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# Portsmouth diocese independent safeguarding audit



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

Programme of independent safeguarding audits of Church of England dioceses; commissioned by the House of Bishops through the National Safeguarding Team

## **Portsmouth diocese audit**

July 2015

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## 1. Introduction

This is the first of the Social Care Institute for Excellence [SCIE] pilot audit of diocesan safeguarding arrangements for the Church of England. The aim of these audits is to work together to understand the safeguarding journey of each diocese to date and to support the continuing improvements being made.

The framework for the audit (and the consequent report) has been specified by the National Safeguarding Team of the Church of England and links to the Children Act section 11 / Working Together to Safeguard Children 2015 requirements as they apply to faith organisations and the House of Bishops' safeguarding policies and guidance documents. The National Safeguarding Team specified the national expectations and the auditors evaluated the progress the diocese was making in reaching these eleven standards, applying them to the safeguarding of both children and adults.

The project is being started with the cooperation of four pilot sites to check the planning, conduct and output of the audit approach. The dioceses which have volunteered to be part of this pilot are Salisbury, Portsmouth, Blackburn and Durham.

The evaluation of the methodology (including using s.11 as the basis of the report structure) will be published in a separate pilot evaluation report. An overview report will also be published bringing together the learning from all four pilots and highlighting any systemic issues that are of wider significance.

Following evaluation of these pilots and any consequential adjustments to the methodology, the audits will be rolled out nationally during 2016 and 2017.

The fieldwork audit of Portsmouth diocese was undertaken by Hugh Constant and Susan Ellery on 6, 7 and 10 July 2015. The audit process involved examination of case records, group and individual conversations along with consideration of local policies, protocols and guidance, within the context of leadership arrangements for safeguarding.

### Structure of the report

**Section 2** provides the overview of the auditors' findings about the culture and quality of safeguarding practice within the diocese.

**Section 3** of the report provides the findings of the audit and is structured using the eleven headings set out in Working Together to Safeguard Children 2015, applied to the safeguarding arrangements for children and for vulnerable adults.

Recommendations have been included (if relevant) at the end of each sub-section

**Section 4** provides the headline findings from the case file audit. The diocese has been provided with the detailed audit material on the individual cases: this is not included in this report due to the confidential personal information contained.

**Section 5** gives information in relation to additional learning points.

The **appendix** explains the methodology employed in the audit.

## 2. Overview

The auditors were very impressed with the openness and desire to learn evident in the diocese. Those who participated in the audit communicated their commitment for vulnerable people, young and old, to be in a safe environment when they engage with the churches in our community.

The lack of defensiveness about people's work facilitates a culture of continuous learning and improvement, and the audit is perceived to be part of this process. It was explained that because dioceses effectively work on their own most of the time, this audit provides a welcome opportunity to be scrutinised and to discover the strengths in the safeguarding systems, as well as areas that needed improvement.

Overall the auditors were of the view that Portsmouth was well on the way to having developed a robust safeguarding culture, with inclusive and supportive management. Significantly, challenges are made and welcomed as opportunities for learning and improvement. The auditors were provided with examples of a gradual but significant shift in safeguarding culture over recent years.

This culture comes from the top, with the Bishop providing a clear lead on the importance of safeguarding in all aspects of the diocese. The Safeguarding Team works well together, with good leadership and management from the Deputy Diocesan Secretary (DDS). The skills and experience of the two diocesan safeguarding advisors (DSAs) complement each other and the team has a wealth of experience. There is though a gap in terms of professional safeguarding supervision; this was demonstrated within a couple of the cases audited.

The system of management, oversight, checks and balances between the Bishop's Safeguarding Management Group, the Safeguarding Panel and the Safeguarding Team in the office works well. This dynamic leads to constant challenge and a drive to do better, with new ideas being considered of how to improve safeguarding as demonstrated by the use of parish and case reviews, as described below.

In response to the acknowledged challenge of not knowing what is not being reported to the DSAs and to obtain more understanding of this 'unknown' risk, the diocese is working together with parishes, in developing a 'parish review'; a self-evaluation on safeguarding which is being done by 10 parishes chosen at random.

Another innovative approach in Portsmouth has been the use of a case review process to improve learning about safeguarding in the diocese. So far this has been used in relation to one case.

The diocese does recognise that its record keeping systems, both relating to cases and of 'performance management' are in need of improvement to provide the DSAs with more accessible information. This is currently under review.

### 3. Findings

#### **1. A clear line of accountability for the commissioning and/or provision of services designed to safeguard and promote the welfare of children and adults who are vulnerable**

##### **The adoption of the House of Bishops' safeguarding policies**

All the House of Bishops' safeguarding policies have been adopted by the diocesan synod. Local policies and procedures are kept in a handbook, 'In Safe Hands', which is available online but each parish also has a hard copy folder.

The local policies seen by the auditors were comprehensive and based on the House of Bishop's policies. Policies are in place for the reporting and management of safeguarding concerns.

Whilst there is an aim to ensure consistency between national and diocesan policies and guidance, this can be problematic if the diocese is unaware of national policy developments and consequently produce their own local policy. The diocesan safeguarding handbook was agreed on 11 June 2011 but is now being revised to ensure it is consistent with the recently published House of Bishops guidance documents published in June 2015. The handbook is on the agenda for the Bishop's Safeguarding Management Group in November 2015.

##### **Structure for management of safeguarding in the diocese**

There is a clear structure for the management of safeguarding in place, with the Bishop taking lead responsibility. Below him, the three archdeacons take the lead for enforcing compliance with safeguarding policy and good practice with individual clergy and parishes. This is through ad hoc support and discussion, and regular Articles of Enquiry visitations. Their questionnaire includes a section on safeguarding every year, but the questions included are now outdated and so new ones will be supplied by the Safeguarding Team for the next round of visitations.

The diocesan office structure consists of two part time Diocesan Safeguarding Advisers (DSAs) and a part-time safeguarding administrator, line-managed by the Deputy Diocesan Secretary. The safeguarding administrator works 21 hours per week and deals with recording and filing, and the DBS checks.

Financial, organisational and management support is provided through the Deputy Diocesan Secretary (DDS) and the Diocesan Secretary. The Diocesan Secretary line manages the Deputy Diocesan Secretary in her responsibility in this as in other areas of work and meets regularly with the case-work DSA, as part of monitoring his contract. Professional supervision is not provided to either DSA.

The DSA with primary responsibility for casework has regular meetings with the Bishop and the chair of the safeguarding panel. He also has full access to the personal files for each clergy member, held in the Bishop's offices, as well as all other staff. In his absence his colleague has the same access.



## **Reporting of concerns and risk assessments**

There are policies in place for the reporting and management of safeguarding concerns. Clergy and laity are reminded of their responsibility to report any concerns through the diocesan safeguarding policy documents and training courses as well as newsletters and the website.

The case audit did not provide any indication that there had been lengthy delays before the DSAs were informed of any concerns. The cases examined demonstrated the understanding of appropriate information sharing with other dioceses and local organisations, in particular the police and the local authority. This is being made more formal with the proposed *Information Sharing Protocol*.

The DSAs recognise the risk of 'unknown unknowns' due to the possibility of historic allegations that may yet emerge and/or parishes that have not yet fully embedded the safeguarding agenda. In response to this, Portsmouth is trialling a parish review; a self-evaluation on safeguarding which is being done by 10 parishes chosen at random. Eight have responded to date. The plan is to repeat in the autumn, introduce to all parishes, and then make this part of the quinquennial review. Working with the parishes that need assistance to internalise safeguarding processes and policies will provide an opportunity for dialogue. Working with parishes that are models of good practice could lead to peer mentoring between parishes in the future.

Risk assessments are carried out for offenders and those on bail who wish to be involved in Church activities: all have been undertaken by the DSA. Twenty safeguarding agreements are in place and all those that have existed for over a year have been reviewed, according to the annual return. A sample were seen: whilst some were straightforward (for offenders who comply with all the restrictions put in place), others were detailed with specific requirements, e.g. which toilet to use. The more all-encompassing risk assessments are for those offenders who push boundaries.

## **Safeguarding training**

The diocesan safeguarding training policy provides details of the course content, who should attend and the process for booking onto the course. Information about training is also communicated through the newsletters and the website and in the quarterly newsletter, providing details of training, local and national safeguarding developments.

Introductory safeguarding e-learning is available for all church staff and volunteers in the diocese. Further training depends on the individual role but includes safeguarding policy for parish leaders (including clergy), recruiting and managing volunteers safely and offender management.

## **Maintenance of diocesan safeguarding records**

The diocese acts as an umbrella body for all parish Disclosure and Barring (DBS) checks as well as those for all clergy and diocesan staff. The safeguarding office is responsible for the administration and maintains a database of all checks undertaken. The safeguarding office's database also holds information in regard to training attendance of everyone in the diocese. All information is on spreadsheets at

present by subject e.g. date DBS due, safeguarding training done or date due. There are plans to construct a database which will enable a check on a whole parish; e.g. whether everyone who needs to do the training has done it and if all DBS are up to date. Such 'performance management' functions are at an early stage of development.

Current case work and the case history is recorded on a separate part of the system, with a list of the records maintained securely. The clergy files are available at Bishopsgrove and easily accessible for the DSAs.

Paper files lack organisation and include a lot of duplication. Difficulties in getting 'the story' of what happened can be compounded by the use of imprecise language in previous times.

Electronic recordings usually have a case summary and a chronology which are useful, but tend to include whole email trails repeatedly, every time the most recent email exchange is added.

The way in which safeguarding records are held has been under review for some considerable time. A number of formats have been tried but as yet no decision has been made and the current plan is to look at the system used in Chichester.

### ***Recommendation***

*1. That a new information management system is implemented without delay so as to improve the ability of the safeguarding office to access 'reader friendly' case information, as well as provide statistical information on training and DBS data.*

## **2. A senior board level lead to take responsibility for the organisation's safeguarding arrangements**

The Bishop is the lead person in the diocese for safeguarding. The Bishop, by his own report and the report of everyone else, understands the significance of good practice in safeguarding. His refusal to allow any ministry without a DBS is a clear message as to the importance he attaches to the safeguarding process. However, of his seven staff, two have not yet completed safeguarding training in the last three years.

The archdeacons understand safeguarding too and are clear on their roles and responsibilities. However, one has not yet undertaken the leadership training on safeguarding.

The Bishop chairs the bi-annual Safeguarding Management Group himself. This body involves the Bishop, archdeacons, the Dean of Portsmouth Cathedral, Diocesan Secretary, the Bishop's Chaplain, the chair of the Safeguarding Panel, Deputy Diocesan Secretary and the two DSAs and supports the Bishop in this responsibility. It was variously described as having a strategic overview and having oversight of the panel. The good gender mix at this senior level was perceived as a strength, making it harder for abuse to be underplayed.

The Deputy Diocesan Secretary, is the nominated safeguarding lead on a day-to-day basis.

The Safeguarding Panel, accountable to the Bishop and the Diocesan Synod, oversee the effectiveness of the safeguarding arrangements for children and adults who may be at risk in the Portsmouth Diocese. The Panel meets quarterly and has an independent, capable and self-aware chair. The Panel includes operational level of input from statutory services.

### ***Recommendation***

*2. That the Safeguarding Management Group take responsibility to annually review the performance management data on safeguarding training and agree strategies as to how the leadership can be more effective in improving the take up of training.*

### **3. A culture of listening to children and adults who are vulnerable and taking account of their wishes and feelings, both in individual decisions and the development of services**

The local policy *Responding to Survivors of Abuse* refers to the 'duty to help and, as far as possible, heal survivors who may be experiencing a number of complex emotions such as fear, anger, shame and guilt, and understands that its response to them is critical to their future well-being'. The policy refers to working in partnership with an external service able to develop a programme of support for them centered around their needs. The Diocese of Portsmouth contracts its listening service to PARCS, a local abuse counselling service. If someone experiences abuse from a church officer, the diocese will consider funding up to 10 sessions with PARCS, and possibly more if necessary.

The auditors were told that the diocesan decision, after much thought, has been not to offer authorised listeners; it was felt more likely that any survivor would prefer not to receive support from within the Church, and also that having authorised listeners might mean unqualified, inexperienced people undertaking hugely sensitive counselling work. One of the DSAs though is identified as the first port of call, to decide what might be the best support route. The self-audit data consequently shows a zero return for authorised listeners.

There appears to be some confusion though, as the policy *Responding to Survivors of Abuse* refers to the Policy and Training Advisor being 'the appointed authorised listener'. The function is explained as being to help survivors think about the next step and support them to move forward. The policy appropriately makes it clear that this is not a counselling function and that the recommended option is for a referral to specialist services, but that some may not wish to go further than to have their history acknowledged.

Currently the structure to hear the views of young people happens within the parishes informally through parish safeguarding representatives and youth workers. There are no advocates as such available, albeit the youth workers sometimes consider themselves performing this function; it is not however in their job description. It is envisaged that further work will be undertaken on a more explicit structure with the review of the diocesan safeguarding policy.

### **Recommendation**

*3. The diocese to provide clarity about the use or not of authorised listeners and advocates for children and adults who are vulnerable, and that there is consistency between practice and policy so staff are clear about the process.*

**4. Clear whistleblowing procedures, which reflect the principles in Sir Robert Francis’s Freedom to Speak Up review and are suitably referenced in staff training and codes of conduct, and a culture that enables issues about safeguarding and promoting the welfare of children [and adults] to be addressed<sup>1</sup>**

There is a general understanding of how complaints and whistleblowing would be handled, but currently this is not supported by specific explicit written processes and procedures.

The whistleblowing policy is contained within the general safeguarding handbook, but would benefit from being more explicit about whom to contact.

The complaints procedure is very specific, but covers only complaints by offenders who are refused employment, telling them to write to the Bishop. When asked, people were able to explain how other complaints are dealt with in accordance with church legislation and policy. It is planned that the updated diocesan safeguarding policy will reference the web address of the central guidance on how to make a complaint against the clergy.

### **Recommendations**

*4. The Diocese to provide written policy which makes the distinction clear between complaints, whistleblowing and reporting of safeguarding concerns.*

*5. The Diocese to develop an explicit written complaints procedure; consideration to be given to the use of a staged approach, starting with an informal stage to resolve most complaints and an investigative process for the most complex.*

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<sup>1</sup>Sir Robert Francis’s Freedom to Speak Up review report can be found at [https://freedomtospeakup.org.uk/wp-content/uploads/2014/07/F2SU\\_web.pdf](https://freedomtospeakup.org.uk/wp-content/uploads/2014/07/F2SU_web.pdf)

## **5. Arrangements which set out clearly the processes for sharing information, with other professionals and with the Local Safeguarding Adult<sup>2</sup> and Children Board<sup>3</sup>**

The local safeguarding policy sets out, clearly and concisely, the information sharing protocols with partner agencies such as the police and local authority, and strikes a reasonable balance between confidentiality, and the need to report even without consent where others may be at risk. Changes may though be needed to reflect Care Act guidance on supply of information.

The first draft of an *Information Sharing Protocol* has been produced at the request of the DDS, and will go through the diocesan process for approval, before being included in the new diocesan safeguarding policy handbook.

### ***Recommendation***

*6. The information sharing protocols in the local safeguarding policy to be updated to reflect Care Act Guidance on supply of information and general co-operation, with reference to the six Safeguarding Principles.*

## **6. A designated professional lead for safeguarding. Their role is to support other professionals in their agencies to recognise the needs of children and adults who are vulnerable, including rescue from possible abuse or neglect. Designated professional roles should always be explicitly defined in job descriptions. Professionals should be given sufficient time, funding, supervision and support to fulfil their safeguarding responsibilities effectively.**

There are two part-time DSAs. One has a contract, not a job description, as he is self-employed, and the other, an employee, has a job description. Both contract and job description are clear about the DSA's responsibilities.

The two Safeguarding Advisers (DSAs) have different responsibilities, to match their individual skills and experience. One has a police background, with experience of investigating child abuse and neglect, so has the responsibility for the case work. The other has a background of business/human resources/risk assessment and nine

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<sup>2</sup> Safeguarding Adults Board is a multi-agency partnership which provides strategic leadership for the development of adults safeguarding policy and practice, consistent with national policy and best practice.

<sup>3</sup> Local Safeguarding Children Boards (LSCBs) were established by the Children Act 2004 which gives a statutory responsibility to each locality to have this mechanism in place. LSCBs are now the key system in every locality of the country for organisations to come together to agree on how they will cooperate with one another to safeguard and promote the welfare of children. The purpose of this partnership working is to hold each other to account and to ensure safeguarding children remains high on the agenda across their region.

years of experience working in safeguarding within the diocese. Her responsibility is training and policy development, including monitoring the uptake of training throughout the diocese and to provide expert safeguarding advice to clergy, parish workers and safeguarding representatives in matters relating to safeguarding in parishes.

The DSA responsible for training and policy, has recently had her hours increased from 16 to 21. She feels 'totally supported' and recognises that the team has grown as it used to be just her and the administrator. In the last year, this DSA has felt slightly under-resourced as a result of it being a particularly heavy period with regard to the writing of policy and a new handbook.

There appears to be some confusion relating to the role of the DSA with responsibility for training and policy, as she is not universally identified as the DSA, possibly as she is referred to in some policy documents as the Policy and Training Advisor. This was the term also used in the diocesan self-audit. When she started nine years ago, she was line managed by the previous DSA. Since that time though she has had training and experience in safeguarding and in recognition of her increased role in safeguarding her job title was changed in 2014 to 'DSA- training and policy'. The DSA for case work is able to seek consultation from both the DSA policy and learning and members of the safeguarding panel.

The change in arrangements for DBS checks means that instead of a copy being sent to the employing organisation, administration spend considerable time getting people to bring their DBS in to be seen.

The DSAs manage to liaise effectively with statutory agencies, through DSA membership of the Local Safeguarding Children Board and attendance at specific meetings. The local authority has representation on the safeguarding panel. A gap is the current lack of representation on the Safeguarding Adult Board since the local authority revamped the Board, reducing membership, with the DSA being one of those not invited onto the new smaller Board.

The DSAs communicate regularly with parishes via the training newsletters and the website. The office also acts as the triage for all safeguarding queries and these are recorded and dealt with accordingly.

Case work audited demonstrated effective and prompt responses by the DSA and shows no indication of resource problems. For example, an alert was received about an offender wanting to worship, and contact was made with the offender the next day to do a risk assessment.

The management provided by the DDS was greatly appreciated, but a lack of regular professional supervision and ad hoc consultation was identified as problematic. This was demonstrated in the audit; the learning points were provided directly to the DSA.

The supervisor would need to be someone with a thorough grounding in safeguarding, ideally as it relates to both adults and children, although the children's background would be more relevant. It would be positive for someone from a social work background to provide such support, so as to complement the current DSAs experience. This may provide a different perspective at times and a useful challenge.

**Recommendation**

*7: That both DSAs be provided with professional safeguarding supervision and availability of ad hoc consultation, preferably from someone with a social work background in safeguarding.*

**7. Safe recruitment practices for individuals whom the organisation will permit to work regularly with children and adults who are vulnerable, including policies on when to obtain a criminal record check.**

Policies and procedures around safer recruitment are outlined in the diocesan handbook *In Safe Hands* and this guidance is updated regularly through the quarterly newsletters. This does though cause a potential problem of outdated policies remaining as the resource document. In local authorities electronic procedures have replaced hard copies, so as to enable easy updating. However, this is more problematic in parishes not equipped to access online material.

The handbook is currently under review and will incorporate the House of Bishops' policy on *Safer Recruitment 2015*. This will ensure that everyone has the same handbook in the short term, but will still mean that subsequent changes need to be notified in a way that ensures hard copies are updated.

A firm lead has been established by the Bishop and others in making it clear that people cannot work for the church until DBS checks are in place. This should help counter the sense that remains, especially among some at parish level, that DBS checks, especially of longstanding volunteers, are a bureaucratic waste of time. It is though recognised that, for a Parish Safeguarding Representative, working on a voluntary basis, DBS checks are burdensome, and recent data protection-led changes to their administration has made this harder to manage.

The diocesan self-audit showed that 23 people with PTO and 9 clergy are outside DBS renewal standards of every five years. This indicates that whilst progress has been made, this is an area that requires further work.

**Recommendation**

*8. That consideration is given by the Safeguarding Management Group over how to support the DSAs to improve the rate of DBS renewals.*

**8. Appropriate supervision and support for staff, including undertaking safeguarding training: employers are responsible for ensuring that their staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children and adults who are vulnerable and creating an environment where: staff feel able to raise concerns and feel supported in their safeguarding role; staff should be given a mandatory induction, which includes familiarisation with safeguarding responsibilities and procedures to be followed if anyone has anyone has concerns about a child's or adult's safety or welfare; and all professionals should have regular reviews of their own practice to ensure they improve over time.**

All appointment letters from Bishopsgrove incorporate standards of training required for all clergy and PTO. It is standard for new staff to have safeguarding e-learning, but this only started in March–May 2014. The current figures provided by the diocese shows that 246 of the 352 licensed clergy with DBS checks have undertaken safeguarding training i.e. 70 per cent. The numbers of laity who have undertaken the training, either policy or awareness, is impressive at 1,900 and includes some who have not been DBS checked, as others are enabled to do the course. Whereas policy always required PTOs to undertake safeguarding training there was an administrative omission that PTOs did not get the same number of chasing letters to do this and so Portsmouth diocese are currently 'playing catch-up' to get all of them through the training.

The Safeguarding Team ensures all clergy, readers and safeguarding representatives have attended relevant training, refreshed every three years. At parish level, this is the responsibility of the parochial church council (PCC)<sup>4</sup>/safeguarding representatives, but the Safeguarding Team sends out reminders to individuals.

Lack of training in safeguarding for senior clergy is an issue nationally, as this training is provided centrally. The bishop gets training including safeguarding and the archdeacons sometimes get invited to take spare places but usually the day before when a bishop drops out. Five of the seven senior clergy have though taken up diocesan training and the other two will be doing so imminently, we are told.

There is a day's safeguarding training for senior clergy which is being rolled out on a regional basis (the south east is 14 October 2015) but this approach needs to be followed up with a programme of three yearly updates plus training for new senior clergy.

The DSA team is planning a Learning Lessons review process for complex cases, so that learning from these can inform and improve processes and policies and be disseminated to the Bishop's Safeguarding Management Group and the Safeguarding

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<sup>4</sup> A parochial church council (PCC) is the executive committee of a Church of England parish and consists of clergy and churchwardens of the parish, together with representatives of the laity.



Panel. So far, one case has been through such an internal process within the team.

Several people showed an awareness of the challenges presented by the physical separation of the Isle of Wight, and the need to make sure that people on the island are not disadvantaged by distance. Safeguarding training, for example, is taken to the island to support attendance and, when the Archdeacon is unable to fit in crossing the Solent to attend panel meetings, use is made of Skype so that he is part of the discussion and not a recipient of minutes. Many of the people interviewed for the purposes of this audit did reflect on differences between the issues on the island and the mainland in terms of a large number of churches, given the size of its population, consequently low size congregations and difficulty filling all the roles and the proportion of ex-offenders who choose to remain on the island when released from prison. As the Archdeacon pointed out with the relatively small number of children attending Church, much of the safeguarding activity is in the context of safeguarding vulnerable adults.

### ***Recommendation***

*9. The different safeguarding challenges presented by the characteristics of the Isle of Wight need to be better understood and steps taken to increase the inclusion of the clergy on the island. Such steps could include audit/review activity and hosting one of the diocesan senior management groups on the island.*

**9. Clear policies in line with those from the Local Safeguarding Children and Adults Boards for dealing with allegations against people who work with children or adults who are vulnerable. An allegation may relate to a person who works with children or vulnerable adults who has behaved in a way that has harmed a child; or may have harmed a child or adults who is vulnerable; possibly committed a criminal offence against or related to a child; or behaved towards a child or children in a way that indicates they may pose a risk of harm to children or adults who are vulnerable.**

Clear policies are in place in line with *Responding to Serious Safeguarding Situations Relating to Church Officers and Other Individuals* Practice Guidance May. The audit of 13 case files demonstrated evidence that the policies are effectively put into practice, albeit with room for improvement as detailed above, best achieved via professional safeguarding supervision.

**10. Employers and voluntary organisations should ensure that they have clear policies in place setting out the process, including timescales, for investigation and what support and advice will be available to individuals against whom allegations have been made. Any allegation against people who work with children should be reported immediately to a senior manager within the organisation. The designated officer, or team of officers, should also be informed within one working day of all allegations that come to an employer's attention or that are made directly to the police. Any allegation should be reported immediately to a senior manager within the organisation.**

Allegations are dealt with in line with national House of Bishops' guidance and Local Safeguarding Children<sup>5</sup> and Adults Boards procedures. *Responding to Serious Safeguarding Situations Relating to Church Officers and Other Individuals* (Practice Guidance May 2015) does not provide explicit timescales, but uses the term 'immediately'. However, policy and (on basis of case file audit) practice both demonstrate a recognition of the importance of a prompt response by the DSA, the protection of any victim and support to the alleged abuser (and family, congregation, colleagues thereof).

Practice suggests reports made promptly and effectively in most cases when alerts are raised.

**11. If an organisation removes an individual (paid worker or unpaid volunteer) from work such as looking after children (or would have, had the person not left first) because the person poses a risk of harm to children or adults, the organisation must make a referral to the Disclosure and Barring Service. It is an offence to fail to make a referral without good reason.**

There are policies and processes in place to ensure such referrals are made; two DBS referrals have been made in the last four years.

## 4. Learning from case audits

The auditors examined 13 case files [out of 91 files available] and three additional offender management risk assessments.

A separate report is being provided about the detailed learning from these cases and any actions required. However the following provides the general learning:

- The Church and other religious groups face particular challenges around personal/professional boundaries, due to the involvement of staff and clergy's families in Church activities, resulting in inevitable complexities around the distinction between the personal and professional boundaries. This came up in more than one case.
- The DSAs respond to safeguarding referrals in a timely and responsive manner.
- Generally the DSA communicates with partner agencies appropriately and in a timely manner, involving police and social care services as appropriate
- Whilst generally safeguarding referrals were made in a timely manner, there was a five-day delay in one case.
- There was one case which should have been reported to children's social care, so that the child's voice could be heard and the information provided to the DSA be checked with the family.

The most significant learning as a result of examining the cases was the need for professional supervision for the DSAs as in recommendation 7.

### **Recommendation**

*10. There is a need for open discussion within the Church about the challenges faced in terms of personal/professional boundaries, due to the inevitable overlap between family and friends and the congregations. There needs to be clarity around when such overlaps mean that management control of situations need to be dealt with by others, even in the context of no identified safeguarding concerns.*

## 5. Additional learning

This section addresses additional learning which does not emerge from the above framework, but emerged in discussions with individuals and groups.

- It is very hard to oust an incumbent who has freehold and you can't take them into Capability (can do Disciplinary).
- The national church is in the process of engaging in a consultation process over guidelines for clergy regarding the confidentiality of the confessional in the context of safeguarding. In this diocese the bishop's expectation is that in the confessional, absolution would not be considered until the person had made a full confession to the police. In addition, if someone asks a minister (lay or ordained) if a conversation is confidential, the expected response is to explain that confidentiality cannot be offered where life and limb is at risk or where sexual offences are discovered.
- Historically, the National Safeguarding Team did not always alert DSAs of forthcoming policy and guidance which led to duplication of effort. A lot of preparation was done on risk assessment just before the national document came out. However, following discussions with the national team this has improved enormously and hopefully will continue to do so.
- The new national policies do not always state that they replace the older ones, leading to a risk that they sit alongside and cause confusion.
- Parish Safeguarding Representatives (PSRs) are contacted by the DSA when they are appointed – they sometimes do not realise what the job entails and resign when they realise what is involved. They also do not automatically get a seat on the PCC by right, and in some parishes a safeguarding lead other than the PSR attends.
- The Safeguarding Panel chair has no meetings with peers and does not get the benefit of shared learning about the common challenges and best practice

### **Recommendations**

*11. The diocese produce a handbook specifically for Parish Safeguarding Representatives and provide tailored training.*

*12: Explore possibility of a regional network for safeguarding panel chairs, or some other benchmarking mechanism.*

## Appendix: Review process

The framework for the audit links to the requirements of the Children Act section 11 / Working Together to Safeguard Children 2015 requirements as they apply to faith organisations and the House of Bishops' safeguarding policies. The National Safeguarding Office specified the national expectations, so that the auditors could evaluate the progress the diocese was making in reaching these standards.

### Data collection

The audit involved both an examination of records as well as conversations with individuals and groups.

The diocese provided the auditors with a redacted spreadsheet of all case files from 2011–2015, with a brief summary of each case, including referrals made to the Disclosure and Barring Service<sup>6</sup>. One of the auditors selected eight from the list, trying to get a variety in terms of more/less recent case; offender's role; indications of multi-disciplinary involvement. It was though not possible from the details provided to ascertain which met the following criteria, so the diocese was asked to select one of each category:

- allegations of abuse against a Church officer
- people in the congregation who are known to potentially pose a risk of abuse
- other scenarios where there may be a risk of abuse e.g. domestic violence, adult safeguarding
- scenarios where a risk of harm has been identified in respect of a child
- complaints about the diocesan response to safeguarding concerns.

The records examined consisted of:

- thirteen case files [out of 91 files available]
- three additional offender management risk assessment.

The people who contributed to the audit via individual and group conversations were:

- the Deputy Diocesan Secretary
- the two Diocesan Safeguarding Advisors [DSAs]
- the Diocesan Safeguarding Panel<sup>7</sup>: one-hour observation, discussion with statutory members and then individual conversations with chair
- three Archdeacons
- Diocesan Secretary
- Safeguarding Administrator

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<sup>6</sup> The Disclosure and Barring Service (DBS) helps employers make safer recruitment decisions and prevents unsuitable people from working with vulnerable groups, including children.

<sup>7</sup> Safeguarding Panel consists of an independent chair, the, Bishop's Chaplain, three Archdeacons, two DSAs, Deputy Diocesan Secretary, Reps from Police, Probation, Adults and Children's Services, Health from IoW, Portsmouth and Hampshire.

- Bishop of Portsmouth
- Bishop's Chaplain
- Parish focus group: vicar, teacher and lay reader, intern and group leader, parish administrator and parish safeguarding representative.

The following local policy and guidance documents were considered as part of the audit:

- *In Safe Hands* – the diocese's safeguarding handbook of policies and procedures
- The diocese's safeguarding training manual
- Job descriptions/contracts for DDS, DSAs, Safeguarding Administrator, and Safeguarding Panel Chair
- *Safeguarding Matters* – the diocesan safeguarding newsletter
- Minutes of three Safeguarding Panel meetings
- Safeguarding statistical return for 2014
- Safeguarding audit questionnaire
- Parish Safeguarding Review – pro-forma and one completed return.