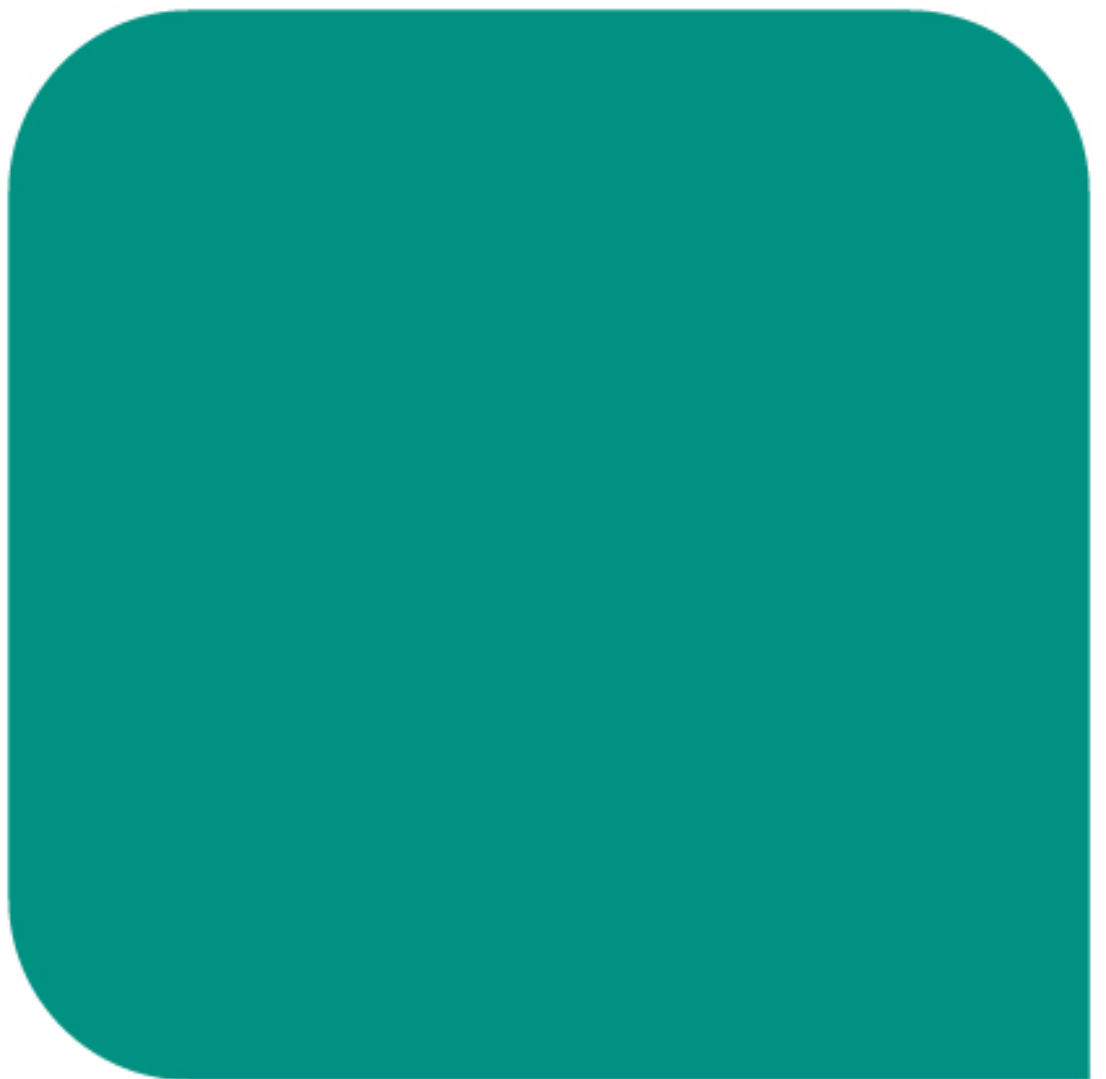




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# **Diocese of Bath & Wells independent safeguarding audit (September 2016)**



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# 1 INTRODUCTION

## 1.1 CONTEXT

The Social Care Institute for Excellence (SCIE) has been commissioned to undertake an audit of the safeguarding arrangements of each diocese of the Church of England. The aim of these audits is to work together to understand the safeguarding journey of the diocese to date and to support the continuing improvements being made. Following pilot audits of four dioceses in 2015, an agreed audit model is being applied nationally during 2016 and 2017.

The audit of the Diocese of Bath & Wells was carried out by Lucy Erber (the lead auditor) and Susan Ellery on 6, 7 and 8 September 2016.

The only limitations to the review process was that there is only one substantive incumbent Archdeacon in post at present, meaning that our findings on the Archdeacon's responsibilities in regard to safeguarding could only be gathered from the one post-holder. This meant that triangulation with the experiences of other Archdeacons was not possible.

This report was written by Lucy Erber with support from Susan Ellery and quality assurance provided by Edi Carmi, the overall auditing lead. This audit was observed by Leethen Bartholomew, as part of his induction to his new role of Practice Development Manager, SCIE.

## 1.2 THE DIOCESE

The Diocese of Bath & Wells covers the county of Somerset and part of Dorset. This is predominately a rural area, with many holiday destinations, historic buildings and areas of natural beauty. The rural beauty of the Diocese masks considerable rural poverty, with pockets of high (often seasonal) unemployment or low wages when people are in work. This is also reflected in the towns within the Diocese, such as Taunton, Shepton Mallet and Weston-Super-Mare. Public transport in the area is, on the whole, poor, and, aside from the M5, there are few major roads that cross the diocesan area.

The diocesan centre sits in the city of Wells, where the Cathedral and Bishop's Palace (which are a significant tourist attraction) are also located. Bath (larger in size than Wells both in area and population) has an Abbey, and, as the auditors were advised, feels as important as Wells within the Diocese, despite its distance from the diocesan centre.

The overall population is 900,000 and is 95 per cent White British in its ethnic profile. There are 494 parishes and 564 churches.

The Diocese covers eight local authorities – North Somerset Council, Somerset County Council and Bath & North East Somerset Council, and Mendip, Sedgemoor, South Somerset, Taunton Deane, and West Somerset Councils.

The Bishop of Bath & Wells and the Suffragan Bishop of Taunton lead the Diocese, supported by the Archdeacon of Taunton, the Archdeacon of Bath and the Archdeacon of Wells. At the time of the audit only the Archdeaconry of Bath had an incumbent.

In 2015, the Diocesan Safeguarding Advisor dealt with 24 referrals in regard to children and 10 in regard to adults.

### **1.3 STRUCTURE OF THE REPORT**

This report is divided into:

- Introduction
- An overview of what is working well, what needs to work better and a summary of considerations for the Diocese.
- The Findings of the auditors: the auditors have made links with the S. 11 (Children Act 2004) audit form completed by the Diocese in preparation for the audit. Considerations for the Diocese are listed, where relevant, under each Finding section.
- Appendix: Review process and any limitations to the audit.

## 2 OVERVIEW

This section provides the headline findings from the audit, in terms of what is working well and the areas for improvement. The detail behind these appraisals are in the Findings in section 3.

### 2.1 WHAT'S WORKING WELL?

Safeguarding is a priority in this Diocese, with strong leadership and commitment from the Bishop, the national Church of England lead. The social work-qualified Diocesan Safeguarding Advisor (DSA) has the benefit of experience in both children's and vulnerable adults' safeguarding along with skills from having been a manager and a practitioner.

This sound basis for safeguarding is demonstrated by the following strengths that were demonstrated through the audit:

- Strong multi-agency links by the safeguarding service, evidenced by positive feedback to this audit.
- Safeguarding is on the agenda at a strategic level within the Diocese.
- Professional supervision in place for the DSA.
- The Diocesan Safeguarding Advisor (DSA) and the Assistant DSA are highly respected in the parishes, and within the Diocese, for their knowledge and efficiency of response.
- The Diocese seems responsive to changing needs – recent increase in DSA hours, move over to electronic DBS process and new training post have been recently agreed.
- Links with Cathedral are strong and getting stronger.
- Safeguarding training is highly valued and popular – gets good feedback from participants: flexible and delivered to different groups as well as in different venues.
- The DSA was said to go the extra mile and we saw evidence of that with commitment shown by out-of-hours availability, even though it is not specified in her contract.
- Some good examples of casework.
- DSA sits on a sub-group of Somerset Local Safeguarding Children Board (LSCB) and is an accredited LSCB trainer.

### 2.2 WHAT NEEDS TO WORK BETTER?

Although there are many strengths in the progress made in safeguarding in the Diocese in Bath & Wells, there remain some areas for further improvement, as outlined in section 3. The main areas are around:

- role of the DSG: there is a need to further develop its role in quality assurance (QA) of cases, as opposed to involvement in operation management

- best way to provide the DSA with case discussion support currently provided by the DSG
- whether the DSA should sign safeguarding agreements: currently this is perceived as between the parish and the individual, although the DSA is present at the meetings. The auditors hold the view that if they were signed by the DSA it would underline the ownership of the agreement by the Diocese
- The need for a complaints and whistleblowing procedure which relates specifically to safeguarding
- Facilitating knowledge of the Authorised Listening Service, so potentially increasing usage
- Improvements in the content and structure of case records (see 3.5).

## 2.3 CONSIDERATIONS FOR THE DIOCESE

The term 'considerations' instead of recommendations is used in the SCIE Learning Together methodology. The reason for this is that it is important that each diocese decides exactly how to implement the improvements indicated; this is likely to be different from place to place. Some considerations will be around taking specific types of action, whilst others will be alerting the Diocese to develop their safeguarding planning in the future.

These considerations are to be found at the end of each of the sections in the Findings (see section 3). They are listed below for ease of reference, but the detail behind each of these is in the Findings section.

- Consideration be given to the DSA attending the Bishop's staff meeting on a regular and formalised basis, so safeguarding is a regular and consistent agenda item.
- Review the job description of the DSA and include an expectation that the role includes covering an out-of-hours service.
- Review the supervision contract between the DSA and her professional supervisor and consider including a clearer and more specific link between the role of her supervisor and that of her line manager.
- Consider the need for administration support in light of other considerations proposed by the audit.
- Review the possible membership of the DSG cited in the Terms of Reference to include education, health and probation.
- Continue to try and identify suitable representatives from local agencies to be members of the group, including probation, children's and adult's services.
- Senior diocesan management to clarify the role of the DSG and the appropriateness of its involvement in individual case decisions.
- Senior diocesan management to consider the best forum to provide operational management support to the DSA and line manager in the form of case discussion / group supervision: how is this best provided so as to be effective, consistent with national policy and data-protection requirements.



- Review whether the DSA should sign safeguarding agreements, alongside members of the Parish, so as to clearly demonstrate the role of the diocese in the process.
- Review the structure and content of case files so as to make them more accessible, secure and in line with national guidance.
- The DSG to monitor the level of clergy and retired clergy with Permission to Officiate (PTO) who have attended safeguarding training.
- DBS outcomes to be noted on blue clergy files.
- Develop a complaints procedure that relates specifically to safeguarding, and ensure it is well publicised, including placing it on the diocesan website.
- Develop a whistleblowing procedure (in line with forthcoming national guidance) that relates specifically to safeguarding, and ensure it is well publicised, including placing it on the diocesan website.
- The DSG to consider how to further develop its safeguarding QA role, for example through the use of case audits.
- Information from the annual Articles of Enquiry to be used more proactively: this could involve central collation, reporting to the DSG and used by Archdeacons to monitor safeguarding in the parishes.
- Consider further ways to publicise the existence, and role, of the Authorised Listening Service.

## 3 FINDINGS

### 3.1 SAFEGUARDING MANAGEMENT

The Bishop of Bath & Wells has recently been appointed the national lead on safeguarding within the Church of England.

The Bishop takes ultimate responsibility for safeguarding within the Diocese. The delegated safeguarding lead within the Diocese is his Senior Chaplain, who is also a member of the Diocesan Safeguarding Group. Both have close contact with the Diocesan Safeguarding Adviser (DSA), whose professional advice and independence is respected.

Contact between DSA and senior management is based on regular meetings between the DSA and Senior Chaplain, and quarterly meetings between the DSA, Chair of the Diocesan Safeguarding Group (DSG) and the Bishop immediately following DSG meetings. The DSA also meets on her own with the Bishop on a monthly basis.

The DSA advised the auditors that if she ever needed access to the Bishop at any other time this was easily arranged and there were never any obstacles to this taking place. The Bishop also said that if the DSA ever needed to meet with him he would ensure time would be made to facilitate that. Line management of the DSA is the responsibility of the Assistant Diocesan Secretary, whilst professional supervision is undertaken by an external social work trained consultant.

The DSA meets with the Bishop's Staff Team on an 'as and when' basis. The auditors felt that this would help if the regularity of her attendance was formalised in order to ensure that the importance of safeguarding was highlighted by the subject being a regular agenda item.

Safeguarding is also a matter on the agenda for the Bishop's Council. It includes safeguarding on its Risk Register, and recently invited the Independent Chair of the DSG to one of its meetings.

A Diocesan Safeguarding Group (DSG) is also in place; this is considered in greater detail in 3.3.

The monitoring of safeguarding in parishes is undertaken via the Archdeacon's Articles of Enquiry, and is considered in greater detail in 3.11. The training of both clergy and volunteers in the parishes is monitored by records kept by the DSA, and is discussed in 3.6.

There are strong links with the Cathedral in regard to safeguarding. The Cathedral Safeguarding Officer works closely with the DSA (reported by both individuals) and this has recently been formalised by the DSA being contracted for two hours per month to provide supervision to the Cathedral Safeguarding Officer. A Cathedral representative will be asked to join the DSG.

Overall, the auditors found that safeguarding is the highest of priorities (including being listed on the Diocesan Risk Register) and taken with the utmost seriousness by the Diocese. Everyone was keen to ensure they undertook their safeguarding role to the fullest and best of their abilities.

*(Reference: part 1 of S.11 audit: Provide a structure to manage safeguarding in the Diocese. Also to part 2: The Bishop appoints a member of his senior staff to be the lead person for safeguarding.)*

### **Considerations for the Diocese**

*Consideration be given to the DSA attending the Bishop's staff meeting on a regular and formalised basis, so safeguarding is a regular and consistent agenda item.*

## **3.2 DIOCESAN SAFEGUARDING ADVISER/S**

### **3.2.1 Roles and responsibilities**

The Diocese of Bath & Wells employs:

- one Diocesan Safeguarding Advisor who works 29.75 hours per week
- one full-time Assistant Diocesan Safeguarding Advisor (Assistant DSA).

Overall, a total of 64.75 hours per week are dedicated to safeguarding activity.

The DSA undertakes the casework, delivers training and line manages the Assistant DSA, as well as providing supervision to the Cathedral Safeguarding Adviser. She also undertakes out-of-hours cover in evenings and at weekends/public holidays by carrying a mobile phone.

The Assistant DSA processes applications for the Disclosure and Barring Service (DBS) and organises and delivers training. She will also provide cover for the DSA when she is on leave, as there is an agreement between the two members of staff that they will not take leave at the same time. Both roles cover children and vulnerable adults, but the majority of the work does concern children's safeguarding.

Agreement has recently been given for a new post of Safeguarding Trainer, in response to the recent training and development programme developed by the National Safeguarding Team (NST). The Diocese anticipates that this post should be filled early in 2017, and will be line managed by the DSA. At present, the Diocese is in the process of changing its DBS process over to e-bulk, which it expects will make this process quicker and easier.

It appeared to the auditors that the DSA and the Assistant DSA work very well together as a team, and this was also observed in many of the conversations that were undertaken during the audit, and by the Parish Focus Group – who spoke very highly of both the DSA and her assistant in regard to their knowledge, support and efficiency. They also produce a useful and well-presented six-monthly newsletter containing news, information, updates etc. that is circulated to parishes.

Very positive feedback about the service was also received from a local Adults Safeguarding Board, a police officer from a Public Protection team, a probation officer and a counsellor. Everyone commented on the responsiveness of the safeguarding staff and their ability to share and accept/act on information from

relevant safeguarding agencies and professionals. In fact, the safeguarding team has strong links with external agencies. The DSA represents Faith Communities on Somerset Safeguarding Children Board, and is developing links with the recently formed Somerset Safeguarding Adults Board.

Both the DSA and Assistant DSA have relevant job descriptions, although the auditors did note that the expectation to cover an out of hours' service was not mentioned in the DSA's job description, and felt that this should be reviewed.

### **3.2.2 Qualifications and experience**

The DSA is suitably qualified for the role of DSA with good practitioner and management experience. She is a qualified and Health and Care Professionals Council (HCPC)-registered social worker with very extensive experience as a practitioner and a manager. She has previously worked in local authority frontline children's social work teams, as well as in services for adults with drug and alcohol problems, adults who have experienced domestic abuse etc. She is also an accredited trainer.

The Assistant DSA has a background in working with sex offenders in a prison setting.

### **3.2.3 Supervision and management arrangements**

Line management of the DSA is undertaken by the Assistant Diocesan Secretary. He also sits on the Diocesan Safeguarding Group. The Assistant DSA is both supervised and line managed by the DSA.

The DSA receives five-weekly professional supervision from a social work professional. The DSA informed the auditors that she is also able to contact her supervisor outside supervision sessions if she feels the need to discuss a case issue.

Commendably, there has been recognition of the need to link the supervisor with the management aspects of the service, with a contract that states:

*'Discussions will remain confidential within the supervision meeting. The exceptions to this would be where the supervisor is alerted to factors which compromise the supervisee's ability to perform safely, lawfully and effectively.'*

This could be further improved by clearer governance stating specifically that concerns would be relayed to the DSA's line manager, to provide a clearer link between the professional supervision of the DSA and her overall work performance on behalf of the Diocese (overseen by her line manager, the Assistant Diocesan Secretary).

### **Adequacy of resources**

There would appear to be sufficient resources for the safeguarding service. The introduction of the e-bulk system for DBS applications and the new training post were considered, by the auditors, as examples of how the Diocese was addressing increased workload and expectations on the service. Alongside this, there was a clear view stated that if further resources were required any such request or need

would be considered very sympathetically and seen as a high priority, and the Diocesan Secretary was very clear about the process that would be followed to obtain extra resources.

The auditors noted that there was no administrative support to the safeguarding service apart from that provided by the assistant DSA. Lack of resourcing to the service was not an issue raised, but if extra work is required, for example in regard to addressing file structure (see 3.5), it may be that this would need to be reviewed, even if on a temporary basis. The auditors noted that the assistant DSA originally held an administrative post but, after nine years and the assumption of increased responsibility, her role has clearly moved away from basic administration tasks.

*(References: part 1 of S11 audit. Appoint a suitably qualified DSA, and provide financial, organisational and management support. The adviser must have full access to clergy files and other confidential material.*

*Part 6: The DSA's role is clear in the job description and person specification. And: The DSA has sufficient time, funding, supervision and support to fulfil their safeguarding responsibilities, including local policy development, casework, advice, liaison with statutory authorities, training, personal and professional development and professional registration.*

*Part 8: The DSA should be given access to professional supervision to ensure their practice is reviewed and improves over time.)*

### **Considerations for the Diocese**

*Review the job description of the DSA and include an expectation that the role includes covering an out-of-hours service.*

*Review the supervision contract between the DSA and her professional supervisor and consider including a clearer and more specific link between the role of her supervisor and that of her line manager.*

*Consider the need for administration support in light of other considerations proposed by the audit.*

## **3.3 DIOCESAN SAFEGUARDING GROUP**

### **3.3.1 The Chair**

The Chair of the Diocesan Safeguarding Group (DSG), is independent and undertakes this role in a voluntary capacity. He is a retired Chief Superintendent who oversaw the work of Police Child Abuse Investigation Teams during his career and has also worked for a children's national maritime charity as a director, and, amongst other responsibilities, developed their children's safeguarding procedures. The Chair attends the regional network for DSA Chairs.

### **3.3.2 Composition of Group**

The composition of the Group is:

- Bishop's Senior Chaplain
- Assistant Diocesan Secretary

- police (Detective Sergeant from a Public Protection Team and representative of the police)
- family law solicitor (volunteer)
- health expertise - volunteer who is a registered nurse and works at the Care Quality Commission
- Clergy representative
- DSA
- Assistant DSA
- Diocesan Communications Manager
- Diocesan Assistant Director of Education, with background in youth and community work
- parish representative
- social work (volunteer) with experience of working in children's social care, probation and NSPCC, Lucy Faithfull Foundation and Circles (the organisation that provides the framework for the re-integration of offenders into Church communities)

Within this Group the Diocese is fortunate in being able to draw upon wide professional representation, using volunteers to achieve this. The need for volunteers is to address the challenge in obtaining representation from statutory agencies, other than the police. Approaches have been made to probation, the LSCB and the LSAB. It is in the 2016 work plan to make further attempts and will be continued into 2017. However, this is an active DSG, with, on average, 10 members attending every meeting.

There is a Terms of Reference (ToR) for the Group that includes areas such as data on referrals and cases, training, development from the National Safeguarding Team. Whilst the ToR does mention the need to have a representative from local authority children's and adults' services, no mention is made of the need for them to have a safeguarding role. Similarly, whilst both a police and legal representative are identified to make up the membership, education, health or probation are not (although the Diocesan Assistant Director of Education is a member). In the view of auditors this means that the membership in the ToR is biased towards criminal justice and law agencies, rather than other key safeguarding agencies such as education, health or probation. Therefore, the auditors think that DSG membership in the ToR needs to be reviewed to include such agencies, and for the Diocese to continue to make efforts to obtain such representation from statutory agencies (as explained above).

### **3.3.3 Purpose and function**

The DSG meets on a quarterly basis and, immediately following each meeting, the Chair and the DSA meet with the Bishop to brief him on what has been covered by the agenda items.

Each meeting is held in two parts. The first part discusses areas that are identified in the ToR, such as policy issues, training. The second part of the meeting discusses cases and decides on case closure where this is relevant. This role for the DSG is not specifically mentioned in the ToR, although brief reference is made to provide

oversight of risk assessment and ‘to provide an independent voice on safeguarding matters and casework by monitoring and constructively challenging the effectiveness of diocesan safeguarding interventions’.

The involvement of the DSG in case-management decisions raises questions about the function of this forum. Its involvement in the decisions on individual cases seems to run contrary to its position as a strategic body, providing scrutiny of safeguarding practice in the Diocese. In this context it has a role in quality assuring the work undertaken (see 3.10), but not in making casework decisions.

The current national policy contributes to the confusion, as it does allow for the DSA to receive case support through the DSG, albeit only from a sub-group of safeguarding professionals or a risk panel to advise on complex cases (Protecting All God's Children [PAGC] 2010). The current consultation draft of Promoting a Safer Church: The Church of England’s Safeguarding Policy for Children, Young People and Adults (October 2016) no longer includes such provision. This reflects the changing role of the DSG over time. When PAGC was written in 2010, this body was called the Diocesan Safeguarding Children Management Group and was very much part of management processes. The new consultation draft calls it The Diocesan Safeguarding Advisory Panel, recognising it as an advisory body, not part of day-to-day management.

Another issue which may have relevance here, is compliance with data-protection requirements: with the exception of the DSA and the Assistant DSA, members and their agencies may have no involvement with the cases that are presented, and consequently such discussion may contravene data protection requirements.

In practice, one of the cases audited was closed following such a decision being made at the DSG – this was considered to be premature by the auditors (see 3.5). This highlighted further problems associated with the DSG involvement in case decision-making, around accountability – the minutes of the DSG are not on the case file, so the rationale for case closure is not available as part of the audit trail.

In conversations held during the audit, the Independent Chair said he felt it was important that the DSG held the Diocese to account for its safeguarding work, and making operational decisions on cases was one way of doing it. He added that countless enquiries into child deaths concluded that too few professionals had sat down and communicated with each other, and this was just what the DSG was doing.

The DSA also said that she highly valued these case discussions, where there was input from a varying range of professional perspectives. The DSA also made the point that her role is essentially solitary in that she does not have social work colleagues at hand to refer to.

The auditors have carefully reflected on the desire of the Chair to hold the Diocese to account for its safeguarding practice, and on the value that the DSA places on these case discussions. Their view remains that it is important and appropriate that the DSA briefs the DSG on high-profile cases, but not appropriate that they are making operational case-management decisions. However, case discussion is clearly serving a purpose here, given the isolation of the DSA function. It may be that there could be a different forum able to serve this function that could involve particular individuals who are able to hear case details, in accordance with data-protection requirements, and who have relevant safeguarding expertise.



It is though appropriate for the DSG to hold the Diocese to account for its safeguarding practice and this can usefully include a scrutiny role of information from case audits (see 3.10). The DSA has suggested that a further development of the quality assurance function of the DSG could be to actively involve members of the DSG in audit activity, and this could indeed be a positive development, if this is planned in accordance with data-protection requirements.

*(Reference: part 1 of S.11 audit: Provide a structure to manage safeguarding in the Diocese. Also to part 2: The Bishop appoints a member of his senior staff to be the lead person for safeguarding.)*

### **Considerations for the Diocese**

*Review the possible membership of the DSG cited in the Terms of Reference to include education, health and probation.*

*Continue to try and identify suitable representatives from local agencies to be members of the Group, including probation, children's and adults' services.*

*Senior diocesan management to clarify the role of the DSG and the appropriateness of its involvement in individual case decisions.*

*Senior diocesan management to consider the best forum to provide operational management support to the DSA and line manager in the form of case discussion / group supervision: how this is best provided so as to be effective, consistent with national policy and data-protection requirements.*

## **3.4 GUIDANCE, POLICIES AND PROCEDURES**

The Bishop advised the auditors that the local synod plans to formally adopt all the Church of England's current key safeguarding policies early next year. They were last adopted by the Synod in 2011, and the Bishop is very aware that there have been several updates alongside new policies/procedures/guidance produced by the National Safeguarding Team (NST).

Key policies, procedures and guidance are, nevertheless, being implemented on a day-to-day basis by the Diocese (although some exceptions will be identified under section 3.5). This was evidenced through file audits, in conversations and through documents such as the 2016 Training Strategy. Where local needs demand it, some aspects of national policies and procedures are adapted, such as in the 2016 Learning & Development Practice Guidance, but the auditors had no concerns about any misinterpretations in examples that they viewed.

A selection of relevant documents is available on the diocesan website under the Safeguarding section.

Members of the Parish Focus Group expressed some concern at the speed and volume that new policies and procedures are being produced by the NST. They said it can feel quite overwhelming and that there appeared to be little understanding by the NST that most parish work was undertaken by volunteers and of the reality of trying to embed safeguarding at a parish level.



*(Reference: part 1 of the S. 11 audit: Ensure the Diocesan Synod adopts the House of Bishops' safeguarding policies, together with any additional diocesan procedures and good practice guidelines.)*

### **3.5 CASEWORK**

The auditors reviewed 14 case files. Where cases related to members of the clergy or retired members of the clergy with Permission to Officiate (PTO) their clergy blue files were also reviewed.

The auditors were aware that Peter Ball, currently in prison following historic sexual offences committed against children, had had PTO within the Diocese. This case is currently the subject of an independent review by Dame Moira Gibb, so the auditors did not spend any significant time auditing this case, aside from checking that appropriate feedback is being relayed to the Bishop and the DSG so they are fully apprised of the progress of the review and any issues arising. The auditors were satisfied that this is taking place and noted the reflective approach taken by the Diocese to any lessons that could be learned.

Of the cases audited, 13 were in regard to children's safeguarding and one in regard to adults' safeguarding.

Where any issues in practice were identified during the audit, they were highlighted to the DSA and her line manager, and all audit forms were shared with the DSA.

Overall, standards of casework practice were felt to be good. Examples of this include evidence from files that relevant professionals from other agencies were involved and relevant information shared. Responses by the DSA were also noted to be timely and appropriate. There were two particular examples of some very good practice where the DSA had worked proactively with, and succeeded, to engage individuals of concern who had in the past been difficult to engage. Evidence of Type A Risk Assessments were seen on files and were thorough and of a good quality, although in one case the recommendation in regard to attendance at particular services had not been followed up in the subsequent safeguarding agreement (SA).

In general, SAs were being made as required and reviews took place in a timely manner, with appropriate people in attendance. One particular point for consideration was the signing of SAs. The DSA attends the SA meetings, but does not sign the agreement; this is done by the members of the parish who are implementing and overseeing the agreement. The reason given for this was that parishes are independent entities and the Diocese has no ability to force a parish to implement a safeguarding agreement. However, the view of the auditors was that if the DSA signed safeguarding agreements, alongside colleagues in the parish, it would demonstrate ownership of the risk and how it is being addressed by the Diocese, so clearly demonstrating the role of the Diocese in safeguarding.

There was, however, one case that caused the auditors concern, and links into the concerns raised in 3.3 about the role of the DSG in making decisions about cases, in particular case closure in this instance. There were particular issues around the historical responses to allegations. When the case re-emerged in 2015, the minutes of the DSG case discussion suggest the alleged perpetrators' denial of wrongdoing was taken at face value, partly on the report that the police did not judge a criminal

act to have taken place. The case was closed as agreed in the case discussion within the DSG. The view of the auditors was that a risk assessment and subsequent safeguarding agreement should have occurred, along with a discussion with the Local Authority Designated Officer (LADO). The Diocese was provided with written feedback on this case and recommendations for further action. The question of whether such decisions should be taken at DSG meetings is addressed in 3.3 above.

### 3.5.1 Case records

Case files are safely stored and secured in the DSA and Assistant DSA's office.

The auditors had some issues with the structure and content of case files. Paper case files are kept in cardboard folders, with loose-leafed documents being filed in chronological order; this means that it is sometimes difficult to access critical documents and there is a risk that loose-leaf papers can get displaced or lost. Notes of log actions were very brief – usually just noting the event (i.e. date, telephone call to a particular individual and note of the issue discussed). The Diocese has explained that newer case records will provide a cross reference to case file notes, where the detail is provided, but the auditors did not manage to locate the details, possibly because of the lack of structure in the files.

#### **Considerations for the Diocese**

*Review whether the DSA should sign safeguarding agreements, alongside members of the parish, to clearly demonstrate the role of the Diocese in the process.*

*Review the structure and content of case files so as to make them more accessible, secure and in line with national guidance.*

## 3.6 TRAINING

Currently safeguarding training is delivered by the DSA and the Assistant DSA. The Assistant DSA also undertakes the organisation of the training.

The Diocese has adopted the Learning & Development Practice Guidance 2016 and this framework is being used to deliver training. Most training is delivered in the parishes, but Training the Trainers is also being rolled out in order to enable more parish-based training to be delivered in the future.

The Focus Group members all spoke very highly of the training and said that it was both interesting and informative and delivered in a professional and stimulating manner. They also commented on how well it was being organised. Feedback forms are completed by participants following training sessions and these are collated. The main complaints were reported as being about the refreshments provided or location.

A record is kept on a spreadsheet by the Assistant DSA of who has undertaken training and when it is due for renewal. At the end of 2015 only 47 per cent of members of the clergy had been trained in the previous three years, although the percentage was higher for lay members of the Church (around 59 per cent).

There has been an issue about training capacity, particularly with the introduction of the Learning & Development Practice Guidance 2015. This is being addressed by

the creation of a full time safeguarding training post that should be filled by early 2017. The auditors noted that the DSG work plan contains targets and priorities for improving the numbers of people trained.

The Diocese has explained this low level of recent training with a wider historical perspective. All new curates and incumbents in the past 10 years have been given safeguarding training in their first year, and parish incumbent clergy are always invited to attend training happening in their Deanery. Some clergy will have had training slightly more than three years ago so would not be counted in the above statistics. It is therefore likely that a large number of those clergy who have not been safeguarding trained are retired clergy with Permission to Officiate. This group of PTO clergy make up approximately one-third of clergy within the Diocese. The plan will be for the new safeguarding trainer to target these, along with those active clergy who have not had safeguarding training in the past three years, to attend training as soon as possible.

*(Reference: Part 1 of S.11 audit: Select and train those who are to hold the Bishop's Licence in safeguarding matters. Provide training on safeguarding matters to parishes, the Cathedral, other clergy, diocesan organisations, including religious communities and those who hold the Bishop's Licence. And to part 8: Those working closely with children, young people and adults experiencing, or at risk of, abuse or neglect ...have safeguarding in their induction and are trained and have their training refreshed every three years.)*

#### **Considerations for the Diocese**

*The DSG to monitor the level of clergy and retired clergy with PTO who have attended safeguarding training.*

### 3.7 SAFE RECRUITMENT OF CLERGY, LAY OFFICERS AND VOLUNTEERS

The auditors looked at several clergy blue files connected to cases reviewed in the case file audit, plus six further clergy blue files in regard to safe recruitment, and six files in regard to the recruitment of lay officers by the Diocese (four) or Cathedral (two).

Files are neatly maintained and it was easy to find information.

In regard to current DBS clearance, the status of the DBS is not recorded on blue clergy files, but is kept on a database maintained by the Assistant DSA, to which the Bishop's Office has access. The auditors felt it would be helpful if this information was also kept on an individual's blue clergy file. In all but one case, DBS clearance was shown on the lay officer files.

In all cases where clergy had been the subject of safeguarding allegations this was clearly recorded on the clergy blue file.

References were present on all files, and application forms on most clergy files and all lay officers.

*(Reference to part 7 of S.11 audit: The Diocesan Secretary has implemented arrangements in line with the House of Bishops' policy on Safer Recruitment 2015. And to part 1: Keep a record of clergy and church officers that will enable a prompt response to bona fide enquiries...where there have been safeguarding concerns, these should be clearly indicated on file.)*

#### **Considerations for the Diocese**

*DBS outcomes to be noted on blue clergy files.*

### 3.8 DISCLOSURE AND BARRING SERVICE (DBS)

The DBS system in Bath & Wells is currently run by the Assistant DSA. Whilst getting relevant individuals to complete forms and produce paperwork was identified as a challenge, some members of the Focus Group noted that there was an overall understanding of why this was required, and challenges were because people are just busy, rather than resistant.

Records are kept on spreadsheets about who requires a DBS and when it has to be renewed. In 2015, 1,440 DBS checks were undertaken.

The current system is about to change with the imminent introduction of an e-bulk system operated by Capita, although this will remain being managed by the Assistant DSA.

The Diocese has made four referrals to the DBS in regard to concerns about individuals since 2013.

## 3.9 COMPLAINTS AND WHISTLEBLOWING

### 3.9.1 Complaints

The Diocese has a complaints procedure, but not a separate one for complaints in regard to the safeguarding process. Within the general complaints procedure, people are referred to the Diocesan Safeguarding Adviser or the Bishop's Chaplain if they wish to make a complaint.

The auditors think that there should be a complaints procedure that relates specifically to the safeguarding process which can be used by those either making allegations that a matter was not followed up, as it should have been, or by those who have had allegations made against them, and have concerns around the responses.

It might be helpful for all concerned if the procedure used a three-staged process of an informal attempt at resolution, formal independent investigation and a final adjudication.

### 3.9.2 Whistleblowing

There is a general whistleblowing policy for the Diocese. Whilst the Diocese did consider specifically including safeguarding within this, it felt that it had to follow what constitutes a protected disclosure. However, a separate section on safeguarding is included in the staff handbook.

The auditors consider that a specific policy on whistleblowing to cover safeguarding issues does need to be developed as this would be in line with expectations laid out in Protecting All God's Children (2010), section 6.35–6.38. It is noted however that the statutory provisions relating to whistleblowing cover only employees but not office holders or volunteers.

*(Reference: part 1 of S. 11 audit: Provide a complaints procedure which can be used by those who wish to complain about the handling of safeguarding issues. Also part 4: There is an easily accessible complaints procedure including reference to the Clergy Disciplinary Measures and whistleblowing procedures.)*

#### **Considerations for the Diocese**

*Develop a complaints procedure that relates specifically to safeguarding, and ensure it is well publicised, including placing it on the diocesan website.*

*Develop a whistleblowing procedure (in line with forthcoming national guidance) that relates specifically to safeguarding, and ensure it is well publicised, including placing it on the diocesan website.*

## 3.10 QUALITY ASSURANCE PROCESSES

The supervision arrangement for the DSA and assistant DSA provides a form of quality assurance (QA), as within this process some cases are reviewed and discussed and, where required, challenge provided by the supervisor. The role of supervision as QA is though limited to discussion of those cases which are identified

as needing professional advice. There is scope for further development of internal auditing processes. The DSA has suggested that this may be a way the DSG could be involved in QA activities. This would seem to be a positive suggestion, if consistent with data-protection arrangements, and more appropriate use of the DSG than its current involvement in operational management of cases (see 3.3).

The DSA submits an annual report to the DSG on safeguarding activity, covering casework, external contacts, safer recruitment, etc. There is though no further QA activity by the DSG around casework, other than through its direct involvement in case management, a role questioned in 3.3. The DSA has suggested a useful area of development would be for DSG members to be directly involved in some audit activities as part of this QA role. This would seem to be a promising area of development, if it is consistent with data protection requirements. Legal advice will need to be sought. Alternatively, auditing could be commissioned through other sources.

In 2015, the National Safeguarding Team asked the Diocese to pilot the new Parish Audit. The findings showed that parishes do not always have a clear understanding about what safeguarding is, and that, as a Diocesan Safeguarding team, it is a challenge to monitor the implementation of policies from a distance. The pilot also showed that the audit document was too complex and needed to be simplified to achieve a clearer result which could easily be analysed. This was taken on board by the NST, which will be conducting the audit centrally from 2016.

The Diocese also reports annually to the National Safeguarding Team in its Annual Safeguarding Return, which is based on Sec. 11 requirements.

#### **Considerations for the Diocese**

*The DSG to consider how to further develop its quality assurance role in safeguarding, for example through the use of case audits.*

### **3.11 MONITORING OF SAFEGUARDING IN PARISHES AS PART OF ARCHDEACON'S RESPONSIBILITIES**

Safeguarding questions are included in the Archdeacons' Articles of Enquiry. The Archdeacon of Bath reported that he had quite a high response, over 90 per cent. He estimated that over 80 per cent of parishes have a safeguarding officer in post. He actively follows up parishes who do not make returns or do not have a safeguarding officer.

He undertakes his annual visitations on a Deanery basis, and aims to use a relevant format for the visit (such as a service of worship), rather than an official meeting.

The auditors felt it would be helpful if information from Articles of Enquiry was more proactively used, involving it being recorded centrally and reported to the DSG.

### **Considerations for the Diocese**

*Information from the annual Articles of Enquiry to be used more proactively: this could involve central collation, reporting to the DSG and used by Archdeacons to monitor safeguarding in the parishes.*

## **3.12 RESOURCES FOR CHILDREN AND VULNERABLE ADULTS**

There is a very well organised and resourced Authorised Listener service in place. The DSA feels that it is very well publicised and that she always talks about its role when its use may be relevant, although it is not well used. Members of the Focus Group (except one) said that they had not heard of the service. This is unfortunate as much time and effort has gone into organising this service. The auditors wondered if further publicity of the service may assist, e.g. placing information about it on the diocesan website.

There is also a small budget available to pay for counselling and the DSA had just drafted a policy on access to this budget. Both the DSA and Assistant Diocesan Secretary were clear this could easily be increased if necessary.

### **Considerations for the Diocese**

*Consider further ways to publicise the existence, and role, of the Authorised Listening Service.*

## **3.13 INFORMATION SHARING**

There is robust and effective information sharing with external agencies. This has come about because the DSA has developed strong relationships with Local Children's Safeguarding Boards and Adults Safeguarding Boards, and, through them, has contact with relevant agencies, such as probation, police. This is evidenced through the conversations held, feedback received as part of the audit process, and from information viewed on files.

Both the DSA and the Assistant DSA are also members of the South West Ecumenical Safeguarding Forum. This is a multi-faith forum that focuses on the role of faith communities in safeguarding in the South West region.

## **3.14 LINKS WITH NATIONAL SAFEGUARDING TEAM**

The DSA has strong links with the National Safeguarding Team, and has spent a period of time on secondment to it. The DSA and the Assistant DSA attend twice-yearly meetings with the National Safeguarding Team.

The DSA, and indeed all those with direct responsibilities for safeguarding in the Diocese, are very aware of, and committed to, the direction of travel of the national team

### **3.15 NATIONAL SYSTEMIC SAFEGUARDING ISSUES**

- Level of new policies and procedures coming from the national team seen as overwhelming and unreasonable by the Parish Focus Group, not taking into account many are volunteers.
- The role and function of DSGs, and whether operational management of cases should be part of this.
- Line management of DSA, the correct model or models to consider in the linking of supervision into the management responsibilities of the Diocese.



## **APPENDIX: REVIEW PROCESS**

### **DATA COLLECTION**

#### **Information provided to auditors**

- Annual national safeguarding statistical returns for last two years.
- S.11 query completed for LSCB; Deceased Clergy File Review, and Past Case Review update
- Diocesan Safeguarding Policy 2013 update; Cathedral Tuition Policy; Policy on the employment of ex-offenders, for both the Diocese and the Cathedral; Cathedral Safeguarding Incident Flowchart; Complaints Policy; Diocesan Safeguarding and Whistleblowing Policies for staff; Cathedral Staff handbook; DBF Recruitment and Selection Policy; Cathedral Recruitment Policy; Diocesan Guidelines for Clergy
- Minutes of the last three meetings of the Diocesan Safeguarding Group
- Recruitment/policy document, and current excel list of Authorised Listeners
- Job description of DSA and Safeguarding Panel Chair
- 2016 Safeguarding Training Strategy, full-day local training module prior to roll out of C1/S1 and local Bishop's Staff Team Module prior to recent roll-out of C4.

#### **List of trained people**

- three safeguarding newsletters
- Diocesan Safeguarding Group Operational Plan
- Terms of Reference DSG
- Safeguarding structure plan, including Cathedral arrangements
- DSA Supervision agreement and review

#### **Participation of members of the Diocese**

Conversations were with:

- the Bishop
- the Bishop's Senior Chaplain
- the Diocesan Secretary
- the Assistant Diocesan Secretary
- the Diocesan Safeguarding Advisor
- the Assistant Diocesan Safeguarding Advisor
- the Archdeacon of Bath
- the Chair of the Diocesan Safeguarding Group
- the Cathedral Administrator
- the Cathedral Safeguarding Officer

The Parish Focus Group comprised:

- two Parish Safeguarding Officers
- one Deanery Safeguarding Officer
- two members of a Safeguarding Agreement monitoring group
- two Lay Readers
- one retired minister

**The audit: what records / files were examined?**

- 14 case files (13 children's, 1 adult's), + relevant blue clergy files
- six blue clergy files (Safer Recruitment)
- six recruitment files for lay officers

**Limitations of audit**

The only limitations to the audit was that there is only one substantive incumbent Archdeacon in post at present, meaning that our findings on the Archdeacon's responsibilities in regard to safeguarding could only be gathered from the one person. This meant that triangulation with the experiences of other Archdeacons was not possible.