

GENERAL SYNOD

Safeguarding Codes of Practice: Religious Communities

Summary

This paper presents the Religious Communities Safeguarding Codes of Practice. The two documents are attached at Appendix 1 and 2.

This paper sets out the changes since the previous version and produced and details of the consultation and development which were undertaken.

1. The Codes of Practice

- 1.1. The *Religious Communities Safeguarding Code of Practice (Recognised Communities)* and the *Religious Communities Safeguarding Code of Practice (Acknowledged Communities)* attached at Appendix 1 and 2 are published as Safeguarding Codes of Practice under [Section 5A of the Safeguarding and Clergy Discipline Measure \(2016\)](#). Section 5A differs in two important respects from the former rules. First, it replaces the former ‘duty to have due regard’ with a ‘duty to comply’ with the requirements of the Code. This was a recommendation arising from the Independent Inquiry into Child Sexual Abuse (IICSA).¹ Secondly, it extends the list of ‘relevant persons’ to whom this Code applies.
- 1.2. All Code documents contain both **requirements**, and **guidance** to relevant persons on how to comply with the requirements. All requirements are clearly marked as such and are in a blue box.
- 1.3. The guidance explains how to deliver some of the requirements, sets out some good practice examples, and explains why some requirements are necessary. In other words, it explains “why and how” to deliver the requirements.

¹ Recommendation 2: amendment of Canon 30. [anglican-church-case-studies-chichester-peter-ball-investigation-report-may-2019.pdf](#)

2. Reasons why these Codes are required

- 2.1. The current [Safeguarding in Religious Communities Guidance](#) was the first safeguarding policy to be revised and was approved in November 2020. It needed to be done relatively swiftly in order that all religious communities had this in place before being formally recognised as a religious community of the Church of England.
- 2.2. The requirement for religious communities to arise from the Independent Inquiry into Child Sexual Abuse (IICSA) report into Peter Ball and the Diocese of Chichester. Recommendation 1 stated:
The Church of England should introduce appropriate guidance which deals with safeguarding within the context of a religious community affiliated to the Church. It must ensure that these organisations meet adequate requirements for safeguarding and child protection. The needs of victims should be prioritised when designing safeguarding policies and practices.
The regulation and management of religious communities should include a mandatory requirement both to have and to follow safeguarding guidance. The requirement to comply with this safeguarding guidance should be the same as would be expected in any other Church institution. There needs to be clarity in respect of how safeguarding should be managed in these communities, along with appropriate auditing of compliance.
- 2.3. This IICSA recommendation resulted in Synod passing Amending Canon No. 40, which introduced a new Canon DA 1 Of Religious communities. The new Canon provides that before the House of Bishops may declare a community to be a religious community of the Church of England, certain conditions must be met, including in relation to the safeguarding of children and vulnerable adults.
- 2.4. The intention was to review the policy after two years to ensure that it was in fact working for religious communities. However, that review has only been able to take place since the summer of June 2023, resulting in the revised documents now attached.

3. What has changed

- 3.1. Engagement and feedback demonstrated the 2021 document, although a challenge for some communities, was felt to be sound, and therefore the changes have focussed on clarity and support in terms of fully embedding and moving forward.
- The document has been split into one document for Recognised Communities, and one for Acknowledged Communities, to better reflect their different circumstances.
 - A section on obedience has been added.
 - The self-audit template has been updated, and communities encouraged to review their progress.

- Resources to help conversations about healthy cultures have been included, and this section has been given more prevalence.
- Clarity around terminology and other issues such as Learning & Development has been provided.

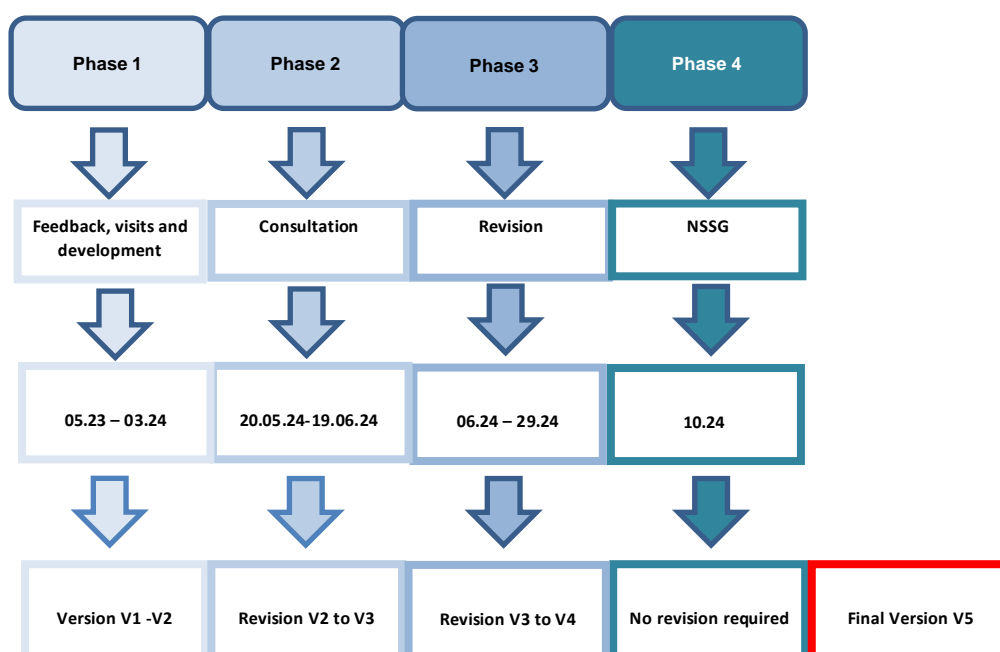
4. Development and Consultation Process

4.1. [Section 5B of the Safeguarding and Clergy Discipline Measure 2016](#), states that before issuing the codes, the House of Bishops must be satisfied that: *sufficient and appropriate consultation has been carried out.*

In deciding whether it is satisfied, the House of Bishops must, in particular, assess whether and, if so, to what extent it would be appropriate to consult the following—

- persons, or groups of persons, who have suffered violence, abuse, neglect or exploitation in a setting or relationship to which the code applies;
- the president or deputy president of tribunals;
- the Standing Committee of the House of Clergy;
- the Standing Committee of the House of Laity

4.2. The consultation and development activities undertaken in producing these Codes are set out below.



4.3. Consultation took place between 20th May 2024 and 19th June 2024. All NST consultations are circulated via email to the following groups:

- Bishops
- Diocesan Secretaries
- DSAs / CSAs
- Deans

- Cathedral Administrators
- DSAP Chairs
- Archdeacons
- Cathedral Safeguarding Leads
- Religious Communities

In addition, as part of the requirements of the Codes, we also circulated the document to:

- Standing Committee, House of Laity
- Standing Committee, House of Clergy
- House of Bishops

4.4. 23 individual responses were received, representing:

- 3 DSAs
- 11 Recognised Communities
- 5 Acknowledged Communities

4.5 Consultation Questions and Responses

The consultation posed six specific questions. The results of these questions, along with the feedback received, are summarised below:

4.5.1 Question 1: Is the division into separate sections for acknowledged and recognised communities beneficial?

A significant majority of respondents (18; 72%) indicated that this division is beneficial.

4.5.2 Question 2: Does the Scope section encompass all individuals subject to this Guidance?

While the majority of responses (14; 56%) confirmed that the Scope section is comprehensive, an additional 11 suggestions were submitted for consideration. These suggestions were reviewed and incorporated as appropriate.

4.5.3 Question 3: Should the responsibility of a Designated Safeguarding Person (DSP) to promote a healthy culture be classified as a Requirement or Good Practice?

Responses were mixed, with 40% (10) supporting it as a Requirement and 48% (12) opposing this classification. While respondents agreed that the DSP should have a role in fostering a healthy culture, the degree of influence a DSP can exert varies significantly depending on the community structure. For instance, some communities employ external DSPs, which may limit their direct influence. As a result, this responsibility has been categorised as Good Practice, ensuring expectations remain achievable and evidence based.

4.5.4 Question 4: Does the Guidance adequately address the subject of visitors and guests?

The majority (15; 60%) confirmed that this aspect is adequately addressed.

4.5.5 Question 5: Requirement 3.1: Joining a Community. Is further clarification needed, or is a link to the Religious Community Handbook sufficient?

Nearly half of respondents (12; 48%) indicated that the addition of the link is sufficient. Four additional suggestions for clarification were reviewed and incorporated.

4.5.6 Question 6: Is additional clarity needed on the responsibilities of the Episcopal Visitor and the Diocesan Bishop?

Most responses (13; 52%) did not identify a need for further clarification. However, 28% (7) of respondents raised concerns regarding ultimate safeguarding responsibility. These concerns reflect similar issues raised periodically by DSAs and Religious Communities. Consequently, relevant sections and links to the [Roles and Responsibilities](#) guidance and the [Handbook of the Religious Life](#), have been added to provide greater clarity.

4.6 Other feedback

Feedback not directly related to the consultation questions was also collected and is summarised below:

4.6.1 Incidents Occurring Abroad

Addressing incidents abroad remains complex, particularly when large mission charities are involved. While the revised Guidance aims to balance clarity with flexibility, it emphasizes that any organisation registered as a Religious Community is required to adhere to this Code of Practice.

4.6.2 Bespoke Learning and Development

In 2023, bespoke Senior Leadership training was developed and delivered successfully, receiving positive feedback. Colleagues are now evaluating opportunities to expand bespoke pathways and determining appropriate scheduling for their delivery.

5. Implementation

5.1 If approved, these Codes will go live on the 1st March 2025. There are no major changes that require any additional implementation time or support beyond the normal business as usual. The document will be revised and return to Synod in 2028.

Alex Kubeyinje, National Director of Safeguarding

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Introduction

The Church of England's policy statement, 'Promoting a Safer Church'¹, sets out the Church's commitment to the safeguarding of children and adults. This commitment extends to Religious Communities under the "Whole Church" approach.

Under the [Religious Communities Regulations 2020](#), in order to be a recognised or acknowledged community under the new Canon DA1, communities must ensure their governing documents:

- impose on members and officers of the community (including the Visitor) duties that are equivalent to those imposed by or under section 5 of the [Safeguarding and Clergy Discipline Measure 2016](#) (duties in relation to safeguarding of children and vulnerable adults);
- make provision as to the persons or bodies who have particular responsibility in relation to the safeguarding of children or vulnerable adults;
- make provision for the Visitor's functions in relation to the safeguarding of children and vulnerable adults.

This document is Safeguarding Code of Practice, issued under section 5 of the Safeguarding and Clergy Discipline Measure, and therefore applies to all members of recognised and acknowledged religious communities.

This Code contains both **requirements** and **guidance**. The guidance explains, for example, how to deliver the requirements, sets out some good practice examples, and explains why the requirements are necessary. In other words, it explains "why and how" to deliver the requirements. Whilst the case examples and other associated advice should be considered as best practice which should be followed, the duty to comply does not apply to them. For clarity, in this Code, all **requirements** are clearly marked as such and are in a blue box.

Requirements for Religious Communities are made under the Religious Communities Regulations 2020. Requirements for all other Church Officers are made under s. 5A of the Safeguarding and Clergy Discipline Measure 2016, as amended by the Safeguarding (Code of Practice) Measure 2021, which came into effect on 1 March 2022.

¹ The Policy Statement can be downloaded from <https://www.churchofengland.org/sites/default/files/2019-05/PromotingSaferChurchWeb.pdf>

Scope

This document applies to members of all those religious communities which are recognised or acknowledged under the Religious Communities Regulations 2020. For the avoidance of doubt, this document also applies to alongside, employed staff, volunteers, oblates, tertiaries and novices where these are appropriate.

Those members of religious communities who are ordained, hold PTO, are licensed or who are otherwise a relevant person under section 5A of the [Safeguarding and Clergy Discipline Measure 2016](#) are expected to also comply with other Safeguarding Codes of Practice as appropriate to that role.

It is acknowledged that Religious Communities vary widely in their size, scope, mission and membership, which can make the development of an overarching Code difficult. This document sets out what is expected, but the reality is it must be implemented in a proportionate manner. For example:

- Very large communities with employed staff who deliver a service or ministry to children, young people and vulnerable adults would be expected to implement this code in full.
- Those with many overseas members/staff would be expected to have an arrangement in place that works for their particular circumstances.
- Very small communities with no staff who do not have any contact with children or vulnerable adults would need to apply very little of this Code.

The key issue is that all aspects of this Code have been considered by a community, in consultation with the DSO if needed, and an evidenced decision has been made.

Definitions

Please refer to the main [Safeguarding Children, Young People and Vulnerable Adults](#) Guidance for definitions of abuse.

Recognised communities are those which are organised along the traditional Benedictine vows of stability, conversion of life and obedience, or the “evangelical counsels” of poverty, chastity and obedience. Members spend a period – usually at least three years – in temporary/first/simple vows after the noviciate and before Solemn or Life vows when they cease to hold personal property, and live either in community or as solitaries. Recognised communities will have a Rule and Governing Documents which provide for the ordering of the life of the community.

Acknowledged communities vary in their practice and lifestyle. In most cases, the members are dispersed, with opportunities provided for meeting together whilst in others there may be a shared life in one place in what is otherwise a dispersed community. Members may be single, married, in family units or in a partnership. Members make 'seasonal vows' of commitment, most holding down jobs in wider society. Each community has a Rule of Life and Governing Documents which provide for the ordering of the life of the community.

Review

This Code will be reviewed no later than July 2028.

Terminology Checker

DSO - Diocesan Safeguarding Officer: A professional employed by the Diocese to support and manage safeguarding activity in the diocese.²

NST – National Safeguarding Team:³ The Church of England’s central safeguarding provision, supporting policy development, training, major projects and investigating cases against senior clergy (e.g. bishops and deans), and cases where there is a high degree of interest or complexity.

DSP – Designated Safeguarding Person: The person within the Religious Community who takes the lead on safeguarding activity.

Leader – The Term “leader” is used in this document to mean the person with overall responsibility. Example titles for this role include Abbott, Abbess, Prior, Prioress

Oblates and Associates – An Oblate is someone who wishes to be associated with a community's prayer and work, while following a calling outside the Community. Their association with the Community may be expressed in different forms, among which are those traditionally known as Oblates, Associates and Companions. Oblates do not profess vows but make promises for such periods as the Constitution of the Community determines. Some Oblates or Associates may live in the Religious house with which they are associated, known as intern oblates or interns. Alternatively, they may live apart from the Community in a society of their own, with a Rule and Constitution provided by the Community. Oblation and association may also be a means whereby Oblates or Associates follow the ideals of the Community while remaining in their own state of life.

Tertiary - A Third Order (whose members are usually called Tertiaries) is part of the Franciscan tradition, and involves a Rule of life and commitment by the members to each other. This constitutes a separate Order, parallel to and closely connected with the Community, but distinct from it.

Episcopal Visitors - Visitors are the guardians of the Constitutions of the Community and guarantors to the Church at large of the Community's sound administration, stability and right to confidence. The Visitor must be a bishop external to the life and membership of the

² The term Diocesan Safeguarding Advisor (DSA) will change to Diocesan Safeguarding Officer (DSO) during the life of this Code of Practice

³ For further information on specific responsibilities, please see [Key Roles and Responsibilities of Church Office Holders and Bodies Practice Guidance.pdf \(churchofengland.org\)](https://www.churchofengland.org/Key-Roles-and-Responsibilities-of-Church-Office-Holders-and-Bodies-Practice-Guidance.pdf)

Community, and must hold office in the Anglican Communion. This role may also be known as the Bishop Protector or Provincial Minister.

Further information can be found in the [Handbook of the Religious Life](#)

Section 1: General provisions

Requirements

- 1.1 All religious communities must comply with all the House of Bishops' safeguarding Guidance and Codes of Practice and embed these into their practices where it is applicable, in accordance with the "Whole Church" approach.**
- 1.2 Safeguarding policies apply both internally and externally:**
 - 1.2.1 Between individuals within communities (be they acknowledged or recognised).
 - 1.2.2 When ministering to those outside the religious community, or when receiving visitors in whatever capacity, in which case they apply to both parties.
- 1.3 The Leader of each religious community has overall responsibility for ensuring compliance with safeguarding policies and good practice and for promoting a safer culture.**
- 1.4 The Leader of a religious community must ensure that the governance documents of the community (or the charity which has legal responsibility for that community) state that they accept and abide by the House of Bishops' Guidance and Codes of Practice for safeguarding children, young people and vulnerable adults in the Church of England.**
- 1.5 Local arrangements for delivery of this Code of Practice must be put in place. These must be reviewed annually and must set out how the policy will be implemented locally according to the particular needs and context of the community. They do not replace this policy.**

Guidance

The Church of England is creating a change in culture in the way safeguarding is viewed by all its many component parts. This moves away **from** the current perception that safeguarding is something which is done “additionally”, as a tick-box exercise or by a designated individual, **to** a culture where safeguarding is in the DNA of the Church and the people who comprise the Church. To become a Safer Church, safeguarding needs to be in the heart and soul of the Church’s theology and mission – it is who we are and what we do. With this perspective, safeguarding policies and procedures should be approached, not with a spirit of fear and (sometimes) reluctant compliance, but rather with an appreciation that they are an external expression and living out of an internal understanding of safeguarding being intrinsic to Christian beliefs and values.

Religious communities should therefore reflect on what other policies and processes (formal or informal) in existence may need to be reviewed or amended in light of this, to demonstrate they have good safeguarding practice at their core. It is expected that this safeguarding Code will need to be supplemented with local procedures which will be individual to each community, and it is recommended to review these annually. These will set out how the policy principles will be applied to that particular community’s needs, for example, how it will be applied in a community of six individuals who live together will be different from how it will apply in an international community with thousands of members. These will need to include, for example and where relevant:

- How to report concerns to Diocesan Safeguarding Officers (DSOs), and which DSs to report to
- How to manage events which occur abroad
- How to access training and at what level

All new national safeguarding policies are uploaded to the [Safeguarding e-manual](#). This means that the most up-to-date version will always be available, and this is particularly beneficial for acknowledged communities. It is not recommended that copies are printed; however, if they are, care will need to be taken to ensure these are replaced following any updates. These are highlighted in the weekly National Safeguarding Team (NST) newsletter, a bespoke version of which is sent monthly to Religious Communities.

Section 2: Appointing a Designated Safeguarding Person

Requirements

2.1 Each community must appoint a Designated Safeguarding Person (DSP)

2.1.1 The DSP must not be the Leader of the community. They need not be a safeguarding professional, but must be able to demonstrate an aptitude for the role.

2.1.2 An external DSP may be appointed, this must be done in consultation with the DSO. The DSO may be able to assist in identifying a suitable individual.

2.2 The DSP must be trained in safeguarding at the Leadership pathway level and take day-to-day responsibility for safeguarding practice, awareness raising and ensuring there is safeguarding training provision in place.

2.2.1 The DSP is responsible for establishing links with the DSO in the diocese where the main community house is based. It is accepted that there may be some differences in local practice, and these should be reflected in the local arrangements - for example, where a community has houses in different dioceses.

2.2.2 In larger communities, the DSP may be trained to co-train alongside the DSO.

2.3 The DSP is the person to whom all safeguarding concerns must be reported, unless the concerns are about the DSP, in which case they must be reported directly to the DSO. In an emergency situation, the first contact should always be with the police or social services.

2.4 The DSP must report all allegations or concerns to the DSO in the first instance, once any immediate harm or emergency has been dealt with.

2.5 The DSP must discuss all safeguarding matters, which in some circumstances may include ongoing cases, preventative measures and embedding a safeguarding culture with the Leader at regular meetings.

Guidance

The role of the DSP is to provide advice and support to all members of the community. They should liaise with the DSO to secure training for members and for advice on dealing with safeguarding allegations. The DSP will be the first point of contact for any concerns which are raised, including those which may involve the Leader (see section 7 later). A template person specification/roles and responsibilities is included at Appendix A.

One key aspect of the DSP role will be to help develop the organisational culture and promote a healthy, safer community. The role is not simply about reacting to situations, but proactively identifying and mitigating risks where these exist, having open discussions about behaviour, regular meetings with the Leader and helping to embed safeguarding throughout the life of the community. In other words, facilitating the culture change referred to under Section 1 to take place. This is an ongoing process, and can be started by having honest discussions about culture, seeking advice from the DSO, undertaking the training courses and using the tools and resources available on the Church of England website.^{4,5} A self-audit tool was made available to help Religious Communities implement this revised guidance in 2020. Communities may wish to revisit this at this point and think about their progress and what improvements have been made.

⁴ [Safer Environments and Activities](#)

⁵ [Templates and Resources](#)

Section 3.1: Safer Recruitment (General)

This first section provides general requirements and good practice advice for **all** communities with regards to joining and appointments. For those communities who specifically work directly in regulated activity with children, young people and vulnerable adults, or who have staff/volunteers who do, this is dealt with in section 3.2.

Requirements

3.1.1 The Leader of the community must ensure that where members are joining a recognised community:

3.1.1.1 All those seeking to join a recognised community must, as part of the joining process, have discussions which explore issues around safeguarding behaviours and beliefs, alongside values and motivations.

3.1.1.2 If there are any concerns as to the suitability of the person seeking to join the community, where there may already be members who are vulnerable, this must be discussed with the DSO and the Leader before a decision is made.

3.1.1.3 A similar process should take place with anyone wishing to be an Alongsider⁶, and wherever possible two references must be sought.

3.1.2 Trustees:

3.1.2.1 The Leader of the community must ensure that, in those communities which are also charities (whether registered or not), trustees are recruited or appointed in line with Charity Commission guidance⁷.

Guidance

It is recognised that ordained members will have gone through a safer recruitment process prior to ordination, but they will still need to go through a process as part of their preparation for joining a recognised or acknowledged community as set out above and in the community's own governance documents. It is also recognised that communities strive to be as welcoming and inclusive as possible, but this needs to be proportionately balanced against risks and will

⁶ An Alongsider is someone who lives with the community for a period of time, either for a time to contemplate or to reflect whether the religious community life is for them

⁷ <https://www.gov.uk/government/publications/finding-new-trustees-cc30/finding-new-trustees>

depend on the nature of the community. General advice on joining and exiting procedures can be found in the [Handbook of the Religious Life](#).

For recognised communities, it is of utmost importance that no-one who is going to be a risk to themselves, to other members of the community or to members of the public is admitted, but is supported to get help in other ways. Therefore, these issues should be fully explored as part of the process of joining, and if any issues are raised, these should be discussed with the DSO and the Leader. It is accepted that someone may present with issues which are temporary, or which are more permanent, and the receiving community needs to be confident in their ability to support people appropriately. It is unlikely that the community will be able to make this judgement on its own, therefore advice from the DSO (and through them potentially the statutory services) needs to be sought as to the current level of risk of an individual, and whether that can be safely managed, both currently and in the future.

As a minimum, should discussions during preparation for joining or at any point during ongoing supervision bring to light similar behaviours to the examples below, which is not an exhaustive list, these should be taken as warning signs and explored further, with help from the DSO if needed:

- Non-consensual touching, e.g. hugging, holding hands
- Not appreciating personal space or boundaries
- Reference to spending time alone with children/taking children away for trips
- Interest in children that is beyond what would be expected
- Unwilling to be challenged on their ideas
- Unwilling to undertake safeguarding training or appreciate its importance
- Unwilling to accept that abuse can occur in a faith setting

It should be noted that simply being a member of a religious community does not automatically qualify someone for a DBS check – DBS checks are determined by the **role** that someone undertakes. The full guidance around DBS checking eligibility is set out in Section 9 of the [Safer Recruitment and People Management](#) Guidance, but in summary:

- Basic checks: Any individual can apply for a Basic DBS check.
- Enhanced check with or without barred list: Must be applied for by an organisation for a role that is in regulated activity. Regulated activity is clearly defined in law and covers roles such as teaching and personal care of children and personal care of adults. All

ordained clergy (including those with PTO) are subject to an Enhanced with barring list check.

- Trustees: The Charity Commission recommends that where a role is eligible for a check, that check is undertaken. For trustees, this would be an Enhanced check only if the charity is a children's or vulnerable adults charity, again there are legal definitions of what these are.

If you are in any doubt about whether a DBS check should be undertaken, you should seek advice from the DSO.

Only staff/volunteers involved in substantial work with children or vulnerable adults need to go through a [Safer Recruitment](#) process, which may involve an [Enhanced DBS check](#) if the work is Regulated Activity. Where these circumstances apply, the guidance in the next section should be followed. However, given the nature of recognised communities, it is strongly recommended for roles not subject to safer recruitment, that some form of process, e.g. checking references, full job history, interview is undertaken.

Section 3.2: Safer Recruitment and People Management

This section deals specifically with those communities who work substantially with children, young people and vulnerable adults and/or employ staff who do.

Requirements

3.2.1 The [Safer Recruitment and People Management](#) Guidance applies to all members, employees or volunteers who will have a substantial role working with children or vulnerable adults or providing a service to them on behalf of the community.

3.2.1.1 In line with the Safer Recruitment and People Management Guidance, the DSP should review each of these relevant roles (with the help of the DSO if required) to document the level of DBS checking and training required, and ensure this happens.

3.2.1.2 Where any concerns regarding safeguarding are discussed as part of any recruitment or appointment process or subsequent people management process, a written record must be kept, in line with data protection principles.

3.2.2 The Leader must ensure that regular supervision must take place for these roles, and must include discussion about safeguarding issues.

Guidance

For those communities who have members, staff or volunteers who work with children, young people or vulnerable adults (which may include members of the community itself), it is important that the [Safer Recruitment and People Management](#) guidance is followed at all times, and in a manner appropriate to the role. This guidance includes advice on keeping appropriate records.

It is important to remember that Safer Recruitment and People Management does not stop when someone is recruited/appointed/admitted – it is a continuous process involving observations, discussions and feedback that lasts as long as someone is a member or employee/volunteer. This continues to ensure that those who are not suitable are not appointed/admitted, or if they are they do not stay, thus ensuring the safety of others within the community and of any users of services the community provides.

It is important to note that whilst the requirement for ensuring regular supervision happens has been placed on the Leader, that does not mean the Leader themselves needs to do the supervision. This may be delegated in practice to another role, but it is the Leaders responsibility to ensure that it happens.

Section 4: Creating a healthy culture

Requirements

4.1 The Leader must ensure that there is, at least annually, a reflective discussion where views on the culture of the community can be discussed and any necessary actions addressed.

4.1 Creating a healthy culture

Creating a healthy organisational culture is an essential part of safeguarding, facilitating victims and survivors of abuse to come forward and encouraging reporting of behaviours which are of concern. It relates to the nature and quality of the communications and behaviours that happen within an organisation. It involves how people treat each other and talk to each other, and whether these interactions are positive and affirming or negative and destructive. Healthy organisational cultures are compassionate and caring, open to challenge, and transparent. Unhealthy cultures are closed, critical and can generate fear or apathy. Given the acute sense of vulnerability that victims and survivors will already feel, most will be reluctant to disclose their abuse in cultures that are (or appear to be) unhealthy. It is therefore imperative that all Church bodies, including religious communities take active steps to ensure the health of their life together. The [Responding Well to Victims and Survivors of Abuse](#) Guidance sets out why a healthy culture is so important, and some of the key principles are summarised here:

Communication patterns

- The mode of communication adopted by people is “genuine dialogue”, a respectful, person-centred exchange in which all people are open to being influenced, rather than “monologue disguised as dialogue.”
- There is encouragement and welcoming of different perspectives and views.
- People do not feel they are “taking a risk” by expressing different views to other members of the community.
- People do not have anxiety or fear about raising concerns.

Behaviour patterns

- There is absence of coercive and/or controlling behaviour by ordained and non-ordained people and a “command and control” style of leadership.
- “Poor behaviour” (e.g. bullying) is challenged and resolved when it occurs.

- There is no evasion of responsibility to address difficult situations – for example, senior clergy or staff are not reallocated different roles when safeguarding concerns are raised about them, and the matter is addressed.
- Those involved in the community support each other through difficult times.

Relationships

- Power is shared and distributed instead of being vested in a few people.
- Leadership styles are inclusive and consultative rather than controlling.
- There are no powerful elites or cliques dominating the life and affairs of the community
- Safe boundaries between people are understood and observed.
- No one is isolated or left out of the community's life and activities.

Self-reflexivity

- Collectively and individually, the community devotes time to reflect on their behaviours and relationships.
- The tendency towards, and dangers of, clerical deference are acknowledged and actively guarded against.
- People are aware of the impact they can have on others.
- Feedback from others (for example, about communication style and behaviour) is welcomed.
- Leaders in the community learn from failures and reviews (in their own as well as in other organisations) and take appropriate actions to seek to prevent any recurrence.

4.2 Promoting healthy Christian cultures

Healthy Christian cultures need to be consciously and purposefully developed, nurtured and reviewed. The starting point is to reflect on the quality of the existing culture. Communities can do this by:

- Highlighting the importance of healthy cultures and raising it in peoples' consciousness at meetings
- Having conversations at these meetings where people ask and seek to answer the question: "How healthy is our culture?"
- Creating opportunities to include all those involved in the community in this dialogue – for example, introducing yearly feedback and reflection sessions to evaluate the "health" of the community's culture and community.

- Drawing on the section “Characteristics of healthy and safe cultures” above in these dialogues.
- Proactively role modelling healthy culture behaviours and communication patterns – as individuals and senior leadership roles.

4.3 Issues for Recognised communities

It is acknowledged that those communities who live together may experience tensions at varying stages, and being alive to the signs of potential bullying or harassment, and having the ability to have those conversations is even more important in these circumstances. Signs of bullying and harassment can be found in the [Definitions](#) section of the *Safeguarding Children, Young People and Vulnerable Adults* guidance, and it should be noted that these do not automatically come under safeguarding processes. Sometimes, a pastoral or Human Resources response is more appropriate. Many communities will already have identified ways which have enabled them to live together well and may be encouraged to reflect on what has worked for them. It needs to be acknowledged that as people age, their needs, wants and priorities will change, and even the most stable community may experience challenges.

Obedience

Obedience is one of the key vows taken by recognised communities and a virtue of great richness. It is also however, patent of serious abuse; it has negative as well as positive connotations. It has the basic meaning of ‘acceding to the will of another’.

In religious life, it denotes something which is habitual and ready; it is not in contradiction with responsibility or freedom. In communities shaped by the Rule of Benedict especially, it is to be accompanied by listening to one another. When a decision is made, compliance is owed. Nothing may be commanded which goes against Christian truth.

This is grounded on the pattern of Christ’s obedience; to hear, to trust, to submit and surrender to God belong to the biblical understanding of obedience which is basic to religious life.

This can, however, in worst case scenarios, be exploited by someone to their own ends, to increase their “power” over others. This need not necessarily be the one who leads the community, it could be anyone within it. Some pertinent issues are covered in the next section on spiritual abuse, but it may be helpful for communities to explore what obedience means to them, including what are risks as well as positives:

- How can obedience help/hinder the development of a healthy culture?
- How might any potential risks be mitigated?

- To what/to whom is obedience directed? Structures? Individuals? Outside factors?
- Do we demand obedience or ask for it?
- Is our obedience total, discerning or dependent on circumstances?

Working through some of these questions may generate some areas for communities to discuss and explore further.

4.4 Spiritual Abuse

There is further information with regards to healthy cultures in the [Safeguarding Children and Vulnerable Adults](#) guidance on Spiritual Abuse. This section provides examples of the spectrum of behaviour that flows from healthy, through unhelpful and unhealthy to abusive behaviour.

Spiritual abuse is a form of emotional and psychological abuse that occurs specifically in a religious context. It is characterised by a systematic pattern of coercive and controlling behaviour in a religious context, and can be best demonstrated by use of scripture to justify abusive behaviour. Further signs you may see are set out in the [Definitions](#) section. It is important to recognise that anyone can be the subject of spiritual abuse, including whole communities. It is therefore vital, particularly for recognised communities, that signs of unhelpful and unhealthy behaviour are identified and addressed at an early stage.

The Guidance states:

“It is important to situate spiritual abuse in the spectrum of behaviour we experience within Christian contexts. The diagram above is helpful in understanding this spectrum. At one end there is good, healthy, nurturing behaviour in which people flourish and grow, and there are many examples of this in our communities. Then as we move along the spectrum, we reach unhelpful behaviour. This is where someone’s reaction/behaviour is not harmful but not helpful and we all behave in this way at times. If we continue along the spectrum and if, in the context of spiritual abuse, we start to see a consistent pattern of behaviour that is negative, where we check ourselves before approaching that person; where they are not open to question etc., it starts to become unhealthy and much of the behaviour that concerns us sits here. It can often be challenged and addressed at this stage.

If it becomes a persistent pattern of coercive controlling behaviour that reflects the definition of psychological abuse with a religious rationale, it can cross the threshold into spiritual abuse.”

4.5 Where to start/moving forward

Thinking about how to develop a healthy culture might feel overwhelming to start with, however, specifically as part of a recognised community, it is likely that you have had to find ways to resolve differences, perhaps significant differences, already. Appendix C sets out some suggestions as to exercises you may want to undertake, and template worksheets are available to capture any results and actions that you identify. These are not mandatory, and can be adapted to suit your own individual needs.

Section 5: Safeguarding Learning and Development

Requirement

5.1 An assessment of the safeguarding learning needs of all roles must be undertaken in line with the requirements of the [Learning & Development Framework](#):

5.1.1 All members must complete Basic Training

5.1.2 In communities who undertake work with children or vulnerable adults or have contact with children/vulnerable adults, all members must participate in the Basic and Foundation Safeguarding Learning.

5.1.3 DSPs must undertake Leadership and Raising Awareness of Domestic Abuse training.

5.1.4 Leaders of communities must undertake the Senior Leadership Pathway, a bespoke version of which is available for Religious Communities.

5.5 Where it is required, Safeguarding Learning must be delivered to the community by arrangement with the DSO for the local diocese, but in some communities this may be with the lead DSO if there is one in place.

5.6 For those communities who employ staff, Safer Recruitment and People Management training must be completed by the relevant person(s) in line with the current Safer Recruitment and People Management policy.

5.7 An exemption for training for those community members who are inactive, frail or sick should be considered on a case by case basis by the DSO and agreed with the NST Lead.

Guidance

The Church of England has introduced [learning pathways](#) which are different in important aspects to what has gone before. There is emphasis on learning being a journey rather than a one-off event, the use of a blend of learning methodologies, and a focus on personal reflection and dialogue. Such pathways are transformative, going beyond a change in process to affect people at the level of beliefs and values in order to achieve true and lasting behavioural change.

The DSO and the DSP should agree between them the safeguarding learning needs of members and the way these can best be met. All training must follow the structure and methodology set out in the requirements for each pathway.

Good use of online learning can be made, however it needs to be noted that missing out on non-verbal behaviour cues, i.e. that someone is displaying behaviour of distress, or of disinterest can be an issue.

Learning Needs Assessments

A learning needs assessment looks at each role within any community to establish what the training requirements for that role needs to be, and how they can be met. A template needs assessment is attached at Appendix D for assistance.

Personal development courses are additional and depend on the career or other development needs of the individual, and particularly for DSPs, thought may need to be given as to how best to engage and join with national Church of England Safeguarding learning and events.

Section 6: Safeguarding yourself and your community

Requirements

6.1 The Leader of a religious community has overall responsibility for ensuring the safety of their community, visitors and premises.

6.2 As a minimum, a written record of the names and contact details of any overnight visitors to recognised communities must be kept in line with data protection principles.

6.3 The DSP is responsible for ensuring that there are processes in place to keep community members and other visitors safe from visitors who may seek to cause harm. This is particularly important where there are people with vulnerabilities in the community, either on a permanent or temporary basis.

6.4 Working with others, the DSP is responsible for ensuring that there are processes in place to safeguard members when they are working in the community, including where appropriate, risk assessing any premises and activities with regard to safeguarding.

Guidance

Religious communities differ greatly between themselves and do many great things. This section is specifically for those communities which provide some sort of service, be that within their own premises or out in the community. From a risk management perspective, the starting point is to always think “what might go wrong, and how might that be prevented?”, rather than hoping everything will go right. This should not be seen as an “add on” or a tick box exercise, but about how to integrate safer working practices into the mission and the ways of working.

Safeguarding members at premises

Those communities which have visitors come to their property, or a property they use for the purpose of delivering a service, should ensure that visitor details are kept for a period of one year from the date of visit. This is in case of any issues which may arise as a result of their

visit, which would require you to either contact them directly, or to pass their details onto a statutory agency. In some circumstances this could simply be name and contact details, in others more information may be required, including for example, emergency contact details, proof of identity and even a very basic risk assessment. This requires a privacy notice to be in place. It must never be forgotten that someone who visits a community in whatever capacity may do so to cause harm to others, and communities need to satisfy themselves that they and their other visitors are protected. This is particularly the case where vulnerable people may be part of the community for either a permanent or interim period of time, and there needs to be a clearly understood plan for ensuring their safety. The scope and size of these measures will depend entirely on the particular visitors the community hosts, must be proportionate, and advice from the DSO should be sought where necessary.

Looking after those who are the subject of a safeguarding allegation

A pertinent issue for recognised communities is they may be asked to offer a temporary placement to a member of clergy who is subject to a safeguarding investigation. In these circumstances, a risk assessment would have been completed by the “sending” DSO, and should be shared with the “receiving” DSO. It will be for the receiving DSO to ensure that the DSP and the Leader, and where it is necessary, all members of the relevant religious community, are made aware of the risks and what is being done/what they need to do to mitigate them.

Safeguarding members in the community

Members of communities who work with children or vulnerable adults in the community should already be safely recruited and should be involved in regular supervision discussions. For those members, and for all other members who work in the community, there should also be clear processes to safeguard them as well as those they work with. This will include, as a minimum, details of where the member will be working, who with and how long for. In certain circumstances, it may be necessary to carry out a risk assessment of the environment members will be working in, and ensure basic mitigations are taken, e.g. two people together, telephones etc. The [Safer Environments and Activities policy](#) and the [Code of Safer Working Practice](#) both have more information on this.

Safeguarding buildings and activities

The DSP should work with others to ensure that a basic risk assessment of any premises owned or used is carried out in relation to safeguarding. This is in addition to any health and safety risk assessments which must be completed. This will identify any areas of concern, for example, unsecure or hidden entrances, basic security measures on doors and windows,

areas of low lighting, placement and security of toilets etc. Steps can then be taken to mitigate the risks posed by the building itself.

If they are not already been carried out, risk assessments of the activities being carried out should also be completed, again so that the risk of any safeguarding incident arising is mitigated as far as possible. The [Safer Environments and Activities policy](#), and the [Code of Safer Working Practices](#) both have more information on this and [model risk assessment templates](#) are also available.

Section 7: Reporting concerns or allegations

Requirements

7.1 Any concerns or allegations must be made to the DSP in the first instance, unless they are about the DSP in which case they should be made straight to the DSO. In an emergency, always contact the emergency services. A written record of these must be kept.

7.2 The DSP must inform the DSO as soon as possible of any incidents or concerns. The DSP and the DSO will agree the best way forward and (where appropriate) inform the Leader.

7.2.1 If the matter is about the Leader, the DSP must inform the DSO as normal and also the Episcopal Visitor.

7.2.2 If a matter is so urgent it cannot wait until after a weekend or Bank Holiday, contact must be made with the police or social services.

7.2.3 It is expected that local protocols will be put in place to address the reporting of concerns, and it must be made clear that reporting a concern to the DSO cannot be overruled by anyone else in the community.

7.3 All members are required to comply with any requests for assistance from either the DSP or the DSO.

7.4 If the DSP is uncertain whether a matter should be raised with the DSO, they should raise it in any event and keep a record of the discussion and the advice from the DSO.

Guidance

When dealing with a safeguarding matter, communities need to be mindful of the guidance set out in the [Responding Well](#) to victims and survivors of abuse guidance and the Responding to allegations policies. These matters will mostly be dealt with by the DSO, and therefore it is important that they are informed as soon as possible. In certain, limited circumstances, the DSO may refer the case to the NST for them to consider. These circumstances might include when the case involved the Leader and was high profile, complex or involving multiple allegations.

The key thing for communities is to recognise what might constitute a situation which requires a safeguarding response, or recognise behaviours, situations or individuals who might pose a risk. This is where being able to observe behaviours and have open discussions becomes important, as this is the opportunity to be able to spot at an early stage where things may need an intervention. This is all part of creating a healthy, safe culture.

Advice on record keeping with regards to safeguarding can be found on the [Church of England website](#).

Please refer to the main [Safeguarding Children, Young People and Vulnerable Adults](#) policy for full examples of the behaviours, signs and situations which may give you cause for concern and which may require a safeguarding response.

If you are in any doubt about whether to report a concern, consult with your DSO and make a written record of their advice.

Charity Trustees have specific responsibilities with regards to Safeguarding, which include ensuring that safeguarding is done well within their charity. These are set out in the [Charity Commission](#) guidance, and specifically include:

- Ensuring that policies and processes are in place and regularly reviewed
- Complying with guidance on making Safeguarding Serious Incident Reports to the Charity Commission
- Discussing safeguarding generally at each meeting
- Reviewing any lessons learned

An infographic setting out [10 actions trustee boards need to take to ensure good safeguarding governance](#) is available.

As with all other aspects of governance, the role of the Trustees is oversight and assurance – generally they will not get involved with the day to day management of any particular issue. This is, however, much more difficult in very small communities, and therefore some thought needs to be given as to the degree of separation that can be given to Trustees around safeguarding matters. This is important when it comes to dealing with any [Conflicts of Interest](#). Conversely, larger communities may have a [Lead Trustee for Safeguarding](#), who takes the lead in providing that assurance and oversight to the remaining Trustees, accepting that all Trustees maintain responsibility for safeguarding in their community.

Section 8: Serious Incident Reporting to the Charity Commission

Requirements

8.1 Those communities which are charities (or are overseen by and accountable to a charity) have a duty to report any serious incidents (including safeguarding) to the Charity Commission. The Leader must ensure there is a mechanism for doing so in accordance with the House of Bishops' Serious Incident Reporting Guidance for Religious Communities.

8.2 This is in addition to reporting the safeguarding incident to the DSO.

Guidance

For further information on how to identify and report a Serious Incident to the Charity Commission, please refer to the [Guidance for Religious Communities](#).

Section 9: Episcopal Visitors

9.1 The role of the Episcopal Visitor is to:

- 9.1.1 Check safeguarding policies and arrangements, including any self-assessment as part of each Visitation. This includes having regard to the extent to which such policies may already have been reviewed by an independent body.
- 9.1.2 Maintain a record of the safeguarding aspects of each Visitation and share the outcome with the appropriate DSO;
- 9.1.3 Inform the appropriate DSO if they have any safeguarding concerns in relation to the community.
- 9.1.4 Be available to deal with any appeal subsequent to the Community's formal complaints procedure.
- 9.1.5 Develop a sense of whether the community has a safe and healthy culture.

9.2 Where there is a concern relating to the DSP or the Leader of a community, the DSO must inform the Episcopal Visitor.

Guidance

The role of the Episcopal Visitor is set out in the [Handbook of the Religious Life](#), and explains the role as:

“that of episcopal guarantor to the Church at large of the Community's right to the Church's confidence and the Community's guide in maintaining that confidence.”

The Handbook also includes the requirements that safeguarding policies should be reviewed at each Visitation. As such, the Episcopal Visitor is not responsible for dealing directly with any safeguarding matters, in a community this will be dealt with by the Diocesan Safeguarding Officer, and therefore ultimately overseen by the Diocese Bishop. However, the Episcopal Visitor must be informed of serious incidents as they have a duty to ensure that safeguarding policies and processes are in place and are followed. They are also responsible for, and must lead discussions, around how to implement healthy cultures, and must ensure this happens with the Leader and the wider community on a regular (at least annual) basis.

Appendix A – Model role description/person specification for Designated Safeguarding Person

The community's Designated Safeguarding Person (DSP) is the key link between the diocese and the community concerning safeguarding matters.

Person specification

1. Willingness and aptitude to undertake the role, attend the relevant training and undertake their own development in the field of safeguarding
2. Ability to challenge in an appropriate, supportive manner
3. Able to demonstrate why safeguarding is an essential outworking of the Gospel
4. Experience of being able to instigate difficult conversations
5. Able to articulate the need for culture change with regard to safeguarding in the Church as a whole, and in particular to their community
6. Demonstrate an empathetic and professional attitude when dealing with possible allegations of abuse

Role Description:

1. Be familiar with community's safeguarding policy and how it is implemented in local practice
2. Establish positive working relationships with the Diocesan Safeguarding Officer
3. Discuss regularly with the Leader any safeguarding concerns or emerging issues
4. Determine which staff need which level of training and liaise with the DSO to ensure this happens
5. Have an awareness of all activities involving children and vulnerable adults, keep a record of them and assist with the safeguarding risk assessment of these activities.
6. Where appropriate, help the community develop protocols to keep themselves and their visitors safe.
7. Be the first point of contact for any safeguarding concerns the community may have.
8. Help facilitate discussions about what the community sees as a safe culture, what the current barriers are and how they may be resolved.

Appendix B – Example implementation self-audit checklist (Revised 2024 version)

	Current Status	Action still to be taken	Lead person	Timescale
Example: <i>Undertake a training needs assessment</i>	Example: <i>Training has lapsed recently, the assessment needs to be completed from scratch</i>	Example: <i>1. Priority for training will be given to:</i> <ul style="list-style-type: none"> • <i>Leadership roles</i> • <i>Those involved in youth work</i> <i>2. All other posts will then be assessed and prioritised according to need</i> <i>3. Training schedule moving forward will be developed and shared with the DSO.</i>	Example: <i>Deborah McGovern</i>	Example: <ul style="list-style-type: none"> • <i>Priority training to be completed by June</i> • <i>Assessment to be completed by September</i> • <i>Schedule to be finalised in October</i>
Section 1				
Review and Communicate the policy				
Review of relevant data protection documents				
Review of local protocols				
Section 2				
Confirming who is the DSP and ensuring they have the correct training				
Communication and publication of who this is and what their role is				

New DSPs to have an induction with the DSO				
Clear protocols in place for communities with more than one diocese/DSO.				
Section 3				
Assessment of which roles need to be safely recruited				
Safer Recruitment training undertaken				
Review of joining processes to ensure they are adequately exploring safeguarding issues				
Section 4				
Opportunities to agree what a safer culture means for your community				
Implementing the outcomes of these discussions				
Section 5				
Training needs assessment carried out				
New and refresher training timelines				

created where appropriate				
Section 6				
Safeguarding risk assessments/action plans developed/reviewed for any activities, accommodation, buildings or services				
Processes in place to keep members, visitors and service users (as appropriate) safe				

Appendix C: Creating Healthy Cultures exercises

C.1 The Pastoral Principles

The [Pastoral Principles](#) were developed specifically to help Christian communities specifically engage in debates around same-sex marriage and the different deeply held convictions that individuals and churches hold on these matters. However, the principles themselves can be adapted to use in any circumstances where honest conversations are needed and different positions are held. Each principle is set out a card (these can be bought or downloaded from the webpage linked above) which offer reflections and questions to think about. The principles are:

- Acknowledging prejudice;
- Speaking into silence;
- Addressing ignorance;
- Casting out fear;
- Admitting hypocrisy;
- Paying attention to power.

In addition, the whole course is available on-line via the link above. A template to capture your comments and actions is available below.

Date(s) of discussions

Principle	Where are we strong	Where can we do better	Our Action Points	Our Progress
Acknowledging Prejudice <i>What does this mean to us?</i>				
Speaking into silence <i>What does this mean to us?</i>				
Addressing ignorance <i>What does this mean to us?</i>				
Casting out fear <i>What does this mean to us?</i>				
Admitting hypocrisy <i>What does this mean to us?</i>				
Paying attention to power <i>What does this mean to us?</i>				

C.2 Culture Conversation Cube

Based on the six components of a safer, healthier culture as outlined in the book 'Escaping the Maze' by Justin Humphreys and Lisa Oakley⁸, the [Culture Conversation Cube](#) allows you to start conversations about the culture of your organisation. The components are:

- Communicating well;
- Listening well;
- Managing Power;
- Establishing good governance;
- Building effective structures;
- Modelling safe behaviours

A template to capture your comments and actions is available below.

⁸ 'Escaping the Maze of Spiritual Abuse – Creating healthy Christian Cultures' – Dr Lisa Oakley and Justin Humphreys, 2019

Date(s) of discussions

Principle	Where are we strong	Where can we do better	Our Action Points	Our Progress
Communicating Well				
Listening Well				
Managing Power				
Establishing Good Governance				
Building Effective Structures				
Modelling Safe Behaviors				

C.3 Spectrum of Behaviour

The Spectrum of Behaviour⁹ (“fruit polos”), and the associated table can be adapted for use within your community. You could think about:

- What does healthy behaviour look like in your community
- What does abusive behaviour look like in your community
- What might be the warning signs that individuals/the community are heading towards being unhealthy?

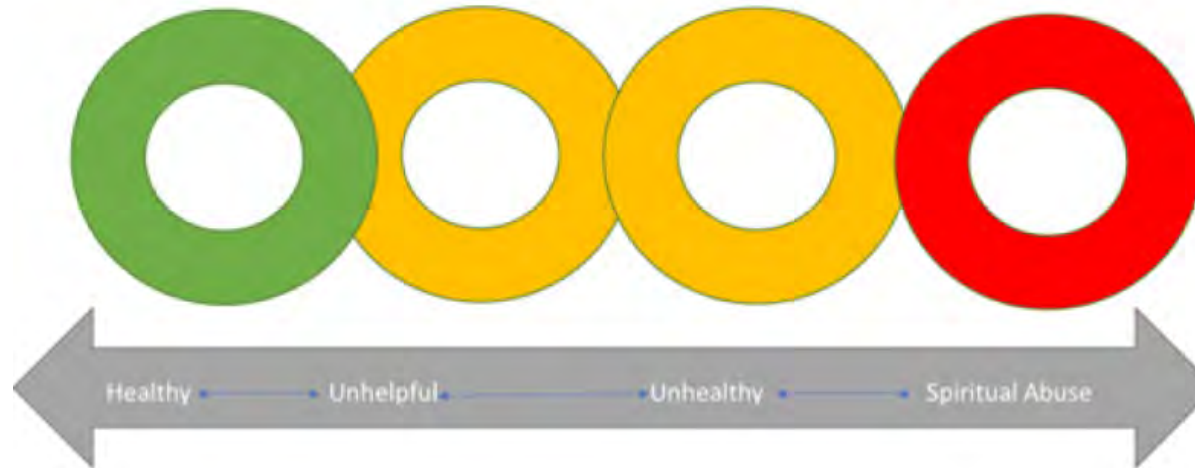
A template to capture your comments and actions is available at Appendix x. Please note that use of the template is not mandatory.

⁹ Oakley, L: 2021

Date(s) of discussions

Spectrum of Behavior Worksheet

A spectrum of behaviour



[Example from Safeguarding Children and Vulnerable Adults Guidance](#)

	Healthy	Unhelpful	Unhealthy	Spiritually Abusive
Example	<ul style="list-style-type: none"> • Offering spiritual mentorship and support, which is mutually beneficial with agreed boundaries. • Aiming to be self-reflective and self-aware about one-to-one pastoral conversations. • Being aware of the likely power imbalance in a pastoral mentoring relationship. • Possibly having confidential supervision for one-to-one pastoral conversations, or 'checking in' with a third party confidentially about these. 	<ul style="list-style-type: none"> • Being a little too directive in one mentorship conversation. • Being overly defensive when one piece of advice is disagreed with or ignored. 	<ul style="list-style-type: none"> • Requiring the individual to share personal details which they do not wish to share. Going beyond agreed boundaries • Spiritual mentorship or support becoming very directive and difficult to disagree with or not comply with. • Exploring and interpreting personal psychological history to a depth appropriate to a trained counsellor or psychotherapist. 	<ul style="list-style-type: none"> • Consistent pattern of highly controlling and directive mentorship. • Use of scripture to control behaviour consistently. • Using God's name to enforce actions the mentor recommends. • Making someone feel unable or afraid to disagree with any advice given. • Presenting oneself as akin to a professional counsellor, anointed by God for this role, with equivalent skills and competencies. •
Suggested Response	Affirm good practice	If this is a on- off situation, it could be that a little extra pastoral support is needed, or	More robust, formal intervention would be needed at this stage to help the individual move back down the spectrum and	A persistent pattern of such behaviour would constitute spiritual abuse. If this was towards a child of vulnerable

		<p>some help with capability.</p> <p>The response required will in part depend on whether the individual appreciates that their behaviour was unhelpful in that situation. If they don't, this would be a warning flag which might trigger a more robust response (see next column)</p>	<p>prevent them moving forward.</p> <p>This might include, closer supervision, re-training on safeguarding or disagreeing well, coaching, mentoring or counselling.</p>	<p>adult, this would be a safeguarding matter.</p>
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Our Examples

Examples	Healthy	Unhelpful	Unhealthy	Spiritually Abusive

Title of House of Bishops Safeguarding Code of Practice	Safeguarding in Religious Communities – Guidance for Acknowledged Communities
Author	National Safeguarding Team
This version	Version 5
Review Date	July 2028

Safeguarding in Religious Communities

October 2024

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Introduction

The Church of England's policy statement, 'Promoting a Safer Church'¹, sets out the Church's commitment to the safeguarding of children and adults. This commitment extends to religious Communities under the "Whole Church" approach.

Under the Religious Communities Regulations 2020, in order to be a recognised or acknowledged community under the new Canon DA1, communities must ensure their governing documents:

- impose on members and officers of the community (including the Visitor) duties that are equivalent to those imposed by or under section 5 of the Safeguarding and Clergy Discipline Measure 2016 (duties in relation to safeguarding of children and vulnerable adults);
- make provision as to the persons or bodies who have particular responsibility in relation to the safeguarding of children or vulnerable adults;
- make provision for the Visitor's functions in relation to the safeguarding of children and vulnerable adults.

This Code contains both **requirements** and **guidance**. The guidance explains, for example, how to deliver the requirements, sets out some good practice examples, and explains why the requirements are necessary. In other words, it explains "why and how" to deliver the requirements. Whilst the case examples and other associated advice should be considered as best practice which should be followed, the duty to comply does not apply to them. For clarity, in this Code, all **requirements** are clearly marked as such and are in a blue box.

Requirements for Religious Communities are made under the Religious Communities Regulations 2020. Requirements for all other Church Officers are made under s. 5A of the Safeguarding and Clergy Discipline Measure 2016, as amended by the Safeguarding (Code of Practice) Measure 2021, which came into effect on 1 March 2022.

¹ The Policy Statement can be downloaded from <https://www.churchofengland.org/sites/default/files/2019-05/PromotingSaferChurchWeb.pdf>

Scope

This document applies to members of all those religious communities which are recognised or acknowledged under the Religious Communities Regulations 2020, including employed staff and volunteers.

Those members of religious communities who are ordained, hold PTO, are licensed or who are otherwise a relevant person under section 5A of the [Safeguarding and Clergy Discipline Measure 2016](#) are expected to also comply with other Safeguarding Codes of Practice as appropriate to that role.

It is acknowledged that Religious Communities vary widely in their size, scope, mission and membership, which makes the development of an overarching Code difficult. This document sets out what is expected, but the reality is it must be implemented in a proportionate manner.

For example:

- Very large communities with employed staff who deliver a service or ministry to children, young people and vulnerable adults would be expected to implement this code in full.
- Those with many overseas members/staff would be expected to have an arrangement in place that works for their particular circumstances.
- Very small communities with no staff who do not have any contact with children or vulnerable adults would need to apply very little of this Code.

The key issue is that all aspects of this Code have been considered by a community, in consultation with the DSO if needed), and an evidenced decision has been made.

Definitions

Please refer to the main [Safeguarding Children, Young People and Vulnerable Adults](#) Guidance for definitions of children vulnerable adults and abuse.

Recognised communities are those which are organised along the traditional Benedictine vows of stability, conversion of life and obedience, or the “evangelical counsels” of poverty, chastity and obedience. Members spend a period – usually at least three years – in temporary/first/simple vows after the noviciate and before Solemn or Life vows when they cease to hold personal property, and live either in community or as solitaries. Recognised communities will have a Rule and Governing Documents which provide for the ordering of the life of the community.

Acknowledged communities vary in their practice and lifestyle. In most cases, the members are dispersed, with opportunities provided for meeting together whilst in others there may be a shared life in one place in what is otherwise a dispersed community. Members may be single, married or in a partnership. Members make 'seasonal vows' of commitment, most holding down jobs in wider society. Each community has a Rule of Life and Governing Documents which provide for the ordering of the life of the community.

Review

This Code will be reviewed no later than July 2028.

Terminology Checker

DSO - Diocesan Safeguarding Officer: A professional employed by the Diocese to support and manage safeguarding activity in the diocese.²

NST – National Safeguarding Team:³ The Church of England’s central safeguarding provision, supporting policy development, training, major projects and investigating cases against senior clergy (e.g. bishops and deans), and cases where there is a high degree of interest or complexity.

DSP – Designated Safeguarding Person: The person within the Religious Community who takes the lead on safeguarding activity.

Leader – The Term “leader” is used in this document to mean the person with overall responsibility. Example titles for this role include Abbott, Abbess, Prior, Prioress

Tertiary - A Third Order (whose members are usually called Tertiaries) is part of the Franciscan tradition, and involves a Rule of life and commitment by the members to each other. This constitutes a separate Order, parallel to and closely connected with the Community, but distinct from it.

Episcopal Visitors - Visitors are the guardians of the Constitutions of the Community and guarantors to the Church at large of the Community's sound administration, stability and right to confidence. The Visitor will be a bishop external to the life and membership of the Community, and must hold office in the Anglican Church. This role may also be known as the Bishop Protector or Provincial Minister

Further information can be found in the [Handbook of the Religious Life](#)

² The term Diocesan Safeguarding Advisor (DSA) will change to Diocesan Safeguarding Officer (DSO) during the life of this Code of Practice

³ For further information on specific responsibilities, please see [Key Roles and Responsibilities of Church Office Holders and Bodies Practice Guidance.pdf \(churchofengland.org\)](#)

Section 1: General provisions

Requirements

- 1.1 All religious communities must comply with all the House of Bishops' safeguarding Guidance and Codes of Practice and embed these into their practices where it is applicable, in accordance with the "Whole Church" approach.**
- 1.2 Safeguarding policies apply both internally and externally:**
 - 1.2.1 Between individuals within communities (be they acknowledged or recognised).
 - 1.2.2 When ministering to children, young people or vulnerable adults outside the religious community, in which case they apply to both parties.
- 1.3 The Leader of each religious community has overall responsibility for ensuring compliance with safeguarding policies and good practice and for promoting a safer culture.**
- 1.4 The Leader of a religious community must ensure that the governance documents of the community (or the charity which has legal responsibility for that community) must state that they accept and abide by the House of Bishops' Guidance and Codes of Practice for safeguarding children, young people and vulnerable adults in the Church of England.**
- 1.5 Local arrangements for delivery of this policy must be put in place. These must be reviewed annually and must set out how the policy will be implemented locally according to the particular needs and context of the community. They do not replace this policy.**

Guidance

The Church of England is creating a change in culture in the way safeguarding is viewed by all its many component parts. This moves away **from** the current perception that safeguarding is something which is done “additionally”, as a tick-box exercise or by a designated individual, **to** a culture where safeguarding is in the DNA of the Church and the people who comprise the Church. To become a Safer Church, safeguarding needs to be in the heart and soul of the Church’s theology and mission – it is who we are and what we do. With this perspective, safeguarding policies and procedures should be approached, not with a spirit of fear and (sometimes) reluctant compliance, but rather with an appreciation that they are an external expression and living out of an internal understanding of safeguarding being intrinsic to Christian beliefs and values.

Religious communities should therefore reflect what other policies and processes (formal or informal) in existence may need to be reviewed or amended in light of this, to demonstrate they have good safeguarding practice at their core. It is expected that this safeguarding policy will need to be supplemented with local procedures which will be individual to each community, and it is recommended to review these annually. These will set out how the policy principles will be applied to that particular community’s needs, for example, how it will be applied in a community of six individuals who live together will be different from how it will apply in an international community with thousands of members. These will need to include, for example and where relevant:

- How to report concerns to Diocesan Safeguarding Officers (DSOs), and which DSOs to report to
- How to manage events which occur abroad
- How to access training and at what level

All new national safeguarding policies are uploaded to the [Safeguarding e-manual](#). This means that the most up-to-date version will always be available, and this is particularly beneficial for acknowledged communities. It is not recommended that copies are printed; however, if they are, care will need to be taken to ensure these are replaced following any updates. These are highlighted in the weekly National Safeguarding Team (NST) newsletter, a bespoke version of which is sent monthly to Religious Communities.

Section 2: Appointing a Designated Safeguarding Person

Requirements

2.1 Each community must appoint a Designated Safeguarding Person (DSP)

2.1.1 The DSP must not be the Leader of the community. They need not be a safeguarding professional, but must be able to demonstrate an aptitude for the role.

2.1.2 In very exceptional circumstances, an external DSP may be appointed, this must be done in consultation with the DSO.

2.2 The DSP must be trained in safeguarding at the Leadership pathway level and take day-to-day responsibility for safeguarding practice, awareness raising and ensuring there is safeguarding training provision in place.

2.2.1 In larger communities, the DSP may be trained to co-train alongside the DSO.

2.3 In an acknowledged community, the DSP will be responsible for establishing links with a lead DSO for the purposes of building a relationship and general oversight.

2.3.1 These arrangements must be made clear in local protocols.

2.4 The DSP is the person to whom all safeguarding concerns must be reported, unless the concerns are about the DSP, in which case they must be reported directly to the DSO. In an emergency situation, first contact should always be with the police or social services.

2.5 The DSP must report all allegations or concerns to the DSO in the first instance (see section 7 later).

2.6 The DSP must discuss all safeguarding matters, which in some circumstances may include ongoing cases, preventative measures and embedding a safeguarding culture with the Leader at regular meetings.

Guidance

The role of the DSP is to provide advice and support to all members of the community. They should liaise with the Diocesan Safeguarding Officer to secure training for members and for advice on dealing with safeguarding allegations. The DSP will be the first point of contact for any concerns which are raised (see section 7 later). A template person specification/roles and responsibilities is included at Appendix A.

One key aspect of the DSP role will be to help develop the organisational culture and promote a healthy, safer community. The role is not simply about reacting to situations, but proactively identifying and mitigating risks where these exist, having open discussions about behaviour, regular meetings with the Leader and helping to embed safeguarding throughout the life of the community. In other words, enabling the culture change referred to under Section 1 to take place. This is an ongoing process, and can be started by having honest discussions about culture, seeking advice from the DSO, undertaking the training courses and using the tools and resources available on the Church of England website.^{4,5} A self-audit tool was made available to help Religious Communities implement this revised guidance in 2020. Communities may wish to revisit this at this point and think about their progress and what improvements have been made.

The reason for establishing a relationship with one “lead” DSO for acknowledged communities is to act as a point of reference in terms of keeping up-to-date, being made aware of national changes, queries about general practice or training and advise on what should be reported and where. The DSP may wish to have regular check-in sessions with the DSO, and both should undergo an induction on appointment. Where it is relevant, this should be in addition to links with local DSOs, to whom any actual concerns need to be reported. Reporting principles are covered in Section 7.

⁴ [Safer Environments and Activities](#)

⁵ [Templates and Resources](#)

Section 3.1: Safer Recruitment (General)

This section provides general requirements and good practice advice for **all** communities with regards to joining and appointments. For those communities who specifically work directly in regulated activity with children and vulnerable adults, or who have staff/volunteers who do, This is dealt with in section 3.2.

Requirements

3.2 Members joining an acknowledged community:

3.3.1 All those seeking to join an acknowledged community must, as part of the period of preparation to join a community, have discussions which explore issues around safeguarding behaviours and beliefs, alongside values and motivations.

3.4 Trustees:

3.4.1 The Leader of the community must ensure, in those communities which are also charities (whether registered or not) that trustees are recruited or appointed in line with Charity Commission guidance⁶

Guidance

It is recognised that ordained members will have gone through a safer recruitment process prior to ordination, but they will still need to go through a process as part of their preparation for joining a recognised or acknowledged community as set out above and in the community's own governance documents. It is also recognised that communities strive to be as welcoming and inclusive as possible, but this needs to be proportionately balanced against risks and will depend on the nature of the community. General advice on joining and exiting procedures can be found in the [Handbook of the Religious Life](#).

As a minimum, should discussions during preparation for joining or at any point during ongoing supervision bring to light similar behaviours to the examples below, which is not an exhaustive list, these should be taken as warning signs and explored further, with help from the DSO if needed:

⁶ <https://www.gov.uk/government/publications/finding-new-trustees-cc30/finding-new-trustees>

- Non-consensual touching, e.g. hugging, holding hands
- Not appreciating personal space or boundaries
- Reference to spending time alone with children/taking children away for trips
- Interest in children that is beyond what would be expected
- Unwilling to be challenged on their ideas
- Unwilling to undertake safeguarding training or appreciate its importance
- Unwilling to accept that abuse can occur in a faith setting

Simply being a member of a religious community does not automatically qualify someone for a DBS check - DBS checks are determined by the **role** that someone undertakes. The full guidance around DBS checking eligibility is set out in Section 9 of the [Safer Recruitment and People Management](#) Guidance, but in summary:

- Basic checks: Any individual can apply for a Basic DBS check
- Enhanced check with or without barred list: Must be applied for by an organisation for a role that is in regulated activity. Regulated activity is clearly defined in law and covers roles such as teaching and personal care of children and personal care of adults. All ordained clergy (including those with PTO) are subject to an Enhanced with barring list check
- Trustees: The Charity Commission recommends that where a role is eligible for a check, that check is undertaken. For Trustees, this would be an Enhanced check only if the charity is a children's or vulnerable adults charity, again there are legal definitions of what these are.

If you are in any doubt about whether a DBS check should be undertaken, you should seek advice from the DSO.

Only staff/volunteers involved in substantial work with children or vulnerable adults need to go through a [Safer Recruitment](#) process, which may involve an [Enhanced DBS](#) check if the work is Regulated Activity. Where these circumstances apply, the guidance in the next section should be followed. However, given the nature of acknowledged communities, it is strongly recommended for roles not subject to safer recruitment, that some form of process, e.g. checking references, full job history, interview is undertaken.

Section 3.2: Safer Recruitment and People Management

This section deals specifically with those communities who work substantially with children, young people and vulnerable adults and/or employ staff who do.

Requirements

3.2.1 The [Safer Recruitment and People Management](#) Guidance applies to all members, employees or volunteers of Religious Communities who will have a substantial role working with children or vulnerable adults or providing a service to them on behalf of the community.

3.2.1.1 In line with the Safer Recruitment and People Management Guidance, the DSP should review each of these relevant roles (with the help of the DSO if required) to document the level of DBS checking and training required, and ensure this happens.

3.2.1.2 Where concerns regarding safeguarding are discussed as part of any recruitment or appointment process or subsequent people management process, a written record must be kept, in line with data protection principles.

3.2.2 The Leader must ensure that regular supervision must take place for these roles, and must include discussion about safeguarding issues.

Guidance

For those communities who have members, staff or volunteers who work with children, young people or vulnerable adults (which may include members of the community itself), it is important that the [Safer Recruitment and People Management](#) guidance is followed at all times, and in a manner appropriate to the role. This guidance includes advice on keeping appropriate records.

It is important to remember that Safer Recruitment and People Management does not stop when someone is recruited/appointed/admitted – it is a continuous process involving observations, discussions and feedback that lasts as long as someone is a member or employee/volunteer. This continues to ensure that those who are not suitable are not appointed/admitted, or if they are they do not stay, thus ensuring the safety of others within the community and of any users of services the community provides.

It is important to note that whilst the requirement for ensuring regular supervision happens has been placed on the Leader, that does not mean the Leader themselves needs to do the supervision. This may be delegated in practice to another role, but it is the Leaders responsibility to ensure that it happens.

Section 4: Creating a healthy culture

Requirements

4.1 The Leader must ensure that there is, at least annually, a reflective discussion where views on the culture of the community can be discussed and any necessary actions addressed.

4.1 Creating a healthy culture

Creating a healthy organisational culture is an essential part of safeguarding, facilitating victims and survivors of abuse to come forward and encouraging reporting of behaviours which are of concern. It relates to the nature and quality of the communications and behaviours that happen within an organisation. It involves how people treat each other and talk to each other, and whether these interactions are positive and affirming or negative and destructive. Healthy organisational cultures are compassionate and caring, open to challenge, and transparent. Unhealthy cultures are critical, closed and can generate fear or apathy. Given the acute sense of vulnerability that victims and survivors will already feel, most will be reluctant to disclose their abuse in cultures that are (or appear to be) unhealthy. It is therefore imperative that all Church bodies, including religious communities take active steps to ensure the health of their life together. The [Responding Well to Victims and Survivors of Abuse](#) Guidance sets out why a healthy culture is so important, and some of the key principles are summarised here:

Communication patterns

- The mode of communication adopted by people is “genuine dialogue”, a respectful, person-centred exchange in which all people are open to being influenced, rather than “monologue disguised as dialogue.”
- There is encouragement and welcoming of different perspectives and views.
- People do not feel they are “taking a risk” by expressing different views to other members of the community.
- People do not have anxiety or fear about raising concerns.

Behaviour patterns

- There is absence of coercive and/or controlling behaviour by ordained and non-ordained people and a “command and control” style of leadership.
- “Poor behaviour” (e.g. bullying) is challenged and resolved when it occurs.

- There is no evasion of responsibility to address difficult situations – for example, senior clergy or staff are not reallocated different roles when safeguarding concerns are raised about them, and the matter is addressed.
- Those involved in the Church Body community support each other through difficult times.

Relationships

- Power is shared and distributed instead of being vested in a few people.
- Leadership styles are inclusive and consultative rather than controlling.
- There are no powerful elites or cliques dominating the life and affairs of the community
- Safe boundaries between people are understood and observed.
- No one is isolated or left out of the community's life and activities.

Self-reflexivity

- Collectively and individually, the community devotes time to reflect on their behaviours and relationships.
- The tendency towards, and dangers of, clerical deference are acknowledged and actively guarded against.
- People are aware of the impact they can have on others.
- Feedback from others (for example, about communication style and behaviour) is welcomed.
- Leaders in the community learn from failures and reviews (in their own as well as in other organisations) and take appropriate actions to seek to prevent any recurrence.

4.2 Promoting healthy Christian cultures

Healthy Christian cultures need to be consciously and purposefully developed, nurtured and reviewed. The starting point is to reflect on the quality of the existing culture. Communities can do this by:

- Highlighting the importance of healthy cultures and raising it in peoples' consciousness at meetings
- Having conversations at these meetings where people ask and seek to answer the question: "How healthy is our culture?"
- Creating opportunities to include all those involved in the community in this dialogue – for example, introducing yearly feedback and reflection sessions to evaluate the "health" of the community's culture and community.

- Drawing on the section “Characteristics of healthy and safe cultures” above in these dialogues.
- Proactively role modelling healthy culture behaviours and communication patterns – as individuals and senior leadership roles.

Obedience

Obedience is one of the key vows taken by recognised communities, and potentially some acknowledged communities, and a virtue of great richness. It is also however, patent of serious abuse; it has negative as well as positive connotations. It has the basic meaning of ‘acceding to the will of another’.

In religious life, it denotes something which is habitual and ready; it is not in contradiction with responsibility or freedom. In communities shaped by the Rule of Benedict especially, it is to be accompanied by listening to one another. When a decision is made, compliance is owed. Nothing may be commanded which goes against Christian truth.

This is grounded on the pattern of Christ’s obedience; to hear, to trust, to submit and surrender to God belong to the biblical understanding of obedience which is basic to religious life.

This can, however, in worst case scenarios, be exploited by someone to their own ends, to increase their “power” over others. This need not necessarily be the one who leads the community, it could be anyone within it. Some pertinent issues are covered in the next section on spiritual abuse, but it may be helpful for communities to explore what obedience means to them, including what are risks as well as positives:

- How can obedience help/hinder the development of a healthy culture?
- How might any potential risks be mitigated?
- To what/to whom is obedience directed? Structures? Individuals? Outside factors?
- Do we demand obedience or ask for it?
- Is our obedience total, discerning or dependent on circumstances?

Working through some of these questions may generate some areas for communities to discuss and explore further.

4.3 Spiritual Abuse

There is further information with regards to healthy cultures in the [Safeguarding Children and Vulnerable Adults](#) guidance on Spiritual Abuse. This section provides examples of the

spectrum of behaviour that flows from healthy, through unhelpful and unhealthy to abusive behaviour.

Spiritual abuse is a form of emotional and psychological abuse that occurs specifically in a religious context. It is characterised by a systematic pattern of coercive and controlling behaviour in a religious context, and can be best demonstrated by use of scripture to justify abusive behaviour. Further signs you may see are set out in the [Definitions](#) section. It is important to recognise that anyone can be the subject of spiritual abuse, including whole communities. It is therefore vitals, particularly for recognised communities, that signs of unhelpful and unhealthy behaviour are identified and addressed at an early stage.

The Guidance states:

“It is important to situate spiritual abuse in the spectrum of behaviour we experience within Christian contexts. The diagram above is helpful in understanding this spectrum. At one end there is good, healthy, nurturing behaviour in which people flourish and grow, and there are many examples of this in our communities. Then as we move along the spectrum, we reach unhelpful behaviour. This is where someone’s reaction/behaviour is not harmful but not helpful and we all behave in this way at times. If we continue along the spectrum and if, in the context of spiritual abuse, we start to see a consistent pattern of behaviour that is negative, where we check ourselves before approaching that person; where they are not open to question etc., it starts to become unhealthy and much of the behaviour that concerns us sits here. It can often be challenged and addressed at this stage.

If it becomes a persistent pattern of coercive controlling behaviour that reflects the definition of psychological abuse with a religious rationale, it can cross the threshold into spiritual abuse.”

4.4 Where to start/moving forward

Thinking about how to develop a healthy culture might feel overwhelming to start with, however, specifically as part of a recognised community, it is likely that you have had to find ways to resolve differences, perhaps significant differences, already. Appendix C sets out some suggestions as to exercises you may want to undertake, and template worksheets are available to capture any results and any actions that you identify. These are not mandatory, and can be adapted to suit your own individual needs.

Section 5: Safeguarding Learning and Development

Requirement

5.1 An assessment of the safeguarding learning needs of all roles must be undertaken in line with the requirements of the Learning & Development Framework:

5.1.1 All members who hold any official role must complete Basic Training

5.1.2 In communities who undertake work with children or vulnerable adults or have contact with children/vulnerable adults, all members must participate in the basic and foundation safeguarding learning.

5.1.3 DSPs must undertake Leadership and Raising Awareness of Domestic Abuse training.

5.1.4 Leaders of communities must undertake the Senior Leadership Pathway, a bespoke version of which is available for Religious Communities.

5.4 For those communities who employ staff, Safer Recruitment and People Management training must be completed by the relevant person in line with the current Safer Recruitment and People Management policy.

Guidance

The Church of England has introduced [learning pathways](#) which are different in important aspects to what has gone before. There is emphasis on learning being a journey rather than a one-off event, the use of a blend of learning methodologies, and a focus on personal reflection and dialogue. Such pathways are transformative, going beyond a change in process to affect people at the level of beliefs and values in order to achieve true and lasting behavioural change.

The DSO and the DSP should agree between them the safeguarding learning needs of members and the way these can best be met. All training must follow the structure and methodology set out in the requirements for each module.

Good use of online learning can be made in acknowledged communities, however it needs to be noted that missing out on non-verbal behaviour cues, i.e. that someone is displaying behaviour of distress, or of disinterest can be an issue.

Learning Needs Assessments

A learning needs assessment looks at each role within any community to establish what the training requirements for that role needs to be, and how they can be met. It is acknowledged that some communities will need to access specific training about working overseas, such as that provided by 31:8. A template needs assessment is attached at Appendix D for assistance.

Personal development courses are additional and depend on the career or other development needs of the individual, and particularly for DSPs, thought may need to be given as to how best to engage and join with national Church of England Safeguarding learning and events.

Section 6: Safeguarding yourself and your community

Requirements

6.1 The Leader of a religious community has overall responsibility for ensuring the safety of their community, visitors and premises.

6.2 The DSP is responsible for ensuring that there are processes in place to keep community members and other visitors safe from visitors who may seek to cause harm.

6.3 Working with others, the DSP is responsible for ensuring that there are processes in place to safeguard members when they are working in the community, including where appropriate, risk assessing any premises and activities with regard to safeguarding.

Guidance

Religious communities differ greatly between themselves and do many great things. This section is specifically for those communities which provide some sort of service, be that within their own premises or out in the community. From a risk management perspective, the starting point is to always think “what might go wrong, and how might that be prevented?”, rather than hoping everything will go right. This should not be seen as an “add on” or a tick box exercise, but about how to integrate safer working practices into the mission and the ways of working.

Safeguarding members in the community

Members of communities who work with children or vulnerable adults in the community should already be safely recruited and should be involved in regular supervision discussions. For those members, and for all other members who work in the community, there should also be clear processes to safeguard them as well as those they work with. This will include, as a minimum, details of where the member will be working, who with and how long for. In certain circumstances, it may be necessary to carry out a risk assessment of the environment members will be working in, and ensure basic mitigations are taken, e.g. two people together, telephones etc. The [Safer Environments and Activities policy](#) and the [Code of Safer Working Practice](#) both have more information on this.

Safeguarding buildings and activities

The DSP should work with others to ensure that a basic risk assessment of any premises owned or used is carried out in relation to safeguarding. This is in addition to any health and safety risk assessments which must be completed. This will identify any areas of concern, for example, unsecure or hidden entrances, basic security measures on doors and windows, areas of low lighting, placement and security of toilets etc. Steps can then be taken to mitigate the risks posed by the building itself.

If they are not already been carried out, risk assessments of the activities being carried out should also be completed, again so that the risk of any safeguarding incident arising is mitigated as far as possible. The [Safer Environments and Activities policy](#), and the [Code of Safer Working Practices](#) both have more information on this and [model risk assessment templates](#) are also available.

Section 7: Reporting concerns or allegations

Requirements

7.1 Any concerns or allegations must be made to the DSP in the first instance, unless they are about the DSP in which case they should be made straight to the DSO. In an emergency, always contact the emergency services. A written record of these must be kept.

7.2 The DSP must inform the DSO as soon as possible of any incidents or concerns. The DSP and the DSO will agree the best way forward and inform the Leader.

7.2.1 If the matter is about the Leader, the DSP must inform the DSO as normal and also the Episcopal Visitor.

7.2.2 If a matter is so urgent it cannot wait until after a weekend or Bank Holiday, contact must be made with the police or social services.

7.2.3 It is expected that local protocols will be put in place to address the reporting of concerns, and it must be made clear that reporting a concern to the DSA cannot be overruled by anyone else in the community.

7.3 All members are required to comply with any requests for assistance from either the DSP or the DSO.

7.4 If the DSP is uncertain whether a matter should be raised with the DSA, they should raise it in any event and keep a record of the discussion and the advice from the DSO.

Guidance

When dealing with a safeguarding matter, communities need to be mindful of the guidance set out in the [Responding Well](#) to victims and survivors of abuse guidance and the Responding to allegations code of Practice. These matters will mostly be dealt with by the DSO, and therefore it is important that they are informed as soon as possible. In certain, limited circumstances, the DSO may refer the case to the NST for them to consider. These circumstances might include when the case involved the Leader and was high profile, complex or involving multiple allegations.

The key thing for communities is to recognise what might constitute a situation which requires a safeguarding response, or recognise behaviours, situations or individuals who might pose a risk. This is where being able to observe behaviours and have open discussions becomes important, as this is the opportunity to be able to spot at an early stage where things may need an intervention. This is all part of creating a healthy, safe culture.

Advice on record keeping with regards to safeguarding can be found on the [Church of England website](#).

Please refer to the main [Safeguarding Children, Young People and Vulnerable Adults](#) policy for full examples of the behaviours, signs and situations which may give you cause for concern and which may require a safeguarding response.

If you are in any doubt about whether to report a concern, consult with your DSO and make a written record of their advice.

Complexities for acknowledged communities

Due to the fact that most acknowledged communities do not have one particular “home”, and in some cases have members and provide services throughout the globe, the issue of where to report a safeguarding concern can be complex. This can be decided on a case-by-case basis with communities and their lead DSOs, however it **must** be decided and documented. (Requirement 2.2.3). Subject to local agreements that are already in place and working effectively, the following **principles** should be adopted:

For incidents alleging to have taken place in England:

- The DSO in the diocese where the incident is alleged to have taken place will normally have primacy, accepting they will need to liaise with the DSP and potentially DSOs in other dioceses. Where this is the case, who is going to lead on what should be recorded.
- Where the alleged incident involves an ordained member, the DSA from the diocese that has issued the licence, PTO etc. will need to be informed in case suspension etc. is required.

For incidents alleging to have taken place outside England

- There may or may not be statutory processes in the country in which the alleged event takes place. If there are, then these must be followed.
- The Lead DSA (normally either the DSA in the area where the main base of the community is or the DSA in the area of the Episcopal Visitor) should be informed as

the first point of contact, in order to determine what action needs to be taken. This will largely focus on managing any resulting risk if/when the individual returns to the country, but may also involve suspension, revocation of licence, PTO etc.

- Where the alleged incident involves an ordained member, the DSA from the diocese that has issued the licence, PTO etc. will need to be informed in case suspension etc. is required.

Some communities are of a sufficient size to have their own safeguarding teams and processes, in which case the Lead DSO needs to be informed so they can make a decision as to who will lead on various aspects of the case – it may be that the Community's own processes are all that needs to be followed in some specific cases, providing they are in line with [Chairty Commission](#) good practice.

Trustees

Charity Trustees have specific responsibilities with regards to Safeguarding, which include ensuring that safeguarding is done well within their charity. These are set out in the [Charity Commission](#) guidance, and specifically include:

- Ensuring that policies and processes are in place and regularly reviewed
- Complying with guidance on making Safeguarding Serious Incident Reports to the Charity Commission
- Discussing safeguarding generally at each meeting
- Reviewing any lessons learned

An infographic setting out [10 actions trustee boards need to take to ensure good safeguarding governance](#) is available.

As with all other aspects of governance, the role of the trustees is oversight and assurance – generally they will not get involved with the day to day management of any particular issue. This is, however, much more difficult in very small communities, and therefore some thought needs to be given as to the degree of separation that can be given to Trustees around safeguarding matters. This is important when it comes to dealing with any [Conflicts of Interest](#). Conversely, larger communities may have a [Lead Trustee for Safeguarding](#), who takes the lead in providing that assurance and oversight to the remaining Trustees, accepting that all Trustees maintain responsibility for safeguarding in their community.

Section 8: Serious Incident Reporting to the Charity Commission

Requirements

8.1 Those communities which are charities (or are overseen by and accountable to a charity) have a duty to report any serious incidents (including safeguarding) to the Charity Commission. The Leader must ensure there is a mechanism for doing so in accordance with the House of Bishops' Serious Incident Reporting Guidance for Religious Communities.

8.2 This is in addition to reporting the safeguarding incident to the DSA.

Guidance

For further information on how to identify and report a Serious Incident to the Charity Commission, please refer to the [Guidance for Religious Communities](#).

Section 9: Episcopal Visitors

9.1 The role of the Episcopal Visitor is to:

- 9.1.1 Check safeguarding policies and arrangements, including any self-assessment as part of each Visitation. This includes having regard to the extent to which such policies may already have been reviewed by an independent body.
- 9.1.2 Maintain a record of the safeguarding aspects of each Visitation and share the outcome with the appropriate DSO;
- 9.1.3 Inform the appropriate DSO if they have any safeguarding concerns in relation to the community.
- 9.1.4 Be available to deal with any appeal subsequent to the Community's formal complaints procedure.
- 9.1.5 Develop a sense of whether the community has a safe and healthy culture.

9.2 Where there is a concern relating to the DSP or the Leader of a community, the DSO must inform the Episcopal Visitor.

Guidance

The role of the Episcopal Visitor is set out in the [Handbook of the Religious Life](#), and explains the role as:

“that of episcopal guarantor to the Church at large of the Community's right to the Church's confidence and the Community's guide in maintaining that confidence.”

The Handbook also includes the requirements that safeguarding policies should be reviewed at each Visitation. As such, the Episcopal Visitor is not responsible for dealing directly with any safeguarding matters, in a recognised community this will be dealt with by the Diocesan Safeguarding Officer, and therefore ultimately overseen by the Diocese Bishop. However, the Episcopal Visitor must be informed of serious incidents as they have a duty to ensure that safeguarding policies and processes are in place and are followed. They are also responsible for, and must lead discussions, around how to implement healthy cultures, and must ensure this happens with the Leader and the wider community on a regular (at least annual) basis.

Appendix A – Model role description/person specification for Designated Safeguarding Person

The community's Designated Safeguarding Person (DSP) is the key link between the diocese and the community concerning safeguarding matters.

Person specification

1. Willingness and aptitude to undertake the role, attend the relevant training and undertake their own development in the field of safeguarding
2. Ability to challenge in an appropriate, supportive manner
3. Able to demonstrate why safeguarding is an essential outworking of the Gospel
4. Experience of being able to instigate difficult conversations
5. Able to articulate the need for culture change with regard to safeguarding in the Church as a whole, and in particular to their community
6. Demonstrate an empathetic and professional attitude when dealing with possible allegations of abuse

Role Description:

1. Be familiar with community's safeguarding policy and how it is implemented in local practice
2. Establish positive working relationships with the Diocesan Safeguarding Officer
3. Discuss regularly with the Leader any safeguarding concerns or emerging issues
4. Determine which staff need which level of training and liaise with the DSO to ensure this happens
5. Have an awareness of all activities involving children and vulnerable adults, keep a record of them and assist with the safeguarding risk assessment of these activities.
6. Where appropriate, help the community develop protocols to keep themselves and their visitors safe.
7. Be the first point of contact for any safeguarding concerns the community may have.
8. Help facilitate discussions about what the community sees as a safe culture, what the current barriers are and how they may be resolved.

Appendix B – Example implementation self-audit checklist

	Current Status	Action still to be taken	Lead person	Timescale
Example: <i>Undertake a training needs assessment</i>	Example: <i>Training has lapsed recently, the assessment needs to be completed from scratch</i>	Example: <i>1. Priority for training will be given to:</i> <ul style="list-style-type: none"> • <i>Leadership roles</i> • <i>Those involved in youth work</i> <i>2. All other posts will then be assessed and prioritised according to need</i> <i>3. Training schedule moving forward will be developed and shared with the DSA.</i>	Example: <i>Deborah McGovern</i>	Example: <ul style="list-style-type: none"> • <i>Priority training to be completed by June</i> • <i>Assessment to be completed by September</i> • <i>Schedule to be finalised in October</i>
Section 1				
Amendments to governing documents				
Communication and publicity of new policy				
Review, and if necessary creation of relevant data protection documents				
Implementing the policy – need for and development of local protocols				
Section 2				
Confirming who is the DSP and ensuring they have the correct training				

Communication and publication of who this is and what their role is				
New DSPs to have an induction with the DSA				
Clear protocols in place for communities with more than one diocese/DSA.				
Section 3				
Assessment of which roles need to be safely recruited				
Safer Recruitment training undertaken				
Review of joining processes to ensure they are adequately exploring safeguarding issues				
Agreeing what a “safer culture” means for your community, and identifying what steps need to be taken to achieve that				
Process in place for members to feed in their views about the culture of the organisation				

Section 4				
Training needs assessment carried out				
New and refresher training timelines created where appropriate				
Section 5				
Safeguarding risk assessments/action plans developed for any activities, accommodation, buildings or services				
Processes in place to keep members, visitors and service users (as appropriate) safe				

Appendix C – Creating Healthy Cultures Exercises

C.1 The Pastoral Principles

The [Pastoral Principles](#) were developed specifically to help Christian communities specifically engage in debates around same-sex marriage and the different deeply held convictions that individuals and churches hold on these matters. However, the principles themselves can be adapted to use in any circumstances where honest conversations are needed and different positions are held. Each principle is set out a card (these can be bought or downloaded from the webpage linked above) which offer reflections and questions to think about. The principles are:

- Acknowledging prejudice
- Speaking into silence
- Addressing ignorance
- Casting out fear
- Admitting hypocrisy
- Paying attention to power.

In addition, the whole course is available on-line via the link above. A template to capture your comments and actions is available below,

Date(s) of discussions

Principle	Where are we strong	Where can we do better	Our Action Points	Our Progress
Acknowledging Prejudice <i>What does this mean to us?</i>				
Speaking into silence <i>What does this mean to us?</i>				
Addressing ignorance <i>What does this mean to us?</i>				
Casting out fear <i>What does this mean to us?</i>				
Admitting hypocrisy <i>What does this mean to us?</i>				
Paying attention to power <i>What does this mean to us?</i>				

C.2 Culture Conversation Cube

Based on the six components of a safer, healthier culture as outlined in the book 'Escaping the Maze' by Justin Humphreys and Lisa Oakley⁷, the [Culture Conversation Cube](#) allows you to start conversations about the culture of your organisation. The components are:

- Communicating well;
- Listening well;
- Managing Power;
- Establishing good governance;
- Building effective structures;
- Modelling safe behaviours

⁷ 'Escaping the Maze of Spiritual Abuse – Creating healthy Christian Cultures' – Dr Lisa Oakley and Justin Humphreys, 2019

Date(s) of discussions

Principle	Where are we strong	Where can we do better	Our Action Points	Our Progress
Communicating Well				
Listening Well				
Managing Power				
Establishing Good Governance				
Building Effective Structures				
Modelling Safe Behaviors				

C.3 Spectrum of Behaviour

The Spectrum of Behaviour⁸ ("fruit polos"), and the associated table can be adapted for use within your community. You could think about:

- What does healthy behaviour look like in your community
- What does abusive behaviour look like in your community
- What might be the warning signs that individuals/the community are heading towards being unhealthy?

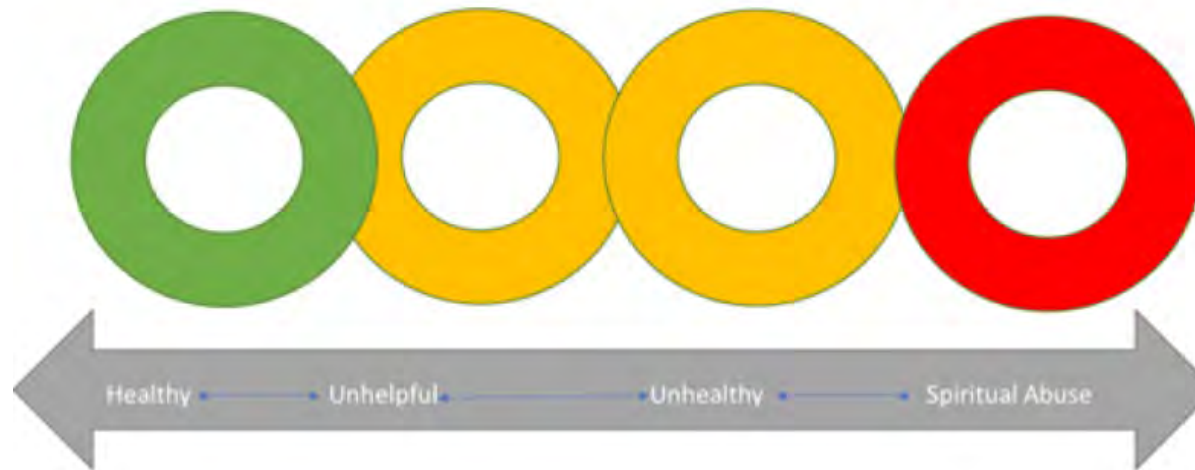
A template to capture your comments and actions is available below.

⁸ Oakley, L: 2021

Date(s) of discussions

Spectrum of Behavior Worksheet

A spectrum of behaviour



[Example from Safeguarding Children and Vulnerable Adults Guidance](#)

	Healthy	Unhelpful	Unhealthy	Spiritually Abusive
Example	<ul style="list-style-type: none"> • Offering spiritual mentorship and support, which is mutually beneficial with agreed boundaries. • Aiming to be self-reflective and self-aware about one-to-one pastoral conversations. • Being aware of the likely power imbalance in a pastoral mentoring relationship. • Possibly having confidential supervision for one-to-one pastoral conversations, or 'checking in' with a third party confidentially about these. 	<ul style="list-style-type: none"> • Being a little too directive in one mentorship conversation. • Being overly defensive when one piece of advice is disagreed with or ignored. 	<ul style="list-style-type: none"> • Requiring the individual to share personal details which they do not wish to share. Going beyond agreed boundaries • Spiritual mentorship or support becoming very directive and difficult to disagree with or not comply with. • Exploring and interpreting personal psychological history to a depth appropriate to a trained counsellor or psychotherapist. 	<ul style="list-style-type: none"> • Consistent pattern of highly controlling and directive mentorship. • Use of scripture to control behaviour consistently. • Using God's name to enforce actions the mentor recommends. • Making someone feel unable or afraid to disagree with any advice given. • Presenting oneself as akin to a professional counsellor, anointed by God for this role, with equivalent skills and competencies. •
Suggested Response	Affirm good practice	If this is a on- off situation, it could be that a little extra pastoral support is needed, or	More robust, formal intervention would be needed at this stage to help the individual move back down the spectrum and	A persistent pattern of such behaviour would constitute spiritual abuse. If this was towards a child of vulnerable

		<p>some help with capability.</p> <p>The response required will in part depend on whether the individual appreciates that their behaviour was unhelpful in that situation. If they don't, this would be a warning flag which might trigger a more robust response (see next column)</p>	<p>prevent them moving forward.</p> <p>This might include, closer supervision, re-training on safeguarding or disagreeing well, coaching, mentoring or counselling.</p>	<p>adult, this would be a safeguarding matter.</p>
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Our Examples

Examples	Healthy	Unhelpful	Unhealthy	Spiritually Abusive

