



THE CHURCH  
OF ENGLAND

**Practice Guidance:  
Safer Recruitment – Permission to Officiate**

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## Introduction

The care and protection of children, young people and vulnerable adults involved in Church activities is the responsibility of the whole Church. Safer recruitment practice is an essential part of the Church of England's approach to safeguarding. The House of Bishops is therefore committed to safely appointing and supporting all those (including clerics with Permission to Officiate, (PTO)) with any responsibility related to children, young people and vulnerable adults within the Church. It is committed to ensuring that appropriate training is provided and that no-one whose training is not up to date can engage in ministry.

This guidance is underpinned by the House of Bishops' Safeguarding Policy Statement – *Promoting a Safer Church (2017)*. It forms part of the House of Bishops' Safer Recruitment Guidance.<sup>1</sup>

### Who is this guidance for?

This guidance applies to all those involved in the granting of PTO, who need to be aware of the House of Bishops' policy on PTO, which [can be found here](#). There is a legal obligation to have regard to parts of that policy (see below) and this guidance highlights which part of that policy are covered by that legal obligation.

Under section 5 of the Safeguarding and Clergy Discipline Measure 2016, all authorised clergy, bishops, archdeacons, licensed readers and lay workers, churchwardens and PCCs must have 'due regard' to safeguarding guidance issued by the House of Bishops. A duty to have 'due regard' to safeguarding guidance means that the person under the duty is not free to disregard it and is required to follow it unless there are cogent reasons for not doing so ('cogent' for this purpose means clear, logical and convincing). Failure by clergy to comply with the duty imposed by the 2016 Measure may result in disciplinary action. All decisions not to pay 'due regard' must be recorded and the reasons clearly stated.

In addition, failure to have due regard to the House of Bishops' Safeguarding Policy and Practice Guidance may have direct consequences for the validity of your insurance.

### When must this guidance be used?

This guidance must be used for the granting, review, renewal or removal of PTO.

### What does this guidance aim to do?

This guidance aims to strengthen the Safer Recruitment processes that apply to clergy with PTO by ensuring that those who have been granted PTO have been safely 'recruited'/appointed.

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<sup>1</sup> The Safer Recruitment Practice Guidance can be found here:  
[https://www.churchofengland.org/sites/default/files/2017-11/safeguarding%20safer\\_recruitment\\_practice\\_guidance\\_2016.pdf](https://www.churchofengland.org/sites/default/files/2017-11/safeguarding%20safer_recruitment_practice_guidance_2016.pdf)

## 1. Diocesan Bishop Responsibilities

As clergy with PTO are engaging in ministry that will bring them into contact with children, young people and vulnerable adults, bishops must follow the House of Bishops' Safer Recruitment practice guidance when granting PTO and ensure that:–

- an application form for PTO is completed ([see Annex 3](#) of the House of Bishops' policy on PTO for an example);
- if the cleric is remaining in the diocese, the Clergy Personal File (commonly known as the 'Blue File') and DSA are consulted and, if the cleric is not known to the bishop, references are obtained;
- a Clergy Current Status Letter (CCSL) – <https://www.churchofengland.org/sites/default/files/2018-08/Personal%20Files%20Relating%20to%20Clergy%202018%20Edition.pdf> and Episcopal Reference is obtained if the cleric is coming from another diocese;
- a confidential declaration is obtained;
- an enhanced criminal records check (currently administered by the Disclosure and Barring Service and hereafter referred to as a 'DBS Check') with a check of the barred lists is carried out unless the cleric is remaining in the same diocese and already has a valid check;
- an interview takes place if new to the diocese;
- PTO is issued for a fixed term, and a review is carried out before renewal, which must be subject to obtaining enhanced DBS checks;
- Clergy with PTO complete appropriate safeguarding training, which must be refreshed every 3 years;
- an induction takes place if new to the diocese, along with an introduction to safeguarding policies and procedures and a review of training needs.

In addition, bishops must ensure that: –

- complete lists of clergy with PTO within their dioceses are maintained;
- there is a record of when DBS checks need to be renewed and further safeguarding training undertaken for all clergy to whom they have given PTO;
- appropriate arrangements are made for the oversight of all clergy with PTO, which may be done by designating a person (often a relevant incumbent or priest in charge) (see 4.32–35 of the House of Bishops' policy on PTO) to be responsible for each cleric with PTO.

Bishops, when granting PTO, must be aware of the following: –

- PTO must not be restricted by attempting to exclude children or vulnerable adults from someone's ministry. However, PTO may be restricted by geographical area (for example to a parish or deanery).
- PTO should not be suspended, but must be withdrawn, whilst investigations are carried out into any allegations made against a cleric, in line with the House of Bishops' *Responding to, Assessing and Managing Safeguarding concerns or allegations against church officers practice guidance (2017)*.<sup>2</sup>
- **It is a criminal offence for an individual who is barred from working with vulnerable groups (i.e. children and/or vulnerable adults) to apply for a regulated activity role (including PTO) and it is a criminal offence for an organisation to appoint a barred person to a regulated activity (including PTO).**

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<sup>2</sup> The practice guidance can be found here: <https://www.churchofengland.org/sites/default/files/2017-12/Responding%20PG%20V2.pdf>

It is important to ensure that clergy with PTO are fully aware that: –

- PTO depends on holding an up-to-date DBS check, which, under House of Bishops' policy, is only valid for 5 years;
- PTO is subject to carrying out safeguarding training and keeping this training up to date;
- they must work in accordance with the House of Bishops' safeguarding policy and practice guidance<sup>3</sup> and report any safeguarding concerns or allegations to the DSA in line with House of Bishops' guidance;
- the clergy discipline legislation applies to **all** clergy, including those with and without PTO.

Clergy are in roles with substantial contact with children and vulnerable adults, whether they are on a licence or have PTO and **will** be engaging in 'regulated activity' under the Safeguarding and Vulnerable Groups Act 2006. When bishops grant clergy PTO, they are thus required to do so in line with the principles set out in the Safer Recruitment practice guidance. This will include carrying out an enhanced DBS check<sup>4</sup> (with a check of the barred lists), although it should not be forgotten that this is only a small part of the process, and the majority of those who may pose a risk will not have a criminal conviction, (please see Safer Recruitment practice guidance for further details).

## 2. The Process for granting PTO – Quick Guide

The process specifically related to safer recruitment when giving PTO is summarised in the table below. Whether or not the cleric is moving to a new diocese, the elements will be largely the same, although the safeguarding checks will be different in the latter case. Please read the [full guidance](#) for more information.

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<sup>3</sup> The House of Bishops' policy and practice guidance documents can be found here:

<https://www.churchofengland.org/more/safeguarding/policy-practice-guidance>

<sup>4</sup> This will not be necessary in a case where someone is applying for PTO in the diocese where he or she is currently serving unless the period of their current DBS check is about to expire.

<ul style="list-style-type: none"> <li>i. Exit interview</li> <li>ii. <u>Completing an application form for PTO</u></li> </ul>	
<ul style="list-style-type: none"> <li>iii. <u>Safeguarding Checks</u> <ul style="list-style-type: none"> <li>a) In a diocese where someone has already ministered           <ul style="list-style-type: none"> <li>(1) Bishop checks with the DSA, identifies any issues and checks the Blue File (or any other relevant file);</li> <li>(2) If the last enhanced DBS check (plus check of the barred list) was carried out within the last 5 years, it is not usually necessary to renew this;</li> <li>(3) Complete a Confidential Declaration;</li> <li>(4) Further safeguarding training is not required unless it is due, (should be renewed every 3 years).</li> </ul> </li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>iii. <u>Safeguarding Checks</u> <ul style="list-style-type: none"> <li>b) In a new diocese           <ul style="list-style-type: none"> <li>(1) Cleric completes a Confidential Declaration</li> <li>(2) Bishop of sending diocese completes CCSL and Episcopal Reference after reviewing the Blue File and any other relevant files, after having consulted the Diocesan Safeguarding Adviser (DSA)</li> <li>(3) Entry interview with a member of the bishop's staff or area dean of the new diocese to discuss various issues including safeguarding training needs. As part of this, the applicant must also have an induction into diocesan safeguarding policies and procedures, including an interview with the DSA and this will include any safeguarding refresher training.</li> </ul> </li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>iv. <u>Bishop assesses suitability of applicant for PTO and approves PTO.</u> It is important to note that PTO is approved subject to a satisfactory enhanced DBS check (with a check of the barred lists) if from another diocese, or in the same diocese but the period for which the DBS check is valid is due to expire shortly. The applicant is, therefore, asked, when relevant, to apply for an enhanced DBS check (with a check of the barred lists) at this point.</li> <li>v. <u>Bishop agrees the scope of the PTO role and any geographical restrictions</u></li> <li>vi. <u>Bishop designates someone to be responsible for the ministry of cleric granted PTO</u></li> <li>vii. <u>Cleric agrees mutual expectations with Designated Responsible Person</u></li> <li>viii. <u>After DBS clearance (when relevant) bishop grants and issues PTO</u></li> <li>ix. <u>Bishop reviews Blue File (if received from another diocese)</u></li> </ul>	

Highlighted here are those aspects of the PTO process detailed above that have a safeguarding element and to which the principles of safer recruitment and the duty to 'have due regard' must apply. For full details of the entire process please refer to the PTO Policy.

## i. Safeguarding checks during the PTO process – Assessing safeguarding suitability

### a) Where clergy are applying for PTO in their own diocese

#### (1) Identifying issues and checking the Blue File

Before granting PTO, it is important to identify any relevant issues, including safeguarding concerns. The bishop may be aware of these anyway, but, where the cleric already holds an appointment in the diocese, the bishop must check the Blue File. The bishop should also check with the DSA whether there are any safeguarding concerns that may not have been recorded on the file. If the bishop has any concerns about safeguarding<sup>5</sup> he or she should obtain further information and advice, as necessary, for example by consulting the DSA or checking with the cleric's area dean or the relevant archdeacon whether there are any safeguarding issues<sup>6</sup>. If the bishop does not know the applicant sufficiently well and/or considers that there is not enough information on the Blue File for the bishop to be confident about issuing a PTO, then references should be obtained from the area dean and a lay person in the parish where the cleric last ministered. In terms of safeguarding, these must include information on the suitability of the cleric to work with children and vulnerable adults.

#### (2) and (3) Other checks

Clergy who are applying for PTO in the same diocese where they have ministered are not required to have a new DBS Check if they already have a DBS check, unless the DBS check is approaching 5 years in age. See paragraph 6.2 Portability within the Church of England in the *Safer Recruitment Practice Guidance*.

Regardless of whether or not a cleric has to renew his/her DBS check, the cleric will still need to complete a new Confidential Declaration Form when they apply for PTO.

There is no need for the bishop to provide a CCSL and Episcopal Reference if the cleric is remaining in the same diocese.

#### (4) Safeguarding training

PTO should not be granted on condition that required training (for example, a refresher course in safeguarding) is completed. If safeguarding training is up to date, clergy do not need to undertake a refresher simply because they are moving from holding an office to PTO, if that training is not immediately required.

If it is decided not to grant PTO, see section 6 of the PTO policy on refusing, withdrawing, or not renewing PTO and also section 3 of this document.

### b) Where clergy are applying for PTO in a new diocese

Where PTO is being applied for in a new diocese the following safer recruitment checks need to be carried out:

- the cleric must complete a Confidential Declaration Form (see <https://www.churchofengland.org/sites/default/files/2017-12/NST%20Confidential%20Declaration%20Form%20August%202017.docx>).

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<sup>5</sup> The bishop may have other concerns, of course but these are not relevant for this guidance. Please see the full PTO Policy

<sup>6</sup> Paragraph 18 of the CCSL and Episcopal Reference Guidance Notes are also applicable here: '*Safeguarding concerns could relate (but are not limited) to the protection of children, young people and vulnerable adults from physical, emotional and/or sexual abuse, neglect or domestic violence. Even when the police have decided not to pursue an investigation, or the Crown Prosecution Service has declined to prosecute, any potential risk should still be assessed. If there is any relevant history, the Bishop should consult the Diocesan Safeguarding Adviser before completing Part B*'.

- the cleric must have an enhanced DBS Check (with a check of the barred list), (see below for details about the timing of such a check).

As the cleric is seeking PTO in a new diocese, the bishop of the 'receiving' diocese needs to obtain a CCSL and Episcopal Reference from the bishop of the 'sending' diocese before PTO is granted. If the bishop of the 'receiving' diocese, does not consider the Episcopal Reference sufficiently detailed for the bishop to be confident about issuing PTO, the bishop should request further references from the 'sending' bishop, (such references should come from the area dean and a member of the laity in the relevant parish and cover the applicant's suitability to work with children and vulnerable adults as detailed below).

The CCSL and Episcopal Reference Guidance notes require the bishop signing them to carry out a review of the cleric's Blue File, including any safeguarding and disciplinary files for additional information, as required, to identify any safeguarding information that is material to the person's ministry.<sup>7, 8</sup> The diocesan bishop of the 'sending' diocese should then:

- provide a reference that includes any safeguarding information that is material to the person's ministry;
- complete a questionnaire covering safeguarding and relevant criminal or other misdemeanours;
- supplement the CCSL and Episcopal Reference with a check for any relevant safeguarding information on the Archbishops' List;

If the 'sending' bishop does not consider that he or she knows the applicant sufficiently well to be able to provide a reference or does not consider that there is enough information to be able to provide a meaningful reference, the bishop should obtain references from the area dean and a lay person in the parish where the cleric last ministered containing an assessment of the applicant's suitability to work with children and vulnerable adults and supply these to the 'receiving' bishop. The 'sending' bishop and the 'receiving bishop' should work together to ensure that references are adequate for the purposes of granting PTO.

### *(3) Entry Interview and Safeguarding*

It is a requirement of the current PTO Policy that where a cleric is moving to a new diocese, the bishop should ensure that he or she has an 'entry' interview with a member of the bishop's staff or the area dean. In terms of safeguarding, a Confidential Declaration Form needs to have been completed prior to the interview; it can then be discussed at the interview in accordance with the *Safer Recruitment Practice Guidance*. The interview can also be an opportunity to have an initial discussion about safeguarding training requirements.

Where new to the diocese, clergy applying for PTO must have an induction including an introduction to diocesan safeguarding policies and procedures. It will also be necessary formally to review their safeguarding training needs, in order to establish whether their transferable training is up to date. This diocesan induction will need to happen after the bishop has approved PTO (subject to a satisfactory DBS check) but before the PTO is

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<sup>7</sup> Paragraph 18 of the CCSL and Episcopal Reference Guidance Notes provides as follows: '*Safeguarding concerns could relate (but are not limited) to the protection of children, young people and vulnerable adults from physical, emotional and/or sexual abuse, neglect or domestic violence. Even when the police have decided not to pursue an investigation, or the Crown Prosecution Service has declined to prosecute, any potential risk should still be assessed. If there is any relevant history, the Bishop should consult the Diocesan Safeguarding Adviser before completing Part B*'. Any concerns identified should be addressed in the answers to questions 5, 6, 7, and 8 of the CCSL

<sup>8</sup> Of course, there may be other information that is material to a person's ministry but for the purposes of this guidance only safeguarding information is of relevance. Please see the full PTO Policy for other information.

granted. This will mean that the diocesan induction will be provided to those approved for a PTO, and this will need to be completed before the PTO is formally granted.

### c) Overseas applicants

Where clergy have served overseas, additional checks apply. These are outlined in section 2.10 of the *Safer Recruitment – Practice Guidance (2016)*.<sup>9</sup>

### d) Individuals who may pose a risk

The Safer Recruitment practice guidance states (at 2.3) that those recruiting to paid and volunteer positions must have a policy statement on the recruitment of ex-offenders, so that applicants who are ex-offenders are clear about how they will be treated, and recommends the sample policy statement produced by the DBS.<sup>10</sup>

Clergy are considered to be in roles where they can have substantial contact with children and vulnerable adults, whether they are on a licence or have PTO. They are in 'regulated activity'. Consequently, the roles are eligible for an enhanced DBS check (with a check of the DBS barred lists). The existence of a criminal record will not necessarily prevent a person from being granted PTO; it is only if the nature of any matters revealed may be considered to place a child and/or a vulnerable adult at risk of abuse or neglect. For instance, a conviction for a child sexual abuse offence is likely to prevent the granting of PTO.

Where a cleric is barred by the DBS from working with children and/or vulnerable adults, the cleric is liable to a penalty of removal from office and prohibition from occupying office. A cleric who is barred by the DBS **must not** under any circumstances be granted PTO as such a person may not lawfully engage in regulated activity. Anyone making such an appointment would be committing a criminal offence.

If there are any safeguarding allegations or concerns revealed (particularly where there had been convictions for offences in connection with child sex abuse, domestic abuse or findings of fact in civil proceedings) such as:

- in a DBS check
- in the Confidential Declaration
- after a review of the Blue File
- after a review of a safeguarding case file
- by any other relevant checks

then advice must be sought from both the DSA and the diocesan registrar, before deciding whether to grant PTO. The DSA will assess the safeguarding risk and make a recommendation concerning the suitability of the individual. See paragraph 4.24 of the PTO Policy.<sup>11</sup>

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<sup>9</sup> [https://www.churchofengland.org/sites/default/files/2017-11/safeguarding%20safer\\_recruitment\\_practice\\_guidance\\_2016.pdf](https://www.churchofengland.org/sites/default/files/2017-11/safeguarding%20safer_recruitment_practice_guidance_2016.pdf)

<sup>10</sup>The DBS Code of Practice issued under section 122 of the Police Act 1997 states that it is a requirement that all registered bodies must treat DBS applicants who have a criminal record fairly and not discriminate automatically because of a conviction or other information revealed. The code also obliges registered bodies to have a written policy on the recruitment of ex-offenders, a copy of which can be given to DBS applicants at the outset of the process for obtaining a disclosure. For further details, see the notes accompanying the confidential declaration form at <https://www.churchofengland.org/sites/default/files/2017-12/NST%20Confidential%20Declaration%20Form%20August%202017.docx>.

<sup>11</sup> For details of the risk assessment process, see <https://www.churchofengland.org/sites/default/files/2017-11/gs-2050-safeguarding-clergy-risk-assessment-regulations-2016.pdf>

Where a cleric has been the subject of a criminal investigation for offences relating to children or vulnerable adults that did not result in a conviction, then the bishop would need to consult the DSA and the diocesan registrar before deciding whether to grant PTO. The DSA will assess the safeguarding risk and make a recommendation concerning the suitability of the individual.

PTO should always be refused or withdrawn (or not renewed) if there have been substantiated concerns or allegations in relation to child or adult abuse, for example when (and this list is not exhaustive):

- there has been a finding of criminal guilt or acceptance of a caution;
- there has been a finding of fact as part of civil proceedings, or an unequivocal admission in the context of a civil settlement;
- allegations have been found proven in disciplinary proceedings, for example under the clergy discipline legislation (or the predecessor legislation);
- a cleric has been prohibited and/or barred from work with children and/or vulnerable adults;
- a family court has made a finding of fact that a cleric has caused significant harm to a child and/or vulnerable adult, or when a cleric has had any such court make an order against him/her on the basis of any finding or allegation that any child and/or vulnerable adult was at risk of significant harm;
- there had been a statutory and/or church investigation, including a risk assessment, in line with *Responding to, Assessing and Managing Safeguarding Concerns or Allegations against Church Officers (2017)*<sup>12</sup> guidance, that evidenced the safeguarding concerns had been substantiated and there was an ongoing risk to children or adults.

See section 3 on refusing, withdrawing, or not renewing PTO (or section 6 in the main PTO Policy).

#### e) Assessing suitability

The bishop assesses an applicant's suitability to be granted PTO, (for full details of this process please refer to the PTO Policy).

From a safeguarding point of view, individuals need to be able to have a reasonable degree of confidence that someone with the bishop's PTO is fit to minister. Granting PTO should, therefore, not be a formality. Nor is it simply a matter of ensuring that the appropriate safeguarding checks have been carried out. PTO should only be granted if the bishop considers an individual capable of exercising ministry.

Granting PTO, however, does not necessarily imply that the cleric is able to take a role of responsibility in a parish; merely that he or she is able to officiate and to carry out related duties, for example to preside and preach, provide pastoral support, and conduct funerals and weddings to an adequate standard.

If the bishop decides that a cleric is suitable and approves a cleric's application for PTO, the cleric will be asked to apply for an enhanced DBS Check (plus a check of the barred lists). PTO is approved by the bishop but it will be conditional on the receipt of a satisfactory enhanced DBS Check, (with a check of the barred lists). It is only **after** the DBS certificate has been received and is considered satisfactory by the bishop in consultation with his/her DSA and, when necessary, the diocesan registrar, that PTO will be formally granted.

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<sup>12</sup> <https://www.churchofengland.org/sites/default/files/2017-12/Responding%20PG%20V2.pdf>

## ii. Agreeing the scope of the role to be carried out under PTO

PTO must **not** be restricted by attempting to exclude children or vulnerable adults from someone's ministry, as all clergy, including those with PTO, are engaging in 'regulated activity' and therefore must be able to work with children and vulnerable adults. PTO can only be restricted to encompass a certain geographical area. Such restrictions are not relevant to this guidance. For further details, please refer to the full PTO Policy.

## iii. Safeguarding and Drawing up the PTO

Clergy need to be clear that they will not be able to minister beyond the period for which their DBS check is valid. Bishops must, therefore, grant PTO for periods that align with DBS renewal periods. As soon as PTO is approved but before it is granted, the applicant should be asked to apply for the appropriate DBS Check, as PTO cannot be renewed without a valid DBS Check.

It is important to start the process of applying for PTO or a renewal in sufficient time to enable the DBS check to be carried out before the cleric's authority to minister has expired, as the cleric will not be able to minister without a valid enhanced DBS check (with a check of the barred lists). Bishops will need to ensure that clergy are aware of this.

The Safer Recruitment Practice Guidance makes it clear that all Church Officers – which includes clergy with PTO – should have a clear job or role description which sets out what tasks the applicant can do. See the full PTO Policy for the details of what a PTO job/role description should include.

## 3. Safeguarding and Refusing, withdrawing or not renewing PTO

As is stated in the current PTO Policy, the diocesan bishop is not expressly required to give a reason for withdrawing PTO and there is no right of appeal. For further details see the full PTO Policy.

Valid safeguarding concerns are a reason for refusing or withdrawing or not renewing PTO. If there are safeguarding concerns then the bishop should contact his/her DSA and diocesan registrar for advice.

Appropriate safeguarding reasons for refusing, withdrawing/not renewing PTO include, (this list is not exhaustive):

- following an initial risk assessment, if safeguarding concerns or allegations in line with the practice guidance *Responding to Safeguarding Concerns or Allegations that relate to Children, Young People and Vulnerable Adults (2018)*<sup>13</sup> have been identified in situations where suspension would otherwise be the usual response;<sup>14</sup>
- following an allegation of abuse in a cleric's past ministry pending the police investigation;<sup>15</sup>

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<sup>13</sup> <https://www.churchofengland.org/sites/default/files/2018-11/Responding%20to%20Safeguarding%20Concerns%20or%20Allegations%20that%20relate%20to%20Children%2C%20Young%20People%20and%20Vulnerable%20Adults.pdf>

<sup>14</sup> Under the Serious Incident Reporting Guidance (2019) it is possible that the withdrawal of PTO due to safeguarding concerns or allegations will necessitate a report to the Charity Commission as a safeguarding Serious Incident. Please see *Guidance for DBFs, PCCs and Religious Communities: Identifying and Reporting Safeguarding Serious Incidents to the Charity Commission (Jan 2019)*.

<sup>15</sup> This would also be a reason not to renew following a safeguarding concern or allegation when the outcome of a statutory and/or church investigation is that the concern/allegation has been substantiated and that there is ongoing risk.

- failure to comply with House of Bishops' policy and practice guidance on safeguarding children and vulnerable adults, including failure to participate in safeguarding training, or refusal to have a DBS check or complete a Confidential Declaration Form.

#### (i) The Safeguarding Report – List of clergy refused PTO or whose PTO has been withdrawn for safeguarding reasons

When a diocesan bishop retires or leaves the diocese, the diocesan safeguarding team are responsible for writing a confidential report on the state of safeguarding in the diocese on behalf of the outgoing bishop for his/her successor. This report should contain a list of those clergy who have had PTO refused or withdrawn for safeguarding reasons, and details of any soft or low-level information about those with licences or PTO, so that the new bishop is fully briefed.

### 4. Renewing PTO and DBS Checks

PTO is granted subject to DBS clearance. It is currently the policy to require DBS checks to be renewed every 5 years.

PTO must only be granted or renewed after a DBS certificate has been received and examined,<sup>16</sup> and must not be granted for a period which exceeds the period for which the DBS check is valid.

For more general information about the renewal of PTO please see the full PTO Policy document.

### 5. Safeguarding training<sup>17</sup>

As well as DBS checks, all clergy granted PTO will need to carry out appropriate safeguarding training, including refresher training every 3 years by a revised C5 module.

For those holding PTO, the bishop granting permission should determine the level of training required in consultation with the DSA: for those who will be in active ministry, C3 is the required module; for those who will only rarely be engaged in ministry it may be more appropriate for C1 to be completed.

The House of Bishops' *Training and Development Practice Guidance (2017)* states at 3.4 that:

*There may be some extenuating circumstances in which bishops may wish to exercise a degree of discretion in implementing the requirements for training, for example with clergy who because of infirmity never exercise their PTO. The Bishop should seek the advice of the Diocesan Safeguarding Adviser prior to giving discretion. If the PTO is being exercised – no matter how limited the circumstances – there remains a requirement for training, but it may be that C1 is a more appropriate level than C3. Where such discretion is exercised, the bishop should record it in the blue file of any clergyperson or the appropriate record of lay ministers.*

This should only be used in exceptional circumstances. Any exemption from any training **must** be recorded in the Blue File and monitored. See [Annex 8 of the PTO Policy](#) for a recording template form entitled 'Safeguarding Training – Partial Exemption from Full Training Requirements'.

This training is portable, and a refresher is not required, provided that training is up to date, whether someone is applying for PTO in a new diocese or moving from holding an office to PTO in

<sup>16</sup> If the disclosure does reveal any relevant information, the bishop should seek advice from the DSA and the diocesan registrar.

<sup>17</sup> For more information in relation to training please see the *Training and Development Practice Guidance*, which can be found at <https://www.churchofengland.org/sites/default/files/2017-12/SafeguardingTrainingAndDevelopmentWeb.pdf>

the same diocese on retirement from stipendiary ministry. Even when training is up to date, a diocesan induction will be required when someone is moving to a new diocese.

Failure to participate in safeguarding training when required so to do is a disciplinary offence and a reason for withdrawing PTO.

Bishops must:

- ensure that the necessary safeguarding checks are carried out and the relevant paperwork (including CCSL and Episcopal Reference, references, Confidential Declaration Form and PTO application) is completed, including placing relevant copies on the Blue File;
- produce a report to the House of Bishops, when requested, on how the relevant safeguarding arrangements are applied in the diocese to clergy who are exercising a ministry through PTO.

## **6. Recording PTO information, record keeping and Blue Files**

### **(i) Recording PTO**

As well as maintaining a list of names of those who have PTO, it will also be necessary for bishops' offices to record the following information for safeguarding purposes:

- the date from which a PTO is valid, and the date when it expires;
- the period for which the DBS check is valid and when it expires;
- when further safeguarding training is required.

### **(ii) Blue Files**

Details of safeguarding information that will need to be retained on the Blue File (or maintained on another file if the Blue File is retained in another diocese) for all clergy (including those on PTO) are detailed in the House of Bishops' *Personal Files relating to Clergy Policy* (May 2018). See in particular paragraphs 32 to 39 inclusive and paragraph 60.<sup>18</sup>

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<sup>18</sup> <https://www.churchofengland.org/sites/default/files/2018-08/Personal%20Files%20Relating%20to%20Clergy%202018%20Edition.pdf>