

# Diocese of Worcester independent safeguarding audit (September 2016)





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# 1 INTRODUCTION

#### 1.1 CONTEXT

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

The audit of the Diocese of Worcester was carried out by Susan Ellery (the lead auditor for this diocese) and Leethen Bartholomew on 27, 28 and 29 September 2016.

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

This report was written by Susan Ellery with support from Leethen Bartholomew. It was quality assured and finalised by Edi Carmi, the overall auditing lead, taking into account feedback from both the Diocese and the National Safeguarding Team.

#### 1.2 THE DIOCESE

The Diocese of Worcester covers an area of 670 square miles and includes the County of Worcestershire, the Metropolitan Borough of Dudley, and a few parishes in northern Gloucestershire, south-east Wolverhampton and Sandwell.

The north of the diocese is mainly urban with an impressive history and cultural mix, whereas the south is primarily rural.

The Diocese has benefitted from the foundations of good safeguarding laid in the mid-1990s. The forerunner to the present Diocesan Safeguarding Group was established in 1996. Actions taken include a child protection lead being recommended for the Cathedral in 1999, safeguarding training dating back to 2000, safeguarding agreements with offenders in place from 2001 and safer recruitment ing addressed in 2002.

Today the Diocese covers a population of 865,000 of whom approximately 18,000 people are on the electoral roll of a church. There are 97 benefices, 170 parishes and 285 churches.

#### 1.3 STRUCTURE OF THE REPORT

This report is divided into:

- Introduction.
- An overview 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) Church of England national audit form].
- Considerations for the Diocese are listed, where relevant, at the end of each finding
- An appendix sets out the review process.

# 2 OVERVIEW

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

#### 2.1 WHAT'S WORKING WELL?

The Bishop of Worcester is fully engaged with safeguarding issues. The current Bishop, in common with previous Bishops of Worcester, delegates the lead role to the Suffragan Bishop of Dudley. The fact that the lead is delegated to a bishop was seen by a range of people in the Diocese as a demonstration of the importance attached to safeguarding.

The Bishop of Dudley and the Diocesan Safeguarding Adviser (DSA) work closely together and people spoke highly of the support they receive. All the casework audited was of a good standard.

The Diocese has introduced a parish self-audit this year, called the Parish Toolkit, and despite the input required it received positive feedback from the Parish Focus Group. Parish safeguarding officers said that the toolkit helps them in making sure that the Parochial Church Council (PCC) takes safeguarding seriously.

The Archdeacon of Dudley described a deanery-based model for the Archdeacon's visitations to parishes that includes the church wardens of each parish having a 20-minute interview with the Archdeacon. The interview will not always focus on safeguarding but church wardens are expected to bring their signed policies and to be able to talk about actions taken in their parish. This approach helps to ensure that safeguarding awareness permeates the parish structure.

In terms of safeguarding, the relationship with the Cathedral is working well and moving towards a service level agreement. The DSA has delivered specific training to Cathedral staff and the Cathedral Steward is a member of the Operational Safeguarding Group. Specially adapted training has also been delivered to the two religious communities in the Diocese.

The Diocese has strong links with Children's Social Care in Worcestershire County Council, via the Local Authority Designated Officer (LADO) and with Adult Services in Dudley Metropolitan Borough, via the lead for the Adult Safeguarding Board. Both sit on the Diocesan Safeguarding Group and since 2005 for children, and 2008 for vulnerable adults, they (or their predecessors) have contributed an annual report on the health of safeguarding.

Safer recruitment was in evidence on all the clergy and lay files seen. Where there had been a clergy safeguarding concern, this was clearly marked on the individual clergy personnel file (the blue file), by a red card securely attached at the front. Safeguarding training certificates were also on file and showed which iteration of training had been completed and when. Most of the blue files were well kept, and a plan is in place to catch up on filing.

The Diocese has clear and easy-to-follow complaints and whistleblowing policies.

There is an acceptance that the current substantive DSA resource (25 hours a week) may not be enough and there is a budget plan to increase it in 2017/18. The auditors recognise that the DSA has a temporary increase of hours to full-time at present due to added demands in preparing material for the Independent Inquiry into Child Sexual Abuse (IICSA) and the SCIE audit.

#### 2.2 WHAT NEEDS TO WORK BETTER?

The auditors acknowledge that the majority of the points made in this section relate to the further improvement of actions or structures that are already in place in the Diocese. No major gaps were identified.

The professional supervision of the DSA is very new and the auditors questioned whether the frequency is enough. The auditors suggested a formal arrangement whereby the supervisors and the Suffragan Bishop meet twice a year, including the DSA for part of the meeting. Once a year this meeting might feed into the DSA's annual appraisal.

The Diocesan Secretary asked for comment on how information-sharing protocols might be developed. This is a difficult area for a non-statutory organisation, particularly in terms of getting statutory agencies to participate. The auditors suggested working with adult and children's safeguarding boards so that they achieve a protocol with all non-statutory agencies.

The Independent Chair of the Diocesan Safeguarding Group (DSG) acknowledged that they would benefit from stronger links with police and probation, both in terms of strategy and casework input.

Although the Chair of the DSG described undertaking a quality assurance (QA) role himself, and the local authority representatives on the group write annual reports on the state of safeguarding, the auditors wondered whether the QA and critical challenge roles of the DSG might be set out and recorded more systematically. Perhaps QA should have a section of its own in the diocesan safeguarding work plan which is reviewed by the DSG.

The auditors heard that participants in training are asked to decide their personal goals before they leave. This is good practice and it was suggested that a sample of participants might be contacted perhaps three months later to find out whether they have been able to make the changes in their parishes they aimed to, or what the obstacles to changing things as they wanted to have been. This should help the Diocese to understand any structural issues that impede progress.

The training strategy would benefit from development in terms of setting out what needs to be achieved in the numbers to be trained and at what level, and then a plan of implementation.

There seems to be some misunderstandings about the DVD planned for Permission to Officiate (PTO) holders who are too frail or ill to attend training, mainly about whether people will be accompanied while watching and what they will have to sign afterwards. This might need a bit more thought about the numbers, time needed, cost and benefits.

The auditors saw scope to develop the support given to the parish safeguarding officers (PSOs). The PSOs in the Parish Focus Group felt well supported in terms of casework but sometimes in need of recognition and emotional support. Networks of PSOs in the deaneries and regular meetings with the DSA or an assistant might be possibilities.

The DSA is aware that she may not know of all the safeguarding agreements held in parishes due to a period before her arrival when paperwork and processes were not always collated centrally. The Parish Toolkit should take the DSA a long way towards holding a complete set of agreements.

The awareness of Authorised Listeners was low in the Parish Focus Group, although some people knew of them but did not know the title. Once the new team of Authorised Listeners is ready, a communication plan to raise their profile might be considered.

The Parish Toolkit is providing a wealth of information about safeguarding at the grass roots level and there is scope to analyse the data and use it to target geographical areas and/or issues that would benefit from greater input.

## 2.3 CONSIDERATIONS FOR THE DIOCESE

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

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

There is additionally in 3.15 a consideration for the National Safeguarding Team, linked to the findings from section 3.5.

- Consider a formal arrangement to link the line management of the DSA with the two professional supervisors.
- Explore whether the supervision of the DSA is sufficient in terms of length and frequency.
- Consider how supervision decisions are recorded and transferred to the case record.
- Map out the safeguarding tasks and how they are best achieved within the resources available from April 2017, making adjustments to existing posts or recruiting to an additional post as needed.
- Consider reviewing the way that individuals are identified in the notes of DSG and OSG, so that their roles are clear.
- Consider including a statement on the website, from the Bishop or Suffragan Bishop, to endorse the safeguarding policies and the work of the safeguarding

team.

- Consider how case recording should distinguish clearly facts, subsequent analysis and opinions e.g. through use of a different type face.
- Consider a plan to put in place Type A Risk Assessments on all current safeguarding agreements.
- Consider a plan to engage with bell ringing organisations, perhaps in conjunction with neighbouring dioceses, to promote acceptance of the protocol published by the Central Council of Church Bell Ringers and to encourage bell ringers to be part of the wider Church community.
- Consider how to find out whether safeguarding training is effective in the longer term by contacting a sample of course attendees three months later and asking for feedback about how the training has had an impact on their practice.
- Using the Training Strategy and the OSG notes as a basis, draw up a plan for the implementation of the national framework over the next two to three years.
- Consider whether the Complaints Policy might allow for a verbal submission by phone or face to face.
- The DSG to consider how QA might support and improve effective practice and add a programme of QA to the Diocesan Register of Safeguarding Concerns.
- The DSG to consider how the analysis of the Parish Toolkit (see 3.11 below) can contribute to QA at parish level in the future.
- Consider how best to support PSOs and how to make sure that each parish is covered by a PSO.
- Once the Authorised Listening service is in place, devise a communication strategy to make sure that it is known about across the Diocese.
- Make sure that, if a need for counselling for a survivor of abuse is identified, the
  Diocese can move quickly to agree funding and, if needed, find a service that is
  suitable according to the needs of the individual.
- Explore whether the DSA could help the Safeguarding Boards to develop information-sharing protocols with non-statutory partners.

# 3 FINDINGS

#### 3.1 SAFEGUARDING MANAGEMENT

The delegation of leadership in safeguarding by the Bishop of Worcester to the Suffragan Bishop of Dudley is long established and well understood. The current Suffragan Bishop talked about how he was recruited for this role three years ago, in part, because of his experience and understanding of safeguarding.

Although the lead is delegated to the Suffragan Bishop, the auditors recognised that the Diocesan Bishop was fully engaged with safeguarding in the Diocesa. Recently, the Diocesan Bishop, in conjunction with his Diocesan Secretary and Registrar, wrote to the National Safeguarding Adviser about matters which he thought needed to be raised.

The Suffragan Bishop is very active in safeguarding, chairs the Operational Safeguarding Group, is a member of the Diocesan Safeguarding Group and line manages the Diocesan Safeguarding Adviser (see 3.2). The view in the Diocese is that the Bishop's line management of the Diocesan Safeguarding Adviser underlines the importance of safeguarding to the parishes.

The Suffragan Bishop leads on both strategic and operational leadership. By 'strategic', the auditors mean planning for the future and implementing change whereas operations cover the day-to-day management.

Although the Diocesan Secretary did not feature on the structure chart for safeguarding, he plays a crucial supportive role. He is very involved in policy and governance as well as resourcing and liaises closely with the Registrar to ensure that policies and procedures are legally sound; for example, he has been working on the confidentiality aspects of Authorised Listeners and on the draft Case Management Protocol.

The Suffragan Bishop and Diocesan Secretary are members of the Bishop's Staff Group and the Bishop's Council. Safeguarding is a standing item at the Bishop's Staff Group. The Independent Chair of the Diocesan Safeguarding Group (see 3.3) delivers an annual report to Bishop's Council.

Safeguarding links with the Cathedral are strong and developing into a formal arrangement via a service level agreement next financial year. The Diocesan Safeguarding Adviser (DSA) takes cases from the Cathedral, the Cathedral follows diocesan and national policy and practice guidance and the Cathedral piloted the Parish Toolkit (see 3.11 below). The safeguarding lead at the Cathedral (the Steward) also works closely with The King's School which supplies the boy choristers (girl choristers come from a number of schools).

Overall, the auditors found that a culture in which safeguarding is seen as important and as everyone's business is well developed in the Diocese. This was seen particularly strongly in the Parish Focus Group where people talked about challenges but also about wanting to get it right.

(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 ADVISER/S

The DSA is employed by the Diocese and has a substantive contract for 25 hours a week, although she is currently working full-time and a plan is in place to increase either her time or the overall safeguarding resource permanently. She took over in mid-2015, following temporary cover of the post for nine months, due to the illness and death of the previous post-holder.

The post is home-based but the DSA is in the Diocesan Office 'two or three times a week'. The Diocese provides all equipment, e.g. laptop, smart phone. The role has a job description and a person specification based on the national model.

The DSA has the support of a team comprising:

- the Diocesan Youth Officer: shares responsibility for the delivery of training (delivering particular modules and some specially adapted training for individual groups), as well as chairing the Training Strategy Group
- the DBS administrator: shares the delivery of training in one module around safer recruitment and coordinates safer recruitment training to parish administrator
- The HR administrator: co-delivers the safer recruitment training with the DBS administrator, to parish administrators.

The DSA undertakes all casework and is supported in her lead for policy and procedures by the Bishop of Dudley, the Diocesan Secretary and the Independent Chair of the Diocesan Safeguarding Group (see 3.3).

The DSA is a midwife by qualification and moved into management by setting up the first rural Sure Start Children's Centre in Worcestershire. She later moved to Birmingham where she managed two Children's Centres for a national charity and experienced intensive multi-agency working in Teams Around the Child. Her safeguarding experience developed in these roles.

The DSA holds no other roles in the diocese and is not a member of the Church of England.

#### 3.2.1 Management and supervision

The DSA is line managed by the Suffragan Bishop of Dudley and they meet monthly on a formal basis. He demonstrated a knowledge of all safeguarding cases and formally agrees closure when recommended by the DSA. The auditors were concerned about the potential for disagreement on case closure but it was explained that the Suffragan Bishop's agreement signifies that he has read the complete record, rather than it being his decision to close. It might be worth making sure that this is clarified on the closure summary.

The Suffragan Bishop is responsible for the DSA's annual appraisal and would deal with any performance issues, with input from the DSA's professional supervisors if appropriate. The auditors felt that the tie-up between line management and supervision would benefit from being regular and formal.

Since July 2016, the DSA has received professional supervision from two supervisors (one for children's casework and one for adult's), both of whom are qualified social workers with substantial practice and management experience in local authorities. Signed supervision contracts are in place. Supervision on children's cases is quarterly and on adult cases six monthly. The auditors questioned whether that is sufficient and whether four to six-weekly for children's cases and two or three-monthly for adult cases might work better in terms of continuity and liaison between the supervisors and the line manager. The auditors queried what would happen if a case involved both adults' and children's issues, and a potential risk of a long gap before discussion with both supervisors and/or in bringing the supervisors together. However, the Diocese is confident that in such circumstances either a special meeting would occur, or the supervisors would speak with each other.

The auditors discussed with the DSA how decisions made about cases in supervision might be transferred to the case record along with the reasoning, while acknowledging that it would have to be the DSA and not her supervisors who do this.

#### 3.2.2 Resources

The total resource given to the staffing of safeguarding seems to be sufficient, given that the DSA is currently working an extra 12 hours per week. There is a plan in place to continue this increased staffing resource on a permanent basis, although the detail of whether this should be extra DSA time or support to the DSA has yet to be worked out.

The Diocese plans to move imminently to an online DBS system (see 3.8 below) and this should, once embedded, free up some of the DBS administrator's time. The auditors discussed how this might be used to analyse and present the data from the Parish Toolkit and/or to offer the PSOs more practical support. Some of the PSOs in the Parish Focus Group talked about the emotional demands that can be made on themselves as volunteers, particularly when safeguarding agreements are necessary. This might be another useful focus for additional capacity in the safeguarding team.

The resourcing of an increase in the budget share given to safeguarding was seen as a necessity, despite the fact that electoral rolls have been falling slightly in the Diocese. The budget share has increased most years since at least 2000, and is due a substantial increase next financial year. The Diocesan Secretary shared the relevant section of the Diocesan Board of Finance Risk Register which identifies that inadequate resourcing would be a high risk with potentially major consequences but this has been addressed by the Diocese taking action to mitigate this risk.

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

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

The DSA has sufficient time, funding, supervision and support to fulfil their safeguarding responsibilities, including local policy development, casework, advice, liaison with statutory authorities, training, personal and professional development and professional registration. Part 8: The DSA should be given access to professional supervision to ensure their practice is reviewed and improves over time.)

#### Considerations for the Diocese

Consider a formal arrangement to link the line management of the DSA with the two professional supervisors.

Explore whether the supervision of the DSA is sufficient in terms of length and frequency.

Consider how supervision decisions are recorded and transferred to the case record.

Map out the safeguarding tasks and how they are best achieved within the resources available from April 2017, making adjustments to existing posts or recruiting to an additional post as needed.

#### 3.3 DIOCESAN SAFEGUARDING GROUP

The Diocese has a Diocesan Safeguarding Group (DSG), with a primarily strategic function, and an Operational Safeguarding Group (OSG). Both have terms of reference and both are described briefly in this section.

#### 3.3.1 Diocesan Safeguarding Group (DSG)

The DSG meets three times a year and deals with policy, practice and governance issues. The Chair reports annually to the Bishop's Council. Chair attends national and regional chairs' meetings organised by the National Safeguarding Team (NST).

The Chair of the DSG is independent and is an ex senior manager in children's and adult services in local authorities. He is not paid but receives an honorarium and has held his post for two years. The Chair described the group as currently effective in the following areas:

- Reviewing and monitoring the annual work plan (known as the Diocesan Register of Safeguarding Issues)
- Overseeing the work in connection with the Independent Inquiry into Child Sexual Abuse and this audit, via a sub-group.
- Receiving reports about significant safeguarding developments such as the update to the Past Cases Review and the outcome of a recent (nationally significant) Judicial Review case
- Receiving reports from the DSA
- Reviewing the draft policy and practice guidance from the NST.

The Chair was concerned that the DSG could be doing more to promote safeguarding at parish level. The Chair has contributed actively to the quality

assurance (QA) of safeguarding outside his immediate remit by reviewing all cases from 2014 (the period before the arrival of the current DSA), presenting a report to the Suffragan Bishop and by preparing the diocesan response to the update of the Past Cases Review. However, the auditors wondered whether the QA function of the Group could be mainstreamed into the work plan and better reported (see 3.10 for further discussion).

Membership of the DSG is quite small, comprising:

- the Independent Chair
- the external member with expertise in safeguarding children (Local Authority Designated Officers – LADO)
- The external member with expertise in safeguarding adults (the lead for an Adult Safeguarding Board)
- The Bishop of Dudley (who holds delegated responsibility for safeguarding)
- The Diocesan Secretary
- One lay and one ordained representative appointed by Bishop's Council.

The DSA is in attendance. The HR administrator takes the notes, which are of a high quality but would benefit from having the roles as well as names of attendees noted. The auditors commented that the DSG might benefit from a wider membership from statutory agencies, especially police and probation, but note that this is an aim – there are difficulties in obtaining the commitment at the right level of seniority.

At the most recent meeting of DSG, in June 2016, the Chair invited the group to discuss the effectiveness of the Group and how it knew it was making a difference. Five suggestions for action resulted. Overall, the minutes show the DSG moving forwards by referring back to previous minutes, checking the work plan and allocating responsibility for actions agreed.

The Chair of DSG meets formally with the Suffragan Bishop six-monthly. The Chair felt he could challenge or question the Bishop when he felt the need, and talked about his observation of training and review of the Past Cases Review.

#### 3.3.2 Operational Safeguarding Group (OSG)

The OSG is chaired by the Suffragan Bishop and meets four times a year. Membership is entirely internal as the remit is to manage the operational aspects of safeguarding. Membership overlaps with the DSG and comprises:

- the Suffragan Bishop
- the Diocesan Secretary
- the DSA
- the HR Administrator (who takes the minutes)
- the Cathedral Steward (and safeguarding lead)
- Diocesan Director of Education
- Diocesan Youth Officer as Chair of the Safeguarding Training Group
- Diocesan Children's Officer
- DBS Administrator

the Chair of the House of Clergy or their nominee.

The OSG has no role in the conduct of cases, and this has never been in its remit.

Minutes of the meetings are good but, as above, would benefit from having roles spelt out. The meetings are very focused on action about, for example, training and allocates tasks.

People with experience of both groups felt that the strategic/operational split worked well. There are reporting lines between the groups and the DSG does not get side-tracked into the detail of implementation.

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

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

Consider reviewing the way that individuals are identified in the notes of DSG and OSG, so that their roles are clear.

# 3.4 GUIDANCE, POLICIES AND PROCEDURES

The Diocese provided evidence of the Diocesan Synod accepting national policy and of agreeing subsequent actions in 2004 (child protection), 2008 (vulnerable adults) and 2011 (safeguarding children). The Diocese adopts all national policy and practice guidance as it is published. Up-to-date links are provided on the diocesan website which is well laid out and has an effective search engine.

The website would benefit from a statement by the Bishop and/or the Suffragan Bishop to endorse the safeguarding policies and the work of the team.

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

#### Considerations for the Diocese

Consider including a statement on the website, from the Bishop or Suffragan Bishop, to endorse the safeguarding policies and the work of the safeguarding team.

#### 3.5 CASEWORK

The auditors reviewed the casework records of 17 cases (see Appendix for details of type). In all the cases reviewed, the casework was of good quality and responses were timely and proportionate. Outcomes were clear.

#### 3.5.1 Case recording

The DSA introduced the national recommended system for case recording on her arrival in mid-2015. Previous records seen were handwritten and less well organised.

The auditors noted that the DSA writes a detailed case history, as it unfolds, as a case log. Sometimes this leads to duplication when the notes of formal meetings are added to the record. The auditors discussed with the DSA the possibility of using a brief chronology of events and actions taken, and separate accounts of conversations and meetings, although the current format has the advantage that the entire record is in one place.

The auditors also suggested a clearer definition of reported facts and the subsequent analysis, perhaps by using a different type face.

The recording system is electronic and only the Suffragan Bishop and the DSA have access to it.

#### 3.5.2 Information sharing

Information sharing with statutory agencies, other dioceses and faith groups was seen to be appropriate. Although the DSA had had difficulty in getting engagement with the police on some cases, she was seen to have been persistent and achieved some success.

Feedback received from the Police Offender Management Unit was positive, with the officer commenting, 'I have sought regular contact with both (DSAs) in relation to safeguarding concerns related to registered sex offenders who have been attending church or seeking to do so. I have also been contacted by both Diocese Safeguarding Officers when they have sought advice in relation to concerns or intelligence they have had. I consider this relationship to be positive, invaluable and wholly necessary for the continued protection of the public from harm'.

#### 3.5.3 Risk assessment

The DSA introduced the national Type A Risk Assessment<sup>1</sup> in January 2016 and is completing them on all new cases and for existing safeguarding agreements as they come up for renewal. This means that Type A Risk Assessments should be in place by January 2017.

The risk assessments seen were completed carefully and contributed directly to the resulting safeguarding agreements which were unambiguous. The safeguarding agreements seen were, apart from one, signed by the parish supports as well as the subject and the DSA. Overall, the auditors could trace the growth in confidence and expertise of the DSA in tackling what was a new area of work. A clergy member of the Parish Focus Group talked about the relief it was to work with the DSA on two agreements and commented that, as the agreement is between the Diocese and the individual, he could take a more neutral stance.

The DSA has a spreadsheet of all risk assessments and safeguarding agreements, and when they are due for renewal, but this does not yet flag up cases before the

<sup>1</sup> See national practice guidance on "Risk Assessment for Individuals who may Pose Risk to Children or Adults 2015". A Type A risk assessment will usually be completed by the DSA.

due date. The DSA mentioned that she is not sure that she has all the agreements currently in place, as the links between diocesan and parish files were not always clear on her arrival. The Parish Toolkit returns should reveal any agreements she is unaware of (see 3.11 below).

No Type B Risk Assessments have been commissioned as yet.<sup>2</sup>

#### 3.5.4 Other casework

The auditors noticed that, of all the cases chosen for review by the DSA and the lead auditor, none concerned a current member of the clergy. Due to the inconsistency of recording before mid-2015, all the cases reviewed dated from after that point, or, had been re-referred since mid-2015.

This was discussed with the bishops, an archdeacon and the DSA and no conclusions (even tentative) could be drawn. The Archdeacon of Dudley commented that she is part of a 'cell group' of archdeacons who came into post at about the same time and she knows she is not dealing with situations that others are. She spoke of having her 'antennae' out.

There are fewer referrals from the Dudley Metropolitan Borough area regarding children or adults than Worcestershire. The reason for this is not known as this is despite the Archdeacon being very active in monitoring safeguarding in the parishes (see 3.11), the involvement of the Suffragan Bishop at civic level and good attendance at training by clergy and lay volunteers. There were observations that the churches in Dudley MBC area currently run fewer activities for children and young people than other parts of the Diocese (although efforts are being made to improve this picture).

The auditors did, however, see problems with bell ringers that are causing concern at parish and diocesan level. Four cases of bell ringers against whom allegations had been made were audited. In one case, which overlaps with a neighbouring diocese, a tower captain informed the DSA that safeguarding training for bell ringers would probably be resisted on the grounds that, 'the Church is interfering with their ringing activities' and bell ringers would not like being 'preached to.

Members of the Focus Group talked about bell ringers feeling quite apart from the Church and treating travel to different towers to ring bells as a hobby. One PSO had had three separate requests to ring the bells from bell ringers with safeguarding agreements in their home parish in as many weeks and had felt diffident about saying 'no' the final time. Of course, only a small minority of bell ringers have safeguarding agreements and probably only a small minority of safeguarding representatives from bell ringing organisations would say (as one reportedly did) that a safeguarding agreement is 'unfair' if the subject complies with it. But it was agreed

<sup>2</sup> A Type B Risk Assessment is commissioned by the Diocese or responsible body and referred to an independent agency or professional person qualified and experienced in safeguarding risk assessments. A Type B assessment will only be undertaken in relation to a church officer, whether ordained or lay, and on completion of a statutory investigation.

at all levels that work needs to be planned with the cooperation of bell ringing organisations to embed the understanding of safeguarding and what constitutes good practice. The auditors note that there is a safeguarding protocol (December 2015) published by the Central Council of Church Bell Ringers on the Church of England website. A consideration on bell ringers is made below for the Diocese, but it is also raised for the NST in section 3.15.

#### Considerations for the Diocese

Consider how case recording should distinguish clearly facts, subsequent analysis and opinions e.g. through use of a different typeface.

Consider a plan to put in place Type A Risk Assessments on all current safeguarding agreements.

Consider a plan to engage with bell ringing organisations, perhaps in conjunction with neighbouring dioceses, to promote acceptance of the protocol published by the Central Council of Church Bell Ringers and to encourage bell ringers to be part of the wider Church community.

#### 3.6 TRAINING

The C1 (foundation for lay people) and C3 (foundation and leadership for licensed ministers) modules of the national training framework are being delivered in the Diocese, and C2 (leadership for lay people) will begin in 2017. The C3 course will expand from half a day to a full day.

Responsibility for the delivery of training is not the sole responsibility of the DSA. The Diocesan Youth Officer was appointed in 2014 to share in the safeguarding training of the clergy with the DSA and to chair the training group.

The C1 module is delivered by the Diocesan Youth Officer and Children's Officer along with two suitably qualified volunteers. Recent efforts to recruit a bigger pool of volunteers met no success and it was agreed that likely candidates need to be targeted directly rather than a general request being put in the safeguarding newsletter.

Safer recruitment training is also delivered by the DBS administrator and the HR administrator.

Renewal of safeguarding training is three yearly. The auditors noticed that the certificate from the course is duplicated on each blue file which made a real impact and made it simple to check the date.

The Training Report for 2015, when the Diocese was still using its own material, listed 15 basic courses and seven Foundation and Leadership courses. Eighty per cent of the feedback on the former said that needs were met very well or completely, rising to 85 per cent for the latter. In November 2015, the Independent Chair of the DSG observed two basic courses and gave feedback to the training meeting about course materials, the organisation of the courses (venues, etc.) and the website.

Looking ahead, the Diocesan Youth Officer may support training in the forthcoming specialist modules that all clergy will be expected to attend. The team, including the Communications Officer, try to keep safeguarding on the radar of the parishes.

As a result of encouragement over the past two years, there are no longer problems in getting people to apply for training and most courses are over-subscribed. The 2015 annual return to the NST said that, in the previous three years, 158/172 licensed clergy had been trained, 159/169 holders of Permission to Officiate and 161/165 lay readers. Given the combined efforts of the Youth Officer and the DSA to offer training across the Diocese, it is reasonable to expect these numbers to increase by the close of 2016.

The Suffragan Bishop was described as chasing up (with a phone call) any holder of Permission to Officiate (PTO) who resists the efforts of the DBS administrator to enrol them on training. The auditors understand that they are now few in number.

Training is delivered to the Cathedral and a specially adapted version of C1 was well received. By mid-October 2016, all departments in the Cathedral will be trained. The Cathedral noted its appreciation of the DSA and Youth Officer being flexible enough to train between morning service and evensong on a Sunday. Specially adapted C1 training has also been delivered to the two religious communities in the Diocese.

The Suffragan Bishop described an issue in terms of some holders of PTO who are too frail to attend training, or indeed to minister, but who are loathe to give up their PTO as this is connected to their sense of identity as priests. Plans are in place to make sure a safeguarding DVD is watched by housebound priests and the auditors would be interested to know whether this works in practice.

Records of training are kept by the DBS and HR administrators. As mentioned in 2.2 above, the auditors discussed the potential for the Youth Officer to contact a sample of attendees from courses after, say, three months, to check whether the training has made a difference to safeguarding.

The auditors were given a Training Strategy 2016–18, which was a discussion document taken to OSG in July 2016 where actions were noted for implementation. It might be useful if the actions from OSG were fleshed out into a Training Plan that can be shared beyond the membership of OSG and DSG.

(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 3 years.)

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

Consider how to find out whether safeguarding training is effective in the longer term by contacting a sample of course attendees three months later and asking for feedback about how the training has had an impact on their practice.

Using the Training Strategy and the OSG notes as a basis for drawing up a plan for the implementation of the national framework over the next two to three years.

# 3.7 SAFE RECRUITMENT OF CLERGY, LAY OFFICERS AND VOLUNTEERS

Six clergy blue files for people appointed since April 2013 (the date of the first Safer Recruitment Guidance) were randomly selected and checked. Also, six applications for diocesan posts, four of which were lay and two clerical, were checked.

Every file contained a letter confirming the date of the DBS check. Every file, except that for a curate, had an application form and two or three references, one personal. It is understood that a first curacy is obtained via the theological training college and not by application. Every file had a copy of the passport photograph and all the blue files all had a Confidential Declaration.

For the clergy, it was straightforward to trace their previous positions.

Where a clergy person had been subject of a safeguarding allegation, an A4-sized red card securely attached to the front of the file was in place (bearing in mind that only two were seen in order to provide examples of clergy cases). This is a recent innovation and it is very effective.

Overall, the blue files were well kept with only a few loose sheets of filing and a plan in place to rectify this. The Archdeacon of Dudley, when interviewed, said that about a third of the stipendiary clergy have joined the Diocese in the last three years (since her appointment) so she is confident about the interviews they received. Where stipendiary clergy had moved into the Diocese, the Clergy Current Status Letter from their previous diocese was on file.

The Parish Focus Group talked about the Safer Recruitment process being a burden when applied to volunteers and one of the group brought a linear print out of 22 steps. The auditors were impressed, however, that the general view of the Group was that the process was lengthy but necessary and the topic did not become the focus of complaining. The Group shared the need to be sensitive when asking an elderly volunteer who has been doing a role for years to have a DBS check and agreed that the publicity about Jimmy Savile helped. One person made the point that you shouldn't criticise organisations for not taking action then refuse to be part of the action in your own.

(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.)

# 3.8 DISCLOSURE AND BARRING SERVICE (DBS)

At present, the DBS system for the Diocese and Cathedral is run by the DBS administrator, who has 13 hours a week allotted to the task. From October, the plan is to pilot an online DBS system and then to roll it out across the Diocese.

The DBS and HR administrators will train all the PSOs in using the new system, tying it in with Safer Recruitment training. It was clear from the Focus Group that some PSOs are apprehensive about the system because they choose not to use the internet and will need help to use, say, a parish computer.

The DBS administrator talked about helping PSOs with queries about whether a volunteer should have a DBS and expected this aspect of her work to continue. Members of the Parish Focus Group were very appreciative of this support.

#### 3.9 COMPLAINTS AND WHISTLEBLOWING

The Diocese has a complaints and a whistleblowing policy for safeguarding. Both are clearly identified on the website.

The auditors noted that the complaints policy describes clearly how to complain, who may complain and about what. Helpfully, it also sets out what is not included in the remit of the policy. The complainant is given a timeframe of six weeks in which to expect a response, if their complaint cannot be resolved informally.

There is a feedback loop as the Bishop's Chaplain, who administers the procedure, reports annually to the DSG which in turn considers any changes needed to policies or procedures as a result.

The complaints policy was signed off only recently and has not yet been used.

The whistleblowing policy states clearly how to make a referral if the situation is urgent, and distinguishes between complaints and whistleblowing. It allows for whistleblowers to be in a parish or working for the Diocese.

The complaints policy requires a written submission, by post or email, and does not allow for a phone call in the first instance. The whistleblowing policy simply refers to contacting the PSO, the DSA or the police.

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

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

Consider whether the complaints policy might allow for a verbal submission by phone or face to face.

# 3.10 QUALITY ASSURANCE PROCESSES

The Independent Chair of DSG showed his awareness, in conversation, that effective quality assurance (QA) needs to ask how the organisation knows that practice and processes are making a difference as well as reviewing whether they are of a good standard.

There have been a variety of DSG-led QA processes seen or heard about by the auditors:

- The annual report written by the two local authority (LA) representatives on the DSG, and introduced and concluded by the Independent Chair as his annual report to Bishop's Council. In 2016, the LA representatives reviewed 13 children's casework files and 10 adult files from 2015, considering whether the response was reasonable and proportionate. (The annual report is only partly a QA process and is also an account of what has been done in terms of training, policy implementation, etc.).
- The Independent Chair of DSG reviewed all the 2014 safeguarding cases when he took up his post and reported to the Suffragan Bishop.
- The Independent Chair more recently reviewed all the cases considered in the Past Cases Review in 2008/09 and wrote the submission to the national team.
- The QA of training described by the Independent Chair in 3.6 above.

Whilst impressed by the number of QA processes taking place, the auditors felt that they could be coordinated better. Whilst the Diocesan Register of Safeguarding Concerns (the work plan) covers policy, training, casework, communications, etc., it does not specifically address QA or ensure that a programme is rolled out annually. In addition to the annual report to the Bishop's Council, the auditors' view was that a more structured approach to QA would be beneficial.

The DSG might consider how the analysis of the Parish Toolkit (see 3.11 below) can contribute to QA at parish level in the future.

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

The DSG to consider how QA might support and improve effective practice and add a programme of QA to the Diocesan Register of Safeguarding Concerns.

The DSG to consider how the analysis of the Parish Toolkit (see 3.11 below) can contribute to QA at parish level in the future.

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

The auditors talked with the Archdeacon of Dudley, who confirmed that she was able to describe a process that takes place across the Diocese.

Parish level data has been collected by questionnaire since 2003, then via logs in

2014 and finally through the Toolkit in 2016. The auditors were given an analysis of 2016 data but it was incomplete as parishes are still returning the Toolkits (although a very healthy percentage had come back). The auditors discussed the potential to make greater use of the data to target geographical areas and/or issues. The intention is for the Suffragan Bishop, the DSA and the two Archdeacons to review the final analysis of the Toolkit data and use it when planning the visitations in 2017.

The Toolkit has the longer title of Parish Safeguarding Implementation Checklist. It asks for a list of all activities for children or vulnerable adults and requires the parish to self-assess as red/amber/green in a number of fields and then to set out the action(s) needed to reach green should that field be red or amber. The fields include:

- adoption and review of policies
- the appointment and role of the PSO
- the appointment of a parish advocate
- the display of relevant posters (e.g Childline)
- safer recruitment
- insurance.

The Toolkit goes on to ask for basic numerical data about allegations, including domestic violence, and safeguarding agreements. The strength of the Toolkit is that it requires more than yes/no answers and moves towards qualitative information as well as quantitative. The Diocesan Secretary commented that a national version with an electronic interface would be valuable.

Archdeacons' Visitations happen annually, in May, at deanery level. All the church wardens in the deanery attend for a 20-minute conversation with the Archdeacon. They bring the Articles of Enquiry (which have just four questions each year) plus their accounts, attendance records, policies and (in 2016) the Toolkit. The rural dean and lay chair of the deanery check off the documents before the church wardens meet the Archdeacon. The conversation with the Archdeacon is based on the questions in the Articles of Enquiry, and this year also on the Toolkit.

The Archdeacon of Dudley pointed out that, in May, in quite a lot of parishes, the Parochial Church Councils (PCCs) had not yet completed the Toolkit as it was still very new, but she was able to identify some issues with the completion of the Toolkit. One very large parish, for example, had an issue about scale and was taking longer because it wanted to do it well. Some team ministries took time to organise who would complete it and how. Some struggled because they were small, had no children in the congregation and thought they had no vulnerable adults. The current tally is 33 parishes out of 170 (19 per cent), still to return the Toolkit.

The Archdeacon of Dudley commented that this year was her third set of Visitations and she found people to be far more positive about safeguarding than in previous years. She said that there was a higher level of confidence in the system, more people have been trained and that the DSA has made a big impact since her arrival in mid-2015.

The Archdeacon did not have experience of parishes that are obstructive about safeguarding although she could talk about parishes that struggle to resource it. The other Archdeacon wrote a brief submission to the auditors, in which he commented

that the smallest congregations tend not to have people confident to take on the full PSO role, rather than only the processing of DBS checks. He (and the Independent Chair of DSG) raised the possibility that a PSO might be appointed across a number of small parishes and such a collaborative approach should be worth consideration. Perhaps a senior PSO might support the PSOs for a number of rural parishes, which would come within the provisions of Protecting All God's Children section 4.6 '...each parish should appoint at least one coordinator (ie a PSO) to work with the incumbent and the Parochial Church Council (PCC) to implement policy and procedures. The coordinator must ensure that any concerns about a child or the behaviour of an adult are appropriately reported both to the statutory agencies and to the diocesan safeguarding children adviser'.

Just as the auditors found no recent clergy safeguarding cases to audit, they also found a dearth of evidence of individual members of clergy showing a lack of understanding of safeguarding by, for example, being overly sympathetic towards offenders and/or undermining safeguarding agreements. Neither were there reports of clergy challenging the requirement to train or the content of training. This does suggest that safeguarding is well rooted.

#### Considerations for the Diocese

Consider how best to support PSOs and how to make sure that each parish is covered by a PSO.

## 3.12 RESOURCES FOR CHILDREN AND VULNERABLE ADULTS

The Diocese currently has one Authorised Listener and the DSA is in the process of inducting another three. She is working with the support of a neighbouring diocese where Authorised Listeners are well used. The Diocesan Secretary is working on a job description for Authorised Listeners and raised some issues he felt had not been addressed by the NST about the boundaries of confidentiality. Specifically, when the service is commissioned by the DSA, it is not clear what information the DSA should receive from the Listener about work undertaken with survivors.

To date, the Authorised Listener in place has only been offered or used by another diocese in an arrangement brokered by the national team.

The auditors found a low level of awareness of Authorised Listeners in the Parish Focus Group. None of the lay people and neither of the clergy present knew of them, although a couple of people recognised the description of the service.

The views of children and young people generally are represented by a Children's Council (age seven to 12) and a Youth Council (age 13 to 19). The councils meet monthly and join the Diocesan Synod once a year. The Youth Officer said that to date, safeguarding has not featured much on their agenda that is set by Group members.

Counselling does not seem to have been offered within the last year.

The auditors heard that a suggestion has been made that a service of healing be hosted by the Cathedral for survivors of abuse. Apparently this has been done

effectively in New Zealand. It is to the Dean's credit that he is planning to talk to the person who made the suggestion and is considering how such a service might be held in a way that is supportive.

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

Once the Authorised Listening service is in place, devise a communication strategy to make sure that it is known about across the Diocese.

Make sure that, if a need for counselling for a survivor of abuse is identified, the Diocese can move quickly to agree funding and, if needed, find a service that is suitable according to the needs of the individual.

#### 3.13 INFORMATION SHARING

Information sharing within the Diocese and with the DSA works well and the auditors saw no evidence that the DSA does not hear promptly about any safeguarding concerns. Information sharing and joint working with other dioceses was seen on several cases and was strong and effective.

Information sharing with external agencies is less straightforward and links to the limited range of external representation on the DSG. There was some discussion with a DSG local authority representative about the potential for the DSA to get involved in the Local Safeguarding Children Boards (LSCBs) and Adult Safeguarding Boards (ASBs) in order to achieve an information-sharing protocol with non-statutory agencies. It was suggested that the DSA might offer to make a presentation to the Board about safeguarding developments in the Church of England and in the diocese. However, the DSG member pointed out that, due to the Children and Social Work Bill currently before Parliament, LSCBs will be liable to change and may cease to exist in their current form. In this context, it would make sense to try to engage with the LSCBs soon.

#### Considerations for the Diocese

Explore whether the DSA could help the Safeguarding Boards to develop information sharing protocols with non-statutory partners.

## 3.14 LINKS WITH NATIONAL SAFEGUARDING TEAM

The DSA is aware of the direction of travel of the national team and the Diocese has been quick to adopt and share national policy and practice guidance.

The DSA reported that she has consulted the NST about three cases on which she wanted support. Clarity has also been sought from the NST about aspects of recruitment policy i.e. DBS portability and the appropriate DBS checking of Readers.

The safeguarding team has always ensured they provide feedback in every consultation on new policy.

In addition, the Diocese liaised with the Church Commissioners regarding an

application for a Judicial Review. The Diocese has clarification from a senior judge that neither the Cathedral Chapter nor the Bishop in his corporate capacity is classed as a Public (or Hybrid) Body. Therefore, a Judicial Review cannot be made against the Church, a judgement that has brought clarity on the issue to the Church of England as a whole.

#### 3.15 NATIONAL SYSTEMIC SAFEGUARDING ISSUES

This is the first diocese in which the challenge of implementing the December 2015 safeguarding protocol with bell ringers has emerged (see 3.5 above) as part of the audit. However, whilst not a feature of the SCIE audit in York, it has since emerged in the media as being a concern there (The Guardian, 17 October 2016). A possible contributory factor suggested by the Focus Group in Bath and Wells is the separation of bell ringers from the wider Church, which might suggest an underlying vulnerability elsewhere too.

Given that the issue of implementing safeguarding for bell ringers is a significant concern in two dioceses, the NST need to consider what actions are to be taken nationally so as to establish the extent of concerns around the country, the reasons for this and provide advice on best practice.

# **APPENDIX: REVIEW PROCESS**

## DATA COLLECTION

#### Information provided to auditors

Prior to the audit the DSA provided the following documents for the auditors:

- Audit Framework Checklist
- Diocesan Safeguarding Structure
- Diocesan Safeguarding Advisor Job Description
- Training Strategy & Training Information
- Safeguarding Procedures
- Authorised Listeners
- Diocesan Self Audit and statistical returns
- Sample Cases 2011–2013
- The Diocesan Safeguarding Work Plans for 2015 and 2016 (known as the Diocesan Register of Safeguarding Issues).

#### Participation of members of the diocese

The auditors met with:

- the Bishop of Worcester
- the suffragan Bishop of Dudley
- the Dean of Worcester
- the Steward of Worcester Cathedral
- the Diocesan Secretary
- the Diocesan Safeguarding Advisor
- the Independent Chair of the Diocesan Safeguarding Group
- the professional supervisor for children's casework
- the two LA representatives on the Diocesan Safeguarding Group
- the DBS and HR administrators
- the Diocesan Youth Officer
- the Diocesan Communications Officer
- the Archdeacon of Dudley.

In addition, written submissions were received from the Archdeacon of Worcester, the professional supervisor for adult casework and a Detective Constable from the Offender Management Unit.

The auditors also met with a parish focus group comprising:

- a parish priest
- a team vicar
- a children and family worker

- a church warden
- six Parish Safeguarding Officers (one of whom is also the lay chair of a deanery)

# The audit: what records / files were examined?

- Seventeen casework files were reviewed.
- Six clergy Blue Files and six DBF HR files were reviewed for evidence of Safer Recruitment.