinical supervision to ensure independent welfare and professional development.

- 24.2** The Dean and Chapter of Westminster Abbey promotes a culture of respectful professional challenge. Where practitioners disagree on safeguarding risk, thresholds, or action, concerns must be escalated promptly and recorded on the relevant case management file to avoid delay.

25: Partnership Working for Safeguarding

- 25.1** Westminster Abbey has a memorandum of understanding with the Diocese of London for the mutual sharing of information and the provision of advice from the Diocese on safeguarding issues, and an Agreement with St Paul's Cathedral to provide the safeguarding expertise of the Cathedral Safeguarding Officer when the Abbey Safeguarding Officer is absent. Westminster Abbey has in place an information sharing agreement with the National Police Chief's Council. Westminster Abbey and Westminster School work closely together for the common purpose of keeping children safe.

Appendix 1: Pastoral Concern Flowchart



Appendix 2: Westminster Abbey Safeguarding Reference Group

Terms of Reference and Membership

The core role of the Safeguarding Reference Group (SRG) is to provide objective, independent scrutiny, test and challenge of the safeguarding practice of Westminster Abbey, including St Margaret's Church, its interactions with the Choir School and with the Dean's Ecclesiastical lead role at the Chapel of St Mary Undercroft.

Members of the SRG will raise awareness on safeguarding and promote the Dean and Chapter's commitment and ability to provide safe environments for children and adults at risk of harm in all areas of its work.

The SRG will achieve this by:

- Keeping the Abbey's safeguarding arrangements, policy and procedures under constant review,
- Receiving and scrutinising reports from the Abbey Safeguarding Officer,
- Monitoring reports and records of safeguarding matters,
- Identifying risks and issues and making recommendations for action,
- Ensuring emerging national policy and best practice is identified and adopted,
- Working in partnership with other appropriate bodies,
- Establishing, as required, subgroups to address emerging issues,
- Identifying capability gaps and sharing best practice,
- Reporting to the Dean and Chapter at regular intervals on safeguarding matters, and
- Working in accordance with the Abbey's values.

The SRG will meet quarterly for up to three hours. Exceptional meetings can be called by the Receiver General, Independent Chair, or Abbey Safeguarding Officer to address specific issues.

The Abbey will provide secretarial support and a suitable meeting room. Membership of the SRG will consist of:

- The Independent Chair (with no other connection to the Abbey)
- Chapter Safeguarding Lead (Canon Steward & Archdeacon)
- Abbey Safeguarding Officer
- Receiver General
- Head of Security
- Westminster Abbey Choir School Headteacher
- General Manager, Music Department
- Safeguarding Lead from Westminster School
- A representative from the Diocese of London
- A representative from the Barking and Dagenham Local Authority
- Mental health specialist
- Ad hoc consultants or observers as may from time to time be agreed by the SRG

Terms of Reference Agreed October 2025