

Diocese in Europe independent safeguarding audit (November 2017)





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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 was applied nationally from 2016.

The audit of the Diocese in Europe was carried out by Susan Ellery (the lead auditor for this diocese) and Sally Trench on 14, 15, 16 and 17 November 2017.

The audit process incorporated an examination of files and documents, along with meetings with key individuals and a Focus Group of chaplaincy representatives. Details of the process are provided in the appendix.

The auditors worked in the Brussels office on 14 November, and returned to London to work in the Diocesan Office at Church House for the remaining days.

This report was written by Susan Ellery with support from Sally Trench and quality assurance provided by Edi Carmi, the senior auditing lead.

There was one known limitation to this audit; the previous, self-employed, Diocesan Safeguarding Manager left at short notice in October. The Assistant Diocesan Safeguarding Manager (ADSM) took over preparation for the audit and it is important to say that the auditors noticed no deficits in preparation or the audit process. However, the voice of a person who had been a lead in safeguarding in the Diocese for two years was not heard.

1.2 THE DIOCESE

The Diocese in Europe covers 39 countries across Europe and beyond, including Iceland, Morocco and Russia. Three hundred and twenty-two congregations are served by 147 licensed clergy, 100 lay readers and considerable numbers of auxiliary clergy who have Permission to Officiate (PtO).

The Cathedral is in Gibraltar, with two Pro-Cathedrals in Malta and Brussels. The Bishop works from the Brussels office and the Suffragan Bishop from the Diocesan Office in London. There are 70 church buildings owned or rented by the Diocese but most congregations share church buildings with other denominations.

Terminology is slightly different to elsewhere in the Church of England. Instead of parishes, there are chaplaincies and the ministers are chaplains rather than vicars, rectors or priests in charge.

Each chaplaincy is self-funding; the congregation must raise the money to pay directly for clergy and buildings, whereas in England each parish pays a 'parish share' to the Diocese, which in turn pays the clergy. This is discussed further in 2.1 below.

The auditors were told that the nature of the Diocese is changing. It was traditionally a church for British migrants, with established churches in Paris, Brussels, Rome, Malta, Gibraltar, etc. Increasingly, the Diocese is finding that churches attract new congregations. Sometimes local people choose to worship in English and/or are attracted to the style of worship, and increasingly the Diocese caters for non-British populations who were raised in the Anglican tradition in their countries of origin. Helsinki, for example, has 22 nationalities in the congregation including Arabic speaking Sudanese/Finnish and a minister for whom English is his third language. Worship is no longer entirely in English but may be in the local language, as in Poland, or a minority language.

In terms of safeguarding, each country has its own legislative framework and customs and practices. This is discussed further in 2.1 below.

The Church of England is in 'Full Communion' with several other Churches in Europe, including the Nordic-Baltic Lutherans and the Old Catholics. This means that Anglican clergy can work in their churches, and their clergy can work for the Diocese in Europe (and other Anglican communities that are not within the Diocese). Safeguarding standards may vary, especially as the agreements that set up the Full Communion predated the recent rapid progress made in safeguarding policy and practice guidance by the Church of England. This has caused some problems in casework (see 2.5).

The auditors were aware of both general and specific anxieties about the impact on the Diocese and on chaplaincies of the UK leaving the European Union. There seems to be the potential for the deployment of clergy and the transfer of information to be affected, to name two examples of issues discussed. At the moment there is no discernible impact on safeguarding.

1.3 STRUCTURE OF THE REPORT

The report is structured as follows:

- Section 1: Introduction
- Section 2: 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 in section 2: 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 its safeguarding planning in the future.
- Section 3: Conclusions providing an overview of what is working well, what needs to work better and a summary of considerations for the Diocese.
- Appendix, providing detail of the methodology along with any limitations of the audit.

2 FINDINGS

2.1 SAFEGUARDING MANAGEMENT

2.1.1 Leadership

The Bishop, who was installed in 2014, gives a very personal lead on safeguarding in the Diocese. He talked about two cases that made a particular impact on him; one he dealt with when working as a Senior Chaplain in the Diocese and another he became aware of when his appointment was announced. The latter case was that of a previous bishop, now deceased, and the Bishop was concerned to bring the case to a conclusion for the (only known) victim. He, and others, also talked about how the Diocese had had a negative reputation in terms of safeguarding and he was determined to change that.

In 2014 (prior to the appointment of Bishop Robert), a major review of safeguarding was initiated by the Independent Chair of the Diocesan Safeguarding Advisory Committee (DSAC). The need for the review was endorsed by the DSAC and the then Diocesan Bishop (Bishop Geoffrey) who was a member of the DSAC. The review recognised that the Diocese was lagging behind in terms of safeguarding and resulted in 40 recommendations, most of which have been carried out.

The Bishop has recently delegated the lead on safeguarding to the Suffragan Bishop, in order to clarify their roles should any case involve a Clergy Disciplinary Measure (CDM). It is accepted that, if the Bishop is to make the decision in a CDM related to safeguarding, he should maintain a distance from the casework. The Bishop does not make any interventions or decisions in casework.

Delegation of the lead to the Suffragan has a practical advantage in that he is based in the same office as the Diocesan Safeguarding Team (DST). He is a member of all core groups.

Both bishops sit on the DSAC. This is discussed in 2.3 below.

The Diocesan Safeguarding Manager (DSM) does not have regular formal meetings with the Bishop but the Assistant DSM was clear that she can contact him at any time and he always responds as soon as he is able to. The Diocese acknowledged that the considerable progress which has been made in safeguarding would not have been possible without the drive and leadership of the DSAC Chair and the former DSM. The strategic development of a Safeguarding Training Strategy in 2013, the internal Safeguarding Review in 2014, the development of the Train the Trainers programme, the introduction of the DSAC Management Meetings and the work to develop the Diocesan Safeguarding Map have all been led through the DSAC under the guidance of the Chair of the DSAC, with the former DSM having a major role in implementation of these strategic initiatives.

2.1.2 Structure

The overall structure of the Diocese is different to every other diocese in the Church of England. As noted in section 1.2, the funding structure is different and each

chaplaincy has to stand on its own feet financially. Only a handful of chaplaincies have reserves or obtain income from sources other than the members of the congregation, although in some countries the minister is funded by the state. Although the auditors saw no case evidence, there would seem to be a risk of locally influenced independence of attitude that could undermine safeguarding.

In addition, the Ecclesiastical Insurance Group will not provide insurance for the chaplaincies. At present, chaplaincies are responsible for their own insurance. It is likely that a significant proportion do not have proper insurance for public liability and safeguarding matters.

This means that chaplaincies take all the risk, should they have a serious safeguarding issue. This might mean funding a temporary minister if the appointed minister is suspended or stands down during an investigation, funding legal costs or, potentially, meeting the cost of compensation. This could lead to pressure to close down an investigation or to re-instate, or even to a risk-averse culture. The lack of insurance cover was quoted as a source of general, and occasional specific, anxiety by several people. The Diocese is currently examining the possibilities in relation to insurance for chaplaincies. Meanwhile the task continues to be to encourage best safeguarding practice in the chaplaincies, and adherence to central safeguarding policies.

Overall, the auditors felt that the Diocese has obstacles unique to itself, but that these do not inhibit a shared determination to improve safeguarding.

The Diocesan Safeguarding Team (DST) reports to the Diocesan Secretary (see 2.2). Although the current Diocesan Secretary is an interim appointment, he takes a keen interest in safeguarding and has contributed to securing increased resources. He has picked up the issue of lack of insurance and is currently working to resolve it, so no Consideration about this matter is given below.

2.1.3 Links with Cathedrals

Atypically, the Diocese has a cathedral and two pro-cathedrals. For the purposes of safeguarding, they act as any chaplaincy in the Diocese and receive the same level of support.

2.1.4 Culture

The culture of safeguarding, and the extent to which safeguarding is embedded in the chaplaincies, are particularly difficult to assess in the Diocese of Europe. There is, however, general agreement that the culture is improving and that this is primarily due to training (see 2.6 below) but also to overall greater public awareness about the need for safeguarding. There is also a high level of commitment to developing the culture with the caveat set out below.

One of the archdeacons talked about culture change, which he pinpointed to the last three years. He quoted: a greater general awareness about safeguarding, with fewer people thinking it only applied within the UK, a very positive response to training (especially Level 2), and the evidence of his Archdeaconry Synod, where 30/80 delegates chose a safeguarding workshop and participated in a very engaged discussion.

The national safeguarding culture varies from country to country, as does the legislative framework that underpins the culture. The auditors heard that, even in the most developed countries in Europe, cultures differ depending on the primacy given to the privacy of the individual (which can affect reporting of or responses to safeguarding concerns). And, at the most extreme, the Diocese is operating in at least one country outside Europe where the abuse of one's wife is legally permitted. The Diocese faces challenges that are unknown elsewhere in the Church of England. The Bishop explained that, although the DST needs to negotiate a way of working that reflects being part of an English Church operating in Europe, it always seeks to align itself with the highest standards for safeguarding. In practice, there seems to be no country where such standards are higher than in the UK.

In addition, the Diocese recruits priests from other Churches that are in Full Communion with the Church of England but do not necessarily share standards in safeguarding (see 1.2.).

(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.)

2.2 DIOCESAN SAFEGUARDING ADVISER/S

2.2.1 Roles and responsibilities

The Diocesan Safeguarding Team (DST) has grown recently. A Diocesan Safeguarding Manager (DSM) post has been in existence for some years, appointed (until now) on a freelance and part-time basis. The auditors were provided with a person specification, but not a job description for the post dated December 2015.

In early 2016, an Assistant DSM (ADSM) post was recruited to on a 0.8 equivalent and employed basis. This post has a job profile that sets out key relationships, accountability and main duties and responsibilities.

The DSM (who left in October 2017) tried to maintain a more strategic role and the ADSM a more operational role. In practice, the roles overlapped and the two posts worked fairly closely, albeit that they would usually spend only one day a week in the same place.

The DST has had a full-time administrator for some time, although the person in post has changed several times recently. A Training Officer (DTO) (0.8 equivalent) arrived in March 2017 and a full-time Safeguarding Officer (DSO) had just started work, on 31 October 2017. The DSO post is intended to deal with the lower-level enquiries that come through and to triage referrals. The auditors did not see job profiles but understand that they do exist, and would have been made available if requested.

The total resource given to safeguarding will be 4.6 full-time equivalent posts, assuming that the new DSM is appointed on a full-time basis.

2.2.2 Qualifications and experience

The previous DSM was a former senior police officer, with extensive safeguarding experience. The ADSM is a qualified and experienced social worker and has worked in inspection as well as service delivery across a wide range of specialisms. She also has a strong track record in management.

The new DSO is also a qualified social worker, and has 30 years' experience in frontline service delivery, primarily in youth justice.

The Training Officer has a professional background in training, although not in safeguarding.

2.2.3 Employment arrangements

As stated above, the DSM was a self-employed consultant. The Diocesan Secretary intends to appoint his replacement on a full-time employed basis. All the other posts in the DST are employed.

It became clear during the audit that the previous DSM had increased his contracted hours from two days a week to four days with the agreement of the then Diocesan Secretary, although he had considered himself on call seven days a week unless actually on leave. The Diocese recognised that this was unsustainable and is now making arrangements for out-of-hours and holiday cover.

2.2.4 Management arrangements

The DSM post has been and will be managed by the Diocesan Secretary. In the new structure the DSM manages the ADSM, who manages the Safeguarding Officer, the Training Officer and the Administrator.

The auditors saw a record of a supervision discussion about Continuing Professional Development (CPD) and the requirements of the ADSM regarding her registration with the Health and Social Care Council. The discussion acknowledged the uniqueness of the social work undertaken by the ADSM (and now the DSO), in that they are trying to apply UK legislative standards across Europe.

The auditors recommended that the ADSM and the DSO (and the new DSM whether or not they are a social worker) should have access to multi-agency training run by the closest Local Safeguarding Children Board (LSCB) and Safeguarding Adults Board (SAB). They were made aware that the ADSM and the Safeguarding Team are signed up to 'My learning source Southwark Council', and that the ADSM has completed at least four LCSB training sessions since her appointment.

2.2.5 Supervision arrangements

The DSM and ADSM shared supervision sessions with a professional social worker, funded by the Diocese, and the ADSM continues to meet with the supervisor during the recruitment of a new DSM.

Supervision is usually every two months. The ADSM values the sessions highly and describes them as appropriately challenging.

The ADSM shared the records of the previous three supervision sessions with the auditors. The records showed a focus on the processes of safeguarding; time management, resources, policy, accountability, etc. rather than casework. There is a casework sub-group of the DSAC and this is discussed below in section 2.3.

At present, there is no formal link between the supervisor and line manager, and the

supervisor is not contributing to annual appraisals for the DSM and ADSM. This is addressed in the consideration at the end of the section.

2.2.6 Any potential conflicts of interests to DSA's independence

The ADSM holds no other roles in the Church of England and is not a member. The DSO is an active church member and officer but not within the Diocese in Europe.

2.2.7 Adequacy of resources

The total resource given to safeguarding has risen to £275,000 in 2018 and this represents a huge commitment on the part of the Diocesan Board of Finance. The budget does include travel, which is obviously far more expensive than in other dioceses.

The total staffing has also risen, with a 0.8 training post and a full-time Safeguarding Officer post. The auditors noted that, should a case involve the attendance of the DSM or ADSM, the time needed will be far greater than would be the case in an English diocese (unless the case involved travel well beyond the diocese). For example, a risk assessment and safeguarding agreement meeting in a northern European city meant a very long working day for the DSM, and had it been further away would have included at least one overnight stay.

It is very hard to say whether the total resource is sufficient because the issue of potential 'unknown unknowns' has to be a high risk, given the size and diversity of the Diocese. The referral and enquiries rates have risen in recent years. The DST took on eight new cases in 2015, 14 in 2016 and 17 to date in 2017. It would seem likely that referral rates will continue to rise as training is rolled out across the Diocese (see 2.6.below).

(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

Consider how to implement clear lines of accountability between the roles of DST members, the professional supervisor and the Diocesan Secretary, as the manager of the DST, and facilitate the contribution of the supervisor into the annual appraisal processes.

2.3 DIOCESAN SAFEGUARDING ADVISORY PANEL

2.3.1 Chair

The current Chair is a former senior police officer. The Chair has been a member of the Safeguarding Panel of another diocese from 2006 and continues in that role. He has chaired the DSAC for over four years and was stepping down at the end of the year.

The post in not salaried but is paid an honorarium. The current Chair is not a member of the clergy and has no other responsibilities in the Diocese. The current Chair talked about working as an unpaid consultant for the Diocese, because so much progress needed to be made, and because the DSM did not have the capacity to do everything that needed to be done and, in effect, there was no one else to do it. He saw the potential for a conflict of interest. So where there has been a need for a decision on policy, guidance, or any core group matter or similar, the Independent Chairman of the DSAC has documented it and discussed with appropriate people within the Diocese (e.g. the Diocesan Bishop, the Suffragan Bishop, the Diocesan Secretary and the Registrar), and the DSAC itself. On any serious safeguarding matters he has always ensured that his advice to the Diocesan Bishop has been to seek legal advice or to brief the Archbishop of Canterbury (as appropriate). He has also provided detailed briefing notes to the Diocesan Bishop to ensure that he was fully informed.

The auditors were subsequently made aware that negotiations were underway with the Churches' Child Protection Advisory Service (CCPAS) at the time of the audit, to provide consultancy as needed as well as out-of-hours cover.

The incoming Chair has been appointed and is currently Chair of a Children's Services Improvement Board in one local authority, and the Independent Chair of the Local Safeguarding Children Board, in another.

2.3.2 Composition of group

The DSAC knows that the composition of the group is weighted towards diocesan representatives. In addition, because some members are not based in the UK, there can be problems about regularity of attendance. Having said that, minutes of the last three meetings suggest that non-attendance is no worse in this Diocese than others.

The DSAC does contain people with professional experience of safeguarding. One member, for example, was Chief Executive of the Leicestershire and Rutland Probation Trust, and joined the DSAC to bring a safeguarding adults perspective. The deputy Chair of the DSAC was a children and families judge, and is a member of a Local Children's Safeguarding Board. He brings considerable external experience of safeguarding matters with him.

The auditors accept that it is unrealistic to expect the DSAC to recruit serving senior managers across statutory agencies in the UK. They did suggest broadening out the search for suitable members in line with House of Bishops' policy. For example, given the growing trend for church congregations across Europe to find themselves supporting the victims of trafficking, it may be possible to enlist a representative of a voluntary organisation working in that area. It may also be possible to attract people

who were until recently senior managers in statutory services and see the safeguarding work of the Diocese as a service they would wish to support.

2.3.3 Clarity of purpose and function

The auditors were provided with two sets of Terms of Reference for the DSAC, one dated 8 January 2015 and one that states that it was approved by Diocesan Synod on 15 June 2016. Paraphrased, the latter sets out the functions of the group as:

- To advise the Diocesan Bishop and his staff in respect of safeguarding, namely the setting, revision and implementation of policies, protocols and priorities. The DSAC also sets out to advise on areas of policy that have a potential, rather than immediate, impact on safeguarding such as clergy records.
- To take responsibility for the monitoring of the implementation and effectiveness of policy.
- To provide professional support and advice for the DSM and team.
- To approve safeguarding training programmes and, where necessary, organise the development of training.
- To apply, in consultation with the Board of Finance, for additional funding or resources as needed.
- To have a role in strategic liaison between the Diocese and statutory agencies, with the DSM and team acting as the primary point of liaison.
- To review guidelines for chaplaincies over the handling of specific cases and to give advice to the Bishop and his staff about action to be taken in 'difficult' cases.
- To review cases retrospectively to identify lessons learned.

The auditors saw evidence of Lessons Learned Reviews, written at the end of cases that had required (in line with national practice guidance) a core group. Both the core groups and the Lessons Learned Reviews are composed of members of the DSAC, and consequently involve independence from the Diocese. The reviews, written by the Chair of the core group, who was either the Chair or Deputy Chair of the DSAC, were thorough and it is understood reflected the views of all members of the core group. One case, of national significance, had been reviewed with support from the National Safeguarding Team and Lambeth Palace. The case bore remarkable similarities to one seen by one of the auditors elsewhere and this transferability of learning was acknowledged in the review and recommendations. The core groups and the Lessons Learned Review Groups are only independent of each other where an independent Lessons Learned Review Group is required by National Church guidance. This was not the case for the core groups and Lessons Learned Reviews that were examined.

The auditors understood that the Chair had suggested the establishment of an Operational Oversight Group (a sub group of the DSAC) and this was approved by the DSAC. It was intended that this group should meet twice a year although it has only, in fact, met once so far. The membership of the group was Diocesan Lead for Safeguarding (Suffragan Bishop) or in his absence the Lead Archdeacon for Safeguarding, the Diocesan Secretary, the DSM, the ADSM and the Chair of the DSAC. The DSAC agreed in June 2017 to adopt the Chair's proposal that the group would, '…review all files to determine whether the action taken is appropriate, raise

any concerns and direct additional action as needed. Where cases have been properly dealt with and properly documented...the Operational Oversight Group (OOG) will "sign off" the case as completed'. The DSAC approved the creation and operation of the OOG and see it as a useful layer of quality assurance.

The auditors considered that the group appears to have both a quality assurance and an operational management function and were mindful of S.2.4 of the practice guidance published in October 2017 on Key roles and responsibilities and Church Office Holders and Bodies. It states, 'It is not the role of the DSAP (here, read DSAC) to be part of the case management process. It is their role to consider information from quality assurance processes, as above. At the discretion of the Chair of the DSAP, some DSAPs may choose to have a sub-group that monitors risk assessments and safeguarding agreements. The purpose of this sub-group is to review the quality of risk assessments (both standard and independent) and safeguarding agreements. This sub-group should have clear Terms of Reference and a membership that reflects the necessary experience and skills to undertake this role'.

Given that a new Chair will take over in 2018, and given that the national practice guidance is so recently finalised, it would make sense for her to review the Terms of Reference of the DSAC and the functioning of the OOG.

The DSAC meets quarterly and the three sets of minutes seen were of a high standard. There was evidence of strategic planning and review, and actions agreed were brought forward to subsequent meetings. The Diocese has a Strategy for Continuous Safeguarding Improvement that guides the agenda at DSAC meetings. The objectives are: to achieve culture change, to improve understanding and practice in adult safeguarding, to ensure accountability and consistency in all chaplaincies, to provide effective support for survivors and victims, to prevent abuse through education, to develop links with statutory agencies in each country where the Diocese operates and to ensure effective practice. This amounts to a very comprehensive approach to the improvement of safeguarding across the Diocese.

Both the Bishop and the Suffragan Bishop are members of the DSAC. The Bishop has recently formally handed the lead in safeguarding to the Suffragan and it may be time to review his membership of the group. Although the auditors did not raise this as a subject for discussion during the audit, it seems that there are potential difficulties in having a group that should 'advise and make recommendations to the diocesan bishop' (S.2.4 of the Key Roles and Responsibilities practice guidance) when the Bishop is a member of the group.

The Chair of the DSAC produces an annual report for Bishop's Council and Diocesan Synod.

(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

Consider how to recruit current or former safeguarding professionals who might compensate for the lack of representation from statutory agencies on the DSAC and bring the Diocese in line with House of Bishops' policy about membership.

Review the Terms of Reference of the DSAC, and particularly the Terms of Reference for the Operational Oversight Group, so that the latter group's function is explicitly in line with House of Bishops practice guidance as a quality assurance, not a case management, role.

Should further consultancy work be needed, consider employing an independent person / organisation rather than extending the role of the Chair of the DSAC.

2.4 GUIDANCE, POLICIES AND PROCEDURES

The Diocese has a comprehensive set of procedures dated December 2015. An introduction by the Bishop makes the point that, even if legal and social frameworks vary from country to country, there are minimum standards that are not negotiable within the Church.

At the consultation stage of the revised national guidance (Promoting a Safer Church), the Bishop expressed concern that the Diocese in Europe had not been taken into consideration when the procedures were drafted. This was not an expression of unwillingness to implement procedures, but of concern that they did not fit a situation where each country has its own cultural and legal standards.

As a result, there was a meeting between the National Safeguarding Team and the Diocese in Europe in June 2017. An Interim Guidance Note was subsequently agreed and this sets out the parameters. The NST and the Diocese have undertaken to agree any modifications or exceptions to House of Bishops guidance with a view to applying the guidance in Europe as in England. Any modifications or exceptions will be published.

The auditors understood that this piece of work has not yet been able to start. The Bishop wishes to undertake a piece of work that would enable the Diocese to have a basic understanding of how the legislative framework for safeguarding works in each country, and to have a means of being able to find out more, when the need arises. Ideally, this work would link with the cultural issues mentioned in 2.1 above.

The auditors understood that the NST has undertaken to support the Diocese to seek additional funding for the work and a specification has been drawn up.

Meanwhile, the auditors were satisfied that the Diocese applies national policy and practice guidance wherever it is possible or makes sense to do so. The auditors accepted that, occasionally, it may be better for an individual if a referral is not made to a statutory agency in a circumstance where, in the UK, it would be negligent not to refer. An example given was in a country where mental health facilities are still at a very primitive level and the decision is currently not to refer a person who has mental

health issues. This decision had been taken in consultation with the DSM and remained under review. However, unless such situations and decisions are discussed with the NST, they are in breach of the current existing guidance which provides for modifications or exceptions to be 'reflected in the body of the safeguarding policy and practice guidance of the Diocese in Europe and specified in an annex to the published safeguarding policy and practice guidance on the websites of the Church of England and the Diocese in Europe'.

(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.)

Considerations for the Diocese

Consider with the support of the NST how to progress the piece of work that will help chaplaincies and the DST understand and operate within local legislative frameworks.

Consider a process that provides any modifications or exceptions to national policy and guidance have been discussed with the NST and are 'reflected in the body of the safeguarding policy and practice guidance of the Diocese in Europe and specified in an annex to the published safeguarding policy and practice guidance on the websites of the Church of England and the Diocese in Europe'.

2.5 CASEWORK

The auditors reviewed ten case records; two concerned historical allegations of abuse by clergy then in the Diocese, two concerned safeguarding agreements due to physical or sexual abuse of a child in the recent past, three concerned current allegations of abuse against children and three concerned vulnerable adults.

2.5.1 Quality of response to allegations

Members of the Focus Group spoke very warmly about the speed and quality of response by the ADSM and the previous DSM. This was reinforced by the case records seen. The auditors saw active prioritisation of ongoing cases alongside an immediate response to new referrals and enquiries.

The actions agreed were always carefully considered and clearly communicated. Referrals were made to statutory agencies when they should have been, in all cases seen. In one case, in a Nordic country, neither the police nor Children's Services followed up a referral about physical abuse of two children. In this case, a link was made with a voluntary child welfare organisation.

Because of the geographic size of the Diocese, Chaplaincy Safeguarding Officers (CSOs) have to take responsibility for dealing with cases that might usually be worked by the DSA. The DST advises and keeps in touch. Given that CSOs are volunteers from a range of backgrounds, this poses an inherent risk although they are often in a better position than the DST to understand the local context. The auditors saw cases where CSOs and the DST worked very well together, using each other's expertise and knowledge.

The DST use a 'Do no harm' principle when deciding whether to refer to statutory agencies as described in 2.4 above (occasionally, it may be better for an individual if a referral is not made to a statutory agency in a circumstance where, in the UK, it would be negligent not to refer). The case seen where a referral was not made was of an adult and the auditors were not aware of any such case involving a child at risk of harm.

In every case seen where a core group should have been held, a core group was held. The groups were well-recorded and finished with a Lessons Learned Review.

Information sharing with other agencies was as effective as it could be in each country, in cases seen. The Diocese has taken advice about the impact of data protection laws on the transfer of information across national boundaries. In some countries, such as France, good liaison was seen with statutory agencies caring for elderly vulnerable people. By contrast, the auditors were told that in some countries the Church of England is neither recognised nor respected and attempts to liaise with statutory agencies are rebuffed or ignored.

2.5.2 Quality of risk assessment and safeguarding contracts

There is currently no format or procedure for standard or Type A Risk Assessments in the Diocese and this is a significant lack. The result is that the safeguarding agreements seen were based on a verbal assessment of risk. This in turn can mean that the reasons why a safeguarding agreement is in place can soon become diluted and that has the potential to give too much scope for a manipulative abuser.

One safeguarding agreement seen was being finalised in collaboration with another diocese, the offender having told his church near his holiday property that he had an agreement in place at home. This did leave the auditors wondering whether there are other people who have a safeguarding agreement in the UK but are less honest than this person when abroad.

The Diocese seems to have relatively few safeguarding agreements in place and the auditors saw one case where a church officer had stepped down but had not then been subject to an agreement, in circumstances where it would seem to be advisable.

The auditors saw evidence of only one review of a safeguarding agreement.

It would be advisable to review practice regarding risk assessments, safeguarding agreements and the reviews of agreements within the context of national practice guidance and accepted best practice.

(Reference: part 1 of S. 11 audit: Provide access to a risk assessment service so the Bishop and others can evaluate and manage any risk posed by individuals or activities within the Church.)

2.5.3 Recording systems

The auditors were told that, prior to the appointment of the previous DSM, there was little or no case recording – and a level of safeguarding resource that would have afforded little time for it.

The Diocese has invested in an electronic data management system, CPOMS, and the ADSM is using it. Unfortunately, the previous DSM relied on the ADSM to enter

information and much of the case recording seen by the auditors still consisted of strings of emails.

Where CPOMS had been used to the full, recording was of a good standard.

Members of the Focus Group talked about their difficulties in safely storing records where chaplaincies have neither an office nor a dedicated computer. One person had to keep safeguarding records in the chaplain's flat, which is less than suitable. The auditors wondered whether the Church could look into cloud storage for electronic records accessible only to authorised people. The auditors note that it is the long-term goal of the Diocese to maintain and store all records (including safeguarding records) electronically on the CMS system, and that a project to plan out the delivery of this goal is currently underway.

2.5.4 Any other issues arising in casework?

Some people talked about the 'grey areas' in adult safeguarding, often when it is difficult to disentangle whether the main issue is bullying behaviour or the harm felt by someone who is vulnerable or may have been made vulnerable through being bullied. The auditors formed the impression that the DST are dealing sometimes with issues that are not strictly speaking safeguarding but could see that the people contacting the team, whether clergy or congregants, may have no other professional with whom to think such matters through or to advise on action to be taken. It seemed to be linked to the potential isolation that was also talked about. The auditors' view was that the Diocese needs to be clear about what the DST does, but that if their remit is to include advice about bullying and harassment, it might be best to equip team members for the task and accept that the service is being used this way because it is needed.

The Bishop talked about how the other denominations with which the Church is in Full Communion may have lower safeguarding standards or even no safeguarding policy. He quoted a case that arose in a shared ecumenical chaplaincy, where the other denomination had appointed a chaplain who would not have been allowed to practice in the Church of England. If this happens, there is a clear safeguarding risk and a reputational risk to the Church. This is a risk where full Communion Agreements predate Safe Recruitment arrangements and may be a risk for the wider Church of England not just the Diocese of Europe, unless there are arrangements implemented to review all such arrangements.

Across such a widespread and diverse area, it is inevitable that local attitudes towards safeguarding will vary. It is also probable that some people may not appreciate that the push for progress has been led by the Church nationally and is not a purely local initiative. In this context, the auditors saw evidence that the DST deals regularly with a small minority of communications, usually emails, which are rude and unreasonable. This happens everywhere but is made more likely when opportunities to meet members of the DST inevitably seldom happen. When it does happen, it adds another layer of complexity to the task of the DST as they try to reach the best possible resolution.

Considerations for the Diocese

Review practice regarding risk assessments, safeguarding agreements and the reviews of agreements within the context of national practice guidance and accepted best practice.

Consider how to implement safe digital storage of records, both in the short term and long term, which may require different strategies.

Consider whether the DST should be equipped to advise about bullying or whether such concerns are best directed elsewhere in the Diocese.

Consider what strategies need to be implemented to minimise the risk of unsuitable appointees in other denominations with which the Church is in full Communion.

2.6 TRAINING

2.6.1 Delivery

The Diocese recognised in 2013 that it had a serious training gap: training had been piecemeal and infrequent. A training strategy was formally adopted by the DSAC in November 2013 and has formed the basis for the delivery of most safeguarding training since then. The training strategy was not included in the pre-audit materials provided to the auditors and they did not ask whether the Diocese had one during the audit.

Training is seen as the principal means to achieve a change in the culture of safeguarding across the Diocese. The Diocesan Strategy refers to a Training Strategy, although this was not seen by the auditors.

The auditors were given an update on 'Implementing, Delivering and Auditing Safeguarding Training', dated May 2016, and written by the DSM, which summarised the work to date.

The Diocese made the very practical decision that basic awareness training, known as Level 1, should be done via online delivery. Since 2015, the Diocese has made two basic programmes available, on children's and adult safeguarding.

A Level 2 programme has been developed for all those who have some involvement in safeguarding in their chaplaincy; from volunteers to chaplains. The course is delivered face to face over one day. The auditors were told that Level 2 is the equivalent of C3 in the National Training Framework, but customised to fit the needs of this Diocese.

A three-year Train the Trainers programme is underway. In 2016, a group of volunteer trainers spent a week together in Cologne, being trained by two experienced but voluntary trainers. A further week-long course is planned for early 2018. This represents a huge commitment by the Diocese, in terms of funding, and by all the people involved who give up a week to be trained, before delivering the training themselves.

Because attendees and trainers have often travelled a long distance to a training session, groups are often quite small and trainers have to operate alone. This is not ideal as occasionally someone in a group needs individual attention, and the aim is to double up on training whenever possible in the future.

Feedback from the Level 2 programme is generally positive and it is seen as a 'game-changer' in terms of attitudes towards safeguarding, especially in terms of persuading people that safeguarding is more than police checks and references. On average, 81 per cent of participants reported being 'Very satisfied' across the five archdeaconries that were able to report on progress in September 2017.

As at September 2017, 1,181 people had completed the Level 1 adult safeguarding training and 1,453 the Level 1 children's safeguarding. It is not known what proportion of the total numbers needing the training this represents. Level 2 had been completed by 739 people. Overall, a lot of progress has been made in a short time. One of the Diocese's top priorities for 2018 will be to establish the 'population' of adults within chaplaincies who require some form of safeguarding, whether this is by DBS checks or training. They intend to produce a monthly safeguarding report from January 2018 which will (over time) identify this population and measure progress towards 100 per cent compliance.

The delivery of the specialist modules will be a further challenge in the future, but the auditors felt that it is right to concentrate on Level 2 training at present.

The six archdeacons (only one of whom is a full-time stipendiary archdeacon) have the responsibility for rolling out training across their archdeaconries, which may cover a vast area. One archdeacon reported having trouble getting 'buy in', partly due to confused communication about who needs to do what training and why.

The Training Officer told the auditors that the quality assurance of training has not yet begun but is planned to start after the Train the Trainers course in January 2018. She sees her role as supporting the trainers as well as observing their training style.

2.6.2 Clergy and training

The clergy share the Level 2 training with lay volunteers, and typically would train alongside their own church members. The onus is thus on the chaplain to provide a lead.

Senior clergy have the same training as their peers in England. One of the archdeacons talked about having recently done NST training on effective hearing and response to disclosures.

The Bishop's agreement to Permission to Officiate (PTO) for retired clergy is not dependent on the completion of safeguarding training, but applicants are expected to have done training in their previous diocese. They are also required to complete Level 1 training online and encouraged to attend Level 2 training.

2.6.3 Organisation and recording systems

The Training Officer in London keeps records of training completed. Refresher training is not yet an issue.

(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.)

2.7 SAFE RECRUITMENT OF CLERGY, LAY OFFICERS AND VOLUNTEERS

A total of nine clergy files were reviewed, for evidence of Safer Recruitment. In terms of documentation, the picture varied.

Three of the clergy had been appointed by the Intercontinental Church Society (ICS), a mission organisation that sends priests overseas to minister to English-speaking congregations. The ICS website makes it clear that it recruits in tandem with the Diocese in Europe and, apart from the format of the application form, the auditors saw no difference in the standard of recruitment. The auditors were told that a joint appointment procedure also happens with the Mission to Seafarers and the United Society Partners in the Gospel (USPG) and this process mirrors that used with the ICS.

All files had evidence of an application form, although one file had only page one of the form. The standard of this file was anomalous in that it contained page one only of a number of key documents and only one reference.

All the files that should have had a Clergy Current Status Letter had one, including the file of a Lutheran minister.

The auditors saw that the Diocese goes to considerable lengths to establish a complete criminal record check (the equivalent of a Disclosure and Barring Service check in the UK); see 2.8 below.

The Diocese operates an extra layer of recruitment in that, once the chaplaincy has decided on its preferred candidate, they then have a formal meeting with the Bishop or the Suffragan Bishop. This gives the Bishop the opportunity to brief the incoming chaplain.

The timetable of this audit meant that the Blue Files were seen in Brussels before the case files in London, so it was not possible to go back to check the Blue File of the clergy case reviewed.

(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

Review the Blue Files to make sure that evidence of Safer Recruitment is complete.

2.8 DISCLOSURE AND BARRING SERVICE (DBS)

DBS and local equivalent checks are a particular issue for the Diocese as it tends to attract clergy and congregants who have lived in various parts of the world. The Diocese insists that volunteers, as well as clergy, try to obtain police clearance in every country they have lived in since the age of 16. The DST has a ring binder of specimen police checks so that those coming in can be authenticated.

From the evidence given by the Focus Group, this policy creates some friction in chaplaincies where people are waiting to start volunteering and sometimes clearance comes through shortly before people are due to move on at the end of a time-limited post. It does, however, draw a clear line. Exemptions are agreed for countries where police checks are unavailable or cannot be trusted, and are signed off by the Suffragan Bishop and the Diocesan Secretary. References are then sought and verified by phone.

All DBS checks are processed by the Safeguarding Administrator, whether for volunteers or for clergy. She reported that she inherited a backlog when she started the job in October 2017 and expects it to continue. The auditors understood that the DBS checks for volunteers are dealt with centrally in order to try to share the burden, where people have to seek external criminal record checks themselves.

There were no records to see of referrals to the DBS and the administrator had not yet seen a 'blemished' DBS.

2.9 COMPLAINTS AND WHISTLEBLOWING

The Diocese has neither a complaints nor a whistleblowing policy, and this was discussed at the feedback session.

(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

Consider how to speedily provide published and easily accessible policies, on the diocesan website that would enable people to make complaints or to whistleblow.

2.10 QUALITY ASSURANCE PROCESSES

The Independent Chair undertook a review of the structures, systems, processes and resources of the safeguarding arrangements in the Diocese in 2014 (as at 2.1.1 above). Eighteen separate questions were asked, covering all aspects of the operations and governance of safeguarding. A total of 40 recommendations were made, and followed up by the DSAC.

The Learning Lessons Reviews, written by the Chair after each core group finishes its work, are a further and effective way to look at how processes worked and what might have been done differently.

More recently, all the chaplaincies have been asked to return information about safeguarding (see 2.11 below) with the intention to produce a map of relative strengths and weaknesses.

The Independent Chair explained that the Operational Oversight Group of DSAC (see 2.3 above) has a quality assurance function, although, as noted, the auditors questioned whether this may overlap with a case management function.

The incoming Chair of DSAC may wish to consider how the group asks itself the question, 'How do we know safeguarding is improving?' and sets out to answer it. Some of the data will be quantitative but data related to the culture of safeguarding and how embedded it is should also be considered.

Considerations for the Diocese

Consider what evidence exists for the view that safeguarding is improving across the Diocese?

2.11 SUPPORT & MONITORING OF SAFEGUARDING IN PARISHES

2.11.1 Archdeacon's responsibilities

The auditors spoke with two of the six archdeacons. Both were chaplains as well as archdeacons, and one made the point that this means that on Sundays she is not travelling to preach at different churches as an archdeacon normally would, but preaching in her own church. This means that opportunities for a more ad hoc monitoring of safeguarding (checking that the policy is on the noticeboard, for example) are reduced. Recognising this Bishop's Council voted in October 2017 to increase the number of full-time paid archdeacons to three by 2019. Full-time archdeacons will be able to spend more time on their responsibility for the oversight of chaplaincies. This is a further sign of the Diocese's serious commitment to safeguarding.

One archdeacon's responsibilities covers a whole country and an island, whilst the other covers several smaller countries. Distances across most of the archdeaconries are huge, and the archdeacons have to operate differently.

The Diocese does not conduct Visitations or Articles of Enquiry. The responsibility given to archdeacons to organise training is perhaps the main mechanism by which they influence the approach to safeguarding.

The auditors were told that the DST attends the archdeaconry and deanery synods, which happen once a year and last three or four days. This gave the DSM and ADSM the opportunity to meet a representative from every chaplaincy, bar one, in one archdeaconry this year.

2.11.2 Support given to chaplaincy safeguarding officers

Members of the Focus Group talked positively about the chaplaincy safeguarding 'log' that they now return to the DST. It includes data on training, police/criminal checks undertaken and numbers and types of referrals/enquiries.

The Diocese is using the data returned for a mapping exercise. Chaplaincies are rated as red, amber or green in different categories although, as it is done on a simple one third/two third/complete basis, it is quite a blunt instrument. A simpler way of grading responses is being trialled. Ultimately, the intention is to have a visual map of areas of strength and weakness regarding the processes that support good safeguarding.

The auditors considered whether a self-audit approach by chaplaincies would be useful but at present the Diocese sees it as more important to ensure compliance with Diocesan safeguarding standards by centrally-led auditing.

At present, there is no ongoing support to CSOs, outside training, synods and cases. Communications about safeguarding are being considered as part of a communications review, and it is likely that safeguarding messages will be included in a new fortnightly e-mail newsletter to all chaplaincies. The Diocese might also explore whether it might be possible to pair up experienced CSOs with new CSOs in the same country, and to look creatively at other ways to keep people up to date and feeling valued.

As stated elsewhere, the previous DSM had recently left his post at the time of the audit. The ways in which this had been communicated to the chaplaincies had resulted in uncertainty about what was happening among the sample of chaplaincy-based people the auditors met. There were also comments about the need to improve communications as part of sustaining the goodwill of volunteers.

Considerations for the Diocese

Consider how to develop the use of the mapping tool so that chaplaincies feel they benefit from it and can use it to inform their own planning.

Consider ways to support CSOs and to make sure that communication is clear and timely.

2.12 RESOURCES FOR CHILDREN AND VULNERABLE ADULTS

2.12.1 Responding to victims/survivors

The Diocese does not have a network of Authorised Listeners and the auditors felt that this could be very difficult to set up and support.

An objective of the strategic plan is to provide effective support to victims and survivors. In 2018, the plan is to identify individuals to provide pastoral support and provide training, and to develop knowledge of and access to relevant counselling services across the Diocese. Because this is part of the strategic plan, no consideration has been made below.

2.12.2 Proactive efforts to create a safe culture

The promotion of a safe culture is primarily done through training. The funding structure of the Diocese means that it has few diocesan posts and would be unable to support specialist ministers or workers for young people, for example.

The auditors were aware, through the review of cases and conversations, that chaplaincy safeguarding officers increasingly find themselves dealing with the problems attached to extreme old age. This is particularly the case in parts of Spain and France, where people retired when in good health, but are now distant from family and often isolated. It may be possible to work with some of the CSOs who have experience of helping such people to provide some guidelines to help congregations feel confident in such circumstances.

Members of the Focus Group talked about problems associated with allegations made by members of the congregation who have suspected or diagnosed mental health conditions. This was most difficult in countries where mental health services are of poor quality. Again, some guidelines for congregations might prove useful in a context where a referral to a statutory agency might result in greater harm to the individual concerned.

Considerations for the Diocese

Consider how to use the experience within some areas of the Diocese to inform quidelines on how to deal with specific safeguarding situations within chaplaincies.

2.13 INFORMATION SHARING

The auditors saw evidence of good liaison and information sharing with other dioceses, both in cases of alleged historical abuse and in a case where a safeguarding agreement needed to be transferred to the church near a holiday property.

There was also good evidence of information sharing with external agencies in some countries. The Diocese is not, of course, the established Church outside England and in some countries it is little known and/or not seen as worthy of respect and cooperation.

An issue came up recently in a northern European country where it was found to be illegal to share information about police checks with the Diocesan Office, unless the subject agreed to the information being shared. The view taken was that people explicitly agree to such information sharing when they sign the Confidential Declaration that accompanies the application for checks.

Considerations for the Diocese

Consider how to keep the transfer of data under review within the context of forthcoming European legislation.

2.14 LINKS WITH NATIONAL SAFEGUARDING TEAM

Links with the NST have strengthened since the meeting in June 2017. The Diocese would value more help from the NST in terms of making practice guidance transferable without losing the high standards expected.

New initiatives take longer to organise and make happen in the Diocese of Europe. The auditors heard some pleas for a slower pace of change as people felt they could not keep up and became discouraged.

3 Conclusion

This section provides the headline findings from the audit, drawing out positives and the areas for improvement. The detail behind these appraisals are in the Findings in section 3.

3.1 WHAT'S WORKING WELL?

- People view the Bishop to be supporting and prioritising safeguarding and the auditors saw case-based evidence of this.
- The Suffragan Bishop is the delegated lead and has a demonstrably strong grasp of safeguarding across the different countries in Europe, and the complexities. He is involved operationally through sign-off of exemptions, for example, as well as being the episcopal reference point for the DST.
- The geographical distance between the bishops and the DST is managed very well and is not seen as a constraint.
- The archdeacons, represented by the two with whom the auditors met, clearly take safeguarding seriously and have a hands-on approach, working positively with the DST.
- The quantity of Level 2 training that has been delivered recently and the positive feedback about it were impressive. Level 2 training was described as promoting a 'sea change' in attitudes and awareness in many places. The whole Train the Trainers programme is very impressive and imaginative in how it is delivered, despite huge distances.
- The chaplaincies have a robust network of safeguarding officers.
- The DST has grown to its current size only very recently, in line with a commitment to increase resources for safeguarding. The team seems very well qualified as a whole. Casework is comprehensive and competent.
- Feedback from the Focus Group was that there is a prompt, clear and helpful response when those out in the Diocese make contact.
- Criminal Records Checks across the countries in the Diocese have been tackled despite the challenges, and are very thorough and with clear high standards which support the protection of children and vulnerable adults.
- DSAC commissioned a review (2014) and from this introduced the Strategic Plan
 which has given a framework for action to improve safeguarding. There is
 general agreement that safeguarding has changed significantly and positively
 over the last three years.
- The use of core groups is strong and the sharing of a formal Lessons Learned Review after each core group winds up is very positive practice.
- The mapping exercise has the potential for being very useful to the Diocese, both centrally and out in the chaplaincies.

3.2 AREAS FOR DEVELOPMENT

The auditors thought that there is potential to develop the mapping exercise so that the chaplaincies are more involved in self-assessment and then making and reviewing their own improvement plans.

The role of Chaplaincy Safeguarding Officer is isolated. A regular newsletter might be a good tool to support them and their work. In addition, there may be the possibility of a buddy/twinning approach to help newcomers.

The auditors shared the concerns of people in the Focus Group about the vulnerability of chaplaincies and individuals in relation to costs of suspension, legal costs and cost of pay-outs because of lack of insurance.

The proposed project to scope out what can be expected right across the Diocese in terms of the national policy and practice guidance, and what is more dependent on local legislative frameworks and/or customs and attitudes, does sound like a very sound idea. However, the auditors thought that it needs to be made clearer what it is intended to cover and to accomplish.

There is no whistleblowing or complaints procedure accessible on the website.

Responding to reports of bullying is an issue and the auditors wondered whether the DST is blurring the lines for their appropriate involvement. However, the auditors also considered that, should the Diocese feel that this is an appropriate use of the DST, due to the particular circumstances of the Diocese, the DST need to feel equipped to advise.

Storage of confidential information can be difficult where there is no parish office and/or parish computer. The Diocese needs to consider how to safely keep and transfer digital information.

The auditors were told that a chaplaincy 'toolkit' covering basic questions such as the safe organisation of church activities is ready to publish on the website, and this would be appreciated by the chaplaincies.

APPENDIX: REVIEW PROCESS

DATA COLLECTION

Information provided to auditors

- Briefing Note
- Self-assessments 2015 and 2016
- Diocesan Internal Review and Executive Summary (2014)
- Briefing Note on Chaplaincy Safeguarding Map October 2017
- Review of PCR Cases 2009
- Core group matrix for a major case
- Statistical Information about criminal record checks and referrals October 2017
- Diocesan Safeguarding Protocol
- DSAC Terms of Reference
- DSAC meeting notes February, June and October 2017
- DSA person specification
- Assistant DSA job profile
- Diocesan Review 2016–17
- Update on Training May 2016
- Summary of numbers trained 30 September 2017
- Level 2 training material
- Notes of a meeting with NST June 2017

Participation of members of the Diocese

The auditors met with:

- The Bishop
- The Suffragan Bishop
- Two of the seven archdeacons
- The Diocesan Secretary
- The Independent Chair of DSAC and the Deputy Chair
- All current members of the DST
- A Focus Group comprising 2 safeguarding officers and 2 safeguarding trainers

The audit: what records / files were examined?

- Nine clergy files, for evidence of safer recruitment
- Ten case records

LIMITATIONS OF AUDIT

The Diocesan Safeguarding Manager left shortly before the audit and his voice was not heard.