



ST PETER'S CHURCH, CHORLEY
HARPERS LANE, CHORLEY, LANCASHIRE PR6 0HP

St Peter's Chorley Parish Church

in the Church of England Diocese of Blackburn

SAFER RECRUITMENT & PEOPLE MANAGEMENT POLICY

In Accordance with the Church of England Safeguarding Code of Practice (2026) and Blackburn Diocesan Guidelines

1. Introduction, Scope, and Vision

St Peter's Church, Harpers Lane, Chorley, is unconditionally committed to promoting a safe, healthy, and nurturing environment and culture for all children, young people, and vulnerable adults. A foundational pillar of this commitment is ensuring that all individuals—whether ordained clergy, licensed lay workers, paid employees, or volunteers—who work with or have substantial contact with vulnerable groups are safely and appropriately recruited, vetted, and supported.

This Safer Recruitment Policy has been thoroughly updated, aligned, and adopted by the Parochial Church Council (PCC) of St Peter's in response to the newly mandated Church of England Safer Recruitment and People Management Code of Practice (issued under Section 5A of the Safeguarding and Clergy Discipline Measure 2016), sitting within the national Safeguarding e-Manual, and supplementary directives from the Diocese of Blackburn. This policy completely supersedes all previous iterations and historical frameworks.

The Church of England's safeguarding policy statement, 'Promoting a Safer Church', emphasizes that safer recruitment goes significantly beyond a simple Disclosure and Barring Service (DBS) check. Academic and institutional evidence shows that many individuals who have abused or will abuse in positions of trust do not possess a prior criminal record. Consequently, while statutory background

checks are a mandatory and critical deterrent, no single check is foolproof. The primary and most powerful tool in the safeguarding toolkit is the creation of a vigilant, healthy, and transparent parish culture where safeguarding is embedded within the church's DNA.

The requirements outlined in this document apply strictly to every single role operating within, or under the governance of, St Peter's Church. No individual shall be permitted to commence any role, attend parish activities as a leader, or have any contact with children or vulnerable adults until the entirety of the safer recruitment process specified for their specific pathway has been successfully completed, verified, and officially approved.

2. Statutory and Ecclesiastical Framework

This policy is established under Section 5A of the Safeguarding and Clergy Discipline Measure 2016, as amended by the Safeguarding (Code of Practice) Measure 2021. This framework introduces a monumental shift in ecclesiastical and statutory law:

Duty to Comply. Under the updated framework, the historical 'duty to have due regard' is fully replaced by a strict, legally binding

All relevant persons within St Peter's Church, including the Incumbent, PCC, and Churchwardens, must comply with the requirements of the Code of Practice. The requirements set out a baseline minimum standard, and local practice that exceeds these standards is actively maintained to ensure maximum protection.

Strict statutory enforcement mechanisms are tied to this Code of Practice under ecclesiastical and civil regulations:

- **Clergy Non-Compliance:** Failure by a member of the clergy to comply constitutes misconduct under the Clergy Discipline Measure (CDM) or replacing legislation and may result in formal disciplinary action.
- **Lay Minister Non-Compliance:** Failure by a Licensed Lay Minister (Reader), Authorized Lay Minister, or commissioned lay worker to comply provides immediate grounds for the revocation of that minister's licence by the Bishop.
- **Churchwarden Non-Compliance:** Churchwardens and other elected church officers who fail to comply with these requirements may be suspended from office under statutory provisions.
- **PCC Trustee Body Non-Compliance:** Breaches by the PCC as a trustee body will trigger formal intervention and regulatory action by the Charity Commission.
- **Employee and Volunteer Breach:** Employees breaching these requirements are subject to immediate internal disciplinary processes, up to and including summary dismissal. Volunteers breaching requirements will be asked to leave their role immediately.

This policy incorporates the National Safeguarding Standards (2024–2026), focusing directly on Standard 1 (Culture, Leadership, and Capacity) and Standard 2 (Prevention), ensuring that personnel management is treated as an integrated, end-to-end preventative sequence to deter and reject unsuitable applicants.

3. Roles and Responsibilities in the Recruitment Process

To ensure absolute clarity and accountability, the specific duties for managing the safer recruitment and people management process at St Peter's are allocated across four distinct pathways as follows:

The Incumbent (Vicar/Clergy Chair): Retains overall spiritual oversight of ministry within the parish. The Incumbent ensures that all appointed leaders and personnel align with the spiritual and safeguarding standards of the Church of England, and acts as a key relevant person responsible for driving compliance.

The Parochial Church Council (PCC): Acts as the ultimate employing and appointing body for all parish-based roles. The PCC holds legal responsibility as a charitable trustee body. The PCC must formally authorize the creation of any role (paid or voluntary), review and adopt this policy annually, and ensure that all safer recruitment approvals and completed clearances are officially recorded in the formal PCC minutes. The PCC is accountable to the Charity Commission for ensuring compliance.

The Parish Safeguarding Officer (PSO): Acts as the operational coordinator for safeguarding and safer recruitment within the parish. The PSO works in close conjunction with the Incumbent and recruiting managers to oversee the end-to-end recruitment sequence. The PSO is responsible for distributing and verifying Confidential Declaration Forms, initiating and tracking DBS disclosures via the Blackburn Diocese approved provider, maintaining the secure Parish Safer Recruitment Tracking Matrix, and delivering mandatory safeguarding status reports to every PCC meeting.

The Churchwardens: Responsible for ensuring that building management, church operations, and sub-contracted or lay-led secular operations (such as the commercial hiring of the church hall or external maintenance contractors) adhere strictly to parish safeguarding parameters. Churchwardens hold a direct statutory duty under the Churchwardens Measure and the Code to enforce compliance across all church premises.

4. Disclosure and Barring Service (DBS) Requirements & Eligibility Matrix

A core element of the Code of Practice is the rigorous and legally precise application of Disclosure and Barring Service (DBS) eligibility criteria. Under civil law, it is a criminal offence to apply for a higher level of DBS check than a role legally qualifies for. St Peter's Church strictly rejects blanket checking policies, ensuring that background vetting is directly proportionate to the specific activities undertaken by the individual.

To resolve ambiguity and ensure absolute alignment with the Church of England e-Manual, the following multi-column tracking spreadsheet defines the mandatory DBS vetting levels and legal rationales for all roles operating at St Peter's Church:

| Role Type / Title | Personnel Covered | Mandatory DBS Level | Legal & Safeguarding Rationale |
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| Clergy & Ordained Ministry | Incumbent, Curates, Self-Supporting Ministers (SSM), Non-Stipendiary Ministers (NSM), Ordained Local Ministers (OLM), Priests with Permission to Officiate (PTO). | Enhanced Disclosure with Child & Adult Barred List Checks. | Mandatory under the 2026 Code of Practice. Clergy hold the Bishop's licence and exercise spiritual leadership, regular pastoral counseling, and frequent oversight of vulnerable demographics, meeting the statutory criteria for Regulated Activity. |
| Licensed & Commissioned Lay Ministry | Licensed Lay Ministers (LLMs / Readers), Authorized Lay Ministers (ALMs), Pastoral Assistants. | Case-by-Case Assessment (Enhanced DBS with or without Barred List, strictly matching actual activities). | No blanket check is lawful. The level of vetting depends entirely on the specific activities undertaken. A Barred List check is only legally permissible if the role meets the statutory definition of Regulated Activity (e.g., frequent, unsupervised teaching or providing intimate care/visitation). If contact is substantial but outside Regulated Activity, an Enhanced check without Barred List is applied if eligible. |
| Elected Officers & Trustees | Parochial Church Council (PCC) Members, Churchwardens, PCC Treasurer, PCC Secretary. | Conditional Eligibility (Enhanced DBS without Barred List ONLY if specific charity thresholds are met; otherwise, No DBS check). | Simply being on the PCC or a Churchwarden does not automatically qualify someone for a DBS check. In standard cases, a blanket check cannot be performed. Under CoE and Charity Commission guidance, trustees are only eligible for an Enhanced DBS check (without Barred List) if the PCC qualifies as a charity that specifically sponsors or provides children's or vulnerable adults' work. Barred List checks are strictly unlawful for trustees by virtue of office alone. |
| Children & Youth Leadership | Youth Workers, Sunday School Leaders, Crèche Volunteers, Paid Children's Ministry Leaders. | Enhanced Disclosure with Child Barred List Check. | Fulfills statutory criteria for Regulated Activity with children due to direct, frequent, and unsupervised teaching, training, supervising, or mentoring of minors. |

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| Operational & Liturgical Staff | Vergers, Parish Administrators, Church Office Secretaries, Sacristans. | Basic DBS (Enhanced without Barred List only if duties include handling sensitive child data or regular lone contact). | Reflects high-profile public visibility, keyholder responsibilities, and routine access to sensitive parish operations, records, or systems. These roles do not routinely meet statutory 'Regulated Activity' thresholds, making a Basic check the legal baseline. |
| Estate & Facilities Management | Cleaners, Site Caretakers, Voluntary Groundskeepers. | Basic DBS Check. | Required due to regular unsupervised access to church premises, buildings, and facilities during times when vulnerable groups may be present, involving keyholder access and lone working. |
| General / Occasional Volunteers | Sidespeople, Welcomers, Tea & Coffee Servers, General Work Party Volunteers. | No DBS Check Permitted. | Roles involve no direct care, supervision, or targeted guidance of vulnerable groups. All activities occur in a fully supervised, public forum. Vetting is controlled via safer environment practices rather than criminal record disclosures. |

5. The Four-Pathway End-to-End Recruitment and Appointment Process

To ensure a rigorous, standardized, and legally compliant sequence, St Peter’s Church mandates an 8-stage end-to-end recruitment process. This sequence must be systematically applied across all four distinct pathways defined by the 2026 Code: the Clergy Pathway, the Employee Pathway, the Volunteer Pathway, and the Elected Member Pathway. No shortcut or stage omission is permitted under any circumstances.

Stage 1: Role Clarification & Authorization

Before any vacancy is advertised, or any volunteer or elected officer is invited to serve, a formal Job Description (for paid staff) or Role Description (for volunteers and lay ministers) must be drafted. This document must clearly define the scope of duties, explicit boundary requirements, the mandatory safeguarding training pathway, and the legally verified level of DBS check required. The creation of the role and its specific safer recruitment parameters must be formally authorized by a vote of the PCC and recorded explicitly in the official PCC minutes.

Stage 2: Safer Advertising

All recruitment advertisements, parish notices, volunteer leaflets, or expressions of interest must feature an prominent and explicit statement confirming St Peter's Church's commitment to safeguarding. The mandated text must state:

'St Peter's Church, Chorley is fully committed to safeguarding and promoting the welfare of children, young people, and vulnerable adults. All post holders and volunteers are expected to share this commitment. This position is subject to a robust safer recruitment process, including a Confidential Declaration and an appropriate, legally compliant DBS disclosure.'

Stage 3: Application & Information Gathering

All applicants, whether applying for a highly paid professional position or a voluntary helper role, must complete a comprehensive formal Parish Application Form. Curriculum Vitae (CVs) will strictly not be accepted in isolation. The application form captures full personal details (including all historical names), an exhaustive employment, education, and volunteering history since leaving secondary education, and a self-declared explanation for any gaps in history. Gaps or frequent movements between parishes must be flagged for subsequent investigation.

Stage 4: Submission of the Confidential Declaration Form (CDF)

Applicants for roles that legally qualify for an Enhanced DBS check must complete and submit the official Church of England Confidential Declaration Form (CDF) at the same time as their initial application. This form gives candidates the opportunity to self-disclose unspent or unprotected convictions, cautions, final warnings, reprimands, or ongoing safeguarding investigations. If an applicant refuses to complete the CDF, the recruitment process must be terminated immediately. Collecting the CDF at the application stage is mandatory to ensure that individuals who are legally barred from Regulated Activity are identified immediately and are never permitted to progress to an interview, preventing a serious criminal offence.

Stage 5: Face-to-Face Interview and Competency Assessment

A structured, formal selection assessment must take place for every single role, even where there is only a single applicant. For paid staff and licensed lay ministries, this involves a structured interview panel comprising a minimum of two people. In strict compliance with Requirement 3.7.2, at least one panel member must have successfully completed the national Church of England Safer Recruitment & People Management training module within the preceding three years. For volunteers, this may take the form of a documented structured conversation. Interview questions must use competency-based techniques to probe the applicant's motivations, understanding of power dynamics, personal boundaries, emotional resilience, and specific values regarding safe safeguarding practices.

Stage 6: Robust Background & Reference Checking

A minimum of two written, independent references must be obtained directly from referees before an appointment can be advanced. For paid roles, one reference must be from the current or most recent employer. For church-based roles, references must be sought from the applicant's previous incumbent or spiritual leader. All references must be requested using the standard Church of England Reference Template, which explicitly asks the referee if they know of any reason why the applicant should not work with vulnerable groups or children.

To ensure absolute safety, the PSO or recruiting manager must follow up all written references with a telephone call to verbally verify the identity of the referee and confirm the authenticity of the reference. Detailed notes of this verbal verification call must be permanently logged in the personnel file.

Stage 7: DBS Submission & Blemished Certificate Management

Once references and identity documents are verified, the formal DBS application is submitted via the Blackburn Diocese approved provider. If a DBS certificate returns with a 'blemished' status (containing criminal records, cautions, or intelligence), the file is immediately referred to the Diocesan Safeguarding Advisor (DSA). No individual with a blemished certificate may be appointed, permitted to work, or allowed to volunteer at St Peter's Church without a formal, written risk assessment panel signed off explicitly by the DSA.

Stage 8: Formal Appointment & PCC Ratification

A formal, conditional offer letter or volunteer agreement may only be issued after all pre-appointment checks (References, Verbal Verification, Confidential Declaration, and DBS clearance) have been fully satisfied. The final appointment must be formally ratified by a vote at the subsequent PCC meeting and entered into the official, auditable minutes before the individual officially commences their duties.

6. Post-Appointment: Induction, Training, and Support

In strict alignment with the 2026 Code of Practice, the safer recruitment process does not conclude upon appointment. Vigilance must be maintained through structured onboarding, continuous learning, and robust professional support systems to sustain a safe culture.

6.1 Safeguarding Learning and Training Pathways

Safeguarding training is legally mandatory for all church officers. Every individual appointed to a role at St Peter's Church must successfully complete the mandated training pathways via the Church of England Safeguarding Training Portal within three months of their appointment. Training must be refreshed every three years without exception. The required pathways are:

- Basic Awareness Pathway: Mandatory for all individuals elected or appointed to any role within the church, including sidespeople, welcomers, and tea/coffee servers.

- • Foundation Pathway: Mandatory for the PSO, Churchwardens, PCC Members, Vergers, and any staff member or volunteer involved in direct ministry or care for children or vulnerable adults.
- • Leadership Pathway: Mandatory for the Clergy, Licensed Lay Ministers (LLMs), Authorized Lay Ministers (ALMs), Churchwardens, and the Parish Safeguarding Officer.
- • Raising Awareness of Domestic Abuse: Mandatory for all PCC members, Churchwardens, the PSO, and anyone holding an Enhanced DBS role.

6.2 Induction and Onboarding Periods

All new personnel must undergo a structured induction process utilizing the official Church of England Induction Checklist. This covers fire safety, code of safer working practice, lone working protocols, and local reporting pathways for safeguarding concerns. Paid staff are subject to a strict six-month probationary period, and volunteers are subject to a mutual three-month 'settling-in' period, during which regular check-ins are conducted by the line manager or Incumbent.

6.3 Ongoing Oversight and Role Drift Management

All ministry and operational teams must receive regular support and supervision. Safeguarding compliance remains a permanent standing agenda item at all local ministry team leaders' meetings, and an annual review of role descriptions must be completed by the PSO and Incumbent.

Role Drift. Management must remain hyper-vigilant regarding

Role drift occurs when an individual safely recruited for a low-risk role (e.g., church administrator or coffee server) gradually takes on duties in a higher-risk role (e.g., helping with youth group or driving vulnerable adults) without undergoing the required safer recruitment checks for that new pathway. Line managers and the PSO must review volunteer activities continuously to ensure no individual drifts into un-vetted activities.

7. Data Protection, Record Keeping, and Information Sharing

St Peter's Church complies fully with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 regarding the processing, secure storage, and retention of personnel records:

- • Safer Recruitment Files: Application forms, reference checks, verbal verification logs, verified confidential declarations, and training certificates are stored in a secure, locked filing system or encrypted digital repository accessible exclusively by the Incumbent and the PSO.
- • DBS Data Handling: In strict compliance with the DBS Code of Practice, specific criminal record details or physical certificate copies are never retained. The parish records only the unique disclosure number, date of issue, name of clearing officer, and overall clearance outcome.
- • Tracking Matrix: The PSO maintains a centralized, password-protected spreadsheet to track the compliance status, training dates, and check numbers for all parish personnel.

- Information Sharing: St Peter's adheres strictly to the Church of England Data Sharing Framework (2022), enabling lawful and secure data sharing between independent Church Bodies where necessary for protection and case management.
- Data Retention: Personnel files for individuals who have worked with children or vulnerable adults are permanently retained for the statutory duration required by the National Safeguarding Team (NST) guidelines following their formal departure from the role.

8. Policy Adoption, Auditing, and Review Tracking

This policy is a living document that must be re-evaluated annually (12 months) to respond to emerging statutory updates or local diocesan adjustments. The formal adoption and tracking status of this policy framework is detailed below:

Formal Ratification & Approval:

Signed: *Neil Kelley*

Name: Fr. Neil Kelley
 Position: Priest in
 Charge / Chair of PCC
 Date: 11 June 2026

Signed: *Ronnie
 Hunter*

Name: Ronnie Hunter
 Position:
 Churchwarden
 Date: 11 June 2026

Signed: *Eric
 Crompton*

Name: Eric Crompton
 Position:
 Churchwarden
 Date: 11 June 2026

Document Version Control History

| Version | Release Date | Author / Originator | Approved By |
|---------|--------------|---------------------|----------------|
| 1.0 | 11/06/2026 | Parish Office | St Peter's PCC |

Institutional References and Legal Citations

1. Church of England General Synod Paper GS 2422, 'Safeguarding Code of Practice: Safer Recruitment and People Management', Version 2, February 2025 (Mandated effective June 2026).
2. Church of England Safeguarding e-Manual, Section 5A of the Safeguarding and Clergy Discipline Measure 2016 (as amended by the Safeguarding (Code of Practice) Measure 2021).
3. Diocese of Blackburn Safer Recruitment Framework and Diocesan Safeguarding Officer Regulations 2024.
4. Charity Commission Guidance: 'CC30: Sales, purchases and transfers of charity property' and trustee vetting eligibility frameworks under the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975.
5. Disclosure and Barring Service (DBS) Statutory Eligibility Guidance for Child and Adult Workforces.