

### Why Past Cases Review 2 (PCR2)?

The original Past Cases Review (PCR) conducted in 2007-2009 was a large-scale review of the handling by the Church of child protection cases over many years. It involved a scrutiny of clergy and other church officers' files to identify past safeguarding allegations or concerns relating to conduct towards children; and specifically to identify those individuals presenting on-going risks to children, to ensure appropriate risk management and response. A review of that original PCR by an Independent Scrutiny Team (IST), published in 2018, revealed serious shortcomings in its discharge and recommended that:

- ALL dioceses and the provinces ensure that relevant files (including those of diocesan lay employees working with children) which are known not to have been examined in 2008/09 or which have subsequently been located and not examined, are independently reviewed and any cases of concern which emerge, are dealt with by the DSA as if they were new referrals.
- ALL dioceses should be asked to check with every parish that all safeguarding concerns about the behaviour of any parish employee or volunteer towards children both currently and historically have been notified to the DSA.
- An updated version of the PCR, as prescribed by the National Safeguarding Steering Group (NSSG), should be conducted in the seven dioceses where further work was considered necessary (Ely, Rochester, Sheffield, Lichfield, Salisbury, Winchester and Sodor & Man.)

The NSSG in fact agreed to extend the remit of PCR2 by inclusion of concerns relating to adults at risk of abuse (also referred to as vulnerable adults.) This effectively requires all dioceses to re-do as well as update the original PCR to the present day, to ensure that an independent scrutiny for safeguarding concerns relating to both children and vulnerable adults has taken place. Only where there is clear evidence of a previous PCR, or more recent equivalent Independent Review of living church officers, embracing concerns relating to both children and vulnerable adults, might a diocese be granted an exemption from this repeat Independent file review.

### What are PCR2 Objectives?

It is the aspiration of the Archbishops' Council that: "By the end of the PCR2 process, **independent review work will have been carried out in every diocese and church institution** within both the letter and the spirit of the protocol and practice guidance. Any file that could contain information regarding a concern, allegation or conviction in relation to abusive behaviour by a living member of the clergy or church officer, (whether still in that position or not) will have been identified, read and analysed by independent safeguarding professionals. At the completion of the review process it will be possible to state that:

- all known safeguarding cases have been appropriately managed and reported to statutory agencies or the police where appropriate
- the needs of any known victims have been considered and that sources of support have been identified and offered where this is appropriate
- all identified risks have been assessed and mitigated as far as is reasonably possible"

- (PCR 2 Background and Overview, p 3, July 2019)

### **Is PCR2 only concerned with diocesan files?**

No. As the Archbishops' Council statement above makes clear, PCR2 will involve the files of all clergy and other church officers in all church institutions – including Cathedrals, Theological Colleges, Religious Communities, Royal Peculiars, as well as Military Chaplains. Unlike the original PCR, safeguarding concerns relating to church officers at a parish level are also included.

The PCR2 guidance was first written with dioceses in mind as this is where the bulk of files are to be found. Dioceses are being encouraged to include other church institutions within their geography to participate in the diocesan PCR2; though with the expectation that there is a proportionate contribution to the cost. Where this does not happen, the objectives of the review will need meeting within these other church institutions, and the principles behind of each of the 5 stages of the review will need adapting for implementation., including setting up a PCR2 Reference Group, creating Known Cases Lists, appointing an Independent Reviewer (IR) and submitting an IR PCR2 Report to the PCR2 Project Management Board. The PCR2 Project Manager, Donald Findlater, is available for consultation about these steps on

[donald.findlater@churchofengland.org](mailto:donald.findlater@churchofengland.org)

### **What is the role of the PCR2 Management Board?**

In making these arrangements for PCR2, the National Safeguarding Steering Group (NSSG) wants to make clear the commitment of the National Church Institutions to ensuring that any concerns about abuse and all disclosures of harm have been investigated with appropriate rigour and that victims have received the very best care and support.

The NSSG realised that in accepting the recommendations of the Independent Scrutiny Team, it needed to ensure that the PCR2 task benefitted from comprehensive guidance and national leadership.

A Project Management Board was established to oversee and coordinate implementation of PCR2, delivering governance and oversight.

The three key aspects of the PCR2 Project Management role are to:

- Ensure that the PCR project achieves a balance between proportionality and rigour in the production of written guidance and in its implementation
- Ensure that the best interests of children and of adults at risk of abuse are given paramount consideration throughout the PCR2 process
- Ensure it operates a quality assurance function across all aspects of project delivery

The Project Management Board, chaired by Bishop Mark Sowerby, is a sub-group of the NSSG, to which regular up-date reports are made.

The PCR2 task is supported by a dedicated Project Manager within the NST.

### **What files are in scope of PCR2?**

Files relating to every living clergy person and living church officer are within the scope of PCR2; whether or not the clergy or other church officers are engaged in ministry, paid or voluntary work at the time of the review. Those who are not in ordained or licensed ministry become subject to review because their current or past church role required or requires them to have substantial contact with children and/or adults at risk of abuse.

### **Which “church officer” roles are within the scope of PCR2?**

A “church officer” is anyone appointed/elected by or on behalf of the Church to a post or role, whether they are ordained or lay, paid or unpaid. It does, in fact, embrace all clergy, although in its use in the published guidance there is often reference to “clergy and church officers” as if the two were distinct and separate.

In fact any confusion is typically about non-clergy church officers in dioceses, parishes, Cathedrals and other settings. The guidance has resisted listing relevant roles, as any list would be inadequate or potentially inaccurate in a range of circumstances. Page 5 of “PCR2 Protocol and Practice Guidance” states that relevant church officer roles are included where the role (past or current) requires them to have “substantial contact with children” (i.e. anyone under 18 years of age) or where their role requires/required them to have direct contact with adults at risk of abuse, including at risk of domestic abuse. “PCR2 Background and Overview” document clarifies a little further in stating that, as well as the files of all those in ordained or licenced ministry, PCR2 will review the files of all (church officers) whose church role brings them into direct contact with children or with adults at risk of abuse.

It is expected that the Diocesan PCR2 Reference Group will support the DSA in identifying relevant roles to include in PCR2 in the diocese, in parishes and in other settings. All who work directly with children and youth, and those who undertake home visiting, are clearly included. Organists, choirmasters, bell ringers and similar will be included in most if not all circumstances. Those fulfilling any kind of education role directed at children or vulnerable adults in a cathedral setting will be included. Those involved in flower arranging in a cathedral or parish church setting will not.

Where a diocese, cathedral or other setting is unclear about a particular role, it may be worth consulting a diocese further ahead in the conduct of PCR2 to see what they think. The PCR2 Project Manager can also be consulted.

It is recognised that parishes do not, typically, maintain a great many files. But where they are kept, those in scope need to be reviewed. Perhaps of greater relevance will be the checking of the parish collective memory for any safeguarding concerns. All such concerns will need reporting to the DSA, whether about a church officer in scope or not. Once reported, the DSA can assist in the decision as to whether the individual about whom a report has been made falls within the scope of PCR2.

### Will PCR2 consider deceased clergy and other church officers and survivors of abuse by them?

PCR2 is concerned with living clergy and church officers only. Nearly all dioceses undertook a Deceased Clergy Review in 2014 or thereabout; or one has been undertaken or recommended since.

However, there remain lessons to learn from survivors of deceased clergy (and other church officers) and they should be encouraged to meet with the IR if they have representations to make. In such circumstances, should it become apparent that their alleged (deceased) perpetrator's file has not been independently reviewed, it should be included within the scope of PCR2.

### Can files be exempted from PCR2?

It is possible for one or more files that have been independently reviewed since 2007, or files where the 2007 PCR actively considered safeguarding concerns relating to vulnerable adults, to be exempted from further review within PCR2. The diocese must obtain the consent of the PCR2 Project Management Board. The process for obtaining exemption is set out in detail on p7 onwards in PCR2 Protocol and Practice Guidance.

### Will survivors be consulted?

Consultation with and advice from survivors of abuse within the church, alongside advice from trauma-informed professionals, is central to the discharge of PCR2. The PCR2 Project Management Board includes a member with lived experience of abuse as well as other members with professional expertise in work with survivors. Each Diocese (and equivalent other church body – e.g. Cathedral, TEI, Religious community where their PCR2 is conducted independently from the local diocese) is required to establish a PCR2 Reference Group, where 50% or more of the membership is expected to be independent of the diocese. At least one person is expected to be an individual with lived experience of abuse or a named person from a group which advocates a survivor perspective.

The PCR2 process looks to identify where abuse allegations have not been handled appropriately in the past and/or where there may be outstanding survivor needs. The Church needs to hear from survivors about these matters, in order to learn what it has done well and what it has done badly. The diocesan safeguarding team is the primary route for anyone wanting to disclose information or contribute to the review. In addition, for those affected by issues raised by PCR2 and who wish to speak to someone from outside the church, a dedicated telephone helpline operated by the NSPCC and independent of the church has been set up - **0800 80 20 20**.

**The welfare of children or of adults at risk of abuse must be of paramount importance in the planning and execution of PCR2.**

## What are the five phases of PCR2?

### **Phase one**

- Establish a PCR2 Diocesan Reference Group and Implementation Plan
- Letter from Diocesan Bishop to every incumbent setting out PCR process and requiring information on all past safeguarding concerns to be notified to DSA.
- Appointment of one or more Independent Reviewer/s,(IR)

### **Phase two**

Following receipt by DSA of all notifications from parishes, draw up an extended Known Cases List (Children)(KCL - C) - comprising all living clergy and church officers where information exists about past safeguarding concerns or inappropriate behaviour towards a child.

Draw up Known Cases List (Adults) (KCL – A) comprising all living clergy and church officers where information exists about past safeguarding concerns or inappropriate behaviour towards a vulnerable adult.

### **Phase three**

The IR is provided with access to all files of individuals on KCL (C) and KCL (A) for review. They will also be given access to all living clergy blue files and all HR/personnel files relating to reader and lay ministry files that are in scope. All HR files or equivalent files in relation to church officers or diocesan employees within scope must be included in the review.

### **Phase four**

Once all the file reviews have taken place a meeting should be arranged between the DSA and the IR to consider the reviewer's report on each case where they identified a concern. The IR and DSA together should confirm that the current arrangements for managing each case are satisfactory and make an appropriate entry on the relevant KCL.

### **Phase five**

To close the PCR2 process the IR should provide a written report for consideration by the DSAP. Once agreed, the DSAP chair should endorse the report and forward it to the diocesan bishop, who in turn will forward it to PCR2 Project Management Board with a letter confirming completion of PCR2.

## Who is suitable to be an Independent Reviewer and by what process should they be appointed?

PCR2 Protocol and Practice Guidance lists the criteria that must be met in the appointment of one or more Independent Reviewers (IRs).

The IR must be

- Manifestly independent of any diocese or other church institution i.e. not a member of the clergy, other church officer or closely involved in any diocese e.g. member of the Synod or Board of Finance

- Suitably experienced in safeguarding investigative work within a relevant profession e.g. social work, police, law, probation
- Possess the inter-personal skills and experience to engage sensitively with victims and survivors
- Experienced in reviewing cases preferably at IMR/SCR level (these are now referred to as child safeguarding practice reviews.)
- Experienced and competent in risk assessment
- Have a good understanding of the process for handling allegations of abuse made in relation to those working with children and vulnerable adults and the associated law and statutory guidance
- If unfamiliar with the safeguarding policies and procedures of the Church of England, possess the ability to study these and apply them to the cases and files under review.

The person appointed to be an Independent Reviewer may be self-employed or may be appointed on a fixed-term contract to undertake this work. The NST will undertake a process for approving a number of individuals who meet the criteria, to assist dioceses in the selection process. A list of these individuals is available from the PCR2 Project Manager – although it is still expected that a diocese will conduct an interview to be satisfied about suitability and working arrangements. That said, dioceses are at liberty to undertake their own advertising, recruitment and appointment process and not consult this NST Approved IR list, so long as the published criteria are met.

#### **What facilities need providing for Independent Reviewers?**

Independent Reviewers are an expensive resource and it is important to use their time efficiently as well as effectively.

Experience shows that the best use is made of the IR's time if the following are provided:

- A list of all files to be examined – preferably electronically
- Location of files clearly identified with arrangements for the IR's access to them
- Arrangements for access to files outside office hours if IRs will be working extended days
- Confidential workspace, Wi-Fi connectivity, phone access, safe document storage space and access to IT equipment, printer and photocopier
- Details of key contacts
- The name of an identified person(s) in addition to the DSA who can provide advice to the IR on the diocesan structure, Who's Who and local policies and procedure.

### **What about cases that have been dealt with by National Safeguarding Team or the Provinces?**

All safeguarding casework that has involved the Provinces or the NST since its inception in 2015 will be included in PCR2. An individual clergy or church officer's file/s should be reviewed only once, comprehensively, rather than separately in parts. The NST and Provinces will notify dioceses of the files they hold and will agree the co-location of all files relating to an individual church officer to allow the IR at diocese, Province or NST (as agreed by DSA and colleagues at Province or NST) to enable comprehensive independent review.

### **What is the timeframe for completion of PCR2?**

The timeframe for completion of PCR2 by dioceses, NST, Provinces and other settings has been extended due to Coronavirus and the delays it has necessarily caused.

When we have some greater certainty about Covid-19 lockdown timescales, a final completion date will be set and communicated to relevant settings.

Once the separate PCR2 Reports are completed and received from all settings by the PCR2 Project Manager, an overview report will be completed for dissemination to the National Safeguarding Steering Group and House of Bishops. Relevant content (ie specific to children) will be supplied to the Independent Inquiry into Child Sexual Abuse.

### **What will it cost?**

The Archbishops' Council has agreed to match up to a maximum of £30,000 of diocesan costs or 50% of the total (whichever is the smaller) on PCR2. Claims should be submitted on completion of the PCR2 process via the [claim form](#).

### **How are costs reclaimed and where can I download a claim form?**

Using the [claim form](#) (click to download) on completion of the process.

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### **Key criterion of independence for reviewers?**

[Protocol and Practice Guidance for PCR, 2019](#) states that the Independent Reviewer must be "Manifestly independent of the diocese ie not a diocesan church officer or closely involved in the diocese eg member of Synod or Board of Finance."

For many appointed to be Independent Reviewers, their professional backgrounds in safeguarding, entirely independent of the Church of England, mostly allows for clarity on this point. That said, where that external professional role involved work with one or more diocesan "church officers" eg as a social worker, police officer, professional supervisor or similar, that independence is compromised with regard to that specific diocese but not necessarily elsewhere. The Diocesan PCR2 Reference Group in the diocese considering the appointment needs to be satisfied that the individual is "manifestly independent".



Matters are often less clear with regard to those who have ever held a position within the Church of England, paid or unpaid; including those with “Independent” in their role description. It is accepted that current DSAs would not be considered suitably independent to be employed as Independent Reviewers of another diocese or indeed “other church setting”. They would, essentially, be scrutinising the quality of safeguarding work of a current colleague. Clearly this is not a question of their expertise but of their independence. And whilst past DSAs (or similar) possess the relevant expertise, a reasonable period should elapse before they can be considered suitably independent to review files in another diocese or setting. A “reasonable period” is likely to be measured in years rather than months, but the individual circumstances need to inform this decision. Given the scope of PCR2, where files are being read from 1960s and 1970s, past DSAs (or equivalent) will never be considered sufficiently independent to review files within the diocese where they were previously employed on more than a temporary/short-term basis.

The PCR2 Board has had significant discussion about current DSAP Independent Chairs – recognising their considerable safeguarding expertise and insights into the Church of England. However, they too fall within the definition of “church officer”, whether paid or unpaid, and their role is prescribed within church policy. However independent they may feel, to outside scrutiny they comprise part of the church’s safeguarding architecture and are unlikely to be regarded as “manifestly independent” should they review the files or cases from another diocese or Church of England setting. For that reason, the PCR2 Board reluctantly concludes that current DSAP Independent Chairs should not be appointed to the role of PCR2 Independent Reviewer. As with DSAs, past DSAP Independent Chairs may be considered suitable after a reasonable period has elapsed.

It is not possible to comment on every possible circumstance that may arise; but the Diocesan Bishop and Diocesan PCR2 Reference Groups are asked to consider the above when deciding on the appointment of their Independent Reviewer/s, for the decision is theirs. Where there is any level of uncertainty about the appointment of an Independent Reviewer based on the question of their independence, the advice of the PCR2 Project Manager or indeed PCR2 Project Board can be sought. Whether it is or is not, the Diocesan PCR2 Reference Group (or equivalent in other settings) should record its discussion on this point of independence and reasons for its final decision; the fact of this discussion and its outcome will be included in the letter of certification completed by the Diocesan Bishop confirming the objectives of PCR2 have been fully met (as per page 23 of *Protocol and Practice Guidance for PCR2*).

In clarifying this matter part way through the PCR2 process, it is possible that this matter of independence is now seen as an issue with regard to currently employed Independent Reviewers. In such circumstances the DSAP chair is invited to discuss the matter with the PCR2 Manager to agree a resolution.

## **For any further queries or comment:**

If you have further questions, please email PCR2 Stakeholder Engagement Manager, Bev Bickley - [pcr2@churchofengland.org](mailto:pcr2@churchofengland.org)

Key Documents to inform PCR2



- [PCR2 Protocol and Practice Guidance](#)
  - [PCR2 Background and Overview](#)
  - [PCR2 Full Appendices for Practice Guidance](#)
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