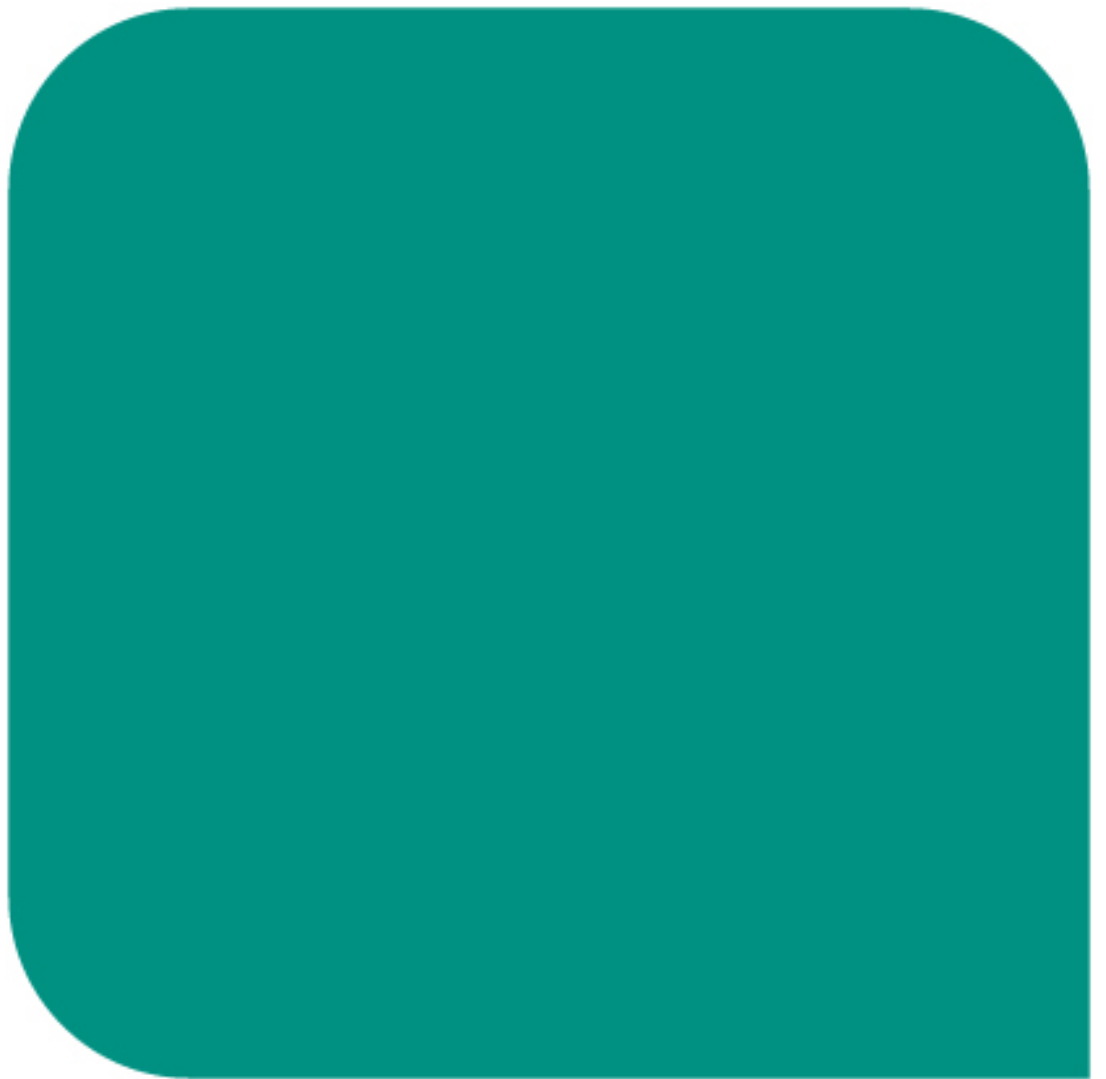




social care
institute for excellence

London diocese independent safeguarding audit (March 2016)



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**Independent auditing of diocesan
safeguarding arrangements for
the Church of England**

Diocese of London

Audit undertaken 8, 9 and 10 March 2016

Meiling Kam, Susan Ellery, Edi Carmi

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1 INTRODUCTION

1.1 CONTEXT AND BACKGROUND

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

The audit of the Diocese of London was carried out by Meiling Kam (the lead auditor for this diocese) and Susan Ellery on 8, 9 and 10 March 2016.

This report was written by Meiling Kam with support from Susan Ellery and quality assurance provided by Edi Carmi, the overall auditing lead.

1.2 THE DIOCESE

The Diocese of London is both large and complex. This imposed a limitation on a three-day audit: within the time available it was not possible to meet all the people that the auditors would have chosen to see. This is explained further in the appendix which describes the review process.

The Diocese of London includes about 500 worshipping communities, over 1,000 clergy and ministers, about 150 chaplaincies and is located over 18 local authority areas. St Paul's is the cathedral.

The Diocese of London's website explains that it covers 277 square miles of Greater London north of the Thames from Staines in the west to the Isle of Dogs in the east and as far north as Enfield. It comprises the Cities of London and Westminster and the London boroughs of Brent, Harrow, Ealing, Hillingdon, Barnet, Camden, Enfield, Haringey, Hackney, Islington, Tower Hamlets, Hounslow, Kensington & Chelsea, Hammersmith & Fulham, Spelthorne and part of Richmond-upon-Thames.

The Diocese is unique to itself (in terms of both population and geographical area). The Bishop of London is bishop to the two cities of London and Westminster. He is also senior Bishop to the four area bishoprics of Stepney, Kensington, Edmonton and Willesden as well as Dean to the Royal Peculiars (see below).

The Bishop recalled that the area bishoprics may have in the past acted independently and without reference to the Bishop of London and the Diocese. However, gradually over time his and the replacement of staff on retirement, they have come together more consistently as the Diocese of London.

It should be noted that, within the Diocese, there are a number of churches that belong directly to the monarch and do not come under the jurisdiction of any bishop (the Royal Peculiars). These are Westminster Abbey, Chapels Royal at Hampton Court, St James Palace, the Queens Chapel of the Savoy, St Peter and Vincula, John the Evangelist in the Tower of London and the Royal Foundation of St Katharine. The current Bishop of London is also Dean of the Chapels Royal, including the Tower of London and Hampton Court, both of which have choirs. The Royal Household has its own safeguarding committee.

In January/February 2015, the Head of Safeguarding at the Churches' Child Protection Advisory Service (CCPAS) undertook an independent audit of safeguarding practice. The format from S.11 of The Children Act 2004 was used and the Diocese provided the report as its self-audit. It was thus possible to look at progress made over the previous year.

The Diocese has published a report by the Diocesan Safeguarding Advisor (DSA) dated December 2015 that notes an average number of monthly calls relating to safeguarding at 79. There were 21 open cases with more disclosures relating to historical abuse and 20 offender agreements at that time. The auditors understand that the number of offender agreements is now closer to 40.

1.3 STRUCTURE OF THE REPORT

This report is divided into:

- Introduction.
- A summary of the auditors' findings: what is working well, what needs to work better and a summary of the 'considerations' for the Diocese.
- The Findings of the audit [links have been made with the S. 11 (Children Act 2004) audit form].
- Considerations for the Diocese are listed, where relevant, under each finding section.
- An appendix sets out the review process, including the limitations of the audit process.

2 OVERVIEW

2.1 INTRODUCTION

This overview provides the auditors' key messages to the Diocese around strengths and areas for further development. The details behind such judgements appear within the text of the Findings which follow in section 3.

2.2 WHAT IS WORKING WELL

London has had a Diocesan Safeguarding Advisor (DSA) working for the past six years and a Bishop who is committed to and clearly owns his responsibility for safeguarding in the Diocese.

The Bishop accepts his lead and delegates effectively from a starting point of knowing that it needs to be done well. The Bishop has been in post since 1995 and has managed to pull together five distinct Episcopal areas refreshing his team when necessary and putting in place a senior team that understands the requirements of safeguarding.

It is possible to see the safeguarding journey that the Diocese has taken and the work it is doing to respond appropriately to concerns that are current, as well as those that may not have been handled as well as they should have been in the past. The Bishop and his team are aware of the change in culture that the Diocese has gone through and acknowledge that they are on a stage in the journey and not the destination.

Such a large diocese needs effective systems, e.g. to roll out safeguarding training, Disclosure and Barring Service (DBS¹) checks, manage and respond to complaints. The auditors found systems in place and working well.

There is also a clear structure to manage safeguarding with responsibility delegated to an Associate Archdeacon who has the necessary time to devote to it.

The majority of training is currently outsourced to CCPAS (Churches' Child Protection Advisory Service). This has the advantage of freeing up the time of the DSA as well as achieving coverage over the Diocese. The auditors were told that 95 per cent of clergy had been trained and there was a rolling programme to update clergy every three years. Members of the focus group told us they had received their reminders and had duly enrolled for their refresher course.

About a year ago the Diocese identified that more time was required to undertake the volume of risk assessments and offender management. Action was taken to appoint a part-time worker two days a week with the skill set to implement agreements and put a system in place to manage them and this is working well.

¹ DBS checks are the criminal record checks undertaken for certain jobs or voluntary work, e.g. working with children or in healthcare, or those that wish to foster or adopt a child.

The auditors were told that safeguarding is the highest risk on the Diocesan Risk Register and the readiness to find funding if needed shows how seriously that is taken.

Case notes and conversations with staff gave a sense of the Diocese facing up to the issues of historical abuse; trying to meet the needs of survivors, apologising where it is right to do so, establishing a working group of Authorised Listeners, and funding access to listening therapies.

2.3 WHAT NEEDS TO WORK BETTER?

Case recording is an acknowledged problem in terms of what is recorded and how. The auditors were told that a new system had been purchased and was going live the week following the audit. It is anticipated that this will make it easier to store and access relevant information.

The auditors observed on the system that was in place at the time that the recording of case information needs to improve so as to provide a summary of key data, consistent identification of individuals by name and role, decisions taken, action taken, outcomes and a closing summary.

There was some lack of evidence of the embedding of safeguarding awareness in the area of domestic abuse. This was evidenced by a focus group member, who found that members of his church tend to believe that domestic abuse would not happen in a Christian community. Others in the group agreed.

The auditors were told that the number of volunteers is high but so is their turnover; that is to be expected given the transient population of London. It was acknowledged by a senior lay diocesan officer that this consistent need to get new volunteers risks making it tempting for parishes to cut corners in the recruitment and training of volunteers (especially in the current context of long waiting times for DBS checks in the Metropolitan Police area). The auditors saw no evidence that such corner cutting was or was not the case; however they did not have the opportunity to test this out with parish-based volunteers (see limitations of the audit in appendix 1).

The small sample of clergy blue files examined showed some variation as to where the DBS check was recorded. The auditors were unable to find either an application form or three references for the most recent appointment in over half of the files. Some of the reasons for this are outlined in section 3.9 of the findings.

2.4 CONSIDERATIONS FOR THE DIOCESE

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

These considerations are to be found at the end of each of the sections in The Findings, where applicable. They are listed below for ease of reference, but the detail behind each of these is in the findings section.

- Confirm skilled professional supervision for both DSA posts in accordance with the expectations articulated in the section 11 audit and House of Bishops' policy and practice guidance.
- To evaluate the extent of professional safeguarding time required to undertake the DSA role in relation to both children and adult safeguarding.
- Consider how to further increase consistent multi-agency membership of the DSSG, with representation from professionals in their management roles in safeguarding.
- Make reference to 'Responding to serious safeguarding concerns related to church officers' guidance 2015 and 'Guidelines for the Professional Conduct of the Clergy', revised 2015, in the main policy document 'Policy for safeguarding in the Diocese of London' or on the website.
- Develop an implementation plan for the new database system to maximise its ability to meet effective safeguarding and efficiency requirements and enable the training of all those that need to input information. Consider, as part of the implementation plan for the new recording system, how to assist consistency in how it is used and what is recorded.
- Consider how to quality assure effectively the CCPAS training so that the content is appropriate to meets the needs of the participants.
- How to build awareness of adult safeguarding and the impact of domestic abuse.
- How to engage more parish volunteers in safeguarding training.
- How to improve the organisation and updating of the blue files so that it is easy to access basic information at the front of the record and the files are in line with the House of Bishops' policy on Safer Recruitment 2015 and the Guidance on Personal Files Relating to Clergy 2013.
- Check that the new whistleblowing policy is addressed in training.
- To evaluate the action taken in response to the CCPAS audit in reviewing the role of the archdeacons in monitoring safeguarding in the parishes and any need for further work to assess the effectiveness of this role and any further actions to be taken.
- Consider how best to maintain and analyse the information about safeguarding at a parish level using the parish survey and the triennial visitation record by the Archdeacon and to use the information collected to focus the efforts of the DST.
- Continue to develop the listening exercise for both children and adults as appropriate and incorporate the learning into the overall strategic approach.
- The Diocese to develop information sharing protocols across London for both children and adults.
- Going forward, the chair and DSSG to consider the adequacy of current quality assurance arrangements for safer recruitment, outsourced training and the casework of both DSAs and consider what improvements could assist this process.

3 FINDINGS

3.1 SAFEGUARDING MANAGEMENT

Safeguarding is the ultimate responsibility of the Bishop of London delegated to the Associate Archdeacon of London. The Associate Archdeacon has been in the role since September 2015 and had the benefit of an induction period prior to her predecessor's departure.

The Bishop is keenly aware of his responsibility and works closely with his safeguarding lead. He spoke of the training around grooming which he had attended with his senior team and demonstrated his familiarity with the details of the work, providing the auditors with an overview of a number of cases.

The auditors formed the view that, although the management of safeguarding via the authority delegated to the Associate Archdeacon by the Bishop is robust, the size and complexity of the Diocese presents challenges in terms of the consistency of the safeguarding message and in monitoring responses to this. This is not a criticism of the clergy or lay professionals responsible for safeguarding and is not a finding that poor practice is happening. It is a reflection of several complicating factors that give the potential for 'private practice', of clergy and/or parishes, namely the development of attitudes and/or practice that are highly localised and are outside the safeguarding practice that the Diocese is seeking to embed.

The fact that safeguarding is highest on the Diocesan Risk Register is probably also another way of reflecting the particular challenges faced in London associated with:

- The Bishop has a wide sphere of responsibility: directly responsible for a small part of the larger diocese as well as managing the area bishops, as well as extra duties in the Royal Peculiars as well as a high national profile.
- The Diocese has a high and exceptionally diverse population and a high number of parishes.
- The population is more mobile than in most dioceses, and in some centres of worship (most notably St Paul's where the auditors were struck by the expressed difficulty of trying to identify and manage an offender) visitors greatly outnumber the regular congregation.
- In the view of the auditors, the DSA inevitably faces a larger challenge than in smaller dioceses in being personally consistently available to individual parishes, albeit it is of note that this view was not expressed by anyone within the Diocese

The challenges are recognised by the Director of Human Resources who acknowledges that the Diocese 'is 'easily three times as large as other dioceses in term of the numbers of clergy and people worshipping'.

The safeguarding management structure extends downwards from the Bishop and includes a safeguarding steering group, a safeguarding team to manage the operational side, five archdeacons quality assuring safeguarding at the parish level and one archdeacon designated by the Diocesan Bishop with overall responsibility.

Within the safeguarding team there is a full-time and a part-time DSA to manage the casework, offender agreements and support requirements that are part of that role.

The operational management of safeguarding is led by the Diocesan Safeguarding Team (DST), which meets monthly. Members of the DST are: the Associate Archdeacon, the Director of Human Resources (and manager of the DSAs), the Head of Youth and Children's Ministry and the two DSAs. Minutes of the meetings show that the focus is on active cases and the detail of how safeguarding works in the parishes

The strategic oversight of safeguarding is the responsibility of the Diocesan Safeguarding Steering Group (DSSG); see 3.3 below.

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

3.2 DIOCESAN SAFEGUARDING ADVISOR

There is currently one full-time DSA, employed by the Diocese on a permanent contract since February 2016. The post holder is a professionally qualified social worker with experience of practice and managing a team. She holds a role as a parish safeguarding officer in her own parish and brings this experience to her professional role.

It should be noted that the previous post-holder (who was full time until she reduced to a 32-hour week in the last year of her employment) retired very recently. Her professional background was in education. We were scheduled to have a conversation with her but circumstances made it impossible for her to attend. The Director of Human Resources described how, on her arrival, the DSA was situated in an open plan office with limited administrative support. The DSAs now have suitable working conditions and full-time administrative support.

The full-time DSA has a job description and person specification, clearly badged by the Diocese.

A further DSA works two days a week solely on risk assessments, Offender Agreements (OA) and Covenants of Care (CC). This post holder is on a fixed-term contract, the end of which has been extended from June 2016 to December 2016. She comes with a very appropriate skill set from probation and a track record of risk assessment. She has managed to put a system in place that works for the Diocese.

The auditors did not see a job description and person specification for the part-time DSA, but were informed that they are in place. Now that the part-time DSA has set up a robust risk assessment and management process, it is difficult to see how the Diocese would manage to maintain this process without the resources of the role.

Because of the size and complexity of the area, the auditors were struck by the number of professional relationships the DSA needs to develop: five bishops and six archdeacons, diocesan officers, parish clergy and, in addition, statutory partners in 18 local authorities. The auditors reflected that as a consequence of this, the DSA has to take time to develop professional relationships with key contacts within and outside the church. If each bishopric were to present as many cases as a Diocese elsewhere, then the DSA is likely to have less availability. The auditors understood that the Associate Archdeacon of London and the Director of Human Resources also commit a significant proportion of their working weeks to hands-on safeguarding

work. There is also a CCPAS helpline and the Clergy Safeguarding Supports (clergy volunteers) are in place to help. No doubt this additional capacity provides substantial support to the DSA, but the auditors were left unsure whether or not this will fill any potential gaps, particularly in relation to the casework and development of professional relationships. This will be clearer once the new DSA has been in post for some months.

Whilst there was no evidence within this three-day audit that the DSAs are struggling to cover their responsibilities, the auditors were concerned if the capacity might be sufficient in the long term, especially in the context that the second part-time DSA is on a temporary contract. Additionally, the current publicity generated by the 'Goddard Enquiry' may generate a higher rate of referrals.

There is currently no national information available to compare how each diocese should measure the need for professional safeguarding DSA resources and this would be a useful area for development nationally.

Professional supervision is currently being sought for the full-time DSA post. Professional supervision for the part-time post is not being sought due to the preference of the post holder. However, this needs consideration in accordance with the requirements listed below. The auditors did not consider that the preference of the post holder should have a bearing on whether or not supervision is obtained.

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

Part 6: 'The DSA's role is clear in the job description and person specification.' And

'The DSA has sufficient time, funding, supervision and support to fulfil their safeguarding responsibilities, including local policy development, case work, advice, liaison with statutory authorities, training, personal and professional development and professional registration.'

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

CONSIDERATIONS FOR THE DIOCESE

- Confirm skilled professional supervision for both DSA posts in accordance with the expectations articulated in the section 11 audit and House of Bishops' policy and practice guidance.
- To evaluate the extent of professional safeguarding time required to undertake the DSA role in relation to both children and adult safeguarding.

3.3 DIOCESAN SAFEGUARDING MANAGEMENT / STEERING GROUP

The strategic oversight of safeguarding is the responsibility of the Diocesan Safeguarding Steering Group (DSSG).

The DSSG meets quarterly or more and the full-time DSA is in attendance. Its role includes quality assurance, as well as advice.

The DSSG has terms of reference, dated March 2013. As well as setting out the purpose and key functions of the group, the terms of reference list the responsibilities of members and the knowledge and experience required of members.

The auditors were able to have only a brief phone conversation with the chair of DSSG, who had resigned at the end of her tenure to take up an appointment in a geographically distant local authority. The chair told the auditors that she always had access to the Bishop and she felt that she could see positive changes in terms of the safeguarding journey with the arrival of the Director of Human Resources two and a half years ago. The chair was pleased with the appointment of the new Archdeacon with responsibility for safeguarding and she felt the Diocese was on its way in terms of a refreshed safeguarding team.

Changing membership

The audit occurred at a time of changing membership of the DSSG, with a new DSA and the resignation of the independent chair (due to other work commitments). Past and future membership arrangements show the efforts made to achieve both safeguarding expertise, as well as multi-agency representation. There have been some challenges in achieving consistency in this, but the Diocese has shown commendably fast responses to replacing the loss of professional safeguarding experience within the DSSG.

The audit report completed by CCPAS in 2015 suggested that the membership of the steering group be reviewed with a view to incorporating more outside agencies to balance it. The manager for the London Safeguarding Children Board was brought on board, however, she has had to withdraw due to time commitments.

The current and future membership of the steering group highlights the efforts made to bring broad professional safeguarding experience to the group along with the representation of the Diocese (the Portfolio Holder for Safeguarding (Associate Archdeacon of London, diocesan Director for Human and the Director of Ministry).

The outgoing chair is a Director of Adult Services, and there is further professional safeguarding expertise represented by the DSA, a consultant for Vulnerable Adults and an ex-police officer (now a LSCB chair). Until the recent appointment of the new DSA, there was a lack of children's social work expertise, as the previous DSA came from an educational background. Children's as well as adult's safeguarding social work experience would, in the view of the auditors, be a basic requirement for the steering group. This is now provided via the new DSA. The broader safeguarding perspectives from police, education and adult services were part of the group, provided by consultants to the Diocese. There was though a lack of representation from statutory agencies.

Recent arrangements to further incorporate the breadth of safeguarding experience involves the forthcoming inclusion of an agency representative from the Tri-Borough, who has expertise in vulnerable adults and quality assurance and a consultant in vulnerable adults (previously a Director of Adult Services). There are also plans to advertise for a consultant with educational expertise and to invite a member of the clergy with legal experience.

The breadth of professional expertise on the steering group is to be commended, along with the fact that in order to obtain this the Diocese has arranged the paid involvement of consultants. However, the representation of statutory agencies remains an ongoing challenge, and in particular that of children's social care. Given the large number of authorities the London Diocese covers, it is more difficult to be able to develop close partnership arrangements with such representation. However, the contribution of such agencies will be different to that of consultants and attempts to get this representation should be persevered.

CONSIDERATIONS FOR THE DIOCESE

Consider how to further increase consistent multi-agency membership of the DSSG, with representation from professionals in their management roles in safeguarding.

3.4 POLICIES, PRACTICE GUIDANCE AND PROCEDURES

The London Diocese policy states that the Diocese has adopted the House of Bishops' safeguarding policies. The policy is introduced by the Bishop and is published on the website. There are also a number of guidance documents and information packs.

The Diocese has its own key document, 'Policy for Safeguarding in the Diocese of London 2012, updated 2015'. The policy was published three months before the national suite of policies in 2015, but the Diocese has checked to make sure it was consistent with the national policy. The auditors did not notice any discrepancies.

The auditors were told that the Diocese has adopted the draft guidance on 'Responding to serious safeguarding situations guideline 2014' and 'Guidelines for the Professional Conduct of the Clergy, revised 2015'. It would make sense for these to be referenced clearly in the diocesan Policy for Safeguarding. The auditors were told that the Diocese is currently working on a more formal checklist for responding to serious safeguarding situations.

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

CONSIDERATIONS FOR THE DIOCESE

Make reference to 'Responding to serious safeguarding concerns related to church officers' guidance 2015 and 'Guidelines for the Professional Conduct of the Clergy', revised 2015, in the main policy document 'Policy for safeguarding in the Diocese of London' or on the website.

3.5 RESOURCES OF SAFEGUARDING SERVICE

The two DSAs share one full-time administrator.

Both training and CRB checks are outsourced to the Churches' Child Protection Advisory Service (CCPAS) and form part of the resource available. It was previously the responsibility of the DSA to quality check the DBS applications from parishes before forwarding them on to CCPAS. However, this has now been made an administrative task by the current DSA.

The Director of Human Resources stated her commitment to spending the time needed to support the new DSA. She explained that she currently spends about 70 per cent of her time on safeguarding but anticipates that, in time, this should decrease to 40 to 50 per cent.

The Diocesan Secretary confirmed that the mechanisms are in place to increase the budget share given to safeguarding if it should be agreed to be necessary. The auditors were aware that increases have recently been made in DSA and administration time.

To support the role of the DSA, Clergy Safeguarding Supports (CSSs) have recently been appointed in each area bishopric. The CSSs are priests who have previous experience pre-ordination of professions that deal with safeguarding issues, e.g. the health service and education. The role is voluntary and on top of the stipendiary (paid) post. It was too early to take a view about the effectiveness of this initiative.

3.6 RECORDING SYSTEMS AND IT SOLUTIONS

The auditors understood that some records, e.g. of DBS checks, training and renewal dates, are kept at area bishopric level. Although data is stored on an information system ('My diocese'), there is no system at present to pull it all together to use across the whole diocese. The opportunity to track key data areas in parishes and to identify under-performing parishes is missed.

The format for case recording seems to have been developed without reference to the typical recording formats in standard databases available in social care. A new system was due to go live shortly after the audit and this should support improvements in record keeping on case files.

DBS checks and reminders are outsourced to CCPAS. The auditors were unable to establish whether this works well at parish level, however, there were no complaints or adverse comments.

The part-time DSA has established a format and process for risk assessments that is based on those she used in the Probation Service (see below 3.7).

(Reference: part 1 of the S.11 audit: 'Provide access to the DBS checks for parishes, the cathedral, the bishop's office and the diocesan office for those beneficed and licensed clergy, paid workers and volunteers who need to obtain disclosures.')

CONSIDERATIONS FOR THE DIOCESE

Develop an implementation plan for the new data base system to maximize its ability to meet effective safeguarding and efficiency requirements and enable training of all those who need to input information. Consider, as part of this, how to assist consistency in how it is used and what is recorded.

3.7 RISK ASSESSMENTS AND SAFEGUARDING AGREEMENTS / CONTRACTS

A robust format and process for risk assessment is now in place, following the appointment of a former probation officer. The auditors were satisfied that she meets the requirements of section 3.8 of the national guidance; 'All risk assessments must be carried out by experienced, professionals qualified in safeguarding, and with skills and experience of conducting risk assessments'.

Relevant stakeholders and the subject are involved in the assessment. Assessments are carried out with people thought to be a potential safeguarding danger as well as those convicted of an offence.

The auditors observed that most of the contracts seen were signed by the subject and relevant parties and where they were not, the explanation given was that the scanned copy was not the signed copy but all the originals were signed.

There is a system for reviewing contracts/agreements but it is largely dependent on the diary of the current post holder. The auditors have been told that this is shortly to change with the advent of a new database system.

Discussion within the focus group described challenges they knew of with regard to:

- What action may be taken if an employed lay officer is found to have an offence in her or his past, which has been kept hidden.
- Whether a convicted offender should ever be given a position of responsibility as a volunteer, even for one day.

The auditors noted that the Practice Guidance on Risk Assessments (June 2015) does not totally clarify this. For example, the possibility that, following a Type A Risk Assessment, a member of a congregation should not hold a position of responsibility is allowed for in the template Agreement but not discussed in the text. Regarding church officers who undergo a Type B Risk Assessment, the template assessment refers to 'any future role of the subject in the church' but the auditors thought the assumption is that the subject will be risk-managed back into a role.

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

3.8 TRAINING

All clergy receive basic training, refreshed every three years. The auditors were told that the training is evaluated and is generally well received. The auditors note that the system of getting clergy trained and reminding them to refresh their training is working very well.

All clergy training is outsourced to CCPAS. The Director of Human Resources confirmed that the training is in line with national published guidance: Safeguarding Learning and Development Framework, 2016. This is a modular-based training, and it has been extended to meet the requirements of the Diocese.

Members of the clergy who attended the focus group reported that they had received a reminder for follow-up training and that they had attended. Should they not attend a letter is sent from the Bishop's office.

The auditors were told that all senior clergy are up to date with safeguarding training. Extra training for senior clergy (such as a recent session on how and why grooming becomes effective) is organised when there is a perceived need.

Face-to-face training is delivered at the diocesan office. The take-up of training for parish safeguarding officers was low when CCPAS audited the Diocese (61 per cent). e-Learning has been introduced and had been undertaken by over 1,000 people during its first year. A member of the focus group was complementary about the e-learning.

The auditors observed about 20 minutes of a training session for clergy. They noted that it was a large group with one trainer and that there was a lack of engagement with one or two members at each table. They were not there long enough to assess whether it was to do with the individuals, content or the mode of delivery. However, they observed that the Director of Ministry was present in a support role and he was able to pick up theological points in a question and answer session.

The auditors note that the Associate Archdeacon and lead for safeguarding uses the opportunity to introduce herself at the start of each clergy training session, as does the DSA. For the DSA, this addresses to some extent the auditors' concern that the delivery of training is a tried and tested way to make a connection with potential referrers and it is missing in this diocese.

The auditors wondered whether the course material they saw had been entirely tailored to the needs of the audience and found, when raising this, that there is a plan to give the task of evaluating the material to the clerical SSOs (see 3.5).

The focus group was thoughtful about how to embed safeguarding into their ministry and move it away from perhaps being a subject one 'ticks' after attending the training. Focus group members suggested a safeguarding 'road show' with the full-time DSA and the Associate Archdeacon to demonstrate how they work together and how safeguarding is an integrated part of the life of a congregation.

There is awareness in the safeguarding team that domestic abuse is not always recognised and responded to in the church, particularly psychological abuse. The part-time DSA is working on the development of a briefing pack and a partnership with an agency specialising in this area is being launched.

The training of the parish safeguarding officers (PSO's) is the responsibility of the DSA supported by CCPAS. It was noted in the audit by CCPAS that the take-up of training by PSOs was poor. Explanations offered included the difficulty of finding a time slot to suit people and the reluctance of many Londoners to travel beyond their immediate area. E-learning has been introduced to meet the need for basic safeguarding training.

In the future, it may work better for the area SSO to co-deliver training to PSOs with the DSA in order to develop the understanding of the SSO role amongst PSOs.

(Reference: part 1 of S.11 audit: 'Select and train those who are to hold the Bishop's Licence in safeguarding matters. Provide training on safeguarding matters to parishes, the cathedral, other clergy, diocesan organisations, including religious communities and those who hold the bishop's licence.'

And to part 8: 'Those working closely with children, young people and adults experiencing, or at risk of, abuse or neglect ...have safeguarding in their induction and are trained and have their training refreshed every three years.')

CONSIDERATIONS FOR THE DIOCESE

- How to quality assure effectively the CCPAS training so that the content is appropriate to meets the needs of the participants.
- How to build awareness of adult safeguarding and the impact of domestic abuse.
- How to engage more parish volunteers in safeguarding training.

3.9 SAFE RECRUITMENT OF CHURCH OFFICERS

In the Diocese of London, practice is to hold some information (e.g. resignation letters) at parish level and some (e.g. applications and references) in the Bishop's Office, as per guidance and custom.

The auditors viewed a sample of 10 blue files and these were variable as to whether they included an application form, and three references for a particular post. Records of DBS checks are held at area level. Some files indicated the date of the check and some had a sheet indicating whether there was a safeguarding concern. Some had a sealed envelope with information about concerns but no check-list or clear indication on the blue file that there were concerns.

All the blue files had contents unsecured except by the elastic pulled over each corner. This seems to present a higher than necessary risk of material going missing.

One appointment to a curacy made in 2014 had no application form on the blue file. It was clear from correspondence that the applicant had been introduced to the incumbent by a connection on the basis of shared beliefs about worship, and it looked as though he had not undergone a full appointment process. If such a process is still possible, it leaves the potential for unsafe recruitment.

It was not easy to access basic information as there was no system such as a front sheet providing the date of most recent appointment, date of DBS check, whether there have been any safeguarding concerns.

(Reference to part 7 of S.11 audit: 'The Diocesan Secretary has implemented arrangements in line with the House of Bishops' policy on Safer Recruitment 2015.'

And to part 1: 'Keep a record of clergy and church officers that will enable a prompt response to bona fide enquiries...where there have been safeguarding concerns, these should be clearly indicated on file.')

CONSIDERATIONS FOR THE DIOCESE

- How to improve the organisation and updating of the blue files so that:
 - it is easy to access basic information at the front of the record
 - the files are in line with the House of Bishops' policy on Safer Recruitment 2015 and the Guidance on Personal Files Relating to Clergy. 2013.

3.10 RESPONSE TO ALLEGATIONS

A total of 16 electronic case files were audited. The content included allegations of serious misconduct by a church officer, the management of risk and agreements to worship. Some related to historic abuse, and a few concerned allegations by vulnerable adults.

The recording of the case work meant it was difficult at times to understand the outcome of actions or whether a case was closed or not (see 3.11). As a result, the evidence for good case work was patchy.

The auditors saw an instance where the DSA was directly challenged by a member of the clergy, but the action taken was unclear. In one case, a disclosure went to an area office but there was no evidence of referral on to the DSA until it resurfaced again a year later and was referred by a different area office. At that point, the DSA had responded quickly but no outcome was in the recording.

The auditors were able to observe the difficulties the Church has in trying to remove someone from office when there is no conviction or when there has been insufficient evidence to take a case forward. One case quoted 'waiting until Ecclesiastical law changes next year' because the subject successfully used a legal challenge.

The auditors saw a detailed and methodical plan of action compiled by the current DSA to guide work on an open case.

Focus group members were warm in their appreciation of the support they received from the previous and current DSAs and could see the 'then and now' difference. One focus group member recalled how one family in a parish managed to get away with effectively silencing a whole community. She felt this would not happen now and attributed this to the culture shift and the changes brought about by the previous DSA. Another focus group member talked of the support he received from the previous DSA in two safeguarding incidents in his parish.

3.11 QUALITY OF RECORDING IN CASEWORK

The DSA and the Director of Human Resources were aware that recording on case files is an issue, as the new DSA has struggled to understand case histories.

Some of the recording is clear with a clear time line. In some cases, a case log implies that a new system had been used, of a 'safeguarding log' with the date, the name, the nature of the referral, and a series of entries and a series of emails. Unfortunately this meant that two sets of recording had to be read and cross-referenced. The auditors were able to understand eventually what had taken place in most but not all of the cases seen.

Reading one case, the auditors were concerned that in a situation of haste or stress it would be fairly easy to confuse the perpetrator with the victim using the information from the file. It also made it difficult to see whether action had been taken or not.

Another case initially perplexed the auditors as it looked, from the recording, as if multiple allegations had been made over a number of years and no effective action taken. The Bishop was able to fill in the gaps and explain both the efforts made to take action and why they had not been successful in removing a person from his post. Although it was good to see so clearly that the Bishop is and has been closely involved with individual cases, he will not always be an available resource. It may be that the Diocese will be judged more harshly than it deserves in the future because case recording does not give the whole story and, ideally, steps would be taken to redress some of the balance while key people are still in post.

3.12 COMPLAINTS

There is a three-stage process for making formal complaints about safeguarding on the diocesan website that is very similar to complaints procedures in the public sector. The procedure is not immediately apparent on the safeguarding pages and was found by using the search function. It lacks information about how to contact the Director of Human Resources as the responsible person but is otherwise clear and understandable.

At Stage 1 a complaint is reviewed by the Director of. At Stage 2 it is reviewed by the independent chair of DSSG and at Stage 3 by CCPAS as an independent body. The process is clear and includes timescales. The auditors were told that the process has been used twice, both times to Stage 3. The procedure has been modified so that only the person directly affected by an issue may use the procedure and not a third party. This change would now disallow one of the complaints made to date. It is unclear whether a parent might be able to complain on behalf of a child.

The complaints procedure on the website is comprehensive and covers all the necessary issues except for whistleblowing or the Clergy Disciplinary Measures. There is a new draft to replace this which the auditors were informed does cover this.

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

3.13 WHISTLEBLOWING

The auditors were told that a whistleblowing policy and procedure is about to be published. As this is new, it will need to be incorporated into safeguarding training, so that everyone understands the need for this and the process with regard to who may whistle blow, about what, who will respond and how.

(Reference: part 4 of S. 11 audit: 'Whistleblowing arrangements are in place and addressed in training.')

CONSIDERATIONS FOR THE DIOCESE

Check that the new whistleblowing policy is addressed in training.

3.14 MONITORING OF SAFEGUARDING IN PARISHES AS PART OF ARCHDEACONS' RESPONSIBILITIES

The auditors were unable to meet any of the five area archdeacons due to time constraints and so gained a limited view of how they monitor and support safeguarding in parishes. The auditors did meet with the Associate Archdeacon who also has some area responsibilities but focused on her safeguarding role.

Safeguarding forms part of the triennial visitation process by the archdeacon. The visitation is preceded by a list of questions (known as the Articles of Enquiry in some dioceses) and a request to see certain documents such as the parish log sheets for DBS disclosures and the action plan for implementing the PCC's Safeguarding Policy. The questions in the Articles are varied to reflect priorities. If any of the documents are missing then the Diocesan Safeguarding Team should be alerted.

The archdeacons are closely involved in the response to safeguarding concerns in their areas and attend the Bishop's senior staff team as well as the Diocesan Bishops' Council, which is briefed and updated on safeguarding.

The CCPAS audit dated 2015 includes the following action: 'the DSSG should consider and agree the role of archdeacons within the visitation process regarding checking compliance with safeguarding... and make clear expectation of this process to be developed further.' The DSSG may wish to evaluate how this has developed and whether it is effective.

The Diocese has also implemented a parish safeguarding audit which parishes are expected to return annually. The auditors noted a reference to a 'slow trickle' of parish audit returns in the DST minutes which suggests an early stage of implementation.

(Reference: part 1 of the S. 11 audit: 'Include the monitoring of safeguarding in parishes as part of the archdeacons' responsibilities.')

CONSIDERATIONS FOR THE DIOCESE

- To evaluate the action taken in response to the CCPAS audit in reviewing the role of the archdeacons in monitoring safeguarding in the parishes and any need for further work to assess the effectiveness of this role and any further actions to be taken.
- Consider how best to maintain and analyse information about safeguarding at a parish level using the parish survey and the triennial visitation record by the Archdeacon and use the information collected to focus the efforts of the DST.

3.15 RESOURCES FOR CHILDREN AND VULNERABLE ADULTS

The auditors were told that there are three Authorised Listeners and they are being used more effectively, and are now offered as a matter of course. Two of the Authorised Listeners have a counselling background and one is an ex-police officer with a safeguarding background. It was noted from the case-files that if an Authorised Listener was requested by an adult who had been abused in the Diocese of London but now lives elsewhere, an arrangement was made to access an Authorised Listener or a counsellor in the home area. The Diocese is funding counselling or therapy for a small number of adults who were victims of abuse in childhood.

The auditors were told that the Diocese has approximately 350 children's champions. There was evidence presented of children's views on how safe they felt in their church, undertaken through a specific recent exercise in the parishes. The listening exercise was a positive step and could be extended if appropriate.

The auditors were told that the listening exercise was extended to adults through, for example, their luncheon clubs for older people and an evening group. There was a low response initially and the auditors recommend continuing to develop the exercise.

(Reference: part 3 of S.11 audit: 'There is a structure to hear the views of young people, there are children's and young people's advocates available, there are Authorised Listeners in place.')

CONSIDERATIONS FOR THE DIOCESE

Continue to develop the listening exercise for both children and adults as appropriate and incorporate the learning into the overall strategic approach.

3.16 INFORMATION SHARING

Information sharing within the Diocese appears to work and there is no sense of the DSA not having access to information.

The Bishop of London is in touch with his Roman Catholic counterparts on the subject of safeguarding.

The DSA is new to post and is making connections. It is recognised that there is a challenge ahead to cover the five Episcopal areas and 18 local authorities in terms of building relationships that would support information sharing.

Information sharing with statutory bodies is increasingly an issue and the establishment of a single point of contact within the Police is a good starting point.

There was only one response to the request for feedback from other agencies, but it is probable that most local authority officers would very rarely be involved in a case of abuse within the Church of England. The feedback was from a Local Authority Designated Officer (LADO) and referenced two cases. One in 2013 was a historic abuse case that was not taken further as the person did not want to give evidence. The second, in January 2016, was a case of domestic abuse (historical) where again the victim did not want police involvement. Advice about risk assessment was given and the input from clergy followed procedures. There was some confusion over who

would do the risk assessment and this was eventually clarified. The LADO thought that there is a misconception within the Church around the role of the LADO as they are there for advice and guidance but not to investigate.

The Diocese does not yet have an information-sharing protocol. It told the auditors that one had been planned and 'paused' due to the expectation that a protocol was to be published by National Office. However, this was a misunderstanding as no such protocol is planned and London Diocese will now develop its own. The auditors recognise this is a challenge for a diocese that covers 18 local authorities.

(Reference to part 1 of the S. 11 audit: 'Ensure that the DSA is informed of any serious safeguarding situation, including any allegation made against a member of the clergy or anyone else holding the Bishop's Licence, concerning misconduct.' Also, 'Share relevant information about individuals with other dioceses, other denominations and organisations or the national church as appropriate.'

And to part 5: 'The Diocesan Secretary, who will have a lead on DPA matters, will ensure that there is clear information-sharing protocols in place.')

CONSIDERATIONS FOR THE DIOCESE

The Diocese to develop information-sharing protocols across London for both children and adults.

3.17 QUALITY ASSURANCE PROCESSES

Responsibility for the quality assurance of the safeguarding work lies with the DSSG and the independent chair. The auditors were unable to get a real sense of how quality assurance works as the conversation with the chair was very brief and the DSA is new to the role.

CONSIDERATIONS FOR THE DIOCESE

Going forward the chair and DSSG to consider the adequacy of current quality assurance arrangements for safer recruitment, outsourced training and the casework of both DSAs and consider what improvements could assist this process.

3.18 LINKS WITH NATIONAL SAFEGUARDING STRATEGY AND TEAM

The national office provided a panel member in the appointment process for the current full-time DSA.

The full-time DSA is aware of the direction of travel of the national team but so far has not needed to contact them for advice about casework. There was though evidence in the files of advice from a member of the NST, in a case where a member of the clergy had been arrested but was never charged with regard to some allegations and subsequently refused to cooperate with a risk assessment. This is good use of the national team for consultation.

3.19 WHAT NATIONAL SYSTEMIC SAFEGUARDING ISSUES HAVE ARISEN?

DSA resources

There was no evidence of any shortage of DSA time in this audit, but the current DSA had only been in post for six weeks. Given the size and complexity of the Diocese, the auditors did pose the question of whether this would be sufficient resources in the long term.

It would be helpful to have national guidance for dioceses on how to evaluate the need for professional DSA resources and which aspects of the responsibilities need to be part of the specific DSA role and which could be delegated to voluntary resources.

Allegations and risk assessments

Evidence from the case audits suggested a lack of ability to intervene (due to ecclesiastic law) when a member of the clergy avoids cooperating with a risk assessment, for example, following a suspension, but no prosecution for allegations due to lack of evidence. The focus group raised some issues around risk assessments (see 3.7). The auditors noted, that the Practice Guidance on Risk Assessments (June 2015) does not totally clarify these circumstances. For example, the possibility that, following a Type A Risk Assessment, a member of a congregation should not hold a position of responsibility is allowed for in the template Agreement but not discussed in the text. Regarding church officers who undergo a Type B Risk Assessment, the template assessment refers to 'any future role of the subject in the church' but the auditors thought the assumption is that the subject will be risk-managed back into a role.

APPENDIX: REVIEW PROCESS

DATA COLLECTION

Information provided to the auditors before or during the audit:

- local structure and arrangements
- audit by CCPAS February 2015
- past case reviews
- statistical returns for last two years
- local procedures, policies and practice guidance for safeguarding
- minutes of three Safeguarding Team meetings (held monthly) and three Safeguarding Steering Group meetings (held quarterly).
- details of Authorised Listeners including job description
- job description of DSA
- information on safeguarding training delivered as well as slides relating to the content of the training
- safeguarding newsletters.

Participation of members of the diocese

The auditors had face-to-face conversations with:

- both full-time and part time DSAs
- the Associate Archdeacon for London
- the General Secretary (equivalent to diocesan secretary)
- the Bishop of London
- the independent chair of DSSG (by telephone)
- the Director of Human Resources (line manager to DSAs)
- Head of Children and Youth Ministry (informal/ unscheduled).

The parish focus group comprised:

- three vicars of parishes
- the full time DSA at Holy Trinity Brompton.

The audit: what records / files were examined?

- sixteen electronic case files and associated blue files (where relevant) were viewed
- ten blue files were reviewed in relation to safer recruitment.

LIMITATIONS OF THE AUDIT PROCESS

As stated earlier in the report, London is a large and complex diocese. As a consequence, in three days it was a challenge to undertake a level of auditing that is comparable with what is possible in a smaller diocese with a simpler structure.

The auditors read a smaller proportion of Blue (clergy) Files and of case records because the total numbers are higher. This means that findings may be based on a smaller body of evidence.

Also, although a selection of files relating to lay appointments had been made available, the auditors did not see them and so could not comment on the implementation of safer recruitment policy.

The auditors were aware that they were not able to review the entire recruitment process of clergy because the documentation relating to the advert for the post and the resignation of the previous post holder was not requested. However, the blue files were reviewed in relation to the House of Bishops' recommendations regarding safer recruitment.

The DSA had been in post for only six weeks, which allowed very limited evidence of her case work, diocesan responses to her decisions or advice or of the historical journey of safeguarding in the Diocese. The auditors planned to talk with the DSA who was in post prior to the current appointment in order to inform their picture of the safeguarding journey in recent years. Unfortunately, circumstances made it impossible for her to attend, although the focus group subsequently did provide information that supported a picture of progress and positive change.

The focus group comprised parish clergy and a full-time DSA working for a large and nationally well-known church. There were no parish volunteers and this was unexpected. This may or may not reflect the situation regarding the time commitments of volunteers in the London area, but meant the auditors were unable to obtain their perspective and perceptions on safeguarding.