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# Independent Safeguarding Audit of Lambeth Palace

Report of Audit March 2022





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## About SCIE

The Social Care Institute for Excellence improves the lives of people of all ages by co-producing, sharing, and supporting the use of the best available knowledge and evidence about what works in practice. We are a leading improvement support agency and an independent charity working with organisations that support adults, families and children across the UK. We also work closely with related services such as health care and housing.

We improve the quality of care and support services for adults and children by:

- identifying and sharing knowledge about what works and what's new
- supporting people who plan, commission, deliver and use services to put that knowledge into practice
- informing, influencing and inspiring the direction of future practice and policy.

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Social Care Institute for Excellence

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# Foreword from SCIE

30 January 2023

SCIE hopes that the independent safeguarding audit reports of Bishopthorpe and of Lambeth palace can be published, if not simultaneously then close in time, by both palaces respectively.

Significant time has passed since the fieldwork for each palace occurred. We know this has caused confusion and concern particularly to the many victims, survivors and supporters who contributed. We apologise. There have been a number of reasons for the time taken. We want to give assurance that none of the factors reduce the independence of the audit or presentation of the audit findings.

The Lambeth Palace audit report will be weightier in length and opportunities for development. This in part reflects the relative status and scale of operations of Lambeth Place. It also reflects differences in the length of time the current Archbishops had been in role at the time of each respective audit.

At the time of the audit, the current Archbishop of York had only recently come into post. With a focus on learning for the present and future, the Bishopthorpe audit did not comment much on the role of the previous Archbishop. Since the Bishopthorpe audit, however, new arrangements for joint working between the palaces have been developed. Therefore, this means that areas that will be raised in the Lambeth Palace audit report, once it is published are likely to be relevant to Bishopthorpe Palace.

Some of the issues highlighted and discussed in both audits will have already changed and progressed. In relation to others, publication allows wider discussion and the chance to move forward in partnership with victims and survivors.

The generosity with which so many victims and survivors of clergy and Church-related abuse contributed to both audits has been humbling. We thank you.

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# 1 INTRODUCTION

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## 1.1 THE AUDIT PROGRAMME

1.1.1 The Social Care Institute for Excellence (SCIE) was delighted to be asked, in 2015, to provide independent audits of the safeguarding arrangements of the dioceses, cathedrals and palaces of the Church of England. This was the first ever national programme of independent safeguarding audits across the dioceses and cathedrals of the Church of England. It represents a significant investment by the Church of England, and an important opportunity to support improvement in safeguarding.

1.1.2 Phase one of this programme of work took place between July 2015 and February 2018, when 42 diocesan safeguarding audits were completed. Phase two comprised audits of all 42 Anglican cathedrals, together with the palaces of Bishophorpe and Lambeth, and commenced in late 2018. Four cathedral audits were completed in 2018 and 19 in 2019 before a hiatus due to Covid-19 led to all audit activity ceasing for 12 months. The programme restarted with the audit of Bishophorpe Palace in November 2020 and will conclude in 2022, following the audit of safeguarding arrangements at Lambeth Palace and the safeguarding role of the Archbishop of Canterbury.

### About SCIE

1.1.3 SCIE improves the lives of people who use care services by sharing knowledge about what works.

1.1.4 We are a leading improvement support agency and an independent charity working with adult, family and children's care and support services across the UK. We also work closely with related services such as health care and housing.

1.1.5 Safeguarding is one of our areas of expertise, for both adults and children. We have completed an independent safeguarding audit of diocesan arrangements across the Church of England as well as supporting safeguarding in other faith contexts. We are also committed to co-producing our work with people with lived experience of receiving a service/ response in the setting at hand.

1.1.6 You can find out more about us on our website [www.scie.org.uk](http://www.scie.org.uk).

### SCIE Learning Together and our approach to audit

1.1.7 SCIE has pioneered a particular approach to conducting case reviews and audits in child and adult safeguarding that is collaborative in nature. It is called Learning Together and has proved valuable in the adults' and children's safeguarding fields. It is built on work in the engineering and health sectors that has shown that improvement is more likely if remedies target the underlying causes of difficulties, and so uses audits and reviews to generate that kind of understanding. Learning Together involves exploring and sharing understanding of both the causes of problems and the reasons why things go well.

### Key principles informing the audit

1.1.8 Drawing on SCIE's Learning Together model, the following principles underpin the approach we take to the audits:

- working collaboratively: the audits done 'with you, not to you'

- highlighting areas of good practice as well as problematic issues
- focusing on understanding the reasons behind inevitable problems in safeguarding
- no surprises: being open and transparent about our focus, methods and findings so nothing comes out of the blue
- distinguishing between unique local challenges and underlying issues that impact on all or many cathedrals/ palaces.

## **Supporting improvements**

1.1.9 The overarching aim of each audit is to support safeguarding improvements. To this end our goal is to understand the safeguarding progress of each cathedral and palace to date. We set out to move from understanding how things work, to evaluating how well they are working. This includes exploring the reasons behind identified strengths and weaknesses. Our conclusions will pose questions for the leadership to consider in attempting to tackle the underlying causes of deficiencies.

1.1.10 SCIE methodology does not conclude findings with recommendations. We instead give the Palace, in this instance, questions to consider in relation to the findings, as they decide how best to tackle the issue at hand. This approach is part of the SCIE Learning Together audit methodology. It requires those with local knowledge and responsibility for progressing improvement work, to have a key role in deciding what exactly to do to address the findings and to be accountable for their decisions. It has the additional benefit of helping to foster ownership locally of the work to be done to improve safeguarding.

## **The process**

1.1.11 The process involves reviewing documentation as well as talking to key people, including focus groups. Further specifics related to the process of the Lambeth Palace audit are provided below.

## **1.2 THE LAMBETH PALACE AUDIT**

### **Focus of the audit**

1.2.1 The audit of Lambeth Palace had a dual focus. One aspect was the general safeguarding arrangements at the Palace and the safeguarding work done by Lambeth Palace staff; the other, the national leadership role of the Archbishop of Canterbury in respect of safeguarding. These two functions are both based at the Palace and exploring the interface between the two elements was a distinct aspect of the audit. The rationale for this dual focus was the significance of the Archbishop of Canterbury as the figurehead and moral leader of the Anglican Church, and the associated public perception of Lambeth Palace as 'head office' for the Church as well as the Archbishop's workplace and residence. The auditors are aware that this is a point of contention for Lambeth Palace as it is not strictly accurate either in relation to the identity or to the function of Lambeth Palace, given the constitutionally devolved nature of the Church. Equally, however, the auditors regard this belief as representing a legitimate expectation of leadership, authority and accountability of the Church as a whole, which is particularly pertinent in relation to safeguarding. For victims and survivors, where else might they escalate their concerns and their experiences of abuse within the Church if not to the Archbishop of Canterbury as head of the Church of England? This issue is discussed further in section 7, on leadership and management.

1.2.2 There was, nevertheless, a particular challenge in exploring the national leadership role of the Archbishop without simultaneously conducting an audit of the national Church per se. The auditors were conscious, therefore, of the partial view that they may have gained about the contribution made by other NCIs (National Church Institutions) to the Church's overall approach to safeguarding and have sought to indicate this where relevant.

1.2.3 Lambeth Palace commissioned an internal audit of the Palace's safeguarding arrangements in early 2021, which was conducted by two reviewers who were already working on PCR2 (Past Cases Review, part 2) at the Palace. This internal audit made use of the general SCIE approach and resulted in a report (May 2021) which was used as the basis for an action plan over 12 months preceding the SCIE independent audit. In order to make use of time, and ensure proportionality, the auditors quality appraised the audit report and ensuing action plan. They noted that the audit was thorough, of good quality and particularly strong in its appraisal of areas such as the safety arrangements for the premises and the library, and arrangements for recording, sharing and storing information. Other aspects of the report, primarily relating to leadership, management and culture, were more cursory. Where the internal audit highlighted areas for improvement, the current auditors checked that these had been addressed and were being consistently applied.

### **Who was seen in this audit**

1.2.4 This audit involved reviewing documentation and case files and talking to people at the heart of safeguarding in the Palace, including the Archbishop and a range of clergy, lay staff and volunteers. Conversations were also held with a small number of relevant staff who work elsewhere across the Church of England, or for external organisations in roles relevant to safeguarding at Lambeth Palace, in the Province of Canterbury or over the wider Church.

1.2.5 In addition, a focus group included a cross-section of Palace staff and volunteers in roles that are not primarily about safeguarding but have an impact on how safeguarding is seen and practised at the Palace.

1.2.6 In the weeks before and after the audit, the auditors talked with a number of survivors and others who had received a safeguarding response from Lambeth Palace, who provided invaluable information and perspectives and helped to inform lines of enquiry. Their input is reflected in the audit report in ways that allow for the preservation of confidentiality and their anonymity.

1.2.7 To help gauge opinions about the Archbishop's national strategic leadership role as regards safeguarding, members of key bodies and those with national safeguarding responsibilities were asked for their views in writing about what had worked well and less well, how the Archbishop's leadership of safeguarding could be improved, and what they thought were priorities for action to strengthen safeguarding arrangements further. Eight people responded from among the following bodies the Survivor's Reference Group, NSSG (National Safeguarding Steering Group), NST (National Safeguarding Team), NSP (National Safeguarding Panel), ISB (Independent Safeguarding Board) and the Archbishops' Council. In addition, a few individuals responded to the general invitation to contribute and were spoken with in person by the auditors.

1.2.8 Lists of people interviewed and of documentation provided are in the appendix to this report.



## **Contributions of those with firsthand experience of a safeguarding response**

1.2.9 In the weeks prior to the audit, as noted earlier, anyone who had experienced a safeguarding response from Lambeth Palace and who wished to contribute to the audit was invited to contact SCIE. Thirty-two individuals came forward, of whom 24 were spoken with directly before or in the week following the auditors' site visit. A further eight wrote detailed accounts of their experiences and views. Of the group, 25% were clergy, a further 25% were lay Church officers, one was a young person aged under 18. Several still held positions within the Church of England. Many were professionals in their chosen field of expertise. The majority were victims or survivors of abuse by a Church officer; one was a supporter. A small number had been accused of abuse or misconduct themselves; or spoke on behalf of another who was an alleged perpetrator. Most had direct or indirect involvement in the Clergy Disciplinary Measure (CDM) process, and/or the safeguarding processes overseen by the NST.

1.2.10 Each individual had their own unique story to tell, and in some instances, this went back many years. For others, their experiences were very recent. Their points of contact with Lambeth Palace varied – sometimes with the former PSA (Provincial Safeguarding Advisor) (when they were based at the Palace), sometimes with current or previous lay staff, sometimes with current or former clergy, including the Archbishop. Sometimes contact was informal; sometimes it was formal, through involvement with a CDM. Often, the individual initiated the direct contact with Lambeth Palace in the belief that, as the base of the Archbishop of Canterbury, and by implication, the 'head office' of the Church of England, someone had the power to 'do something' if a concern was brought to their attention.

1.2.11 Although some had lost their faith as a result of their experiences, and others had retained their faith but lost confidence in the Church of England, the majority were keen to emphasise that they wanted to contribute to positive change by the Church, to make it a truly safe place for victims and survivors. There was significant collective wisdom about the kind of changes they thought would help to achieve this.

1.2.12 The auditors are deeply grateful to all who shared their experiences with such honesty, recognising that, for many, telling their stories was at significant emotional cost.

### **The timing and context of the audit**

1.2.13 The audit of Lambeth Palace was the final one in a programme of independent safeguarding audits that had encompassed every diocese and cathedral across England, as well as Bishopthorpe Palace (home and workplace of the Archbishop of York). An overview report of the independent diocesan safeguarding audits and additional work on improving responses to survivors of abuse was published by SCIE in March 2019, which provided a summary of learning from all 42 diocesan audits and drew out underlying, systemic issues that represent barriers and vulnerabilities to the creation of a safer Church for all.

1.2.14 In 2019, the Independent Inquiry on Child Sexual Abuse (IICSA) held a public hearing on the extent to which the Church of England and the Church in Wales protected children from sexual abuse in the past. It also examined the effectiveness of current safeguarding arrangements in the two Churches, drawing on two previous case studies, which related to the Diocese of Chichester and Peter Ball (published in May 2019). The full investigation report on the Anglican Church was published in October 2020.

1.2.15 NSSG has responsibility for the strategic oversight of national safeguarding activity within the Church. This included overseeing the Church of England's response to the recommendations of the IICSA and engaging directly with the dioceses regarding the implementation of any recommendations arising from the safeguarding audits of the dioceses. The Church of England published its detailed responses to the recommendations of the IICSA report on 29<sup>th</sup> March 2021, accepting in full the recommendations made by the Inquiry.

1.2.16 In this context, it is arguably right that expectations regarding safeguarding arrangements in Lambeth Palace and related to the Archbishop, ahead of the audit, were higher than they would have been had the audit taken place at the start of SCIE's work, before IICSA ran or reported.

1.2.17 The original planned date for the audit at Lambeth Palace was March 2021. This was rescheduled due to lockdowns and associated disruption arising from the Covid-19 pandemic. At the time of the site visit, many staff who had worked from home throughout the pandemic were returning to work on site for at least part of their time. Others who had been recruited to their post during the past two years were new to their surroundings, despite having been in their role for some time. The Assistant Chief of Staff, originally the liaison person for the audit, left post shortly before the audit began. Their recent departure has left a significant gap in the capacity of the senior team and means that the Chief of Staff currently manages all operational functions. This includes the safeguarding function and the LPSO (Lambeth Palace Safeguarding Officer).

1.2.18 At the time of the audit, the national PCR2, was just concluding. This meant that most safeguarding files held at the Palace had been recently reviewed. The auditors did not repeat this review, but its outcomes informed their work.

### **Methodological comment and any limitations on the audit**

1.2.19 As already acknowledged, there were challenges in determining the boundaries of the audit, both externally, in relation to the wider Church, and internally, given that some of the functions based in the Palace (the library, the Faith in Public Life team) 'belong' to different NCIs or were led by them (e.g. recruitment). Others (the two religious communities) have governance arrangements which are separate from those of the Church of England. The auditors have tried to make clear where these issues are significant in safeguarding terms and need addressing by the Church as a whole. In addition, such an audit has not been undertaken before, and hence both methodology and the template for the report itself had to be developed especially for the task. Neither are necessarily a perfect fit, given the complexity of the subject matter.

1.2.20 The people spoken with from the Palace itself were primarily a selection of clergy and managers who had a significant role in relation to safeguarding. Others, who would also have been relevant to speak with, were not spoken with due to limitations of time. Limited access to staff meant that some information could not be checked to establish whether the desired impact and outcomes were achieved. Volunteers, with one exception, had all been stood down at the outset of the pandemic and new arrangements were in the process of being put into place. The auditors therefore heard about plans and intentions, without being able to check these operationally.

1.2.21 The responses from national bodies to the invitation to submit views in writing were disappointingly small in number. While responses received were thoughtful and insightful,

the auditors were concerned that the lack of engagement in an area of work which is a stated priority for the Church may be reflective of a wider view that safeguarding is not seen as important by many who are in positions of significant responsibility and influence. Alternatively, the small number of responses may reflect a general reluctance to comment on the role of the Archbishop and Lambeth Palace in relation to safeguarding.

1.2.22 As a result of a recent clarification by the Information Governance Officer (IGO), following legal advice from the NCI legal office, the auditors did not have access to any CDM files. This was a significant limitation, as it did not enable them to check the degree to which safeguarding issues are recognised, addressed and appropriately responded to at any stage in the CDM process. Alternative, more generalised sources and reports had therefore to be sought out, supplemented by the valuable testimony of those who came forward to share their experience of the CDM process. The other effect of this ruling was that decisions to remove, suspend or reinstate the Permission to Officiate (PTO) of current and retired clergy, where this was an outcome of a CDM, could not be appraised. How best to allow an independent audit of aspects relevant to safeguarding, despite the legal situation as regards CDMs, is raised in section 5.2.

1.2.23 The role of the Archbishop in relation to the allegations made against John Smyth was referred to by some victims, survivors and others. The auditors did not include this case because a national review – commissioned by the Church - is already underway and (at the time of the audit was) due to report later in 2022. The auditors were aware that other high-profile cases, which are or have been in the public domain, are also subject to review either by the Church or another body (such as the Charity Commission), so were similarly out of scope of this audit. However, the experiences of survivors related to these cases who came forward to speak with the auditors have been included in the analysis.

1.2.24 The auditors would like to acknowledge the focus given to the audit by the Archbishop and the Chief of Staff. They both gave generously of their time over the four-day site audit.

## **1.3 STRUCTURE OF THE REPORT**

1.3.1 This report includes the following:

- messages from victims and survivors with first-hand experience of Church responses
- introductory paragraphs to each area, including contextual information regarding the wider Church as well as Lambeth Palace
- the findings of the audit presented per theme
- questions for the Palace to consider listed, where relevant, at the end of each Findings section
- overall conclusions of the auditors' findings: what is working well and areas for further development
- an appendix, which sets out the audit process and any limitations to this audit.

1.3.2 The findings are presented in four different sections:

- safer working practices within Lambeth Palace
- safeguarding practice
- organisational supports
- leadership and management.

1.3.3 The findings report on and reflect arrangements as existed at the time of the audit fieldwork. They do not include changes or developments that have taken place since.

1.3.4 Each analysis section begins with a summary paragraph.

## 2 MESSAGES FROM VICTIMS AND SURVIVORS WITH FIRST HAND EXPERIENCE OF CHURCH RESPONSES

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### 2.1 THE VOICE OF VICTIMS AND SURVIVORS IN THE DIOCESAN SAFEGUARDING AUDIT PROGRAMME

2.1.1 The diocesan audit programme (undertaken between July 2015 and February 2018) included an independent, confidential survey run by SCIE seeking the views of anyone who had received or expected to receive a response from the Church of England related to safeguarding. Sixty people contributed via the survey, making it the largest evidence base that exists for the Church of England. The findings can be found in the diocesan overview report.<sup>1</sup> The original SCIE survey and themes from those who contributed to this audit are summarised here to give a sense of the terrain and experiences where moral authority and leadership is, and remains, needed.

2.1.2 Themes drawn from the survey illuminate features of what good practice looks like, from the perspective of people on the receiving end of Church safeguarding responses, differentiated across five different stages of engagement with people who come forward:

- stage one - making it easy to tell someone
- stage two - when initially told
- stage three - throughout the processes that follow
- stage four - grievances and complaints
- stage five - after processes have ended

All stages included what's important, what to avoid, and particular situations/ circumstances to be recognised.

2.1.3 When asked how long it took after someone in the Church first knew about their situation for a meaningful response to be received, the majority reported that they had never received a meaningful response from the Church. Asked how satisfied they were with the timeliness and quality of Church responses, participants who replied were also overwhelmingly unsatisfied. When asked what a good Church response should look like, participants in the survey provided a wealth of detail. What stood out was how reasonable their expectations were. The findings are also stark in their consistency and compatibility.

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<sup>1</sup> **SCIE Final overview report of the independent diocesan safeguarding audits and additional work on improving responses to survivors of abuse.pdf (churchofengland.org)**

(<https://www.churchofengland.org/sites/default/files/2019-04/SCIE%20Final%20overview%20report%20of%20the%20independent%20diocesan%20safeguarding%20audits%20and%20additional%20work%20on%20improving%20responses%20to%20survivors%20of%20abuse.pdf>).

## 2.2 THEMES FROM THOSE WHO CONTRIBUTED TO LAMBETH PALACE AUDIT

2.2.1 Many of the people who came forward to contribute to the Lambeth Palace audit had experiences of Church responses far wider than just that of Lambeth Palace. Some had stories that went back many years; for others, their experiences were very recent. Despite the variation in experiences, responses, timing, and nature of contact, common themes were discernible. These closely mirrored the themes from the diocesan audits.

2.2.2 Where individuals had a positive experience, whether or not this was from Lambeth Palace in particular or from other parts of the Church, they commented on the relief at being believed and highlighted positive, caring, compassionate, helpful responses by people who followed through on their promises. The availability of and continuing support from an Independent Sexual Violence Advisor (ISVA) via a diocese was seen as invaluable. On occasions, individuals commented on positive changes (e.g. to training and information) made by the Church in response to their feedback. One commented that their positive experience 'had depended on strong, wise individuals to make things happen, rather than a system'.

2.2.3 The majority recounted negative experiences, some of which were specific to Lambeth, others more general in relation to the Church and its processes. People described not being listened to, feeling disbelieved, being treated with cruelty rather than compassion, encountering an absence of clear process – *'every process is difficult'*, *'as a survivor you keep getting put in touch with a new person'* – or processes that felt designed to hurt rather than help, a lack of transparency and accountability, perceived conflicts of interest, being treated as if they were the problem, feeling the Church was looking after itself rather than victims of abuse. The NST safeguarding processes were experienced as particularly negative, with concerns expressed about core groups, conflicts of interest and collusion by senior clergy, Church officers, lawyers and insurers, along with poor communication, protracted timescales and a lack of care. The loss of faith experienced by some has added to their pain.

2.2.4 Throughout it all, the auditors were struck by how little most victims and survivors, especially, were asking for. People wanted to be listened to and heard, to be cared for and supported, to be treated with humanity; for the Church to tell the truth, be concerned about their wellbeing and to keep its promises. They asked for acknowledgement when things had gone wrong, and for someone to say 'sorry'. They wanted processes to be straightforward, transparent, just, and independent; not to be treated as the problem or fobbed off; for leaders to be held to account, *'to walk the walk, not just talk the talk'*.

## 2.3 SYSTEMIC BARRIERS TO ACHIEVING GOOD PRACTICE AND PARTNERSHIP WITH VICTIMS AND SURVIVORS

2.3.1 In the summary report following the diocesan safeguarding audits, SCIE drew out key systemic issues that prevented the Church from making progress toward achieving good practice in its engagement with survivors. Engaging directly through the survey with people who have first-hand experience of Church responses raised additional issues that, on their own, the audits did not reveal.

2.3.2 The additional issues highlighted by the survey included:

- partial histories of the Church's safeguarding journey that obscure the key role of survivors
- limited telling of the difficult stories about abuses and abuse in Church contexts
- a lack of role models and leadership about personally holding your hands up to past failures to respond well to disclosures of abuse or safeguarding concerns
- the mismatch between the provision of short-term support and the profound, lifetime impact of abuse by clergy and people in Church-related roles
- omission of guidance for victims and survivors thinking about coming forward to share safeguarding concerns
- missing 'golden thread' throughout all policy and practice guidance about keeping victims and survivors at the heart of everything
- an insufficiently person-centred allegations management process
- weak articulation of the expectation of positively valuing every person coming forward to disclose abuse for their contribution to creating a safer Church
- no requirement routinely to seek feedback from people who have received a safeguarding response nor proactive identification of complaints about safeguarding responses.

2.3.3 An additional issue, identified through the audit programme as important in promoting confidence in safeguarding arrangements, was the need for clear and explicit policies and procedures for both complaints and for whistleblowing as an integral part of safeguarding practice within each diocese, and across diocesan boundaries to encompass the whole Church. These need to be accessible to the staff and the public, explain the scope of what is covered, provide for a three-staged complaints procedure (informal; independent investigation; appeal) and include a distinct whistleblowing procedure. The need to distinguish the role of CDM as a disciplinary process, rather than a complaints investigation, is an area which was also recognised as necessary. There is further discussion of all these areas (complaints, whistleblowing and CDM) in the report.

2.3.4 Further work, conducted by SCIE and Minister and Clergy Sexual Abuse Survivors (MACSAS) to support a transition toward genuine partnership and co-production with survivors, also revealed some fundamental obstacles to partnership. Core to these obstacles is the mismatch people experience between the Church that is offering an outstretched hand of partnership and the same Church whose very actions and processes continue to block personal resolution and often inflict further layers of abuse, betrayal and conflict. Acknowledging past failures to respond well to individuals, especially on the part of clergy who now hold senior roles, together with evidence of working to achieve personal resolution for survivors of clergy and Church related abuse and re-abuse in an open, compassionate way, are likely, understandably, to be a prerequisite to wider, strategic partnership.

2.3.5 Much effort has been made by the national Church to strengthen the robustness of safeguarding preventatively to reduce numbers of new victims and survivors. There has been a start made in addressing some of these issues at a national level, such as the pilot

redress scheme. Many have not yet been addressed or taken forward but the litmus test of Church of England safeguarding will be in how existing victims and survivors are treated, the extent to which past errors and injustices are acknowledged and addressed, and the dedication put to helping rebuild destroyed lives.



## 3 CONTEXT OF SAFEGUARDING AT LAMBETH PALACE

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This section is descriptive. It provides contextual information about Lambeth Palace that is relevant to safeguarding and therefore forms the backdrop to the audit findings that are presented in the subsequent sections. It gives a brief summary of the Church of England's organisational structure and development related to safeguarding, the role of the Archbishop of Canterbury, and the functions of and at Lambeth Palace. It ends with an overview of the safeguarding structure at Lambeth Palace.

### 3.1 THE CHURCH OF ENGLAND'S ORGANISATIONAL STRUCTURE & DEVELOPMENTS RELATED TO SAFEGUARDING

3.1.1 The Church of England is the established Church in England, and the monarch is its supreme governor. The Archbishop of Canterbury is the Primate of All England in recognition of his lead ecclesiastical role in England. He is regarded as the nation's senior Christian and spiritual voice. There are two provinces in the Church of England, the Province of Canterbury (with the Archbishop of Canterbury as Metropolitan) and the Province of York (with the Archbishop of York as Metropolitan).

3.1.2 The governing structure of the Church is constitutionally decentralised, with 42 dioceses. Each of the 42 dioceses is overseen by a diocesan bishop and most are supported by other (suffragan or area) bishops. There are 115 bishops in total. Each of the diocesan bishops along with their leadership teams are responsible for the care of parishes and clergy in that diocese. Each diocese is a charity in its own right with its own financial and safeguarding responsibilities.

3.1.3 **Lambeth Palace** is one of seven bodies, collectively known as the **National Church Institutions (NCIs)**, which undertake work for the Church of England. Their purpose is to support the mission and ministries of the Church by working with those who serve in parishes, dioceses, schools and other ministries, and with partners at a national and international level.

3.1.4 The seven NCIs are:

- the Archbishops' Council
- the Archbishop of York (in his corporate capacity)
- the Church Commissioners
- the Church of England Central Services (HR, Finance, IT, Legal, Data Services, Communications)
- the Church of England Pensions Board
- the Archbishop of Canterbury (in his corporate capacity)
- the National Society for Promoting Religious Education.

3.1.5 The NCIs are separate legal entities, but they are a common employer. The chief officers of each NCI meet together as a Senior Leadership Team (SLT), chaired by the Secretary-General of the Archbishop's Council. The Archbishops themselves are title holders rather than employees.

3.1.6 The **General Synod** is the national assembly of the Church of England. It considers and approves legislation affecting the whole of the Church, formulates new forms of worship, debates matters of national and international importance, and approves the annual budget for the work of the Church at national level. The 483 members of General Synod are arranged in three Houses – of bishops, clergy and laity.

3.1.7 The **Archbishops' Council** is a charity, set up in law to coordinate, promote, aid and further the work and mission of the Church of England. It does this by providing national support to the Church in dioceses and locally, working closely with the House of Bishops and other bodies of the Church. The Archbishops' Council has nine objectives, one of which is 'To ensure all children and vulnerable adults are safe in the Church'. It has trustee responsibility for the Church of England's national safeguarding work and oversees the work of the **National Safeguarding Team (NST)**, which manages complex safeguarding cases (involving a number of dioceses) and those relating to senior clergy including bishops and deans. The NST is also responsible for leading on House of Bishops safeguarding policy and practice guidance and developing safeguarding training.

3.1.8 The Church of England comprises 42 **dioceses**, each headed by a diocesan bishop who is responsible for safeguarding arrangements in their diocese. The dioceses are grouped into two provinces – Canterbury, in the South of England, comprising 30 dioceses covering roughly two-thirds of England, parts of Wales, and the Channel Islands, with the remainder comprising continental Europe (under the jurisdiction of the Diocese in Europe) and York, in the North, comprising 12 dioceses which cover the northern third of England and the Isle of Man. The **provinces** are administrative entities and have limited functions which are distinct from the dioceses, including in relation to safeguarding. Each province has a **head or primate - the Archbishops of Canterbury and York**, respectively. The Archbishop of Canterbury is the most senior cleric.

3.1.9 There having been previously no formal structural relationship between the two provinces, the past two years have seen a restructuring of the relationship and support available to both archbishops. The post of Bishop at Lambeth ceased following the retirement of the previous postholder, and an appointment was made in 2021 to the new post of **Bishop to the Archbishops of Canterbury and York (BACY)** within a new joint **Office to the Archbishops of Canterbury and York (OABCY)**. This post provides a listening ear to bishops and supports the growing collaboration between Lambeth and Bishopthorpe Palaces. The OABCY is headed jointly by the two chiefs of staff in Lambeth and Bishopthorpe Palaces and is still in development. The impact on safeguarding responsibilities is being mapped out, and initial decisions have been made on the division of tasks and responsibilities, including attendance at key groups such as the **National Safeguarding Steering group (NSSG)** and the **National Safeguarding Panel (NSP)**. The Lambeth Palace Chief of Staff is the Safeguarding Lead for the Palace, and the BACY has leadership responsibility for wider strategic issues such as the safeguarding culture as it relates to bishops.

3.1.10 The NSSG is responsible for the strategic oversight of national safeguarding activity on behalf of the NCIs and for overseeing the work of the NST. It is chaired by the Lead

Bishop for safeguarding (at the time of the audit, this was the Bishop of Huddersfield) and reports to the Archbishops' Council.

3.1.11 The independently chaired NSP was set up in 2018 to resource the Church of England's leadership (Archbishops' Council and House of Bishops) with good high-level strategic advice and direction on safeguarding and to provide reference and scrutiny from a range of voices, including survivors, on the development of policy and guidance. The chair is a member of the NSSG.

3.1.12 **IICSA** (the Independent Inquiry into Child Sexual Abuse) published its investigation report into the Anglican Church in October 2020, having published a previous investigation report of its case studies of the Diocese of Chichester and the response to allegations against former bishop Peter Ball in May 2019. It concluded that 'much has improved, in terms of governance, training, audit, personnel, policies and procedures' and that leaders had 'demonstrated a determination to make necessary changes to keep children safe' but identified the need to translate determination into action, a lack of challenge in decision-making, areas of insufficient oversight and a need to improve engagement with and support for victims and survivors. It made six recommendations for change, which were accepted in full by the Church.

3.1.13 **The Independent Safeguarding Board (ISB)** was set up in 2021, following a decision by the Archbishops' Council and House of Bishops in 2020 to support the development of a more independent structure to deliver professional supervision and quality assurance across its safeguarding activities. The 2020 IICSA report (*The Report of the Independent Inquiry into Child Sexual Abuse*) gave additional momentum to this decision. It is envisaged that the ISB will have both executive and advisory functions. In phase 1 of its operation, it will provide direct oversight of the NST and supervision for the National Director of Safeguarding. Also during Phase 1, the bishops will retain legal responsibility for safeguarding in their dioceses but will receive advice and policy guidance from the ISB. It is not yet clear how the interface between the NSP and the ISB will work, assuming they both remain in place. The ISB has not yet become fully operational.

3.1.14 Following the IICSA hearings, the Church's General Synod committed to a more victim- and survivor-centred approach to responding to the needs of all kinds of survivors of all types of Church-related abuse. This includes making arrangements to provide redress. An **interim support scheme** was put into place in late 2020, pending the introduction of the full **redress scheme**, scheduled for 2023. This was intended to give immediate help and support to survivors whose life circumstances are significantly affected by the abuse suffered, and the response to it. The scheme is designed to address immediate and urgent needs that help in the short term to put the survivor's life back on track, pending the introduction of a more comprehensive redress scheme. A strategic approach to co-production in safeguarding, with survivors of abuse by clergy and those in Church-related roles proposed by the Survivor Reference Group, has not been accepted or progressed.

3.1.15 Following court appearances by several clergy and Church officials charged with sexual offences against children, the Church initiated a **Past Cases Review, part 1 (PCR1)** in 2007. An independent panel was then commissioned in 2016 to review the PCR1 process and outcomes, with a remit that included preparing a report, for submission to IICSA, setting out findings and recommendations. The panel commented on '*the strong policy, procedures and training foundations which have now been laid*' and recommended

that a further review be carried out in specified dioceses where shortcomings had been identified. This second review which is known as **PCR2**, and was at the time of the audit close to completion, having been delayed by the Covid-19 pandemic.

3.1.16 The *Guidelines for the Professional Conduct of the Clergy* were revised in 2015 and reflect explicitly the changed expectations regarding safeguarding of children and adults at risk. The joint foreword from the archbishops explains how the guidelines are framed as an elaboration of the text of the Ordinal and are designed to offer a spiritual and pastoral framework for vocation and ministry in the Church.

3.1.17 To start addressing better the needs of victims and survivors, the Church commissioned Victim Support to provide '**Safe Spaces**', a free and independent support service, providing a confidential, personal and safe space for anyone who has been abused by someone in the Church or as a result of their relationship with the Church of England, the Catholic Church in England and Wales or the Church in Wales. This was launched in September 2020. Shortly after, the interim support scheme was put into place.

3.1.18 The audit took place before the publication of the Makin Review, sponsored by the Church of England, into the abuse perpetrated by the late John Smyth. Other organisations involved in facilitating or covering up the abuse have published their reports. It is likely that the Makin Review will include recommendations for action which will need a response. In the view of the auditors, this response should be formulated with and for the known survivors.

## 3.2 THE ARCHBISHOP OF CANTERBURY

3.2.1 The Archbishop of Canterbury is the Primate of All England. The Archbishop is also *primus inter pares* – 'first among equals' – among the Primates of the 42 Provinces of the worldwide Anglican Communion. The Archbishop is one of the four Instruments of Communion and a Focus of Unity for the Communion. Approximately 25-30% of his role relates to his Anglican Communion responsibilities, plus time for pastoral care and support. He is the Metropolitan for the Province of Canterbury, encompassing 30 dioceses in the southern two-thirds of England with one in Europe, and the diocesan bishop of the Diocese of Canterbury. He is a Privy Councillor, sits in the House of Lords and plays a central part in national ceremonies such as the funeral of a monarch and the coronation of a new monarch. The current Archbishop is Justin Welby, who was installed at Canterbury Cathedral on 21 March 2013.

3.2.2 The Archbishop of Canterbury and the Archbishop of York share leadership responsibility at a national level as joint presidents of the Archbishops' Council (one of the seven NCIs, and a registered charity) and General Synod, which is the legislative body of the Church. The Archbishops are two of the eight members of the House of Bishops' Standing Committee, which sets the agendas for the House of Bishops meetings. The House of Bishops is one of the three houses of the General Synod.

3.2.3 The Archbishop of Canterbury has metropolitan authority (a supervisory authority for defined purposes) in relation to all bishops and clergy in the 30 dioceses in southern England; the Archbishop of York has equivalent authority over the 12 dioceses in the Province of York. Given the very high profile of the roles, both archbishops are commonly assumed to be in a hierarchical relationship with the dioceses, and to have management oversight of bishops, deans and diocesan matters in general. Due to the constitutionally

devolved nature of the Church, this is not the case, except in specific areas, such as clergy discipline involving senior clergy (mainly bishops). See section 5.2 for details.

3.2.4 The Archbishop of Canterbury, in particular, has considerable moral authority as well as access to a broad public platform from which he is able to speak on behalf of the Church. His opinions are often in demand by the media. In the words of one victim/survivor, 'his words – and his silence – have disproportionate weight'.

3.2.5 In terms of safeguarding, the Church of England's safeguarding policy '*Promoting a Safer Church*' gives the two archbishops responsibility for providing leadership and direction; ensuring that diocesan bishops engage in safeguarding induction and training; and directing the archbishop of another province or a bishop to undergo a risk assessment. They are also required to appoint a bishop with lead responsibility for safeguarding children and adults and appoint the members of the NSSG. As leaders of the Archbishops' Council, they have responsibility for such practical matters as ensuring robust safeguarding arrangements are in place across the Church and overseeing safeguarding finances, operations and risk management. In addition, if a complaint is brought against a diocesan bishop and it includes safeguarding concerns, the relevant Archbishop can suspend them with the consent of the two most senior bishops in the province.

### 3.3 LAMBETH PALACE

3.3.1 Lambeth Palace is the centre of the Archbishop's ministry, worship and hospitality. It is situated in London, on the south bank of the River Thames, almost opposite the Palace of Westminster, which houses the Houses of Parliament. It has been the London residence of the Archbishop of Canterbury since its creation in the late 12th century. The oldest parts of the Palace date from that time. Entry is still via the early Tudor brick gatehouse (completed in 1495) on Lambeth Road.

3.3.2 The site comprises the main Palace building, a series of ancillary buildings which have been converted for residential use, a newly built library and extensive gardens (of around 10 acres). It is surrounded on all sides by a high brick wall or equally high fencing. Three sides of the site are bordered by public roads, the other by a well-used public park. Its location close to the centre of government and its function as the symbolic headquarters of the Church of England means that the Palace is vulnerable to acts of terrorism, violence and intimidation. Within the last five years there have been three significant terrorist incidents in the vicinity.

3.3.3 The Lambeth Palace Library is the principal repository of records of the Church of England and describes itself as 'the largest religious collection outside of the Vatican'. Until 2021 it was located within the main Palace complex. A new purpose-built library and repository opened in 2021, located at the far end of the Palace gardens, with its entrance on Lambeth Palace Road.

3.3.4 As well as being the London home of the Archbishop of Canterbury and his family, the Palace houses two religious communities and is the workplace for the Archbishop's staff. It comprises one of the seven NCIs which collectively undertake work for the Church of England and jointly support the mission and ministries of the Church by working with those who serve in parishes, dioceses, schools and other ministries, and with partners at a national and international level. Staff from other NCIs, based nearby, use the gardens for

recreation during their spare time in the working day. The Palace is often described as a 'community of communities.'

3.3.5 The Palace is used increasingly as an events venue for organisations and charities. During the summer the large garden is regularly used for receptions and outdoor activities.

### 3.4 DESCRIPTION OF THE SAFEGUARDING STRUCTURE

3.4.1 The Archbishop of Canterbury holds ultimate accountability for the safeguarding arrangements at Lambeth Palace. In the Palace, the Archbishop is supported in this task by numerous others, who operate across the national Church or have their focus entirely within the Palace.

- **The Chief of Staff and Strategy** is the most senior lay employee at the Palace. Following the recent resignation (just prior to the SCIE audit beginning) of the Deputy Chief of Staff, he is fulfilling the role of safeguarding lead for the Palace. He chairs the Palace Safeguarding Reference Group (SRG) and oversees the work of the Lambeth Palace Safeguarding Officer (LPSO). He also has roles across the other NCIs, as a member of the Church's (lay) SLT.
- The BACY is a new post within the new joint OABCY. The postholder takes the lead in strategy/policy matters as regards safeguarding on behalf of the palaces. The Bishop becomes involved in more detailed operational and casework matters only by exception. The joint office deals primarily with CDMs for bishops of the Province of Canterbury, working closely with the Provincial Registrar as needed. CDMs concerning bishops in the Province of York are handled at Bishopthorpe Palace. The Executive Assistant (Metropolitan) (EAM) is based within the OABCY and is responsible for administering the CDM process.
- The post of **Deputy Chief of Staff** (currently vacant) has responsibility for staff across the five departments of Facilities, Records, Hospitality, Finance and Correspondence, each of which play a part in the Palace safeguarding arrangements. The Chief of Staff was holding these responsibilities at the time of the audit.
- The LPSO is a new (as of October 2021), temporary post with the remit of promoting and maintaining a strong safeguarding culture across the various communities at Lambeth Palace and helping the Palace prepare for the SCIE safeguarding audit.
- **The Dean of the Community of St Anselm (CoSA)** and **the Sub-Prior of Chemin Neuf** are the safeguarding leads for the two religious communities housed within Lambeth Palace.
- The Archbishop and key members of his team work closely with others across the wider Church, including the NST, diocesan bishops and diocesan safeguarding teams, and other NCIs. The former **Provincial Safeguarding Advisor (PSA)**, who was based in the Palace, is now an NST caseworker and acts as the first point of contact for the LPSO.

Heads of departments, in particular **the Head of Estates** and the **Steward**, along with the **Hospitality General Manager**, have operational responsibility for good safeguarding practices in their departments. The former oversees the contract for site security.



## 4 FINDINGS – SAFE ACTIVITIES AND WORKING PRACTICES AT LAMBETH PALACE

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This section focuses on safe activities and working practices related to the space and range of people at Lambeth Palace in different ways at different times. It covers:

- precinct and buildings
- residents and staff
- events, visitors and volunteers
- communities of St Anselm and Chemin Neuf

### 4.1 PRECINCT AND BUILDINGS

#### Description

4.1.1 Lambeth Palace sits on a large site on the south bank of the River Thames. It comprises the main palace building, a series of ancillary buildings which have been converted for residential use, a newly built library and extensive gardens (of around 10 acres). It is surrounded on all sides by a high brick wall or equally high fencing. Three sides of the site are bordered by public roads, the other by a well-used public park.

4.1.2 Entry is via the gatehouse (Morton's Tower), on the corner of Lambeth Palace Road and Lambeth Road. There is an entrance for vehicles, which is always kept closed. The wooden pedestrian door is kept open each day from 8.00am–6.00pm. The gatehouse office is located immediately inside the external gate. Two security staff are on duty at all times, and the office itself is always staffed by at least one member of the security team. CCTV screens connected with all the security cameras around the Palace, library and grounds are monitored from here. The fire alarm panel is also located in the gatehouse, as is the control for the various intruder alarms. A panic button is connected directly to a nearby base for a Metropolitan Police armed response team. There is another entrance, used by residents, which is accessible only by use of an electronic swipe card.

4.1.3 Beyond the security office there is an inner wooden gate through which staff and residents in possession of security passes can pass without formally signing in or out. Visitors and contractors are required to register at the gatehouse. Expected arrivals are notified in advance to the gatehouse, and visitors are met by a member of staff and then escorted through to the main Palace buildings. Visitors and contractors as well as staff are expected to wear lanyards and ID cards. Residents are well known to gatehouse staff and possess ID. Within the Palace and some of the ancillary buildings which are used for work, some doors have coded locks or swipe entry which serves to restrict access.

4.1.4 The security staff work for an external contractor, CORPS Security, under the terms of a contract which is overseen by the Head of Estates & Steward (HES), who has direct responsibility for overseeing the facilities management of the whole Lambeth Palace site. The auditors did not see the contract itself but did note that CORPS Security has its own safeguarding and safer recruitment policies. The HES's tasks encompass maintenance

management, health and safety, events oversight and aspects of household management, as well as security.

4.1.5 Accountable to the Chief of Staff, the HES heads a team comprising a Facilities Manager, Head Gardener and team, and maintenance staff. Other contractors working both regularly and occasionally within Lambeth Palace, including cleaners, are also overseen by the HES, who has been in post since November 2019. The nature of the work and the setting means that the HES has to work closely with a range of external organisations, in addition to contractors. These include the Metropolitan Police, Lambeth Council, heritage bodies and local neighbourhood and community groups as well as the Church Commissioners and other NCIs.

4.1.6 Various procedures are in place to make the experience of residents as normal as possible, covering everything from private correspondence and personal guests to shopping and meal deliveries. Residents connect with each other via a well-used WhatsApp group, on which relevant information is shared about private events, and a system is in place to alert all residents of anything unusual occurring, particularly out of normal working hours.

4.1.7 Safety procedures including fire, invacuation and evacuation are in place but have not been practised since staff began returning from lockdown and working from home.

4.1.8 The newly-built library has been open since August 2021, with public access since November 2021. The Operations Manager is the designated safeguarding lead. The building has been designed to be fully compliant with the Equality Act (2010). As a new building containing priceless historic books and documents as well as large archives, security and safety have been 'designed in'. Public access is via an external entrance in Lambeth Palace Road. There is a constant security presence in the reception area, linked to the Palace gatehouse. Entrance for staff only into the Palace grounds is through several electronically operated security doors and gates. Access through the various parts of the building is heavily restricted and electronically controlled.

4.1.9 A weekly operations meeting brings together key managers and staff to share information about and plan for current and forthcoming events and act as a forum for information exchange. The hospitality team produces a weekly 'What's On' briefing to alert all staff about forthcoming events within the palace and the library.

4.1.10 The internal audit conducted in 2021 highlighted several areas where security practices could be strengthened across the Palace and in the library. These included the introduction of bag searches before and debriefs after events, improving the recording of incidents and reinforcing the need for staff to wear their lanyards. According to the internal audit action plan, these areas have been addressed. The audit also highlighted some concerns with the operation of the current security contract, which the auditors understand is under review.

## **Analysis**

4.1.11 The security arrangements across the Lambeth Palace site are comprehensive and in general residents and staff feel safe. Safeguarding arrangements in place for events at the Palace are generally good but could be strengthened. Arrangements for maintaining the safety and wellbeing of volunteers have been thought through in advance of recruitment. Staff work increasingly well together to ensure that all arrangements run smoothly, with a minimum of risk, but procedures need to be practised regularly to ensure



understanding and workability and compliance needs improving. Aspects of the operation of the current security contract are giving rise to some dissatisfaction and anxiety. Security measures are not adequately complied with within the precinct and buildings, creating unnecessary risks.

4.1.12 The auditors concluded that arrangements for managing the conflicting demands of premises which are both public and private, professional and informal, a place to live as well as to work, and a potential focus of external attack are generally well thought out and managed overall, with good links being maintained with relevant external organisations. People spoken with who work in Lambeth Palace, some of whom live there too, were generally satisfied with the balance that is maintained between necessary standards of safety and sensitivity to the needs of residents for privacy and 'normality'.

4.1.13 Good working practices such as the weekly 'What's On' briefings are effective in ensuring that all relevant people are aware of events taking place, and this is reinforced by the weekly operations meeting, which is attended by lead staff across departments. This latter meeting used to be chaired by the Deputy Chief of Staff, but the auditors understand that since this departure the meeting has become less focused, comprising little more than mutual briefing. This risks losing the benefits of it functioning as a useful forum for problem-solving as well as for information exchange.

4.1.14 The auditors observed that security practices once in the buildings and grounds were not as consistently complied with as is required by the Palace's own procedures. Security doors with coded entry pads were left open, external doors were observed open or unsecured, and not all adults in the grounds – some but not all of whom were contractors - were not wearing lanyards as expected. Not every room had a written plan for evacuation in the event of emergency. At times, the electronic entrance gate inside the gatehouse failed, meaning that it could be pushed open – a point of vulnerability at times when the security operative in the gatehouse was alone or distracted.

4.1.15 The auditors were told that the performance of the external security company has given rise to concerns about consistency, standards of working practices and lax procedures. The gatehouse staff themselves are located some distance away from all other staff, are sometimes working on their own, and on occasions report feeling unsafe.

4.1.16 Over the past two years, almost all staff worked from home and few events took place until late in 2021. Some staff have still not returned to working on site full time, and others have been appointed who were not familiar with the palace procedures in place prior to the pandemic. The recent relocation of the Faith in Public Life team has introduced more staff to the premises who are not familiar with either layout or procedures. The auditors heard that basic drills such as fire drill, invacuation and evacuation procedures have not been tested and practised in the last two years and observed that basic security expectations are not being consistently complied with.

#### **Questions for the Palace to consider**

- How will concerns about the security contract and operational procedures be addressed and when will this happen?
- How will consistency of security practices once in the buildings and grounds be improved?

- What needs to be done to ensure that all residents, staff, contractors and visitors comply with safety arrangements and are familiar with procedures for responding to emergencies?

## 4.2 RESIDENTS AND STAFF

### Description

4.2.1 Lambeth Palace is home to around 30 residents, including the Archbishop and his family. At the time of the audit, this number included some who may be vulnerable to exploitation or abuse. The Palace is also the workplace for around 50 people and home to two religious communities, the CoSA and the Chemin Neuf Community. Very recently, members of the Faith in Public Life team have moved into the space vacated by the relocation of the library. Members of the public and dignitaries visit regularly. These varying functions mean that a balance always has to be found between maintaining a high level of security and retaining a sense of normality; between fostering close community relationships and maintaining a level of alertness. This applies as much to residents as it does to professional staff. Safeguarding arrangements in the two religious communities are discussed in section 4.4.

4.2.2 Various procedures are in place to make the experience of residents as normal as possible, covering everything from private correspondence and personal guests to shopping and meal deliveries. Residents connect with each other via a well-used WhatsApp group, on which relevant information is shared about private events, and a system is in place to alert all residents of anything unusual occurring, particularly out of normal working hours.

4.2.3 The Church has 'The Code of Safer Working Practice' which sets out what is expected of anyone who ministers in the Church, with an emphasis on ensuring high standards of safeguarding. The NCI employee handbook references standards of behaviour and conduct, and links this with its statement of values and the dignity at work policy. These documents do not address the particular context of Lambeth Palace, and no local practice guidance exists.

4.2.4 As a prominent Church institution, Lambeth Palace is regularly approached by people with poor mental health and other difficulties, including those who are homeless. These occasional visitors are met at the gates by the security staff, who respond as best they can and have appreciated receiving advice and support from the LPSO. A protocol is in place with the Fixated Threat Assessment Centre (FTAC), a joint police/mental health unit which assesses and manages the risk to politicians, members of the British Royal Family, and other public figures.

### Analysis

4.2.5 Children and vulnerable adults resident at the Palace are kept safe. Key staff would benefit from training in how to respond well to adults who may be at risk while maintaining their own safety. A local version of the code of safer working practice would bring clarity to situations where relationships and responsibilities are not always clear.

4.2.6 All staff and clergy spoken with by the auditors, including the security staff, are aware of their particular responsibilities to the vulnerable people who are normally resident

and sensitive to the need to normalise their experience of living somewhere which is also a busy workplace for others. Procedures to manage this while maintaining the safety and security of the site and the people within it appear to be well understood.

4.2.7 The auditors noted that the boundaries between residents and staff, particular the security staff, whilst necessarily flexible, can lead to some unsafe practice, particularly regarding keeping oneself safe when working alone, and the use of social media for personal communication with residents. In particular, the Church of England's code of safer working practice might be used as the basis for local practice guidance which is specific to Lambeth Palace and applicable to all staff working on the premises, whether directly employed or contracted.

4.2.8 Awareness of vulnerabilities among staff and (potentially) volunteers was variable. The auditors heard about some good, sensitive responses to the needs of individuals, but were also concerned that there was a sense that 'it couldn't happen here'. The input at the recent safeguarding conference from a survivor who described abuse by Church officers, followed by poor responses by several other Church officers, was a shock to many. The auditors reflected that continued training and other inputs, particularly from the perspective of victims and survivors, would help develop an appropriate level of awareness, coupled with a sense of responsibility for safeguarding being for everyone.

#### **Questions for the Palace to consider**

- How can clarity and sign-up to safe working practice for all staff and clergy based at Lambeth Palace best be achieved? Who should be involved in the development of local practice guidance, or other approaches to embedding good practice?
- How can some targeted awareness raising be progressed to consider safe working practices and social media use in the context of Lambeth Palace, addressing relationships and communication between residents and staff, particularly the security staff?

### **4.3 EVENTS, VISITORS AND VOLUNTEERS**

#### **Description**

4.3.1 Recent years have seen the more intensive use of the site of Lambeth Palace for religious purposes and commercial events. This is in order to make the Palace more accessible to the public, increase awareness of the Archbishop's ministry, and generate income that can contribute to the upkeep and work of the Palace. The Hospitality General Manager (HGM) has responsibility for the overall hospitality operation at Lambeth Palace. Since the appointment of the HGM in December 2014, the number of general visitors to the Palace has continually increased, as has the number of corporate hospitality meetings. This is despite the challenges posed by COVID-19, which resulted in closure of the Palace to visitors for events. In 2019, the year before the Covid lockdowns; there were 650 events, in the final three months of lockdown in 2021, there were 800 events.

4.3.2 Each week, the hospitality team produces a 'What's on' list which is widely circulated across the staff groups and identifies the nature of each event, where they will

be taking place, and what resources are required. These events have to be managed in a way that maintains the privacy and wellbeing of the residents as well as ensuring the safety and security of the premises. To this end, close working between the HGM and the HES and their teams is essential.

4.3.3 In December 2011, upon recruiting the HGM, the Church Commissioners for England established Palace Public Occasion Ltd., a private limited company enabling the Palace to operate as a corporate and non-Church events venue. This included creating the necessary professional infrastructure, such as contracts. Palace public occasions have their own event contracts, drafted by a legal professional, which set out the terms and conditions under which events can take place. These contracts detail mutual responsibilities and includes the requirement to comply with the Church of England safeguarding policy statement *Promoting a Safer Church* (2017) unless the hirer has their own equivalent policy. They also require the hirer to maintain a register of all children and vulnerable adults included in their party, together with relevant contact details, and include contact details for the LPSO.

4.3.4 Events that take place involving external visitors may include children or vulnerable adults. Information is sought during the booking process about any potential vulnerabilities and appropriate provision is made. People and organisations hiring the Palace as a venue are required to confirm compliance with the Church of England's safeguarding policy if they do not have their own in place, and to follow Palace safeguarding reporting procedures.

4.3.5 Visitors who attend organised events at the Palace report to the gatehouse, where security staff are provided with names and vehicle index numbers in advance of the event. Only those on the list are enabled entry. Bag searches are conducted on open days but metal detectors are not used. Visitors are signed in and then escorted by a staff member to wherever the event is taking place. A similar process happens in reverse once an event is over. The Palace is not open to general visitors. It was open for occasional booked group tours but these stopped when the group of volunteers was disbanded. It does open for charity open days such as those held for the National Garden Scheme, Open House London or other charities, of which there are between five and seven per calendar year. Tours and events will relaunch fully in January 2024.

4.3.6 The library has been open to the public since November 2021. Following consultation with the LPSO, the Operations Manager has been designated as the safeguarding officer for the library, and now attends the Palace SRG. In turn, the LPSO has arranged to attend library staff meetings quarterly in order to maintain support and direction for the library in developing and implementing its safeguarding arrangements. The LPSO has given advice and prepared a prompt sheet to assist library staff in responding positively to any adult with additional needs who may wish to use the library facilities, and in responding to any safeguarding issues that may arise. At present there are no plans to admit groups of children, due to the lack of an Education Officer post, although this situation may change in the future.

4.3.7 There have been few volunteers working at the Palace over the past two years, during which time there was a review of how volunteer arrangements were managed. This resulted in the decision to conclude the previous arrangements with the Company of Lambeth Volunteers and bring the recruitment, coordination, support and supervision of volunteers inhouse. The HGM has overall responsibility for volunteers and has worked in

collaboration with the HES to plan for the reintroduction of volunteers. All volunteers will be safely recruited and will work in one of five designated areas of activity across the Palace site, including the library and the gardens. A handbook and induction programme, which includes basic safeguarding training, have been prepared. The HGM is aware that the volunteer group is likely to contain individuals who are already vulnerable or may become so, due to age, health needs or other circumstances.

## Analysis

4.3.8 Arrangements for visitors who attend formal events are clear. Care has been taken over plans for the reintroduction of volunteers. Safeguarding arrangements in the library are working well. Agreed safeguarding procedures for events involving outside visitors are not consistently complied with.

4.3.9 Advance booking arrangements for external events are good and take appropriate account of safeguarding considerations. Likewise, the reintroduction of volunteers has been carefully planned with safeguarding in mind. The auditors noted, however, that those responsible for recruiting volunteers have not yet undertaken the Church's safer recruitment training. This is referred to further in section 4.5.

4.3.10 A small number of staff indicated that they felt unsafe on occasions during events involving external visitors, who they considered could be more stringently checked, for example, through bag checks. Examples were given to auditors of when agreed security procedures regarding vehicle entry were not followed. According to the internal audit action plan, these issues had been addressed, but information given to the auditors suggested that this was not always the case. A routine means of debriefing and feedback may assist in ensuring that agreed arrangements are understood and consistently implemented, and that staff and volunteers feel safe at work.

### Questions for the Palace to consider

- How can the palace satisfy itself that safeguarding procedures for events involving outside visitors are consistently complied with?
- How can feedback from staff be routinely sought regarding how safe they feel at the palace?

## 4.4 COMMUNITIES OF ST ANSELM AND CHEMIN NEUF

### Description

4.4.1 The CoSA was founded in 2015, by the Archbishop of Canterbury. It offers a one-year experience of monastic-style life for young adults aged 20-35, who become 'immersive members' of CoSA at Lambeth Palace. The members come from across the world and can include those with difficult past experiences as well as various physical or mental health challenges. The current group of 11 young adults have been resident since September 2021.

4.4.2 Chemin Neuf is a Catholic foundation with around 2,000 members in over 30 countries. In 2014, the Archbishop of Canterbury invited members of Chemin Neuf to live

as a praying community at Lambeth Palace and help run a training programme for young people (the CoSA).

4.4.3 The CoSA is led by its Dean, supported by two members of the Chemin Neuf praying community. The Sub-Prior of Chemin Neuf is the safeguarding lead for CoSA. As a new community, CoSA developed its own safeguarding policy, *Safeguarding Children, Young People and Adults from Harm*, which is regularly reviewed and updated, most recently in December 2020. This policy sits within the overall safeguarding policy framework of the Church of England, including *Promoting a Safer Church* (2017) and *Safeguarding in Religious Communities* (November 2020) and makes explicit connections with the PSA in the NST. The preface explains that the guidance adopts a 'One Church' approach, which means that the religious communities come under the House of Bishops safeguarding policies and practice guidance, albeit with some additional expectations of local communities, including having their own safeguarding policy and a designated safeguarding person, and access to safeguarding advice and training.

4.4.4 The Sub-Prior of the Chemin Neuf and the Dean of CoSA are the safeguarding leads for their communities. Both seek advice and training from the LPSO and NST.

4.4.5 All religious members and eligible staff are expected to have an appropriate level of DBS clearance, and to undertake safeguarding training commensurate with their post. The Dean has an enhanced DBS certificate and has undertaken NST training on handling disclosures (formerly known as C4). The Dean and Sub-Prior are both on the senior leadership training pathway. Both are also members of the Lambeth Palace Safeguarding Reference Group (SRG).

4.4.6 The Lambeth palace internal audit (2021) states that *'each CoSA member is the subject of a local police background check and DBS check together with a rigorous recruitment process. As DBS checks do not access police information regarding crimes committed overseas, members are asked to supply an equivalent certificate from their home country.'*

4.4.7 CoSA conducted a self-audit in April 2020, using the self-audit framework included in *Safeguarding in Religious Communities*, and made a number of changes to its arrangements as a result. This included designating the Sub-Prior of Chemin Neuf as the safeguarding lead (having previously been the Dean). The self-audit also highlighted the responsibilities of trustees, and areas where specialised training was required.

4.4.8 Community members all live within the grounds of Lambeth Palace. The young adults have their own rooms, communal living spaces, cooking and eating spaces in the cottages with teaching spaces in the Palace itself. Their contact with others working and living on the site tends to be restricted to attendance at the daily prayers held in the chapel.

4.4.9 Members come from many different countries, with very different understandings of safeguarding, and its implications for individuals, the community and for the Church as an institution. Some have suffered abuse in their home countries; others experience difficulties when in the UK. As a safe space for its members, CoSA receives disclosure of abuse each year, many of which the auditors were told it cannot follow up because to do so may put the young adult at risk when they return to their own communities. This means that the focus becomes one of 'healing and wholeness', in the knowledge that justice is not

always possible to achieve. Medical and therapeutic support is arranged when needed, while in the UK.

4.4.10 Each member of CoSA is allocated a 'spiritual companion', who meets with them weekly to focus on the spiritual aspects of their religious life. This activity is overseen by the Sub-Prior. Unsurprisingly, it is in this context that disclosures are often made. All spiritual companions receive basic and foundation level safeguarding training. The auditors were told that there has been recognition of the need to clarify with the spiritual companions their role if a disclosure is made, and to recognise '*the shift from initial care and spirituality to issues of legality*'.

4.4.11 The auditors were told that careful records of safeguarding matters are kept, but that, as a separate legal entity for data protection purposes, there are limits to what information is shared by CoSA and with whom.

4.4.12 The LPSO acts as an adviser to CoSA, and becomes involved on occasions with individuals, at which point the LPSO will open their own case record. Likewise, referrals are made as appropriate to NST, usually via the LPSO.

## **Analysis**

4.4.13 The understanding and awareness by the Dean and Chemin Neuf staff of the safeguarding issues within CoSA are good; the policies in place provide a good underpinning for strong safeguarding practice. There are risks inherent in the relationship between CoSA members and their spiritual companions. Clearer guidance on the role of the spiritual companion in responding to disclosures of abuse is needed, supported by improved information sharing and sustained support from a safeguarding professional.

4.4.14 The auditors concluded that the leaders of CoSA and Chemin Neuf had a good understanding of the potential vulnerabilities of the members of CoSA, together with a high degree of sensitivity about the potential risks to them when returning to their home communities. There was also awareness of the balance that is being struck between giving a spiritual and pastoral response to a disclosure and reporting a safeguarding issue to the LPSO or NST. The auditors were reassured of the active involvement of the LPSO and welcomed the engagement of the Dean and Sub-Prior in the Palace's SRG. However, safeguards remain precarious because the LPSO is very new in post, and the post itself is temporary.

4.4.15 The auditors were concerned that the particular sensitivities and challenges arising from the circumstances of some of CoSA's young members might result in them being responded to differently and potentially out of step with the principles set out in *Responding Well to Victims and Survivors of Abuse* (2022). While accepting that there is unlikely to be a single way of responding that will be appropriate in all circumstances, the auditors would encourage this issue to be kept under very active review. Likewise, a formal information sharing arrangement is needed to ensure that there is no bureaucratic reason preventing the highest standards of safeguarding practice being applied. The auditors wondered whether the SRG offered the potential to provide challenge to CoSA's safeguarding practices, and assurance that the interface between CoSA's internal arrangements and external safeguarding reporting requirements was being consistently and appropriately maintained, with the needs of victims of abuse being foremost.

4.4.16 In the context of CoSA, the role of the spiritual companion is crucial, both in supporting the member in their faith, but also in their safeguarding responsibilities. The

foundation level of safeguarding training is unlikely to be adequate preparation for this role, in this context. The auditors reflected that continuing supervision and training for those who act as spiritual companions is essential, to support them in their role and ensure that safeguarding procedures are being consistently followed.

#### **Questions for CoSA and the Palace to consider**

- How can CoSA apply the principles set out in *Promoting a Safer Church and Responding Well to Victims and Survivors* (2022), and demonstrate that it is doing so consistently?
- What arrangements are needed to provide assurance that safeguarding and information sharing processes are working consistently well in CoSA?
- What additional, specialised support and training is needed for ‘spiritual companions?’



## 5 FINDINGS – SAFEGUARDING PRACTICE

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This section focuses on the core outward facing aspects of safeguarding practice of Lambeth Palace. It covers:

- responding to contacts and correspondence
- CDM
- complaints and whistleblowing.

### 5.1 RESPONDING TO CONTACTS AND CORRESPONDENCE

5.1.1 Correspondence with the Palace needs to be triaged to identify contacts involving safeguarding issues. These then need to be assessed and responded to promptly, safely and appropriately. Risk assessments need to be undertaken in order quickly to determine when a safeguarding response is needed. Such professional triage is the task of the LPSO.

#### **Description**

5.1.2 Arrangements for triaging of correspondence have changed significantly since the retirement of the Correspondence Secretary in December 2017. The Correspondence Secretary carried a broad portfolio of work, of which safeguarding was an important part. In this context, they took on the task of responding to correspondence which arrived at Lambeth Palace from victims and survivors of clergy abuse, a demand which increased significantly during the period from 1996, when they were working at Lambeth Palace. Although experienced in their role, the Correspondence Secretary was not a safeguarding professional, had no access to professional safeguarding advice and was not expected to undertake any specialised safeguarding training, for example in risk assessment. There was no 'safeguarding' category for correspondence. The PSA took over the role of responding to victims and survivors from September 2018, when the PSA was located at Lambeth Palace.

5.1.3 Contact with Lambeth Palace is usually by email, letter or telephone call, the majority of which are handled in the first instance by a small correspondence team, comprising two posts. The team maintains a log on QuickBase (an electronic database), forwards items to different individuals and departments for responses, and keeps track of all such activity, following up as required. These records began in 2019. The auditors were told that, prior to 2019, there was a lack of process, which means that historical information can be laborious to find.

5.1.4 There are standard templates in use, which have been recently updated and added to, to assist with the task of keeping track of correspondence, almost every item of which will get some kind of response. Correspondence and contacts fluctuate considerably from week to week, with peaks often following public events such as an interview with the Archbishop.

5.1.5 The Archbishop's PA oversees the 'pa.archbishop@' mailbox and also takes phone calls regularly. They keep records of all such contacts and consult with the LPSO as appropriate. Contacts made directly to other individuals within the Palace, often via their

PAs, are logged using the same system. The records that relate specifically to the Archbishop and his ministry are logged on QuickBase by the PAs or forwarded to the correspondence teams. Correspondence that relates to a PA's principal only is not kept on QuickBase.

5.1.6 When correspondence received by the Lambeth Palace Correspondence team regarding a member of the clergy is assessed as complex and/or indicates a legal or pastoral issue, advice is sought from the OABCY. Correspondence which indicates there has been a breakdown in mutual trust and confidence between that clergy person and their bishop or involves a complex pastoral matter is also passed to the OABCY. In circumstances where the Archbishop is constitutionally unable to intervene or be involved, the office aims to provide an explanation or, on occasions, will make enquiries with the diocese to ensure an appropriate response is provided. This is a new office, supporting both Archbishops. Roles are in the process of being negotiated together with Bishopthorpe Palace, as are protocols, procedures and working practices.

5.1.7 Lambeth Palace's press office is responsible for the Palace and Archbishop's social media presence, which includes several different platforms. This provides people with another means of contact. There is a protocol within the communications team for responding to issues of concern, which includes referral to the NST duty inbox, with the Correspondence Manager copied in to ensure the item is logged. The auditors understand that discussions are in progress about how to manage this safely, given the already high and increasing number of contacts being made via social media, to ensure that no safeguarding-related issues are overlooked.

5.1.8 Contacts made via the palace website have been logged since the creation of this webform in 2016. Some messages were historically filtered out by the highly sensitive spam and quarantine software. The correspondence team is working through historical records from the webform to ensure that everything has been picked up and responded to appropriately, but the completion of this work is affected by the lack of capacity in this small team. The contact mailbox itself is not 'owned' by anyone, which meant that any items which were put into the 'quarantine' inbox could not be accessed. Having identified the issue, the Correspondence Manager has worked with IT colleagues to find a way of maintaining oversight and ensuring that nothing is overlooked.

5.1.9 A Safeguarding Correspondence triage procedure, reviewed and updated by the LPSO in March 2022, sets out the process/procedure for handling safeguarding-related or suspected safeguarding-related correspondence. Such correspondence is logged separately on QuickBase and passed to the LPSO for response. There is provision for an emergency response in circumstances where there is thought to be an immediate safeguarding risk. A similar process is in place for responding to those who may pose a threat to the Archbishop of Canterbury or to Lambeth Palace itself, given the high public profile of both.

5.1.10 The EAM is responsible for the record keeping within the OABCY and for identifying any correspondence concerning clergy, received by the office, which may have a safeguarding element, in consultation with the BACY where there is any uncertainty; in such cases they are expected to consult with the LPSO. As with the correspondence team, there is now (as of April 2022) a standard operating procedure (SOP) in place to assist in this decision-making.

5.1.11 A 'safeguarding@' mailbox is also available, which is monitored regularly by the

LPSO. Arrangements for maintaining oversight of this mailbox in the absence of the LPSO, and of ensuring a consistent and professionally informed safeguarding response, have been the subject of recent discussion between the LPSO, Lambeth Palace, NST and the IGO and a way forward agreed.

5.1.12 Safeguarding casework, as such, is a function of the NST and of the dioceses, and not of the Palace. However, as noted above, the Palace deals with correspondence from people who might be dissatisfied with a local response to a concern that they believe is a safeguarding issue or who choose to report a safeguarding issue directly to the Archbishop. Some of this correspondence is from victims and survivors of abuse, and the LPSO will respond on behalf of the Palace when they deem it to be appropriate.

5.1.13 In each case where they get involved, the LPSO inputs their activity on each case onto QuickBase. Records seen by the auditors were clear, concise, contained essential information and it was easy to see what had happened and what the outcome was. The general correspondence logs were not seen. Lambeth Palace is in the second phase of the roll out of the national safeguarding case management system, which will replace the QuickBase system for detailing safeguarding cases and contacts.

## **Analysis**

5.1.14 The system for triaging correspondence and concerns about safeguarding has improved in recent years and been strengthened by the presence and accessibility of the LPSO. Record-keeping in relation to triaging of contacts is good. Safeguarding triage remains an area of potential risk due to its dependence on individual postholders who are not required to have significant safeguarding experience, and on the LPSO, which is a temporary, time-limited post. There is uncertainty about what safeguarding issues might be contained in historical records.

5.1.15 The poor systems and quality of record keeping pre 2019 was made worse by parameters set on the Palace inbox which filtered out and destroyed certain types of correspondence within a very short time. This was likely to have disproportionately affected correspondence reporting safeguarding incidents and concerns and affected the accuracy of the historical picture. It was during the period that the Correspondence Secretary was in post that many of the historic safeguarding concerns that the auditors were told about by victims and survivors were reported. While the individual efforts of the current correspondence team are to be commended, the auditors were concerned that, to date, there has been no properly resourced, coordinated effort made to address this, despite the issues being well understood.

5.1.16 The LPSO has actively supported the correspondence team to ascertain when correspondence received may have a safeguarding element, and how it should therefore be responded to. The Correspondence Manager was clear about how they should handle correspondence and other contacts and was aware of a range of safeguarding scenarios which can arise, including in relation to vulnerable adults. The team works closely with the LPSO, who will sometimes become directly involved in responding.

5.1.17 While welcoming the recent active involvement of the LPSO, the auditors were concerned that the task of identifying whether or not a contact contains material with potential safeguarding implications is reliant on postholders who are not required to have significant safeguarding experience, and who may well not understand the nuances of particular situations which may not – on the face of it – be about safeguarding, despite

undertaking safeguarding training. Having a protocol in place is helpful in determining action once potential concerns have been identified. A key lesson from past poor practice at Lambeth Palace is that key decision-making and responses should not be left to those who do not have the relevant knowledge and experience.

5.1.18 Record-keeping regarding contacts, including those with a safeguarding element, is now stronger than in the recent past. Records are made at the time of dealing with the contact and contain all the information that might be required for future reference. The auditors noted that the current electronic system used is limited in its capacity to enable oversight of cases as numbers increase. The planned introduction of the national safeguarding case management system to Lambeth Palace will assist in maintaining effective oversight, will make systemic issues easier to identify, and enable systematic review of the interface between safeguarding at the Palace and the work being done by the NST. This is discussed further in section 6.4 on recording and IT systems.

5.1.19 The auditors reviewed six contacts as samples of correspondence referred to the LPSO. None met the criteria for referral to the NST or an external agency (such as the Police) but did require a response. Each concerned abuse experienced by the correspondent or were written on behalf of someone who had experienced abuse, within a faith context. Five of these illustrated a carefully considered and appropriate response by the LPSO, two of which involved liaising across national borders. The sixth case was referred to the OABCY. All cases seen by the auditors were appropriate for the LPSO to deal with. In each case, the LPSO was prompt, survivor focused and effective, and their intervention was well received by the individuals concerned. The auditors reflected that, based on the examples seen, this should contribute to more consistent, prompt, survivor-centred responses from Lambeth Palace than has been the case in the past – with the caveat that the LPSO role is only a fixed-term, temporary role at present.

5.1.20 Having not seen a sample of correspondence that had not had a safeguarding issue identified, the auditors were unable to assess whether the safeguarding triage procedure was working effectively on every occasion.

5.1.21 The auditors only saw one item of correspondence that was referred to the OABCY for response and were conscious that the joint office has only recently been established and is still in development. However, given that individuals often write to Lambeth Palace because local processes have been found wanting, they reflected that care should be taken to respond in a way that is respectful of them and avoids referral to other parts of the Church and ultimately straight back to the local system about which the correspondent was raising concerns. A number of the individuals interviewed by the auditors had expressed frustration at having been passed around from one place to another when trying to get their point across and were especially critical at being referred back into the very part of the system about which they were complaining or raising concerns. In the absence of a Church-wide complaints procedure, this is not a satisfactory position, and it is not yet clear whether or how the OABCY can avoid it, given that the constitutionally decentralised nature of the dioceses, means that the Archbishop is unable to intervene or become involved.

5.1.22 Many victims and survivors were highly critical of the responses they had received from the Palace, variously feeling that they had been disregarded, fobbed off, not believed or viewed as a nuisance. Some told the auditors they had not received a response at all, despite repeated attempts to contact the Archbishop and other Palace clergy and officials.

5.1.23 The auditors noted that the current electronic system used is limited in terms of enabling oversight of cases as numbers increase. The planned introduction of the national safeguarding case management system to Lambeth Palace will assist in maintaining effective oversight, make systemic issues easier to identify, and enable systematic review of the interface between safeguarding at the Palace and the work being done by the NST.

#### Questions for the Palace to consider

- How can the skills and safeguarding understanding of decisionmakers who gatekeep correspondence, including correspondence related to Church officers, be better developed to support them in their roles?
- Who has responsibility for addressing the continuing issues related to safeguarding correspondence received and sent prior to 2019?
- What is the best way routinely to seek feedback from people who have made contact with Lambeth Palace about safeguarding issues?
- What are the timescales for agreeing safe processes for identifying and responding to correspondence to Lambeth Palace via social media?
- How can victims and survivors be brought in to support the OABCY with identifying good practice in responding to different kinds of safeguarding correspondence?
- What are the long-term plans for support to the correspondence team and correspondence with victims and survivors, given the temporary nature of the LPSO currently?
- How can the Palace assure itself that safeguarding concerns are now being consistently identified and dealt with, in line with the principles set out in *Responding Well to Victims and Survivors of Abuse (2022)*?
- How can the principles set out in *Responding Well to Victims and Survivors of Abuse (2022)* be used to ensure that individuals raising safeguarding concerns with Lambeth Palace are responded to consistently well?

## 5.2 CLERGY DISCIPLINARY MEASURE

### Context

5.2.1 The CDM 2003 is the only formal means of pursuing a complaint against a member of the clergy. It came into force in 2006 and has been used for over 1,300 complaints since then. Unlike secular equivalents, the CDM deals with misconduct (as defined) by clergy and covers both disciplinary processes and complaints. The Measure (which is primary legislation and has the same force as an Act of Parliament) ascribes specific responsibilities to bishops and archbishops in respect of clergy discipline. Not all CDM matters will relate to safeguarding.

5.2.2 The Clergy Discipline Rules 2005 were made under the CDM 2003 and came into force at the same time as the Measure (2006). These set out in some detail the processes which underpin the CDM. They have been amended a number of times. The most recent amendments, in 2021, include more detail about the application of the CDM to bishops and archbishops about whom there has been an allegation of misconduct. Alongside this legislation, there is also the CDM 2003 code of practice issued under section 3 of the Measure by the Clergy Discipline Commission. This is a statutory code and provides guidance to all who are involved in formal clergy discipline procedures. While it does not have the force of law, as a statutory code, it must also be taken into account at all times.

5.2.3 The Archbishop of Canterbury has direct authority in dealing with specific areas of clergy discipline as follows:

- in dealing with allegations of serious misconduct under the CDM against bishops in the Province of Canterbury
- in dealing with potential or pending complaints against clergy and bishops in the Province of Canterbury
- in dealing with entering and reviewing names on the Archbishops' List
- in consultation with diocesan bishops over a return to ministry after a member of the clergy has been prohibited from ministry for a limited period
- in considering the arrangements if it is necessary to suspend a bishop.

5.2.4 Should anyone make a complaint against the Archbishop of Canterbury, this would be dealt with by the Archbishop of York (and vice versa).

5.2.5 The CDM functions in relation to safeguarding matters in three possible ways:

- allegations of abuse by members of clergy, and
- allegations that members of clergy failed to have 'due regard' to the safeguarding policies of the House of Bishops
- 'failing to comply with a requirement imposed by the code under section 5A of the Safeguarding and Clergy Discipline Measure 2016' as grounds for complaint, (added by the Safeguarding (Code of Practice) Measure 2021).

5.2.6 IICSA singled out the CDM for particular criticism, and its revision was one of the six recommendations made. In July 2020, the House of Bishops voted to amend the CDM with a Clergy Conduct Measure. Final proposals were due to be considered by the House of Bishops and General Synod later in 2022, with a new Clergy Conduct Measure expected to come into effect in the next 12-18 months.

5.2.7 This section addresses arrangements at Lambeth Palace for dealing with CDMs. The response by the Palace to complaints and whistleblowing which do not indicate a potential disciplinary matter involving a member of the clergy is considered in the following section (5.3). The term 'disciplinary complaint' is used to distinguish between the two processes.

5.2.8 The workings of the CDM process itself are technically outside the scope of this audit. This section therefore considers the arrangements and practice at Lambeth Palace

for identifying and dealing with safeguarding issues related to the CDM, including:

- Files, processes and practices for identifying CDM cases where safeguarding concerns are involved
- CDM files and adequacy of action to address safeguarding concerns
- processes and practice for identifying whether there is a safeguarding element to a CDM or if one emerges in the course of handling the disciplinary process
- safeguarding aspects of reassessment process required for potential return to ministry.

## **Description**

5.2.9 In relation to bishops, the CDM procedure requires that a disciplinary complaint against a bishop be made in writing to the Archbishop (the Archbishop is involved when the CDM concerns a bishop in the Province of Canterbury). It is important that arrangements at the joint office of the Archbishops of Canterbury and York for identifying safeguarding issues are robust and consistently applied, whether they relate to domestic abuse or offences against children or vulnerable adults, or whether they relate to disciplinary complaints about the response by bishops in the dioceses to safeguarding concerns (e.g. not passing on disclosures of abuse that have been made to them, or not acting on knowledge of abuse). These have increased significantly recently, especially in relation to senior clergy or clergy who are now senior but were not when allegations were first made.

5.2.10 Until 2020, CDM matters in Lambeth Palace were handled by the Bishop at Lambeth and his team. The establishing over the past 18 months of the joint OABCY, and the replacement of the post of Bishop at Lambeth with the BACY has changed how Lambeth Palace administers the CDM process.

5.2.11 The OABCY deals primarily with CDMs for bishops of the Province of Canterbury. It is also responsible for CDMs for chaplains in the armed forces, for a minister who has an archbishop's licence to preach throughout the province and a minister who has a licence from the University of Oxford or Cambridge. CDMs for other members of the clergy are dealt with in the relevant diocese. Complainants and respondents have diverse needs and vulnerabilities. Auditors were told that pastoral support is offered at Lambeth Palace to every complainant and respondent and that work is currently underway to review and revamp the way pastoral support is offered to those involved in a CDM process.

5.2.12 The EAM is responsible for administering the CDM process. Initially this involves logging that a complaint has been received, notifying the respondent, and informing the Provincial Registrar. If a penalty is imposed in any CDM case (bishop or other clergy), the OABCY is informed and the EAM will update the Archbishops' List, write to the respondent confirming they are on the list and keep appropriate records. Access to the List is governed by legislation and is restricted to a few specific individuals. The auditors were not given access to the Archbishops' List.

5.2.13 The EAM also has the responsibility for identifying any instances where there is or may be a safeguarding concern and taking action if there are any immediate risks. In these latter circumstances, they will consult with the LPSO (as set out in a recently agreed protocol), who will log and take any necessary action. The EAM is also able to consult with

the BACY where there is any uncertainty. The current EAM took up post in April 2021 and has undertaken basic awareness and foundation level safeguarding training.

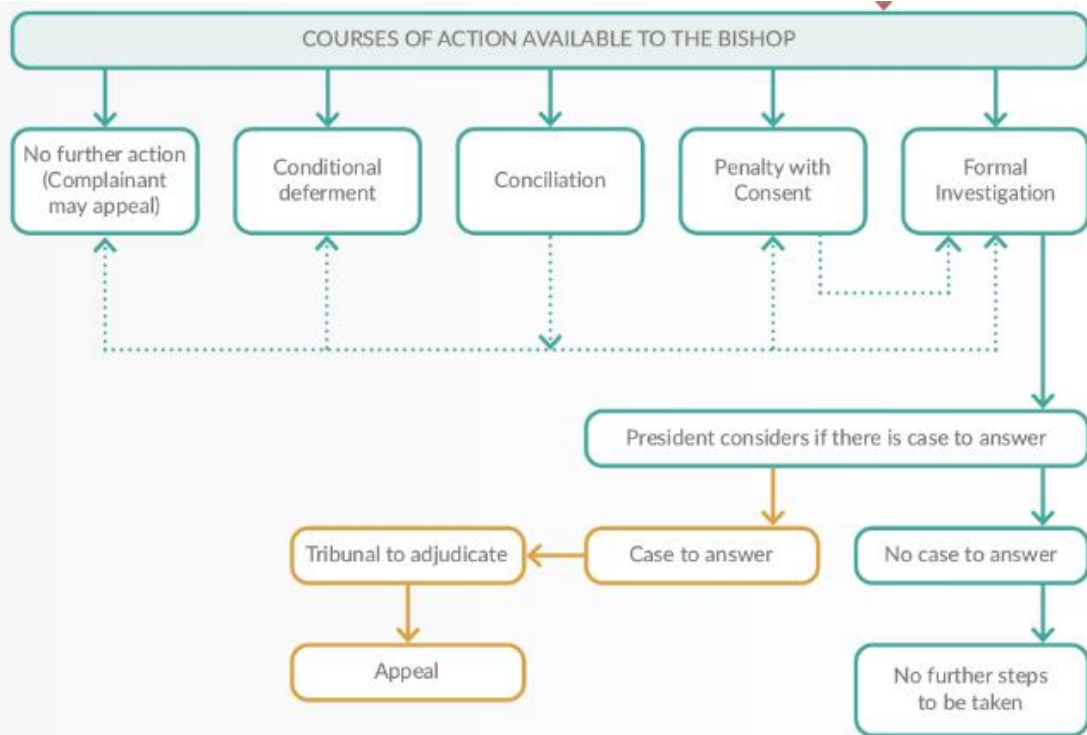
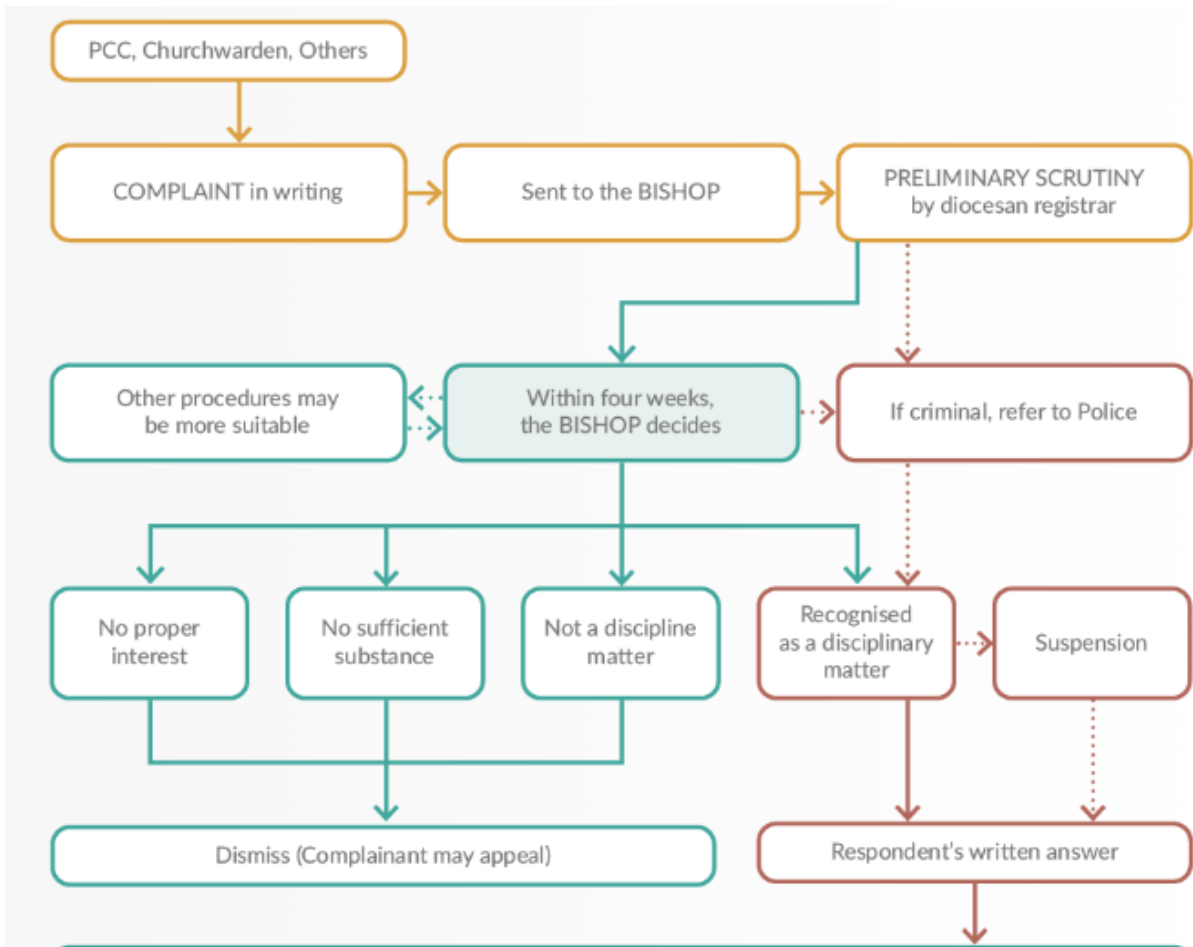
5.2.14 The role of the Provincial Registrar is to review the substance of the complaint and advise as to whether the person making the disciplinary complaint has a proper interest to do so; also to look at whether there is sufficient substance in the complaint to warrant being dealt with under the CDM (and for the archbishop to request an answer from the respondent). The Registrar will also look at whether the complaint has been made in time or if not, whether the President of Tribunals has allowed a complaint to be brought out of time.

5.2.15 The Provincial Registrar is a joint posting with the Head of Legal within the Church of England Central Services (a separate NCI). The Provincial Registrar is a qualified solicitor, specialising in ecclesiastical law, who works for a private legal firm. The current Provincial Registrar is new to the role in relation to Lambeth Palace, although they have been acting for some time as Diocesan Registrar for two other dioceses in the Province of Canterbury. They have recently begun the new safeguarding training for senior leaders, alongside colleagues in one of the dioceses where they are Diocesan Registrar. The other Provincial Registrar is head of the Legal Office based in Church House, Westminster. They have been in post since 2019 but have been working at Church House since 2006.

5.2.16 The graphic overview of the CDM process below, as it relates to bishops, shows the number of courses of action open to a bishop or archbishop in response to the Registrar's advice. If the decision is to recognise the disciplinary matter, after receiving the respondent's written answer, there are a number of options open to the Bishop/Archbishop, one of which is to refer the matter for formal investigation by the designated officer together with the option of suspension. The only time in 1,400 years this has been used in a safeguarding context was when the Archbishop suspended the Bishop of Lincoln following allegations that the latter had not responded appropriately to safeguarding allegations. Formal proceedings under the CDM followed.

5.2.17 The role of the Designated Officer is to investigate the complaint and advise the President of Tribunals whether the matter should be referred to a tribunal hearing. The decision as to whether the complaint should be referred to a tribunal hearing lies with the President of Tribunals.





5.2.18 Following the conclusion of a CDM against a bishop, the EAM updates the Archbishops' List in circumstances where a penalty has been the outcome, notifies the respondent, logs the outcome and any penalty imposed, then files the papers. The Archbishops' List is a record of penalties under the CDM. Most of which are handled at diocesan level without reference to the Archbishop; as previously noted, the Archbishop is involved only when the CDM concerns a bishop in the Southern Province. Penalties can include prohibition for life or limited prohibition. These mean that the person loses their Permission to Officiate (PTO) either permanently or for a specified period. Once a person's period of Limited Prohibition ends, an assessment is required (conducted by an assessor appointed by Lambeth Palace). This is for the benefit of the Archbishop, to inform the Archbishop's decision about reinstating PTO or not, in respect of a bishop in the Southern Province. In respect of other CDMs in the Southern Province, the assessors report, is for the benefit of both the relevant Diocesan Bishop and the Archbishop. The Archbishop can comment on the report and give a view on whether PTO should be reinstated or not, with the Diocesan Bishop making the final decision whether the individual's PTO can be granted or reinstated.

### **Data protection and access to CDM files**

5.2.19 CDM files are kept separate from blue clergy files and access to these files is significantly restricted by the Code of Practice and by statute. An individual's blue file should include indication that a CDM has been initiated, its nature and the outcome, and details of any penalty imposed. The auditors had no access to any CDM files, as a result of a recent clarification by the Information Governance Officer (IGO), following legal advice from the NCI's legal office, (see 1.2.22), nor did they see any blue clergy files containing safeguarding material. This meant that the auditors had no way of knowing whether there was anything missing from files, or whether there were safeguarding matters that they were not informed about.

5.2.20 The Archbishop is responsible for determining the outcome of CDM complaints against a bishop in the southern province, with advice from the Provincial Registrar, which he may or may not chose to take. The auditors spoke to individuals who had direct experience of trying to raise conduct matters concerning bishops with Lambeth Palace. None felt they had had their concerns satisfactorily responded to. As explained above (in paras 1.2.22 and 5.2.18), the auditors did not have access to CDM records. Conversations with the Archbishop indicated that, in the past, he had not always been fully aware of or involved in all correspondence and decisions surrounding CDM cases. The auditors were assured that, more recently, the Archbishop always makes the relevant decisions in the CDMs within his remit.

### **Analysis**

5.2.21 Lack of access to CDM files meant that decision-making at, or influenced by, Lambeth Palace in respect of CDMs with safeguarding elements could not be assessed. This was a significant limitation. Arrangements for assessing CDMs and potential CDMs for safeguarding elements remain an area of risk. Thought is needed about whether and how responses to both respondents and victims involved with the CDM process can be improved, pending changes in national arrangements for clergy discipline.

5.2.22 For the reasons given above (5.2.18), the auditors were not able to check out the degree to which safeguarding issues are recognised, addressed and appropriately

responded to through CDM processes conducted by Lambeth Palace in respect of bishops in the southern province, and whether what is detailed on the Archbishops' List or in the blue files is an accurate reflection of the original complaint in terms of safeguarding. The other effect of this ruling was that decisions to remove, suspend and reinstate the PTO of current and retired Bishops could not be appraised for their appropriateness in terms of safeguarding. Similarly, the role of the Archbishop in giving views and comments to inform decision making of diocesan bishops in the Southern Province on whether PTO should be reinstated or not once their period of Limited Prohibition ends could not be appraised for its effectiveness in terms of safeguarding. This is a significant limitation, and the auditors underline the importance of addressing it. Without the possibility of independent scrutiny, learning from the current CDM practices will not inform the new processes.

5.2.23 Each entry on the Archbishops' List includes a description of the activity that led to the penalty having been imposed and what the penalty was, and the blue file should contain CDM-related documentation from any case, whether or not a penalty was imposed. Lack of access to the CDM files meant that the auditors were not able to check the degree to which safeguarding issues were recognised, addressed and appropriately responded to through CDM processes conducted by Lambeth Palace, and whether what was detailed on the Archbishops' List or in the blue files was an accurate reflection of the original complaint in terms of safeguarding. This is a particular source of concern for victims and survivors, some of whom worry that a minimisation of what happened might occur through the wording so it does not accurately represent their complaint. In addition, the auditors were not able to evaluate the resulting penalties recorded on the Archbishops' List for their appropriateness in terms of safeguarding.

5.2.24 Without the possibility of independent scrutiny and quality assurance, learning from the current CDM practices will not inform the new processes. In relation to building the confidence of victims and survivors, an opportunity to agree the wording of their complaint(s), which would then form part of the entry on the Archbishops' List concerning their complaint would promote transparency and align with accepted good practice in related areas, such as complaints processes.

5.2.25 The process/procedure for handling safeguarding-related or suspected safeguarding-related correspondence or information received by the OBACY are set out in the recently agreed Safeguarding Correspondence Triage Procedure. Identification of a potential safeguarding element in a CDM is dependent on the EAM, who (at the time of the audit) was new in post and has received basic and foundation safeguarding awareness training. The auditors noted the availability of the BACY for liaison where there is any uncertainty about a safeguarding element in a CDM case, and also that neither post required the postholder to have had prior safeguarding experience. They concluded that the current arrangements did not yet reflect fully the needs of the role in enabling the consistent identification of safeguarding issues within CDM processes.

5.2.26 While proposed improvements in pastoral support to both complainants and respondents within Lambeth Palace are to be welcomed, these will not deal with the legacy of the years when victims and survivors have experienced the CDM process as at best unsatisfactory, and at worst, as abusing them further. Without compensatory measures, difficulties associated with the current CDM processes, related to communication, early access to counselling and other resources, providing feedback to the NST and others responsible for safeguarding processes, giving prompt apology where appropriate, are likely to continue.

5.2.27 The auditors reflected that there could be an important role for the OABCY, pending the introduction of a new clergy conduct measure, in improving responses to victims and survivors who are engaged with a CDM against bishops and associated safeguarding processes, as well as with respondents. Promoting transparency and addressing perceived conflicts of interest in CDM processes against bishops has great potential for enhancing the confidence of victims, survivors, and others attempting to help the Church address failings in safeguarding and unsafe people and practices.

5.2.28 The increasing use of the CDM to challenge perceived past failures to take action against abusers is a legitimate use of the procedure and offers the potential for past misconduct to be addressed, and past failures to be dealt with formally and transparently. There is likely to be continuing scepticism about the willingness of the Church to be properly transparent and accountable if the revised measures for clergy conduct continue to remain entirely internal and clerically-led.

#### **Questions for the Palace to consider**

- How can an independent audit of Lambeth Palace CDMs related to safeguarding or containing safeguarding elements, be achieved?
- How can an independent audit of how the outcomes of CDMs, conducted by Lambeth Palace, which are related to safeguarding or containing safeguarding elements, are logged on the Archbishops' List be achieved?
- How can an independent audit of decisions by the Archbishop to reinstate PTO once a person's period of Limited Prohibition ends following CDMs related to safeguarding or containing safeguarding elements, as well as the option for the Archbishop to comment or give a view in relation to equivalent decision-making by diocesan bishops, be achieved?
- How will the Archbishop and senior clergy and staff at Lambeth Palace improve their responses to those involved in CDM and related safeguarding processes, pending the future introduction of a new clergy conduct measure?
- Within the limitations of the CDM, and pending the outcome of the current review, what steps can the Archbishop take to address complaints and criticisms by survivors of the way in which the CDM has been handled at Lambeth Palace and correct perceived injustices?

## **5.3 COMPLAINTS AND WHISTLEBLOWING**

### **Context**

5.3.1 There are two different NCI policies applying to complaints and whistleblowing, respectively. Both apply to and have been formally adopted by Lambeth Palace.

5.3.2 The NCI *Service Complaints Policy and Procedure* applies to the services offered by all the NCIs. Complaints could include:

- an issue with the standard of service provided; a specific action taken (or not taken), or

- the behaviour of individuals working within or on behalf of the NCIs.

5.3.3 There are a number of areas of potential complaint which are outside the scope of the policy, such as complaints about a diocese, cathedral, religious community or other Church and complaints concerning officeholding clergy including bishops. The latter complaints would be expected to be within scope of the CDM process, which is discussed in section 5.2. This means that the NCI complaints policy only applies to staff at Lambeth Palace. Complaints about the outcome of diocesan safeguarding procedures are expected to be dealt with by the diocese, and there is no formal provision for escalation beyond the diocese.

5.3.4 The LPSO potentially has a role in responding to any complaint which has a safeguarding element.

5.3.5 The NCI *Speaking Up (Whistleblowing) Policy and Procedure* applies to all employees in the direct management of the NCIs and was last revised in May 2021. It states a commitment to the highest possible standards of openness, probity and accountability and to encouraging a culture where speaking up is seen as a normal part of upholding common values. The policy is directed at staff who work within the NCIs and sets out procedures for reporting to managers or named others, including via an external whistleblowing charity. The policy sets out an internal four-stage process which makes no provision for external appeal or independent support for the whistleblower. It makes no mention of safeguarding. It does not have any interface with the diocesan equivalents, where they exist. The policy makes no reference to reporting concerns about clergy and does not cross-reference or signpost to the CDM.

5.3.6 The NCI dignity at work policy deals with bullying, harassment, discrimination and victimisation. It includes useful definitions and sets out both informal and formal routes for resolving situations which fall within the scope of the policy but applies only to NCI employees (i.e. not officiating clergy, diocesan staff, etc.). The policy was last reviewed in May 2014.

## **Description**

5.3.7 The auditors were told of one instance some years ago where whistleblowing by one employee which had safeguarding elements resulted in the dismissal of another employee at Lambeth Palace.

5.3.8 The auditors did not see or hear of any complaints made at Lambeth under the terms of the NCI policy but did see an example provided by the Palace of a written complaint made to the Palace about a diocesan matter, and the Palace's response.

5.3.9 The complaints seen by the auditors about Palace responses were in areas that were excluded by the NCI complaints procedure. They comprised correspondence from victims and survivors who were trying to make a complaint, some of which referred explicitly to 'making a formal complaint' but were not classified within the Palace as complaints. Other victims and survivors referred during their interview to having made a series of complaints which were not formally responded to by the Palace or received a response they regarded as inadequate. These complaints were often, but not invariably, about other processes and outcomes of complaints regarding diocesan processes. The subject was often a member of the clergy, in circumstances where the CDM process had either not been initiated or had resulted in an outcome which the complainant regarded as

unsatisfactory.

5.3.10 Bullying emerged regularly in interviews as a significant issue within and across the Church, in respect of both clergy and lay staff, or members of wider Church communities. Victims and survivors, both clerical and lay, gave testimony about the range of circumstances in which they had experienced bullying behaviour at the hands of both clergy and lay people, at all levels of seniority, and described to the auditors the devastating impact it had had on them. Some described the considerable efforts they made to raise their concerns and experiences with a view to preventing others from experiencing the same treatment. There was universal distress and disappointment at the failure to deal with such issues effectively, or, sometimes, at all. Diocesan processes frequently failed them, with victims/ complainants feeling disregarded by senior diocesan clergy.

### **Analysis**

5.3.11 Arrangements for identifying and responding to complaints about safeguarding received by the Palace are hampered by the lack of a comprehensive complaints system which applies across the whole Church. The reality of the constitutional arrangements within the Church means that most complaints, whether formal or informal, are dealt with under diocesan procedures, leaving those who are dissatisfied with nowhere to go. Responses to those who make a complaint about the outcome of diocesan safeguarding processes, pending the future introduction of a new clergy conduct measure, need improvement. The potential for bullying to be a safeguarding issue is not fully understood. The lack of confidence of staff in using the whistleblowing procedure is of concern.

5.3.12 A number of contributors to the audit were victims and survivors of abuse by a Church officer and had previously contacted the Palace to make a safeguarding complaint. Many have waited years for a response; for others, their experiences and concerns are current. A small number were complimentary about how the Church responded. The majority felt that the response (or lack of it) added to the abuse and trauma they had already experienced and are still waiting for some kind of resolution. The nature of the responses given, and possibly the templates that are used to frame such responses, would benefit from being reviewed from a survivor perspective to ensure they are fit for purpose.

5.3.13 Most complaints made to Lambeth Palace that the auditors either saw or were told about concerned the process and outcomes of diocesan safeguarding procedures, including those which were considered (or not) by the CDM process. When they raised the issue with Lambeth Palace (regarding it as the next logical step, given the status of the Archbishop), they were left disillusioned and frustrated by being referred back to the very processes and people that they were complaining about. Several of the individuals interviewed by the auditors described having been passed around from one place to another when trying to get their point across and were especially critical at being referred back into the very part of the system about which they were complaining.

5.3.14 The lack of a clear process for handling complaints against clergy, that were not handled as a formal CDM, was regularly referred to by contributors as a cause of ambiguity, uncertainty, and unfairness. Others tried to complain about the Church processes they had experienced. Several victims and survivors described bringing what they thought was a 'formal complaint', expecting it to be dealt with as such, only to find themselves caught up in the CDM process. Many (including Church officers themselves)

felt that they had been disadvantaged by having raised a complaint in the first place, and further abused by the process itself. Others, including those who themselves had been subject of a complaint or allegation, tried to make a complaint outside the CDM process, and were similarly disappointed with the response. Some complainants believed that initiating a complaint, regardless of which procedure was used, had been detrimental to them, affecting their wellbeing, their employment, even their prospects for ordination or advancement within the Church.

5.3.15 The one complaint seen by the auditors which was passed to the OABCY received an unsatisfactory response (in the view of the auditors), which passed the writer to the Province of York (even though the office is a joint office), and ultimately back to the diocese about which they were complaining. It was unclear to the auditors what criteria were applied in referring a complainant to the OABCY rather than the LPSO, nor why the complainant received letters from both the Province of Canterbury and the Province of York, instead of a single response for both. While the auditors accepted that this is likely to be a reflection of the early stage of development of the joint office, as well as the constitutional limitations of the Archbishop's authority in relation to dioceses, they nevertheless concluded that responses to individuals would benefit from explanation about why the matter could not be dealt with by Lambeth Palace, and they had to be referred back to the diocese.

5.3.16 The auditors would have expected to see examples of safeguarding issues – or potential safeguarding issues (such as bullying and domestic abuse) being identified within complaints. These types of issues have not been well identified and responded to across the Church to date. They did not see or hear during the audit about any examples of cases where safeguarding issues had been identified or LPSO advice sought.

5.3.17 Input from staff underlined the difficulty of staff whistleblowing in the Palace context. Auditors were told that not all staff felt confident make a complaint to senior staff and clergy, either formally through using the whistleblowing procedure or informally, partly because of deference and partly because of a lack of confidence that their concerns would be taken seriously and properly responded to. While providing a clear process to follow, the NCI whistleblowing policy cannot in itself address issues of individual confidence and cultural context. The challenge for the Palace is in creating a culture in which staff feel that 'blowing the whistle' is a positive act which is part of the wider commitment to creating a safer Church.

#### **Questions for the Palace to consider**

- How might the Archbishop and senior clergy and staff at Lambeth Palace improve their responses to those who wish to make a complaint about the outcome of diocesan safeguarding processes, pending the future introduction of a new clergy conduct measure?
- How will the Church address the problem of there being no means of complaining about the actions taken within its dioceses, and what is the role of the Archbishop and his senior staff in achieving a solution?
- How confident is the Palace that bullying is being consistently recognised as a safeguarding issue and what more might be done to respond well to those experiencing bullying, to address those whose behaviour causes distress, and

to promote awareness and understanding of the impact on the individual and the wider Church?

- What more can clergy and senior staff do to promote a safe culture in which all staff and volunteers feel able to make a complaint or use the whistleblowing procedure with confidence?



## 6 FINDINGS – ORGANISATIONAL SUPPORTS

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### 6.1 POLICIES, PROCEDURES AND GUIDANCE

#### Description

6.1.1 The House of Bishops' safeguarding policy and associated practice guidance applies in its entirety to Lambeth Palace. Policies and guidance include safer recruitment, equal opportunities, whistleblowing, complaints, dignity at work (which is aimed at preventing bullying and harassment) and data protection. These are being regularly supplemented and updated. The most recent, *Responding Well to Victims and Survivors of Abuse* came into effect in April 2022.

6.1.2 An NCI employee handbook applies to all staff across all NCIs. It sets out the main terms and conditions of employment, policies and procedures and contains links to other Church policies. It does not contain direct or linked reference to safeguarding responsibilities or standards.

6.1.3 The auditors were told that Lambeth Palace has supplemented the national policy and guidance with some local procedures and guidance. These include departmental specific procedures and guidance, such as the SOP for the triage of correspondence into the Palace, a range of procedures relevant to health, safety and security, guidance regarding children residing on the estate, a range of materials developed by or with the LPSO to assist staff in understanding when and how to report a safeguarding concern, and the volunteer welcome pack. The majority of these were not seen by the auditors.

6.1.4 The Lambeth Palace Safeguarding Reference Guide was developed by the PSA in January 2021 as a 'roadmap', with hyperlinks, to help staff and clergy navigate the safeguarding policy, practice and procedures which underpin safeguarding arrangements at Lambeth Palace. This reference guide has been held on the internal S drive. It is in the process of being revised in light of the new LPSO role and the current restructuring.

6.1.5 CoSA has its own policies, which align with the House of Bishops practice guidance *Safeguarding in Religious Communities* (2015). The preface explains that the guidance adopts a 'One Church' approach, which means that the religious communities come under the House of Bishops safeguarding policies and practice guidance, albeit with some additional expectations of local communities, including having their own safeguarding policy and a designated safeguarding person, and access to safeguarding advice and training. The Sub Prior of the Chemin Neuf Community and the Dean of CoSA are the safeguarding leads for their communities, and both seek advice and training from the LPSO and NST.

6.1.6 Individuals and groups who hire Palace facilities are expected to sign their agreement to the Church safeguarding policy, or confirm they have one that is applicable. CORPS security has its own safeguarding policy.

#### Analysis

6.1.7 The Palace works within the national safeguarding policy framework and guidance, supported by some local procedures and protocols. A palace safeguarding policy, supplemented by additional local procedures which together reflect the unique nature of

Lambeth Palace, supported by a mechanism for systematic appraisal and review of local procedures, would enhance the present arrangements.

6.1.8 The auditors reflected that the unique position of Lambeth Palace, operating as a place of residence as well as a workplace, and as a 'community of communities', requires a local safeguarding policy, with accompanying local protocols. This would provide the context for the local safeguarding procedures and guidance already in place, as well as assist in determining any gaps, and could be included in the revised safeguarding reference guide. For example, a local version of the national social media policy and guidelines could be helpful in setting the parameters for social media contact between children, vulnerable adults, staff and contractors working within the Palace.

6.1.9 Having identified through the internal audit in 2021 that there were gaps in the policies and procedures available, and in their accessibility, the auditors heard that efforts have been made to address this. The auditors saw and heard about a small sample of local policies and guidance, which were relevant and accessibly written. They did reflect, however, that there was very little mention made of local procedures from those interviewed, even when specific topics of relevance were being discussed, and wondered whether this indicated a general lack of knowledge and understanding of the current policy framework. Regular refresher briefings may be helpful in ensuring that everyone understands expectations, procedures and practice standards, and where relevant policy documents might be located.

6.1.10 The auditors were not made aware of any systematic mechanism for signing off, reviewing, and checking understanding of local policies and procedures related to safeguarding, although this had already been highlighted in the internal audit. The SRG might be a possible place for this to happen, but its terms of reference would need amending accordingly.

#### **Questions for the Palace to consider**

- Who is best placed to develop a local safeguarding policy for Lambeth Palace and when will this be put into place?
- How will the Palace satisfy itself that the current safeguarding-related policies and procedures are fit for purpose, known about, understood, consistently applied, and kept up to date?

## **6.2 TRAINING**

### **Description**

6.2.1 Safeguarding training is an important mechanism for establishing safeguarding awareness. It helps to ensure staff can carry out their duties knowledgeably and safely by understanding which individuals are at risk of harm or particularly vulnerable, and correctly record and report instances of abuse and neglect. Such training needs to be relevant, good quality and up to date, using relevant case studies, while keeping the audience engaged. It also requires significant planning to identify and prioritise relevant training needs, who has received training, those who require training and refresher training, together with an accurate and up to date means of recording this information.

6.2.2 A new *Safeguarding Learning and Development Framework*, approved by the National Safeguarding Steering Group on 22 April 2021, sets out the details of the Church's safeguarding learning pathways, and expectations of Church officers in respect of those pathways. Church bodies were expected to plan for its full implementation in January 2022. The framework replaces and updates the previously issued practice guidance on learning and development.

### **Description**

6.2.3 Lambeth Palace clergy, staff and volunteers all have access to the online training provided by the NST. Prior to the arrival of the LPSO in October 2021, safeguarding training for staff was either undertaken online, using the NST resource, or delivered face-to-face by the PSA, who was then based at the Palace. Safeguarding training for volunteers was the responsibility of the hospitality and facilities managers, and there was no input from the PSA.

6.2.4 Basic online training is a requirement for all staff and volunteers at Lambeth Palace and is included in the managers' checklist for completion during an individual's probationary period and prior to confirmation in post. All staff spoken with confirmed they had undertaken the online basic awareness course, although not all had a clear memory of its contents.

6.2.5 Online training is recorded at NST but without local feedback. The auditors understand that the PSA and assistant PSA recorded details of who had received training directly from them, but that this was a very recent system and was not reported anywhere. There was no monitoring of the take-up of training by clergy based at the Palace.

6.2.6 The auditors were told that individuals employed by the security company, CORPS, received training provided by that organisation, but the focus and contents were not known. Members of the CORPS security team have also undertaken online NST basic awareness training.

6.2.7 Discussion of the training available to CoSA participants is in section 4.4.

6.2.8 The internal audit conducted in 2021 found numerous deficits in the delivery, uptake, refresh and recording of training, and also identified where specialist training was needed by specific groups of staff. Some of the deficits have been rectified in the months since the audit.

6.2.9 Since their appointment, the LPSO has developed a training and induction spreadsheet which records take up of training, details who has completed what level of training and when, and notes when refresher training is needed. It also notes in some cases who has received safeguarding input as part of their induction. It does not specify who occupies which post/role, nor what level of training is required by each, although it does indicate which individuals are volunteers. The auditors were made aware that the spreadsheet, having been newly created, was not fully complete at the time of submission to the auditors and was in the process of being updated.

6.2.10 The current spreadsheet indicates that there are several staff who have either completed no safeguarding training at all, not even at the most basic level, and many for whom their training is well out of date. Important specialist training, such as safer recruitment, have not been completed by all those whose responsibilities require it. Some but not all of the overdue refresher training can be at least partly attributable to a

combination of the disruption caused by the pandemic and the lack of a system for automatically notifying individuals (and their managers) when training is due. This issue was highlighted in the internal safeguarding audit and included in the action plan, where the need for line managers to ensure that the staff and volunteers they are responsible for complete the training was identified. No consequence for a failure to complete training was specified.

6.2.11 The LPSO has commissioned externally delivered specialist training for staff in the correspondence team to help them be better equipped for and confident when responding to callers wishing to disclose or report abuse. This was well received, and there is a desire amongst other staff to undertake the same training, due to the nature of their roles.

6.2.12 An online 'safeguarding conference' was organised by the LPSO in early March 2022, which was well attended by staff and clergy across Lambeth Palace. It included input from a member of MACSAS and the Archbishop of Canterbury. It was the second such conference to be held, the first being held in early 2021. Both were intended to raise awareness of different aspects of safeguarding and reinforce the importance of safeguarding being seen as everybody's responsibility.

## **Analysis**

6.2.13 Most staff and clergy have undertaken basic safeguarding awareness training, but not everyone has yet had the level of training in line with their role and responsibilities. A training plan derived from the national *Safeguarding Learning and Development Framework*, supplemented by specialist training as required, and supported by adequate administrative capacity to track take-up, is needed. The expectation that everyone should complete at least basic awareness training has not been followed through.

6.2.14 The expectation that all clergy and staff working in Lambeth Palace complete a basic level of safeguarding training as part of their induction/probationary period is good. There is the same expectation of the volunteers who are in the process of being recruited. For those who have not completed basic awareness training, however, there appears to have been no consequence, meaning that the expectation is not perceived as significant.

6.2.15 More specialist training, such as that provided to the correspondence team, and for others on spiritual abuse and healthy cultures, as well as the new modules for senior leaders, has been well received. Specific groups identified additional training needs that they thought would help them do their job better (e.g. the gatehouse team expressed the need for training to help them respond to the needs of visitors who are vulnerable or who may pose a risk).

6.2.16 Auditors heard from many staff from different teams that training provided by the LPSO, for example on how to respond to a safeguarding concern, has been very valuable, particularly when it has been followed up with written guidance on what to do. The recent online 'conference' was also well received and was the first training that most had experienced which involved input from a survivor of clerical abuse. One person commented on how listening to a survivor had deepened on their understanding of the impact of such abuse. In the opinion of the auditors, this set an important expectation for future training.

6.2.17 The online training was less well-spoken of, and some did not remember that they had received it. There was general agreement that face-to-face training, with the

opportunities it brings for use of relevant case studies and discussion of potential safeguarding scenarios in the specific workplace, was preferable.

6.2.18 The recent safeguarding conference which took place using Zoom, was important in putting a survivor voice at the centre of the agenda, and in giving participants the opportunity to question the Archbishop directly on matters relating to safeguarding.

6.2.19 The LPSO's spreadsheet indicates that some managers have not completed the appropriate level of training or did so several years ago. This included individuals with significant safeguarding responsibilities. The spreadsheet indicated that only one person employed at the Palace had received safer recruitment training, and that had been completed while the individual was working in a diocese. The Palace managers responsible for the safe recruitment of volunteers have not received safer recruitment training either, which is a weakness. This calls into question the degree to which the expectation of training is accepted by more senior staff, and who is held accountable for the lack of follow-through.

6.2.20 The training spreadsheet itself is a good start in gaining an overview of the current position but is very basic and does not contain all the information necessary to ensure that every member of staff and clergy, and every volunteer, is completing training appropriate to their role and refreshing it regularly. It is also time consuming for the LPSO to maintain, and in the view of auditors, not the best use of a part time, specialist professional who is already busy.

6.2.21 The auditors reflected that the recent introduction of the new *Safeguarding Learning and Development Framework*, coinciding with the appointment of the LPSO, provides an opportunity to review training expectations for every post, and for these to be used to develop a training needs analysis on which a training plan can be based. This could in turn provide the basis for monitoring and reporting on training take up, quality and impact – an area of quality assurance activity that is missing at present – and for holding to account those who do not complete the training appropriate to their role.

#### **Questions for the Palace to consider**

- Who is best placed to develop a training plan based on the national *Safeguarding Learning and Development Framework*?
- What would be the most effective way of monitoring and reporting take up, quality and impact of safeguarding and related training and how may this be achieved?
- Where does leadership and accountability for delivering on these training issues lie in the Palace?
- How will the Palace address shortfalls in the safeguarding training of its managers?

## 6.3 SAFER RECRUITMENT

6.3.1 Safer recruitment practice is an essential part of the Church of England's approach to safeguarding. It is referenced in the national *Promoting a Safer Church* policy statement as one of the key features that will help Church bodies promote and maintain a safer culture that protects and promotes the welfare of children, young people and vulnerable adults.

### Description

6.3.2 Lambeth Palace HR function and records are centralised at Church House, the base for the Church of England Central Services NCI. DBS records are also maintained there. All recruitment of Palace lay staff is conducted by HR, in conjunction with the relevant Palace manager. The NCI ensures the HR policies and procedures are compliant with laws concerning Diversity, Equality, Data Protection, Employment Law, etc.

6.3.3 The House of Bishops *Safer Recruitment & People Management Guidance* (2021) is intended to be followed for the appointment to all roles within a Church body that involve substantial contact with children and/or vulnerable adults. The guidance also applies to those from other countries who are coming to work in a relevant role, including exchange programmes. According to documentation seen by the auditors, all existing roles at Lambeth Palace have been reviewed in liaison with the DBS administrator who maintains the staffing DBS database, to identify whether they are eligible for a DBS check.

6.3.4 It is policy for all job descriptions at Lambeth Palace to include a safeguarding commitment: *All staff working at Lambeth Palace share responsibility to promote and maintain a strong safeguarding culture with regard to children and vulnerable adults, including identifying the key actions they should take given their role and responsibilities.*

6.3.5 The NCI pre-employment checklist outlines the pre-employment checks carried out by the HR team to ensure necessary compliance is undertaken prior to individuals starting employment, either as direct employees or as contractors or casual staff.

6.3.6 Recruitment of volunteers is conducted from within the Palace. Volunteers are recruited for specific roles within the Palace, library and gardens. All volunteer role profiles include reference to safeguarding, and basic training is included as part of the induction process. According to the training spreadsheet, those responsible for the recruitment of volunteers have not received safer recruitment training.

6.3.7 The auditors were told that the only 'pass or fail' criterion throughout the recruitment process for new bishops was the safeguarding question.

6.3.8 As all the recruitment/HR files for lay staff are kept at Church House, they were not available for the auditors to see. It was therefore not possible to determine whether safer recruitment guidance was followed in all appropriate cases, whether all appropriate posts were designated as requiring a DBS check, and whether recruitment to non-designated posts complied with best practice in safer recruitment. Most of the staff at Lambeth Palace were recruited prior to this latest guidance coming into effect. Some of the young people who come to spend a year with CoSA come from countries where processes and records are not sufficiently developed and available to fully comply with the requirements of the guidance.

6.3.9 The *Safer Recruitment & People Management Guidance* forms part of the code of practice under the Safeguarding (Code of Practice) Measure 2021. This was brought into



force on 1 March 2022. This 2021 Measure has amended the Safeguarding and Clergy Discipline Measure 2016, and relevant Church officers now have to comply with the requirements set out in the guidance (instead of having 'due regard', as previously).

6.3.10 The CORPS security company has a safer recruitment policy, of which Lambeth Palace has a copy. It is not itself involved in the appointment of CORPS staff who work at the Palace.

6.3.11 The internal audit identified some deficits in safer recruitment practice, including an uneven approach to determining whether DBS checks should be undertaken, including for volunteer posts. Actions were identified, including the introduction of a local policy setting out the requirements for DBS checks and regular confidential declarations and the need to quality assure the safer recruitment process. It was unclear from the action plan whether these actions had been followed through, nor who was responsible.

### **Analysis**

6.3.12 Staff recruitment is conducted by Church House, in conjunction with Palace managers, only one of whom has undertaken safer recruitment training. Recent job descriptions address safeguarding responsibilities, but older ones do not. Clergy blue files did not indicate whether safer recruitment guidelines were followed in all appointments. Actions identified as necessary both to improve and quality assure safer recruitment practice within the Palace have not yet been completed.

6.3.13 The internal audit identified a number of areas for improvement in safer recruitment practice, although the lack of safer recruitment training by managers was not highlighted. Agreed actions do not appear to have been followed through and it was unclear who in Lambeth Palace was responsible.

6.3.14 The auditors looked at two blue clergy files. Both comprised loose papers, and contained evidence of current DBS status, a confidential declaration, references and evidence of safeguarding training undertaken. In neither file was it evident what post was held by the individual and when they were appointed, and neither contained a job profile for their current role. One of the two files contained proof of ID, and one contained records of interviews for various posts. One file contained a useful front sheet from a diocese which contained useful basic safeguarding and other information, including dates of development reviews and indicating cross referencing to CDM files.

6.3.15 The auditors saw a number of job descriptions for various roles throughout the Palace which were relevant to safeguarding. Those dated from 2020-2022 contained the safeguarding statement in the general conditions; those dated prior to 2020 did not. This latter group included the job description for the Chief of Staff and Strategy, who is the current head of safeguarding for the Palace.

#### **Questions for the Palace to consider**

- What is the role of Lambeth Palace in ensuring that the *Safer Recruitment and People Management Guidance* becomes the minimum standard for all recruitments, including appointments made by clergy and others to whom it does not yet apply, and which manager should be responsible for ensuring this happens?

- What safeguarding knowledge and experience is necessary for those posts which are essential to safeguarding oversight and delivery, and how confident is the Palace that these requirements are reflected in the job profiles for the posts?
- Which managers have responsibility for recruitment and how will their training needs be addressed?

## 6.4 RECORDING AND IT SYSTEMS

### Description

6.4.1 Having effective, safe and useable IT systems supports good recording and makes sure that information is secure, but accessible to those people with a legitimate need to see it.

6.4.2 A number of recording systems related to the administration and oversight of safeguarding are in place in Lambeth Palace itself and elsewhere. Some records are held in the archives and stored in the library, some in Palace departments, some by individuals, particularly the LPSO. Some records comprise paper files, some are electronic.

6.4.3 The records of the PSAs who have been based at the Palace should be retained by the NST. There remain records at Lambeth Palace which date from when the former PSA was based there. Records from a previous PSA have not been traced; it is not known whether there were any records, and if so, where they are and how they are stored. The auditors were told that these issues are being addressed.

6.4.4 Bishops' personal (blue) files in the southern province, CDM files and other sensitive records are stored at Lambeth Palace, overseen by the OABCY. The OABCY coordinates the administration of allegations of misconduct regarding archbishops, bishops and ministers who have an archbishop's licence to preach throughout the province, or ministers who have a licence from the University of Oxford or Cambridge which fall within the scope of the CDM working with the Registry. Decisions are made by the Archbishop of Canterbury after receiving advice from the Provincial Registrar. The OABCY deals with the related correspondence, filing and updating of the Archbishops' List (where penalties are recorded).

6.4.5 The internal audit (2021) noted that there was no single database/case work recording system used at Lambeth Palace, and that 'each separate department used their own system, tailored to their individual needs'. The QuickBase database was in use across some teams. The audit also found 'good awareness among staff of the need to keep personal information secure [but] some staff do not understand the importance of accurate recording and record keeping'. The internal auditors found that 'security of the files was relatively good. Files were located in locked drawers, cabinets, cupboards and lockable rooms in a variety of locations within Lambeth Palace'. Several recommendations relating to recording and record keeping practices were made, and these have been included in the safeguarding action plan overseen by the SRG. A number have since been addressed and the IGO has been involved to ensure high standards of record management practice, full compliance with GDPR requirements and to resolve any issues about data control.



6.4.6 The IGO is responsible for the records management function (including compliance with UK GDPR and other relevant legislation) in Church House and across all seven NCIs. The IGO coordinates the responses to all subject access requests (SARs) across the seven NCIs. The auditors were told that an information-sharing agreement which will apply to the whole Church of England is in the final stages of preparation.

6.4.7 The IGO liaises with, but does not manage, the records officer at Lambeth Palace. A regular monthly meeting between the IGO and relevant Lambeth Palace staff was established in February 2022, with the aim of ensuring the highest standards of records management, using systems which are aligned with those in the other NCIs.

6.4.8 The Lambeth Palace Record Office manages the various records held within the Palace. Some records comprise paper files; some are electronic. The Records Officer formerly reported to the Deputy Chief of Staff and, in the current absence of a postholder, reports to the Chief of Staff. Every new member of staff is required to complete mandatory GDPR online training within the first month of their employment at the Palace and the Records Office ensures that everyone completes the course within the expected period.

6.4.9 The majority of Lambeth Place records are retained permanently and are archived in the library. Historical records all comprise paper files and documents. At the time of the transfer to the archive (25/30 years after the creation of the records), the archive team assesses the records and is expected to be able to isolate the confidential documents that cannot be viewed by library readers (unless they are the owners of the information). Records concerning individuals can be held in the archives, but there is concern that some sensitive records may be in the archives having been incorrectly transferred, due to poor record-keeping practice in the past. Records are now becoming digitised, but there are no plans to digitise retrospectively.

6.4.10 The standard period before archived records are eligible for public disclosure is 30 years. Highly confidential records, not required for statutory investigations or not related to ongoing inquiries, are preserved in sealed envelopes and marked with a 100-year retention requirement. Unless otherwise specified, all records in the archives are made available to the public, including those relating to individuals, depending on what they are and what the disclosure rules are. Safeguarding related requests for access to the archives are dealt with by specified individuals.

6.4.11 During and since PCR2 there has been discussion with the IGO that safeguarding related records should be isolated and not delivered to the Records Office or to the archives as the Archbishop's records. This is still under discussion. Since then, there have been ongoing assessments of previous years' records to ensure that safeguarding related records are removed from the Archbishop's records and moved to the LPSO confidential storage. The auditors were told that these arrangements, together with regular meetings between the Lambeth Palace Records Office, the library archivists, the IGO, LPSO, the EAM from OABCY and the correspondence team, are ensuring more consistent practice as well as reducing the risk of safeguarding related records being included in the records made available to the public 30 years from the date of creation.

6.4.12 The auditors were told that concerns about the holding of personal data had been recently discussed between the LPSO, IGO, Lambeth Palace Library Archive team, and the Lambeth Palace Records Office. The information management team and the LPSO are working together to find the best practice to protect safeguarding records, including extending the retention periods covering all highly confidential records.

## Analysis

6.4.13 Record-keeping arrangements have historically been poor, reflecting an inadequate understanding of both legal requirements and good practice. The absence of a single, consistent approach to safeguarding responses, and the fact that there was no 'safeguarding' label for safeguarding-related correspondence, means that records are still not easily searchable, and have not been consistently stored. Capacity to address these historic problems is limited. These issues are now beginning to be addressed, under the guidance of the IGO. There has been insufficient emphasis on 'getting it right' for victims and survivors of abuse.

6.4.14 Until relatively recently, there does not appear to have been a consistent understanding of good record keeping. The absence of a single, consistent approach to safeguarding responses, and the fact that there was no 'safeguarding' label for safeguarding-related correspondence, means that records are still not easily searchable, and have not been consistently stored. While capacity to address these historic problems is limited, the auditors were told that the ensuing risk is mitigated as 'most' of the safeguarding related records have been removed from the Archbishop of Canterbury's records when requested for investigations, or to be filed with a recent complaint, as described above in 6.4.11. The auditors were told also that PCR2 had led to improvements in the labelling, integration and storage of safeguarding files.

6.4.15 The LPSO has a personal work email address, which is also used for safeguarding related correspondence. Having been told of the loss of records associated with a previous PSA, and the (erroneous) belief that nobody else is able to access a 'personal' mailbox, together with the reality of the LPSO role being part time, the auditors reflected that a consistent use of 'safeguarding@' for all formal safeguarding correspondence would assist in promoting continuity, enable regular oversight in the absence of the LPSO and reduce dependence on a single, named individual, albeit there would need to be strict protocols around access to the safeguarding mailbox.

### Questions for the Palace to consider

- How will the Palace address the backlog of historical records to ensure all safeguarding concerns have been identified and properly dealt with?

## 6.5 LAMBETH PALACE SAFEGUARDING OFFICER

### Description

6.5.1 Prior to 2021, the PSA, a member of the NST was based at the Palace. They provided safeguarding advice and support to the Archbishop, his staff and the wider Province and delivered safeguarding training. The PSA also carried out casework, in their role as a member of NST. The PSA was transferred from their original base at Lambeth Palace to join the rest of NST at Church House in 2021.

6.5.2 The role of Safeguarding Officer at Lambeth Palace was created following an internal safeguarding audit, which had been commissioned in early 2021 by NST. The present post is temporary (eight months) and part time (3.5 days per week). The current postholder took up post in October 2021 and is an experienced practitioner with an

extensive professional background in policing. They were one of the two PCR2 auditors for the Palace, and also jointly undertook the internal safeguarding audit for Lambeth Palace.

6.5.3 The LPSO is based in the main Palace building and is readily accessible to all who work or live in the Palace (whereas the PSA had been less visible, due to being based in one of the annexes). The LPSO has both a 'safeguarding@' mailbox and one that is personally addressed.

6.5.4 The primary focus of the LPSO role is *to promote and maintain a strong safeguarding culture across the various communities at Lambeth Palace and to help the Palace prepare for the Social Care Institute for Excellence audit in Spring 2022*. The LPSO is not expected to be a caseworker but does have a role in overseeing safeguarding cases involving Lambeth Palace and in giving direction and responding to most of the 'safeguarding correspondence of a general nature' addressed to the Archbishop of Canterbury. The LPSO is also asked for specific advice by others, including CoSA, on safeguarding matters. This requires the LPSO to keep up to date with professional developments in the world of safeguarding outside as well as within the Church, including standards of good practice.

6.5.5 Recent legal guidance from the IGO and the Legal Office has clarified that this oversight role by the LPSO (or any other safeguarding professional within and beyond the Church), does not extend to accessing CDM files (see section 5.2 for discussion of the CDM).

6.5.6 The LPSO was initially accountable to the Deputy Chief of Staff. Following the postholder's move to a different post, the Chief of Staff fulfils this function. This arrangement is likely to be temporary, pending a restructure within and outside Lambeth Palace, the details of which are as yet unclear.

6.5.7 There are no arrangements in place for professional safeguarding supervision, but the LPSO does attend casework meetings with the NST, and regular meetings at NST with the Diocesan Safeguarding Advisors (DSAs). This enables them to keep up to date with policy and other developments. The PSA formerly based at Lambeth is the LPSO's first point of contact within NST.

6.5.8 Within the Palace, a monthly meeting takes place between the LPSO, the Archbishop and Chief of Staff. A regular joint briefing meeting between the Archbishop, the Chief of Staff, the National Director of Safeguarding and the LPSO had just been established at the time of the audit.

6.5.9 The LPSO has met with each departmental group and community to review their safeguarding arrangements, identifying support and training needs, and putting measures into place to address them. They have established a cycle of regular attendance at staff meetings in the library, which previously had no safeguarding input. Consultation is encouraged and regularly sought.

6.5.10 The LPSO has prioritised addressing gaps or shortcomings in knowledge, training, recording and processes identified in the internal audit and subsequently, giving safeguarding a higher profile across all departments, and becoming established as an important person to consult on matters which may relate to safeguarding. They have prepared guidance and team-specific 'crib sheets', led the action planning and delivery following the internal audit, and commissioned specialist training to address areas where practice needed improving or where individuals/ teams lacked confidence and experience.

## Analysis

6.5.11 The LPSO has worked effectively to deliver on the responsibilities of their role in the short time they have been in post, with evident impact, but the post is time-limited. The continuing availability of specialist, operational safeguarding support within the Palace needs to be secured.

6.5.12 The LPSO has formed good relationships with key managers and staff across the Palace, who in turn seek the LPSO's advice and support when needed. Regular contact has improved understanding of good safeguarding practice, and while progress in some departments has been faster than in others, as noted elsewhere in the report, all managers were clear about their responsibilities for taking action if they have a safeguarding concern and know what to do. Rapid developments in the library safeguarding arrangements are further evidence of the impact of the current postholder, working effectively with the library leadership.

6.5.13 Good progress has been made over the past 12 months in addressing the gaps in process, procedures and understanding of safeguarding identified in the 2021 internal audit. Much credit for this sits with the LPSO. The auditors reflected that this task-centred approach had been effective, and would be further strengthened by a wider, proactive commitment across the Palace to setting the highest standards of safeguarding practice.

6.5.14 The LPSO is regarded as having made a positive difference to the identification of and response to safeguarding concerns. To illustrate this point, the auditors were told about the review by the LPSO and the relevant manager of decisions made and actions taken in response to a safeguarding concern which arose shortly prior to the appointment of the LPSO. It was concluded that these could, in retrospect, be regarded as minimising the potential safeguarding risks posed by an individual. The auditors were unclear whether any action will be taken as a result of this review and questioned whether this indicated a culture of safeguarding awareness which is still under development.

6.5.15 The departure of the Deputy Chief of Staff, who had been managing and supporting the LPSO, has led to the LPSO being directly managed by the Chief of Staff. While there are advantages to this arrangement, giving the LPSO direct access to the most senior postholder in the Palace, the demands on the Chief of Staff's time mean that, in practice, the LPSO has had to be primarily self-reliant. This has been mitigated by their regular contact with the NST, enabling them to keep up to date on current and future developments in policy and practice and, within the Palace, the introduction of regular briefing meetings with the Chief of Staff and the Archbishop, which enables a sharing of information and perspectives, and, potentially, a forum for resolution of any areas of difficulty.

6.5.16 The auditors noted that a major focus of the current LPSO job description is on preparation for the SCIE audit. Had the current postholder not been as energetic, the outcome of aspects of the present audit would have been very different, given what the internal audit revealed about what areas needed addressing. Given that the Church audit programme has been in place since 2017, its findings to date informed the IICSA investigation into the Anglican Church, and each diocese and cathedral had been audited prior to that in Lambeth Palace commencing, the auditors were extremely concerned at what this appears to indicate about the lack of priority given to safeguarding at Lambeth Palace.

6.5.17 The current LPSO post is due to end in June 2022. The need for accessible safeguarding leadership within Lambeth Palace and informed advice to the Archbishop will continue, however, and while commitment was expressed in private about the role, the auditors were left uncertain about plans for its continuation and reflected that its loss would pose a significant risk to the Palace's safeguarding arrangements. It also suggests a lack of understanding that Lambeth Palace must be seen to be leading from the front in respect of safeguarding.

6.5.18 The loss of the post of Deputy Chief of Staff, whether temporary or permanent, has resulted, in the auditors' view, in a loss of capacity to think through the implications of this, and to consider, assuming the post is continued, what the focus of the role should be, and what arrangements are needed for management support and professional supervision.

6.5.19 The auditors noted that the emphasis of the current LPSO role is primarily on operational detail, supporting the Palace to address shortcomings in its safeguarding arrangements which have left it out of step with current expectations and standards within and beyond the Church. Given the developing thinking about the OABCY, which should also result in greater clarity about what role should be played by the Archbishops in relation to safeguarding, there may be an argument for securing access to more senior, strategic safeguarding capacity. This is discussed further in section 7.2 on strategic leadership.

#### **Questions for the Palace to consider**

- What are the present and future needs of the Palace for professional operational safeguarding support and how will these be met, resourced, managed and supported?

## 7 FINDINGS – LEADERSHIP AND MANAGEMENT

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This section addresses leadership and management of safeguarding within Lambeth Palace, and by the Archbishop of Canterbury in relation to the Church of England.

Safeguarding leadership takes various forms – theological, strategic and operational – with different people taking different roles. How these roles are understood, and how they fit together, can determine how well led the safeguarding function is. They form the first three parts of this section of the report, which includes an evaluation of:

- theological and moral leadership
- strategic leadership
- operational responsibility for safeguarding
- oversight and quality assurance
- culture
- engagement with survivors.

### 7.1 THEOLOGICAL AND MORAL LEADERSHIP

#### **Context**

7.1.1 As an episcopal organisation, much of the power for action in the Church of England sits with the bishops. The Archbishop's authority in relation to his colleague bishops is described as spiritual and collegial, rather than managerial. The Archbishop of Canterbury has both a unique responsibility and a national platform from which to promote a safer culture and justice for all who have suffered harm within the church. In addition, people within and outside the Church look to him for theological and moral guidance and leadership of the whole Church.

#### **Description**

7.1.2 The present Archbishop of Canterbury has made numerous public statements in response to emerging revelations about abuse by Church officers and those closely connected with the Church, some of which have been highly emotional and confessional. He has made clear the level of priority and effort he has personally dedicated to using his position as Archbishop, to improve safeguarding across the Church and responses to survivors. For example, speaking to the media on the publication of the IICSA report (2022), he described being: 'shocked ... by the extent to which [abuse and its cover-up] was happening.... Since I came into this job I have worked as hard as I could to move the Church to a different place'. On occasions, he has apologised and expressed profound shame for the Church's failings and acknowledged the poor response by the Church to victims and survivors. He has also denounced those who were perpetrators of abuse, and others who appeared to have failed to respond to disclosures of abuse and take firm action to prevent further abuse. He made strong condemnations during the process of giving evidence to IICSA.

7.1.3 The present Archbishop has overtly endorsed the development of a safeguarding culture within the theological context of the Church through the work, for example, of the NST to clarify the safeguarding responsibilities of the clergy. Early in his tenure, together with the Archbishop of York, he wrote a preface to the revised *Guidelines for the Professional Conduct of the Clergy* (2015) to make explicit the connection between safeguarding and the Ordinal (which sets out formally and liturgically the Church's spiritual expectations of its new ministers as they are presented for ordination): 'protection of others forms part of our calling'.

7.1.4 As an episcopal organisation, much of the power for action sits with the bishops and the Archbishop is acutely aware of the particular difficulties for bishops of trying to achieve improvements in the full glare of public scrutiny, given the legacy of past mistakes. This is exacerbated for those bishops who are themselves victims and survivors of abuse. The auditors were told that the Archbishop has initiated work to educate and support bishops in their role as safeguarding leaders, and to encourage them to hold each other to account for their actions in promoting justice for victims and survivors.

7.1.5 Many victims and survivors commented on the Archbishop's personal care and commitment to hearing what they had to say and achieving justice and redress for them.

7.1.6 The small number of stakeholders who responded to the invitation to contribute to the audit were generally complimentary about the Archbishop's public leadership in relation to safeguarding, the strong pronouncements that he has made on the Church's safeguarding responsibilities, the strong tone in which he expressed his commitment to be accountable and his recognition of the need to 'act with purpose'. One referred to his 'clear and unequivocal lead on safeguarding matters – including apologies for past failures and a public commitment to deep cultural change'.

7.1.7 This positive picture has been undermined on occasions when the Archbishop is perceived to have not followed through on commitments he had previously made publicly on behalf of the Church, when he has appeared to change his previous decisions or statements, or issued contradictory statements about safeguarding-related matters in which he may have been personally involved. This has led to disappointment, frustration and anger for many victims and survivors. As one contributor commented, this can lead to a perception '... that the reputation of the organisation is a determining factor in his responses'.

## **Analysis**

7.1.8 The present Archbishop has sought to provide strong theological and moral leadership, and to make clear his belief that safeguarding the most vulnerable is at the heart of the Church's mission. His ability to turn his expressed personal commitment into visible action is constrained by the constitutional reality of the Church of England and leaves the Archbishop open to accusations of inconsistency regarding safeguarding. Clarification of the role of the Archbishop as a moral leader in this context appears vital as the Church seeks to address past failings and respond well to victims and survivors.

7.1.9 By virtue of his position, the Archbishop has many opportunities to demonstrate courageous leadership by publicly confronting past failings by the Church and by responding well to victims and survivors of historic abuse, holding colleagues across the Church to account, and modelling how to learn from past mistakes. The auditors were given examples where the Archbishop had provided strong leadership in acknowledging

past failings, and in encouraging a culture of mutual accountability which is open to learning rather than being driven by fear and shame. These examples, however, tended not to be public, creating a disjunct between what may be done and what is seen to be done by the Archbishop.

7.1.10 Clarification of the role of the Archbishop as a moral leader in this context seems essential as the Church seeks to address past failings and respond well to victims and survivors. Should he comment publicly, for example, when a bishop has behaved in such a way or taken a decision which he considers to be incompatible with effective safeguarding practice, despite the Archbishop having no formal managerial or governance role in relation to the bishops? Should the Archbishop comment publicly when he regards the Church as failing to progress the interests of victims and survivors in its decision-making and actions?

7.1.11 The auditors recognise that the role of the Archbishop in providing meaningful moral authority and spiritual leadership in the absence of a direct safeguarding role or managerial power, where so much power and responsibility sits with the dioceses, is a significant challenge. His public position has been undermined on occasions by the actions of individual bishops which have been perceived as out of step with good safeguarding practice. The Archbishop's recognition of the need to encourage the bishops to hold each other to account is one way of addressing this dilemma and would benefit from a higher profile.

7.1.12 The result of actions that contradict the Archbishop's otherwise strong position of moral leadership regarding safeguarding risks damaging public trust and inhibits the possibility of finding resolution for victims and survivors. These problems are likely to continue to be an issue while the impression is widely held that the Archbishop has executive authority over the whole Church and the he himself does not either contradict this or explain it clearly and while his role as moral leader lacks clarity. This is a missed opportunity to explain what may appear to be a lack of action on his part. It is also a missed opportunity, as one stakeholder commented, for '... even stronger communication that each bishop/diocese/parish owns the issue and that it is not for the NST to do'. By not speaking out and acting, he risks being seen to collude with wrongdoing. To speak out and act effectively will require significant, informed support from those with relevant safeguarding experience.

#### **Questions for the Palace to consider**

- What is the desired scope of the moral leadership role of the Archbishop regarding safeguarding and the Church's response to victims and survivors of abuse by clergy and those in Church-related roles, given the present constitutional realities of the Church of England?
- How can more openness be achieved about perceived tensions and dilemmas in exerting moral and theological leadership publicly versus behind the scenes?
- What safeguarding expertise do Lambeth Palace and the joint office require to provide moral and theological leadership in this domain?



- How will the Archbishop use his position of moral and theological leadership to enable the Church to address the legacy of past failures, by serving and former bishops, to put first the safety and wellbeing of victims and survivors of abuse by Church officers, and enable their abusers to continue in ministry?
- How can the Archbishop challenge the Church to address past failings, while being clear about the limits of his own direct authority to act?
- In what circumstances should the Archbishop's role as a moral leader lead him to speak out about what he considers to be a safeguarding failure within the Church, or a failure to promote the interests of victims and survivors?

## 7.2 STRATEGIC LEADERSHIP FOR SAFEGUARDING

### Context

7.2.1 Clarity about strategic and operational leadership responsibilities are commonly considered essential aspects of the leadership and governance arrangements of organisations. Strategic leadership develops the vision and mission, strategies, systems and structures for achieving that vision and overall accountability. Operational leadership delivers that vision and mission on a day-to-day basis. Complex structures and multiple forums exist for strategic leadership and governance across the Church of England, to cover a range of areas and activities, as described in the opening of this report.

### Description

7.2.2 The practice guidance *Key Roles and Responsibilities of Church Office Holders and Bodies*, published in 2017, gives the two archbishops the responsibility for providing leadership and direction in promoting a safer Church. Specific responsibilities include:

- appointing a lead Bishop for safeguarding,
- appointing members of the NSSG, and
- ensuring that diocesan bishops engage in safeguarding induction and training.

7.2.3 Other than this, the scope and limitations of the archbishops' strategic leadership responsibility for safeguarding across the Church are not detailed. Since the installation in 2013 of the present Archbishop of Canterbury, there has been considerable investment in safeguarding and many positive changes have taken place, some of which are referenced elsewhere in this report. These wider developments are not the focus of this audit.

7.2.4 In numerous public statements, the Archbishop of Canterbury has expressed a personal responsibility for what might be generally understood as strategic leadership of safeguarding across the Church of England as a whole. The constitutionally devolved nature of the Church of England makes the exercise of strategic leadership by the Archbishop more complex than in a simpler, hierarchical organisation. In a safeguarding context, it means that the diocesan bishops are ultimately responsible for ensuring good safeguarding arrangements and practice in the dioceses, in line with the House of Bishops' safeguarding policy and guidance. The archbishops have moral authority but no managerial power over bishops.

7.2.5 This context requires the Archbishop of Canterbury to work through other structures and individuals to achieve change in areas where he does not have direct authority. It also requires caution in publicly asserting or implying an ability to take action when he lacks the necessary power to follow through.

7.2.6 As the figurehead for safeguarding in the Church, as well as the Palace, the Archbishop keeps himself informed through regular contact with the head of NST, the LPSO and, on occasions, seeks advice and counsel informally from other trusted colleagues, as well as formally from the Provincial Registrar and the NCI Legal Office. The Church's National Director of Safeguarding is available to provide strategic advice. The Archbishop does not have formal access to a safeguarding professional with experience of the challenges of strategic leadership in this complex area of activity who is independent of the Church.

7.2.7 The appointment of a BACY and the establishment of a joint office for both archbishops, based at Lambeth Palace (the OABCY), has signalled a change in how the two archbishops wish to demonstrate and align their leadership of the Church. The BACY replaces the former role of Bishop at Lambeth and provides a direct connection between the archbishops and the bishops. An appointment to the BACY role had been made shortly prior to the audit, and both the BACY role and the OABCY were at an early stage of development. The new BACY has held safeguarding related roles at diocesan level and in a theological college (TEI), has experience in promoting culture change in both locations, and has recently completed the senior leadership safeguarding training pathway.

7.2.8 Safeguarding is one of the first areas where thought is being given to how the joint office should work, recognising that the roles of the archbishops are both internal (to the palaces), and outward facing towards the provinces and the national Church. The BACY is expected to take the lead on behalf of the Archbishops in safeguarding strategy and policy matters, attending NSSG and NSP on behalf of both palaces and liaising with key others on wider strategy issues (such as the group being convened by the lead Bishop to consider safeguarding culture as it relates to bishops). The BACY is expected to become involved only by exception in operational and casework matters, including attending core groups relating to bishops, deans, senior (or high profile) clergy.

7.2.9 The creation of the joint office is expected to be followed by further restructuring at both palaces and reflects changes which are taking place across the NCIs. Pending that, the Chief of Staff is the safeguarding lead at the Palace, and meets weekly with their Bishophorpe equivalent, together with BACY. The regular, case focused, briefing that formerly took place between the Archbishop and the PSA and NST has been very recently replaced by a joint meeting between the Archbishop, the Chief of Staff, the Director of the NST and the LPSO which focuses on more strategic safeguarding issues as well as specific cases of national significance.

7.2.10 The Chief of Staff and Strategy works with the Archbishop in defining and delivering his strategic priorities, which include safeguarding by implication. He is also the main staff point of contact with the Archbishop of Canterbury on safeguarding matters and is expected to convene and attend regular meetings with the acting head of NST, both with and without the Archbishop and the LPSO. He brings extensive experience in reconciliation work to the role, but no formal experience or training in safeguarding.

7.2.11 As the senior lay person at Lambeth Palace, the Chief of Staff works closely with his equivalents across each of the other NCIs as a member of the SLT and has a

particular responsibility for communicating and promoting the Archbishop's priorities. In this role, he has the potential to influence culture and practice in the other NCIs, and in relation to important partners such as legal service providers, Ecclesiastical Insurance and the theological education institutions (TEIs).

## **Analysis**

7.2.12 There have been significant improvements in the Church of England's approach to safeguarding over the past 20 years. A lack of clarity about the scope and limitations of the Archbishop's strategic leadership responsibility for safeguarding across the Church, in the context of its constitutionally devolved structure, limits his ability to hold colleagues to account and be seen to be holding colleagues to account. Having no formal access to independent and expert safeguarding advice is a significant disadvantage.

7.2.13 The Archbishop recognised early on the need for investing in and professionalising the Church's approach to safeguarding, and considerable progress has been made. This was acknowledged by IICSA and continued to be evident to the auditors. It indicates the effectiveness of the Archbishop in encouraging the various decision-making bodies across the Church to make sound decisions. At the same time, this positive picture is undermined by the apparent lack of urgency in implementing significant decisions such as the redress scheme. In this context, it is unsurprising that victims, survivors and others have formed the view that nobody actually has the power to make things happen or to hold senior clergy, in particular, to account. As one contributor reflected, 'addressing governance more widely within the Church is the opportunity to bring the transparency and accountability that is lacking and which makes the Church overall a dangerous place'.

7.2.14 While recognising the Archbishop's lack of direct authority in addressing this and similar issues, because he does not have decision making power in the relevant forums, the auditors queried what should be the role of the Archbishop in publicly commenting on and holding to account his colleagues across the Church? This would be equivalent to the more public stance taken regarding other issues of social justice. Is it also possible to use his various roles (e.g. as Joint President of General Synod and the Archbishops' Council, and Chair of the Board of Governors of the Church Commissioners) to greater effect, in order to ensure that the interests of victims and survivors are at the centre of decision-making across all NCIs, including the investment and allocation of funds?

7.2.15 One of the areas in which the Archbishop has direct authority is in relation to issues raised of alleged misconduct by bishops, sometimes through attempts to initiate a CDM. The auditors would therefore expect clear strategic safeguarding leadership from the Archbishop to be manifest in this aspect of the role. There is an opportunity to clarify the need for a duty of candour on bishops where they have allegedly had disclosures of abuse made to them in the past and not acted on them, and the need to demonstrate accountability through recognition of the harm caused and evidence of learning for the future. Given the power imbalance and the context of the Church, a way also needs to be found to deal with the impasse created currently in circumstances where a bishop cannot recollect having received a disclosure.

7.2.16 Another of the areas in which the archbishops have direct authority is in appointing bishops to the NSSG. The auditors would therefore expect clear strategic safeguarding leadership from the Archbishop to be manifest in this aspect of the role. Given NSSG is responsible for the strategic oversight of national safeguarding activity on behalf of the NCIs and overseeing the work of the NST, members should each have an exemplary track

record of acting on House of Bishops' safeguarding guidance and championing good safeguarding practice. This requires total transparency and accountability on the part of the Church. It means that no active NSSG member should be the subject of an ongoing complaint or CDM related to safeguarding. It means all NSSG members should be required to give a 'conflict of interest' statement that accounts for any past safeguarding failings and alleged failings. No active NSSG member should have historical safeguarding complaints left unresolved due to the previous requirement (now lifted in relation to complaints where the alleged misconduct is of a sexual nature towards a child or the alleged victim is a vulnerable adult) to initiate a CDM within a year of the incident taking place, or have stated that they had no recollection of having abuse disclosed to them and done nothing further to find resolution for the abuse victim concerned. This has not always been the case and is understandably a source of anger and distress to victims and survivors.

7.2.17 As noted, the diocesan bishops hold most responsibility for leadership in delivering a safer Church. The Archbishop has recognised the need to improve and develop the safeguarding culture in this group, in line with standards, expectations and legal responsibilities in the wider public and charity sectors and has supported and promoted investment in training and development.

7.2.18 The auditors recognised the potential for the BACY to work closely with the bishops, on behalf of both archbishops, to raise standards and promote a consistency of action which has been lacking, and which has, on occasions, undermined the expressed commitment of the Archbishop of Canterbury to hold the Church to account for its actions. A strategic plan which sets out the direction of travel for the safeguarding aspects of this role would be beneficial and provide a baseline against which to measure impact, possibly through the weekly meeting between the BACY and the chiefs of staff in the two palaces.

7.2.19 Within the Palace, the allocation of responsibility for safeguarding to a senior member of staff is welcomed. The auditors note that the role description for the safeguarding lead details the operational oversight responsibilities of the role but does not refer to strategic leadership - a significant gap. In addition, the allocation of this role to the Chief of Staff, who already has a very busy job with extensive responsibilities, risks safeguarding being reduced to one of many tasks – and, potentially, problems – which have to be juggled *alongside* many other competing priorities. The regular meeting of the Chief of Staff with the BACY and his counterpart at Bishopthorpe is an opportunity to ensure strategic alignment, and to adopt a strategic approach to achieving desired changes in other NCIs, where safeguarding issues are not prioritised to the degree which is expected.

7.2.20 The auditors note the absence of independent, experienced, and expert safeguarding advice available to the Archbishop and the Palace. Many of the kinds of public and private missteps made by the Archbishop and his senior staff, particularly when responding to victims and survivors, and to media scrutiny, would be less likely if such experienced advice was made available.

### Questions for the Palace to consider

- What further steps are needed to clarify the scope and limits of the strategic safeguarding leadership roles of both archbishops, and how might they be held accountable for their effectiveness?
- What can the Archbishop and Chief of Staff do to demonstrate to NCIs and Church trustee bodies the importance of complying fully with the spirit and letter of the Church's safeguarding policy and put victims and survivors at the heart of a transparent and just system?
- What further opportunities are there for the Archbishop to use his authority in the various leadership and decision-making fora to promote a safer Church?
- How can the Archbishop exert strategic leadership regarding the need for a duty of candour on bishops about failures and alleged failures to respond to disclosures of abuse or sharing of concerns about unsafe practice or people and demonstration of accountability through recognition of the harm and evidence of learning for the future?
- What role does the Archbishop have in ensuring that bishops appointed to the NSSG do not include any individual who has failed to take sound safeguarding actions or has not dealt transparently and compassionately with any past mistakes or alleged failures?
- Will the joint office of the archbishops have a strategic plan for safeguarding and how could this be co-produced with relevant stakeholders, and made public?
- What formal access to independent strategic, informed safeguarding advice is needed by the Archbishop, the BACY and senior colleagues and how might this be secured?

## 7.3 OPERATIONAL LEADERSHIP FOR SAFEGUARDING

7.3.1 The devolved nature of responsibilities and decision-making across the Church means that most safeguarding activity takes place in the dioceses, each of which has its own operational leadership arrangements. Likewise, the NST has its own operational leadership arrangements. Neither the Archbishop nor any other clergy or staff based in Lambeth Palace have operational leadership responsibilities for safeguarding beyond the Palace itself. This section therefore focuses on operational leadership within Lambeth Palace.

### Description

7.3.2 Operational safeguarding responsibilities nationally and in the dioceses are set out in the practice guidance *Key Roles and Responsibilities of Church Office Holders and Bodies* (2017). Operational safeguarding responsibilities in the two palaces are implied

rather than specified, beyond reference to the roles of the archbishops in promoting a safer church.

7.3.3 The Chief of Staff is the lead safeguarding officer for Lambeth Palace, having assumed this responsibility following the departure of the Deputy Chief of Staff. In this role, he has overall responsibility '*for safeguarding processes as they relate to Lambeth Palace staff and residents,*' and for convening and chairing the Palace SRG, with the expectation that the purpose of this group may be revised. He is the line manager of the LPSO. The LPSO and Chief of Staff have both started meeting regularly with the Archbishop, to keep him abreast of safeguarding issues within the Palace.

7.3.4 The SRG, currently chaired by the Chief of Staff, leads and coordinates safeguarding activity 'to ensure the best possible safeguarding operation and culture across the 'community of communities' at Lambeth Palace'. Its membership comprises managers and key individuals across the Palace and library. It meets three times each year for one hour, and its terms of reference were last reviewed in December 2021. The SRG's objective is 'to provide a point of reference, consultation and make recommendations to ensure the best possible safeguarding operation and culture across the 'community of communities' at Lambeth Palace'. Its remit extends widely, including care and support of survivors, policies and procedures, safer recruitment, complaints and whistleblowing, and pastoral care of staff. Latterly it has provided a forum for the LPSO to communicate and encourage further change.

7.3.5 Minutes of the last three meetings of the SRG indicate that time is given primarily to updates from members, with particular attention being paid to preparation for the SCIE audit and to reporting back on actions taken since the completion of the internal audit in 2021.

7.3.6 In the OABCY, operational safeguarding responsibilities (including attending core groups, monthly casework meetings with NST and 'gold group' planning meetings for complex cases) have been agreed, with senior staff from Bishopthorpe Palace and the Chief of Staff from Lambeth Palace dividing responsibilities between them. The overall accountability for these operational arrangements is not specified.

## **Analysis**

7.3.7 Operational accountabilities for safeguarding are clear within the Palace and have recently been agreed for OABCY. The internal audit (2021) indicated that the Palace had been slow to establish its safeguarding arrangements, which does not reflect well on the priority given to safeguarding, or reflect recognition of the importance of leading by example by having one's own house in good order. Since the internal audit, progress on implementing the recommendations has been positive.

7.3.8 The commissioning of the internal safeguarding audit was a positive recognition in Lambeth Palace of the need for improvement. The rationale for not having made the necessary improvements at an earlier opportunity, given the context of IICSA, high profile abuse scandals and national safeguarding developments across the Church, is difficult to understand, however.

7.3.9 The SRG has much potential. It comprises the right range of people who are in a position to show leadership and tackle any difficulties implementing a strategic plan for safeguarding. Now attention needs to be paid to the regularity of meetings and agendas, to allow the group to fulfil its aim of ensuring the best possible safeguarding operation and

culture across the 'community of communities' at Lambeth Palace. The auditors note that three-hours a year devoted to the SRG's task of safeguarding operational leadership and coordination is unlikely to be sufficient. Consideration of how the voices of survivors could be reflected in the group will also assist in strengthening it further as a leadership group.

#### **Questions for the Palace to consider**

- How can the SRG be developed further to lead and support operational safeguarding practice within the Palace?
- What might the advantages and disadvantages be to having some survivor representation on the SRG at Lambeth Palace?

## **7.4 OVERSIGHT AND QUALITY ASSURANCE**

### **Context**

7.4.1 A safe organisation needs constant feedback loops at all levels about what is going well and where there are difficulties in relation to safeguarding, and this should drive ongoing cycles of learning and improvement. Robust quality assurance enables an organisation to understand its strengths and weaknesses. It needs to be strategic and systematic to support accountability and shed light on how well things are working and where there are gaps or concerns. Potential sources of data are numerous, including independent scrutiny.

7.4.2 There are a range of mechanisms that can support this process of learning and improvement:

- professional supervision of the LPSO
- external scrutiny
- routine benchmarking
- identifying lessons learnt from other places and feeding these into planning the work of the Palace
- abuse survivor 'customer' feedback
- routine Palace 'customer' feedback
- complaints procedure about the safeguarding service (see Complaints section)
- independent 'lessons learned' reviews of cases where things seem to have gone wrong or there are concerns.

### **Description**

7.4.3 Nationally, systems for overseeing the delivery and effectiveness of the Church's safeguarding arrangements have developed incrementally over several years. Diocesan Safeguarding Advisory Panels (DSAPs) oversee safeguarding arrangements in each diocese. Nationally, the semi-independent NSP and, more recently, the ISB, have been put into place to enhance the oversight of safeguarding arrangements. A quality assurance

framework is being developed which will provide a consistent baseline for measuring the quality and effectiveness of safeguarding activity. The evaluation of these national arrangements is beyond the scope of this audit. Within scope is consideration of the role of Lambeth Palace and the Archbishop in relation to these arrangements.

7.4.4 At Lambeth Palace, there are systems in place which could contribute to quality assurance activity, such as the training spreadsheet, complaints and correspondence records and recruitment files, but no complete system, as yet, for collating and interpreting information to inform future activity and development.

7.4.5 The Lambeth Palace SRG has coordinated activity on safeguarding primarily with a focus on the forthcoming SCIE audit but has not yet developed a means of gathering evidence of effectiveness and impact. Its terms of reference do not specify any reporting arrangements or accountabilities. A monthly meeting between the LPSO, the Archbishop and Chief of Staff provides a forum for discussion, however.

7.4.6 The regular joint briefing meeting between the Archbishop, the Chief of Staff, the National Director of Safeguarding and the LPSO, which had just been established at the time of the audit, appears to have the function of keeping the Archbishop briefed about strategic safeguarding developments and issues across the Church, rather than any explicit oversight role.

## **Analysis**

7.4.7 Nationally, systems for evaluating the quality and effectiveness of the Church's safeguarding arrangements are still developing. The role of the Archbishop in overseeing safeguarding across the whole Church needs clarification. Within the Palace, the safeguarding reference group is well placed to take on a quality assurance role and will need to put formal systems in place for systematically evaluating effectiveness of the safeguarding arrangements.

7.4.8 The auditors reflected that the SRG has potential to take on a quality assurance function for the Palace's safeguarding arrangements, in addition to its leadership and coordination roles, defining what good safeguarding looks like and putting into place the means of checking on how effective the Palace's safeguarding arrangements are and what impact they are having. This would require moving beyond accounts of activity to creating the means of evaluating quality and outcome. The development of a quality assurance framework led by NST may assist with this next stage. As noted in the section on engagement with survivors (section 7.6), Lambeth Palace is in a good position to collate feedback from victims and survivors who get in touch, to provide insights for the national Church about what is working well and where issues remain.

7.4.9 What wider role, if any, the Archbishop of Canterbury holds in terms of oversight of safeguarding across the Church requires clarification. Is there an expectation that he should have a 'line of sight' to the workings of the whole Church safeguarding infrastructure, down and out to dioceses and parishes, and if so, what system is needed to enable him to fulfil this role? This would have implications for the focus of his regular meetings with the Director of NST.



### Questions for the Palace to consider

- What opportunities are there to develop the SRG to provide assurance that Palace safeguarding arrangements are effective, and how might this be achieved?
- How can the potential quality assurance contributions and oversight roles of the Archbishop and Lambeth Palace in relation to safeguarding across the Church be clarified?

## 7.5 CULTURE

### Context

7.5.1 The most critical aspect of safeguarding relates to the culture within any organisation. In a Church context, that can mean, for example, the extent to which priority is placed on safeguarding individuals as opposed to the reputation of the Church, or the ability of all members of the Church to think the unthinkable about friends and colleagues. Any Church body should strive for an open, learning culture where safeguarding is ‘everybody’s business’ and a shared responsibility, albeit supported by experts, and which encourages people to highlight any concerns about how things are working in order that they can be addressed.

7.5.2 An open learning culture starts from the assumption that maintaining adequate vigilance is difficult, so proactively seeks feedback on how safeguarding is operating and encourages people to highlight any concerns about how things are working in order that they can be addressed.

7.5.3 Culture within a Church body is crucial to effective safeguarding as is the priority given to safeguarding children and vulnerable adults over the protection of the reputation of the Church. A safe culture also relies on the knowledge and understanding of all within the Palace, diocese, cathedral or parish to react to allegations and disclosures of abuse even when these might be about those they know and admire. Crucially, a safe culture requires trust in the organisation’s leadership and in fair and transparent systems and processes.

7.5.4 The recently published practice guidance *Responding Well to Victims and Survivors of Abuse* (2022) contains a section on culture which describes clearly how Church bodies can become safer, prevent abuse and provide good care and support for victims and survivors, if they create and maintain healthy cultures. It highlights the importance of acknowledging and actively guarding against the tendency towards clerical deference as an element in developing a healthy culture.

### Description

7.5.5 As the senior bishop and principal leader of the Church of England, the Archbishop of Canterbury is influential in setting expectations regarding the culture of the Church. This is an aspect of his moral and theological leadership regarding safeguarding. The present Archbishop has spoken frequently on the importance of establishing a safe, healthy culture across the Church, including the necessity to challenge the tendency towards a culture of deference towards clergy.

7.5.6 External to the Palace, contributors indicated that safeguarding had become increasingly important in recent years, and this view was reflected in policy, practice guidance, reports from Synod and other fora, and written documentation. Although based within the Palace, the BACY has an explicit role in promoting culture change across the Church, through working with the bishops to promote a culture which is properly accountable, but where learning rather than fear and shame can be the outcome of making and/or admitting mistakes. The auditors understand that there are also plans to address issues of episcopal wellbeing, following a review into episcopal ministry.

7.5.7 Interviews and documents indicated that safeguarding had become a more pressing priority within Lambeth Palace as the audit approached, hence the appointment of the (temporary) LPSO, the commissioning of an internal safeguarding audit, and the introduction of additional systems and processes. Staff and clergy described to auditors the impact of the LPSO on raising awareness, supporting them in their roles, and challenging previous practices.

7.5.8 As mentioned earlier in the report, some key roles in Lambeth Palace, related to safeguarding, were in flux at the time of the audit. The Deputy Chief of Staff had recently resigned; the LPSO was a temporary role appointed only in October 2021, six months ahead of the SCIE audit. The self-assessment that was submitted ahead of this audit reflected a collection of different views rather than a considered, collective view. Some case examples reflected a degree of naivety regarding safeguarding, and arrangements for engaging with victims and survivors appeared ad hoc rather than thought through, or considered with advice from those with relevant expertise and experience. Feedback systems were underdeveloped, and there was little evidence of a cohesive, strategic approach to developing safeguarding arrangements and practices, supported by a culture of challenge.

7.5.9 The job profile for the temporary LPSO included the responsibility to promote and maintain a strong safeguarding culture across the various communities at Lambeth Palace. They have sought to do this by establishing a visible and positive presence, providing advice, consultation and practical assistance, and delivering or commissioning training.

## **Analysis**

7.5.10 The auditors judged that there have been recent improvements in safeguarding culture and awareness in the Palace. Situations that invite perceptions of a lack of consistency and follow-through in public statements and undertakings made by the Archbishop have undermined his efforts to establish a consistently safe culture across the whole Church.

7.5.11 Within the Palace, the LPSO provides good support and advice to key individuals and has undoubtedly had an impact in raising expectations and improving safeguarding awareness and responses, strengthening the safeguarding culture and standards of practice. The auditors noted that this appointment, and many key developments internally, were all very recent, apparently driven by the forthcoming audit.

7.5.12 The Archbishop and his senior clergy and staff are fully aware of the need to create a culture of openness and transparency, and to challenge deference. The auditors were given examples of how the Archbishop, personally, seeks to challenge the culture of deference within Lambeth Palace. He endeavours to keep himself visible and accessible

to all staff, and this is acknowledged and appreciated by many. Senior clergy, likewise, are familiar, and there is a degree of informality about their relationships with lay staff.

7.5.13 The auditors observed that interactions between senior and junior staff are less open and relaxed and were told that, despite the best efforts of the Archbishop himself, not all staff felt confident to raise concerns with senior staff and clergy, partly because of deference and partly because of a lack of confidence that their concerns would be taken seriously and properly responded to. There were no concerns expressed about raising safeguarding concerns with the LPSO, however. Some staff expressed the view that ‘the little people’ were rarely listened to, not consulted or communicated with systematically by the leadership, and had little influence on decisions.

7.5.14 In his national leadership role, the auditors noted that the Archbishop’s public statements were not always consistent, nor seen through. While there may have been good reason for why he was unable to act, given the lack of managerial authority of the Archbishop’s role, it can seem to reflect ongoing denial by the Church about what is needed to create a safe Church and rebuild broken lives of victims and survivors of Church abuse.

7.5.15 At the same time, there needs to be recognition that both Archbishops are endeavouring to lead and improve the culture of safeguarding across the Church in a climate of high anxiety, where errors are frequently made public, eliciting blame and shame. Senior clergy and staff in the Palace appear to have a good grasp of these issues.

#### **Questions for the Palace to consider**

- What else might the Palace do to promote the healthy culture described in *Responding Well to Victims and Survivors of Abuse* (2022) both within Lambeth Palace and across the wider Church?
- How might the Palace identify areas where safeguarding culture is less well embedded and spread good practice where it is?
- How can progress in the development of a safe culture form part of Palace strategic planning and be quality assured, and how will the Palace be confident that things are improving?
- In what ways could survivors of abuse be invited to support the development of safeguarding culture at the Palace?

## **7.6 ENGAGEMENT WITH VICTIMS AND SURVIVORS**

### **Context**

7.6.1 In their joint foreword to updated *Guidelines for the professional conduct of the clergy* (2015), the Archbishops of Canterbury and York began thus:

*The solemn reminder about trust that is in the The Anglican Church Investigation Report confronts all the ordained with the privilege and responsibility entailed in their particular ministry. We know that the Church of God expects high*

*standards, but it also remains true that society at large expects high standards of the clergy. This is true of both those who profess faith in Jesus Christ and those who do not. A failure in meeting the standard expected results in profound disappointment, and a deep sense of being let down.*

7.6.2 Nowhere is this more relevant than in the way that the Church responds to those who have been harmed by its clergy and others closely identified with it, who hold a particular position of trust in the eyes of the public.

7.6.3 *Responding Well to Victims and Survivors of Abuse*, which came into effect on 4<sup>th</sup> April 2022, sets out requirements and advice for Church officers and Church bodies on how to respond well to victims and survivors of all forms of abuse. It also contributes to the implementation of one of the recommendations of *The Anglican Church Investigation Report* (2020) by IICSA regarding funding and provision of support to victims and survivors of child sexual abuse.

7.6.4 The Church of England's present structure of governance and accountability is one of distributed leadership, rather than the hierarchical model more familiar in large organisations. This gives ultimate responsibility to no single person but instead to each diocesan bishop, with accountability resting within the diocese. For both Archbishops, this can give rise to the challenge of demonstrating meaningful moral authority and spiritual leadership in the absence of a direct safeguarding role or managerial power. For survivors, this can create real and pressing problems in terms of addressing past injustices and in rebuilding destroyed lives.

7.6.5 If a survivor comes to the Palace to disclose, or to complain about their treatment elsewhere, how should the Palace and Archbishop respond on behalf of the Church? To what degree should they provide active spiritual leadership in acknowledging and seeking to address past failures of the Church and to champion the wellbeing and safety of those who have experienced abuse by clergy?

7.6.6 It is the expectation of the auditors that, as in other agencies faced with similar shortcomings, accountabilities are clarified, and the Archbishop engages directly with survivors to learn from their experience and use it to improve the Church's safeguarding practice and advocate for individuals where it is needed.

## **Description**

7.6.7 The IICSA report on the Anglican Church (2020) was highly critical of the Church's response to victims and survivors. In his personal response to the publication, the Archbishop stated: 'The report published today is a stark and shocking reminder of how so many times we have failed – and continue to fail – survivors. Apologies are vital, but they are not enough. We have to listen. We have to learn. And we have to act'.<sup>2</sup>

7.6.8 The Archbishop has given apologies on behalf of the Church for past failures and made a public commitment to deep cultural change. He has met individuals and groups of

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<sup>2</sup> <https://www.archbishopofcanterbury.org/news/personal-statement-archbishop-canterbury-justin-welby-following-publication-iicsa-report>.

victims and survivors of abuse by Church officers, as has his Chief of Staff and other clergy and officers at Lambeth Palace. He has also recognised shortcomings in the way victims and survivors had been responded to from Lambeth Palace in the past.

7.6.9 The auditors heard about and saw numerous examples of how the Archbishop has met with and responded personally to victims and survivors. Many expressed recognition that his sympathy and sorrow were deeply personal but felt let down when this did not result in any action that was apparent to them. More broadly, while recognising the Archbishop's personal commitment to getting things right and welcoming his publicly expressed remorse for past failings, victims and survivors generally criticised him for a perceived lack of action: '.... warm words are not enough'.

7.6.10 Others who came forward to contribute told of responses from Lambeth Palace that seemed incongruous and disproportionate. For example, one survivor contacted Lambeth Palace to request regular pastoral contact, to check their wellbeing – something that is basic to every Church the auditors have encountered. This request for basic pastoral care apparently being not possible to meet, it was suggested that the person apply for compensation but, a year later, their compensation claim petered out due, apparently, to the lack of corroborating evidence, leaving the individual no better than when they had initiated contact.

7.6.11 For others, who had responded to an invitation to attend the Palace and meet either with an official or the Archbishop, there appeared to have been no thought given to basic courtesies such as provision of refreshments, reimbursement of travel costs and enquiry as to their wellbeing, even after having been obviously distressed during their visit.

7.6.12 The abuse perpetrated by the late John Smyth is the subject of the Makin review, commissioned by the Church of England, publication of which has been delayed. A number of victims and survivors of John Smyth talked with the auditors, and shared their views and experiences of the responses they received from individuals within Lambeth Palace and beyond, in the wider Anglican Church. These were extremely negative.

7.6.13 Evidence seen and heard by the auditors of direct responses to victims and survivors by the LPSO, in the relatively short time that they have been in post, indicate that these individual responses were good.

## **Analysis**

7.6.14 Previous efforts by Lambeth Palace to engage with survivors have been insufficiently thoughtful and thought through. Responses by the current LPSO to individuals were good.

7.6.15 The Archbishop is in a unique position to set the tone and model the nature of the Church's relationship with survivors of abuse by clergy and people in Church-related roles and has sought to do so in person on numerous occasions, yet in Lambeth Palace as a whole, some of the very basics of good practice were clearly often missing in engagement with survivors. These include practicalities such as equality of access, giving clarity about the purpose of meetings, negotiating who will be in attendance and their roles, checking preferences about venues, even particular rooms, as well as clerical dress, such as dog-collars. It includes being highly sensitive to power differentials, demonstrating care and respect in every aspect, including support with travel arrangements, welcoming supporters, considering other individual factors that make someone feel more comfortable,

providing refreshments, making repayment of expenses easy, clarifying the outcome, next steps and timescales, and following through on undertakings made.

7.6.16 Over time, a number of different Palace staff appear to have had roles in engaging with victims and survivors, without clarity about what exactly their roles were or should be. This applies equally to the role of the Archbishop, the Chief of Staff and other senior clergy in Lambeth Palace. In the context of IICSA and public statements, this gap is surprising and unhelpful. It increases the chances of mismatched expectations, and of causing frustration and hurt.

7.6.17 The continuing lack of clear structures in the Church for raising and addressing historic grievances about responses to knowledge of abuse and to survivors, can present real and pressing problems in terms of addressing past injustices and in rebuilding destroyed lives. The auditors reflected that there is an opportunity for the Palace to reset its expectations and standards of practice, to build a picture of what has happened in the past and been inadequately responded to, and the legacy that this has left, to exercise proper compassion for survivors, and to assure itself that there are no more 'skeletons in the cupboard'. Any assumptions held that individual survivors will never be satisfied with Church responses to past safeguarding failures, need to be challenged. The new OABCY means that consistency should be achievable in the way that both Archbishops respond to safeguarding contacts. The availability of the LPSO is already resulting in improved identification of safeguarding issues and improved responses.

7.6.18 The publication and very recent implementation of *Responding Well to Victims and Survivors of Abuse* (2022) provides an opportunity for Lambeth Palace to review its own position and responses to victims and survivors and consider what role and standards it should be applying from now on. A local 'Responding Well' plan could assist in thinking through the role of the Palace as well as provide a framework for improving responses to those who approach the Palace with safeguarding concerns, whether formally via the CDM or through less formal contact. All in senior positions at the Palace need to consider why it has required an independent safeguarding audit to point this out and reflect on where responsibility for proactive leadership for safeguarding lies in the Palace.

#### **Questions for the Palace to consider**

- Where should Lambeth Palace seek guidance and support in understanding the basics of good practice in engaging with victims and survivors of abuse by clergy and people in Church-related roles, as well as other kinds of abuse?
- What is the role of the Archbishop and Lambeth Palace in leading and supporting the implementation of the *Responding Well to Victims and Survivors of Abuse* (2022) guidance and how might its framework and principles be used in addressing the legacy of historic abuse in the Church?
- What should the roles of the Archbishop and Lambeth Palace be in relation to victims and survivors, and how will this be negotiated, agreed and communicated? Would a 'Responding Well' plan assist with thinking through the practical implications?

- What should be the role of the Archbishop in setting new standards for engagement with and responses to survivors of abuse within the Church?
- How proactive should the Archbishop be in seeking out survivors who feel they have been let down by the Church and rectifying past failings?
- How will Lambeth and Bishopthorpe Palaces together respond to the needs and views of the victims and survivors of non-recent abuse, who still feel that their experiences and concerns have not been listened to, understood and addressed?



## 8 CONCLUSIONS

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### 8.1 THE HEADLINE FINDINGS FROM THE AUDIT, POSITIVES AND THE AREAS FOR IMPROVEMENT

8.1.1 The security arrangements across the Lambeth Palace site are comprehensive and in general residents and staff feel safe. Safeguarding arrangements in place for events at the Palace are generally good but could be strengthened. Arrangements for maintaining the safety and wellbeing of volunteers have been thought through in advance of recruitment. Staff work increasingly well together to ensure that all arrangements run smoothly, with a minimum of risk, but procedures need be practiced regularly to ensure understanding and workability, and compliance needs improving. Aspects of the operation of the current security contract are giving rise to some dissatisfaction and anxiety. Security measures are not adequately complied with within the precinct and buildings, creating unnecessary risks.

8.1.2 Children and vulnerable adults resident at the Palace are kept safe. Key staff would benefit from training in how to respond well to adults who may be at risk while maintaining their own safety. A local version of the code of safer working practice would bring clarity to situations where relationships and responsibilities are not always clear.

8.1.3 Arrangements for visitors who attend formal events are clear. Care has been taken over plans for the reintroduction of volunteers. Safeguarding arrangements in the library are working well. Agreed safeguarding procedures for events involving outside visitors are not consistently complied with.

8.1.4 The understanding and awareness by the Dean and Chemin Neuf staff of the safeguarding issues within CoSA are good. The policies in place provide a good underpinning for strong safeguarding practice. There are risks inherent in the relationship between CoSA members and their spiritual companions. Clearer guidance on the role of the spiritual companion in responding to disclosures of abuse is needed, supported by improved information sharing and sustained support from a safeguarding professional.

8.1.5 The system for triaging correspondence and concerns about safeguarding has improved in recent years and been strengthened by the presence and accessibility of the LPSO. Record-keeping in relation to triaging of contacts is good. Safeguarding triage remains an area of potential risk due to its dependence on individual postholders, who are not required to have significant safeguarding experience, and on the LPSO, which is a temporary, time-limited post. There is uncertainty about what safeguarding issues might be contained in historical records.

8.1.6 Lack of access to CDM files meant that decision-making at Lambeth Palace in respect of CDMs with safeguarding elements could not be assessed. This was a significant limitation. Arrangements for assessing CDMs and potential CDMs for safeguarding elements remain an area of risk. Thought is needed about whether and how responses to both respondents and victims involved with the CDM process can be improved, pending changes in national arrangements for clergy discipline.

8.1.7 Arrangements for identifying and responding to complaints about safeguarding received by the Palace are hampered by the lack of a comprehensive complaints system which applies across the whole Church. The expectation that most complaints, whether



formal or informal, would be dealt with under diocesan procedures leaves those who were dissatisfied with nowhere to go. Responses to those who make a complaint about the outcome of diocesan safeguarding processes, or pending the future introduction of a new clergy conduct measure, need improvement. The potential for bullying to be a safeguarding issue is not fully understood. The lack of confidence of staff in using the whistleblowing procedure is of concern.

8.1.8 The Palace works within the national safeguarding policy framework and guidance, supported by some local procedures and protocols. A Palace safeguarding policy, supplemented by additional local procedures which together reflect the unique nature of Lambeth Palace, supported with a mechanism for systematic appraisal and review of local procedures, would enhance the present arrangements.

8.1.9 Most staff and clergy have undertaken basic safeguarding awareness training, but not everyone has yet had the level of training in line with their role and responsibilities. A training plan derived from the national *Safeguarding Learning and Development Framework*, supplemented by specialist training as required, and supported by adequate administrative capacity to track take up, is needed. The expectation that everyone should complete at least basic awareness training has not been followed through.

8.1.10 Staff recruitment is conducted by Church House, in conjunction with Palace managers, only one of whom has undertaken safer recruitment training. Recent job descriptions address safeguarding responsibilities, but older ones do not. Clergy blue files did not indicate whether safer recruitment guidelines were followed in all appointments. Actions identified as necessary to improve safer recruitment practice and quality assure it within the Palace have not been followed through.

8.1.11 Record-keeping arrangements have historically been poor, reflecting an inadequate understanding of both legal requirements and good practice. The absence of a single, consistent approach to safeguarding responses, and the fact that there was no 'safeguarding' label for safeguarding-related correspondence, means that records are still not easily searchable, and have not been consistently stored. Capacity to address these historic problems is limited. These issues are now beginning to be addressed, under the guidance of the IGO. There has been insufficient emphasis on 'getting it right' for victims and survivors of abuse.

8.1.12 The LPSO has worked effectively to deliver on the responsibilities of their role in the short time they have been in post, with evident impact, but the post is time-limited. The continuing availability of specialist, operational safeguarding support within the Palace needs to be secured.

8.1.13 The present Archbishop has sought to provide strong theological and moral leadership, and to make clear his belief that safeguarding the most vulnerable is at the heart of the Church's mission. His ability to turn his expressed personal commitment into visible action is constrained by the constitutional reality of the Church of England and leaves the Archbishop open to accusations of inconsistency regarding safeguarding. Clarification of the role of the Archbishop as a moral leader in this context may be helpful as the Church seeks to address past failings and respond well to victims and survivors.

8.1.14 There have been significant improvements in the Church of England's approach to safeguarding over the past 20 years. A lack of clarity about the scope and limitations of the Archbishop's strategic leadership responsibility for safeguarding across the Church, in the

context of its constitutionally devolved structure, limits his ability to hold colleagues to account and be seen to be holding colleagues to account. Having no formal access to independent and expert safeguarding advice is a significant disadvantage.

8.1.15 Operational accountabilities for safeguarding are clear within the Palace and have recently been agreed for the joint office of the Archbishops of Canterbury and York. The internal audit (2021) indicated that the Palace had been slow to establish its safeguarding arrangements, which does not reflect well on the priority given to safeguarding, or recognition of the importance of leading by example by having one's own house in good order. Since the internal audit, progress on implementing the recommendations has been positive.

8.1.16 Nationally, systems for evaluating the quality and effectiveness of the Church's safeguarding arrangements are still developing. The role of the Archbishop in overseeing safeguarding across the whole Church needs clarification. Within the Palace, the SRG is well placed to take on a quality assurance role and will need to put formal systems in place for systematically evaluating effectiveness of the safeguarding arrangements.

8.1.17 The auditors judged that there have been recent improvements in safeguarding culture and awareness in the Palace. Perceptions of a lack of consistency and follow-through in public statements and undertakings made by the Archbishop have undermined his efforts to establish a consistently safe culture across the whole Church.

8.1.18 Previous efforts by Lambeth Palace to engage with survivors have been insufficiently thoughtful and thought through. Responses by the LPSO to individuals were good.

## 9 APPENDIX: REVIEW PROCESS

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### DATA COLLECTION

#### Information provided to auditors

The pre-audit reading consisted of the following;

#### General Documents

1. Schedule for Lambeth Palace Audit
2. Lambeth Palace Self-Audit Summary

#### Staffing and Structure

3. Organogram of Lambeth Palace Staff Teams
4. Organogram of Faith and Public Life Team
5. Organogram of the Lambeth Palace Library
6. Job Description of Lambeth Palace Safeguarding Officer
7. Job Description for Chief of Staff and Strategy
8. Job Description of Dean of St Anselm
9. Job description of Subprior of the Community of St Anselm
10. Job Description of Archbishops Chaplain
11. Job Description of Records Officer
12. Job Description of Hospitality General Manager
13. Job description for Head of Estates and Steward

#### Self-Audits and Past Case Reviews

14. Lambeth Palace Internal Audit Report
15. Lambeth Palace Internal Audit Report Plan (**Excel Spreadsheet**)
16. Lambeth Palace PCR2 Report

#### Policies/Guidance

17. The Community of St Anselm Membership Policy
18. The Community of St Anselm Safeguarding Policy
19. NCI Dignity at Work (Internal Complaints) Policy
20. NCI Service (External) Complaints Policy
21. NCI Whistleblowing (Speaking Up) Policy
22. Lambeth Palace Volunteers Guidance Policy
23. NCI Safer Recruitment and People Management Guidance Policy (**see link below**)
24. NCI Social Media Policy
25. NCI IT Acceptable Use Policy
26. NCI Data Protection Policy

- 27. NCI Equal Opportunities Policy
- 28. NCI Disciplinary Procedure Policy
- 29. NCI Employee Handbook
- 30. NCI Domestic Abuse Policy
- 31. Lambeth Palace Reference Guide (**Available through S Drive only**)
- 32. NCI Pre Employment Check Process
- 33. The Lambeth Palace Induction Process - Line Managers Checklist
- 34. CORPS Security Children and Vulnerable Adults Safeguarding Policy
- 35. CORPS Security Recruitment and Selection Policy

### **General**

- 36. Lambeth Palace Safeguarding Reference Group ToR
- 37. Lambeth Palace Safeguarding Reference Group Minutes (05/03/21)
- 38. Lambeth Palace Safeguarding Reference Group Minutes (07/07/21)
- 39. Lambeth Palace Safeguarding Reference Group Minutes (14/12/21)
- 40. Past Cases Review 2 (PCR2) Reference Group ToR
- 41. Past Cases Review 2 (PCR2) Reference Group Minutes (18/11/21)
- 42. Past Cases Review 2 (PCR2) Reference Group Minutes (02/12/21)
- 43. Past Cases Review 2 (PCR2) Reference Group Minutes (January 2022)
- 44. Lambeth Palace Weekly Operations meeting ToR
- 45. Lambeth Palace Weekly Operations meeting (31/01/22)
- 46. Lambeth Palace Weekly Operations meeting (07/01/22)
- 47. Lambeth Palace Weekly Operations meeting (14/02/22)
- 48. National Safeguarding Steering Group ToR
- 49. National Safeguarding Steering Group meeting minutes (29/06/21)
- 50. National Safeguarding Steering Group meeting minutes (06/09/21)
- 51. National Safeguarding Steering Group meeting minutes (09/11/21)

### **Safeguarding Training**

- 52. Lambeth Palace Safeguarding Training Record (Excel Spreadsheet)

The auditors also reviewed material on a small number of relevant websites concerning The Archbishop of Canterbury, the CDM process, Church of England Policies and the General Synod.

A small number of additional documents were provided during or after the audit itself. These included:

- Volunteers Welcome Pack
- Palace Public Occasions Event Contract
- Office to the Archbishop: safeguarding roles and responsibilities (14/02/22)
- Safeguarding Correspondence Triage Procedure (Correspondence Department)
- Safeguarding Correspondence Triage Procedure (OABCY)
- Procedure for referring concerning communications or approaches to FTAC
- Lambeth Palace Safeguarding Reference Guide (January 2021)

## **Participation of Palace staff and others**

The auditors talked with;

- The Archbishop of Canterbury
- The Chief of Staff and Strategy
- The Provincial Registrar
- Lambeth Palace Safeguarding Officer
- Security Supervisor (CORPS)
- Head of Estates and Steward
- Hospitality General Manager
- Librarian and Archivist
- Operations Manager, Library
- Dean of the Community of St Anselm
- Sub Prior and safeguarding lead, the Chemin Neuf Community
- Bishop to the Archbishop of Canterbury and York
- Executive Assistant (metropolitical)
- Correspondence Manager
- Member of National Safeguarding Team and link with Lambeth Palace
- Records Officer
- Information Governance Officer
- Director of Communications
- Communications Coordinator
- National Adviser, Mission Theology, New Religious Movements and Alternative Spiritualities
- Chair, Clergy Conduct Measure Implementation Group

A focus group included a cross-section of Palace staff and volunteers in roles that are not primarily about safeguarding but have an impact on how safeguarding is seen and practised at the Palace. Informal conversations with a couple of staff who were not in the focus group were also held.

### **What records / files were examined?**

The auditors read six records of cases in which the LPSO had responded to a complaint, concern or request for assistance. None of these met the threshold for referral to the NST.

The auditors reviewed four blue clergy file, all of which had been reviewed recently as part of PCR2.

The auditors also read two records which illustrated responses from Lambeth Palace prior to a safeguarding professional being available on site.

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