

GENERAL SYNOD

SAFEGUARDING STRUCTURES

Summary

1. This paper updates General Synod as to the work delivered in response to the motion, as amended, which General Synod passed in February 2025, to:
 - a) thank all those involved in Church safeguarding, particularly the victims and survivors who give so generously of their wisdom and experience, often at great personal cost, and parish safeguarding officers who make sure that safeguarding is a priority in every level and all those who support them in dioceses;
 - b) affirm its commitment to greater independence in safeguarding in the Church of England;
 - c) thank the Response Group for its work for greater independence in safeguarding in the Church of England; and, noting the significant reservations around model 4¹ in paragraph 6² of GS23782 and the legal advice from VVV dated 31st January 2025, endorse model 3 as the way forward in the short term and call for further work as to the legal and practical requirements necessary to implement model 4; and
 - d) lament and repent of the failure of the Church to be welcoming to victims and survivors and the harm they have experienced and continue to experience in the life of the Church.
2. This paper:
 - a) Reminds the General Synod of the context, and the discussion at the General Synod in February;
 - b) Sets out the work delivered since February, in particular to:
 - Set up a programme to deliver the mandate of the General Synod;
 - Engage and explain the decisions of the General Synod; and
 - To make progress on some priority issues in relation to improving local safeguarding complaints processes.
3. The programme team expect to bring to General Synod in February 2026 a substantial report that sets out firm proposals, ahead of legislation.

¹ Throughout this paper, model 3 refers to the organisational model in which some national safeguarding functions are transferred to an external employer which would require transfer of some staff from the National Safeguarding Team (a staff team of the Archbishops' Council), while model 4 refers to the organisational model which transfers safeguarding practitioners from 84 further charities – the Cathedral chapters which are in the Cathedrals Measure, and all diocesan boards of finance – to the same external employer as those being transferred from the National Safeguarding Team. Both models 3 and 4 include the work on scrutiny functions as outlined in this paper.

² [gs-2378-future-of-church-safeguarding.pdf](#)

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Section 1: Introduction

4. Synod will recall that the February 2025 decision followed a series of debates about how best to structure safeguarding in the Church of England. These discussions included noting lessons learned from the creation and termination of the contracts of members of the Independent Safeguarding Board³, models of independent safeguarding proposed by Professor Jay⁴, and the work of a Response Group to consider these inputs and scope prospective structures. General Synod participated in this process of reflection and planning through debates in February 2024, July 2025 and February 2025.
5. This work has been mindful of the needs and experiences of victims and survivors of Church-related abuse and of the children and adults who currently and will in future use Church safeguarding services.
6. As set out in GS2378 this work has considered how best to:
 - a) Protect safeguarding processes and practitioners from actual or perceived conflict of interest;
 - b) Develop a safeguarding infrastructure for the Church of England which is consistent and offers equivalent levels of service in every context and setting;
 - c) Embed safeguarding practitioners and processes locally in order to continue the crucial work of culture change; and
 - d) Make sure parishes and the office-holders and volunteers who serve them are supported well, along with other frontline settings.
7. GS2378 reported findings from research with a wide range of stakeholders which identified:
 - a) Widespread consensus for external scrutiny, expressed as a strong desire to avoid “the Church marking its own homework”;
 - b) Appreciation for the ongoing developments in Church safeguarding, particularly the support offered to parishes and frontline settings and the current audit programme, among others;
 - c) Inconsistent experiences of using safeguarding services depending on the resource and capacity available in each diocese or cathedral, including service delivery and access to complaint processes; and
 - d) Commitment to independent safeguarding in order to minimise the risk of actual or perceived conflict of interest.
8. When considering how best to configure Church safeguarding services in order to make the Church safer for everyone and to support the frontline volunteers in parishes and other settings, General Synod received legal advice about the governance implications of transferring safeguarding staff from charitable entities in the Church of England to an external employer.
9. The request from a number of members of the General Synod for structural changes to be delivered as promptly as possible has been noted. The legislative process requires at least two years and must be preceded by thorough and careful policy development which forms the basis of instructions to legislative counsel.

³ [isb-review-report-30-november-2023.pdf](#)

⁴ [FINAL FOCS](#)

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Synod will recall that such careful and detailed work is required in order to avoid repeating the circumstances of the Independent Safeguarding Board. A timeline is in this paper (paragraph 43).

Section 2: Programme design

10. Since February, the trustees of the Archbishops' Council have considered in detail this mandate from General Synod and have commissioned a three-year programme to:
 - a) design, develop and deliver an independent scrutiny process and mechanisms for better handling of safeguarding complaints;
 - b) design, develop and deliver a new model for independent governance of the relevant transferred elements of the National Safeguarding Team, which is a staff team of the Archbishops' Council;
 - c) to undertake further work to equip the General Synod to make decisions on the future line management and employment of diocesan and cathedral safeguarding practitioners, and;
 - d) to manage the change effectively with all stakeholders including victims and survivors, safeguarding staff locally and nationally, parish safeguarding officers and those external to Church structures and functions.
11. This programme will be known as the Safeguarding Structures programme and will prioritise as its "lead users" the parish safeguarding officers and others who are the frontline of Church safeguarding and who are supported by the safeguarding practitioners affected by the proposals to transfer some roles to external employment and line management.
12. Of equal and extremely high priority are the requirements and expectations of people who have direct experience of Church-related abuse and those who support them. Paragraphs 10 to 18 outline further the engagement and participation methods which will invite and include survivor voices in the work of the Safeguarding Structures programme. The purpose of this is to hear carefully the voices of people who have been failed by the Church in order to create a culture which seeks to prevent further failings and to benefit the children and adults who currently and may in future use Church safeguarding services.
13. The work to deliver this will be funded thanks to the commitments announced by the Triennium Funding Working Group⁵.

Section 3: Governance

14. Delivering the General Synod mandate is a large and complex programme of a scale that we do not regularly undertake in the Church. It involves changes to law, new governance structures, potential transfers of employer and a wholesale change of culture. All of this must be done in a way that carries support across the Church and with victims and survivors, as well as with children and adults who currently or may in future use Church safeguarding services, and is integrated both

⁵ [Major investment in local churches and parish clergy as £1.6bn three-year national spending plans unveiled | The Church of England](#)

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with changes to safeguarding policies (the new Codes of Practice which the General Synod is introducing) and the national Church governance structures in development. We have accordingly thought hard about the right structure and taken extensive advice across the Church and beyond. Our conclusion – which the Archbishops' Council have agreed – is that the best structure for the successful delivery of Safeguarding Structures programme is to set up the scrutiny and operations work as separate projects, and to ensure that it is overseen by a programme board to ensure that they are aligned. This will help to ensure that a change of this scale is delivered effectively and properly communicated. We will do this by creating:

- a) A Programme Board, which is a delegated committee of the Archbishops' Council and therefore includes and reports to Archbishops' Council trustees, to oversee and integrate the highly complex work of all workstreams. The Programme Board will hold together the work of both of the highly substantial workstreams which are overseen by the Project Boards, and will take responsibility for securing the resources required, managing internal dependencies and reporting to General Synod, among other governance functions.
- b) Two Project Boards to take decisions and advise the staff team in relation to
 - Scrutiny of Church Safeguarding
 - Operational Delivery of Church Safeguarding.

Both Project Boards will be chaired by members of the Programme Board, to enable supportive and relational ways of working within the rigour of a highly technical programme which includes some staff transfer.

15. All three of these Boards are scheduled to operate for three years, to take the policy decisions which will form recommendations to Archbishops' Council, the House of Bishops and General Synod and to inform the legislative processes required.

16. The Programme Board will include:

- a) An Executive Chair from an external context, to bring impartial and appropriately challenging leadership based on experience gained in senior leadership of change. The appointment process for this post is supported by external search agency Saxton Bampfylde.
- b) The Lead Bishop for Safeguarding Structures⁶.
- c) Survivors of abuse.
- d) An Archdeacon.
- e) A Cathedral Dean
- f) The Secretary-General of the Archbishops' Council.
- g) Archbishops' Council trustees.
- h) A Church Commissioner trustee.

⁶ The current lead safeguarding bishop's three-year term of office ends in April 2026 and the intention, with the permission of the archbishops, is to continue to hold responsibility for the safeguarding structures work after that point.

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- i) External expert/s in safeguarding.
- 17. All Programme Board members are appointed using the skills matrix (see Appendix 1). Survivor members are offered appropriate levels of support to access and participate in the meetings and decision-making, and are offered honorarium payments in line with Church policy. External members appointed to the Programme Board or to the Project Boards are remunerated on a retainer basis.
- 18. Both Project Boards are populated and appointed similarly, with appropriate external experience to bring technical expertise which is not already available in the National Church Institutions (NCIs) and to bring helpful challenge.
- 19. Where possible, members of all three Boards are appointed following open call for expressions of interest. This is in order to operate a transparent process and to invite people who might not already be known to NCI staff as having an interest in such work. Inevitably, such processes take longer than direct approaches to individuals and so appointing members of three Boards has taken a considerable amount of staff time since February's group of sessions.
- 20. In conjunction with appointments to the governance arrangements, a staff team is being appointed with the requisite range of skills and experience in safeguarding, audit, regulation, procurement, commissioning, communications and engagement, and change management.
- 21. Following rigorous and transparent appointment processes for governance Boards and staff, the Boards are due to commence work from July 2025 onwards. The Safeguarding Structures programme is due to run for three years in order to deliver the development and design work required for new statutory functions and working arrangements, and to bring to General Synod the Measures or legislative documents required to enshrine them in legislation.
- 22. Everyone working on the Safeguarding Structures programme, in a governance or staff capacity, will be fully committed to developing their understanding and experience of trauma-informed working. All will participate in appropriate training at the beginning of their involvement with Safeguarding Structures, whatever prior training and expertise they may have developed, and will continue to develop their practice throughout their involvement with the Safeguarding Structures programme.

Section 4: Scrutiny of Church Safeguarding

- 23. The Scrutiny Project Board are due to hold their first meeting in July 2025 where they will approve their workplan for submission to the Programme Board. This includes:
 - a) Reviewing local safeguarding complaint processes and designing a uniform policy for use by all DBFs and Cathedrals (see paragraphs 34 to 41);
 - b) Procuring a charity partner to assist the Project Board to design an interim end-stage complaint process and to implement it for a period of approximately two years until the new external body is in place;
 - c) Carrying out the policy development work required to design the scope and activities of an external Scrutiny Body, to be established on a statutory basis with powers to compel co-operation. This Scrutiny Body is to be the agency

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which commissions individual or thematic reviews and an ongoing audit process, offers a substantive end-stage complaint process, and develops appropriate accreditation for Church safeguarding practitioners;

- d) Advising the legislative process, via General Synod and Parliament, to implement the statutory framework required to create the external Scrutiny Body; and
- e) Delivering the implementation of the design and foundation of the external Scrutiny Body, with appropriately supportive change management to make sure that colleagues whose roles are directly affected are served well.

Section 5: Operational Delivery of Church Safeguarding

24. The Operational Delivery Project Board will soon approve their workplan for submission to the Programme Board. This includes:

- a) Carrying out the feasibility work required in order to address the questions raised at General Synod in relation to the legal and practical requirements necessary to implement model 4;
- b) Bringing the response to those questions to General Synod for decision as to whether to commission model 4 in addition to model 3 (which has already been commissioned in February 2025);
- c) Carrying out the policy development work required for either model 3 or model 4, depending on the decision of General Synod in relation to model 4 and noting that both models 3 and 4 involve transferring line management of people delivering some safeguarding functions to an external employer;
- d) Advising the legislative process, via General Synod and Parliament, to implement the statutory framework required in order to deliver model 3 or model 4; and
- e) Delivering the implementation of the design and setup of either model 3 or model 4, with appropriately supportive change management to make sure that any and all colleagues whose roles are directly affected are served well.

Section 6: Engagement and participation

25. Since the group of General Synod sessions in February 2025, there has been considerable interest in, and misunderstanding of, the General Synod decision. We have done substantial work with parliamentarians, with the media, and with others to explain the consequences of the decision. Public interest in Church safeguarding has been high, especially in the days immediately following February 2025 General Synod group of sessions, and some people had thought that General Synod voted against independence in safeguarding. We have worked carefully to try to describe and explain General Synod's decision and the mandate this has produced.

26. In light of this, we have considered that the language characterising this as a debate between "model 3" (independent national operations and independent scrutiny) and "model 4" (independent scrutiny and independent national and diocesan/cathedral operations) is no longer helpful. It has become misunderstood that those in favour of model 3 are opposed to independence in safeguarding and

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those in favour of model 4 are not concerned with the counsel and advice of safeguarding professionals, neither of which are true.

27. We therefore describe the work in terms of the two major workstreams, as outlined in paragraphs 10 to 24:
- a) **Scrutiny.** There is widespread consensus that a system of independent scrutiny of the Church's performance on safeguarding is required, with sufficient powers to compel participation, and the task is now to design, develop and implement this.
 - b) **Operational delivery.** There is not yet consensus as to the extent that day-to-day safeguarding operations within the Church of England must be managed within diocesan and national structures and to what extent these must be managed by an external employer. We must therefore develop in detail and implement the work that General Synod has already agreed – independent national operations – and conduct the further analysis General Synod has requested in relation to the legal and practical requirements involved in transferring diocesan and other safeguarding work to a third party, so that General Synod is able to make that decision.
28. Both of these workstreams require intensive and carefully tailored engagement with a wide range of stakeholders to make sure that the safeguarding structures which this programme designs, develops and delivers meet the needs of the parish safeguarding officers and other frontline colleagues and volunteers, and that it appropriately reflects and responds to the requirements of people who have direct experience of Church-related abuse.
29. Ongoing engagement, fieldwork, consultation and information-gathering will be managed and delivered by the staff team, with input and advice from members of the Boards.
30. Engagement with survivors is crucial to this work, and survivors will be involved in the governance of the programme and invited through ongoing engagement methods to contribute their ideas and experience to the development of the work. In particular, this programme will make available opportunities for survivors who do not wish to join online or in-person meetings or to be identified to other survivors. A dedicated member of staff will work directly with survivors and advocacy networks to tailor engagement and participation opportunities to invite involvement appropriately and with meaningful support.
31. Engagement with colleagues whose roles may be directly affected by the work of the Safeguarding Structures programme will be carefully tailored to their needs and preferences. The Safeguarding Structures team have made a commitment to the National Safeguarding Team that we will make every effort to make sure they hear first about anything which is likely to affect them, rather than their hearing from other sources, and have established a rhythm of meetings every three weeks and a weekly email to keep lines of information and communication open. The Safeguarding Structures team have met with the lead trade union representatives and agreed ongoing methods of contact relating to the elements of the programme which are likely to affect staff of the Archbishops' Council.

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32. The webpage on www.churchofengland.org is in the process of being refreshed and updated and will be an ongoing source of information in the public domain for transparency and accessibility⁷.
33. During the three-year period of the Safeguarding Structures programme, major announcements and ongoing updates will be published carefully and with due regard to the effect that this work has on survivors, on people whose roles may be affected, and on the trustee bodies of the various charities involved in this work.

Section 7: Local complaint process

34. An urgent and important priority identified during the work of the last year, as presented to General Synod (GS2378) is to develop a consistent local safeguarding complaint process for use in all diocesan and cathedral settings. This work is well under way, in order to make sure that people can be assured that a safeguarding complaint will be responded to similarly and consistently, wherever in the Church of England they make their complaint.
35. The process to develop the local complaint process began with a desk-based exercise, examining safeguarding complaints processes across dioceses and cathedrals of the Church of England. The wide variation in the content of existing policies, ranging from scope and escalation points to resolution timescales, revealed a wealth of learning opportunities and highlighted numerous examples of good practice. At the same time, this variation underscored ongoing concerns about inconsistency in the experiences of people using safeguarding services in the Church.
36. Following the desk-based assessment, the Safeguarding Structures Team organised information-gathering workshops with a wide range of stakeholder groups throughout early May. These groups included victims and survivors, Diocesan Safeguarding Advisory Panel Chairs, safeguarding advisers, members of the National Safeguarding Team, diocesan secretaries, Cathedral Chief Operating Officers and others. Sessions were facilitated by the Safeguarding Structures Team and a member of the National Safeguarding Team. Workshops with victims and survivors were facilitated by specialist facilitators. All the information-gathering workshops explored four key themes:
 - a) The scope of a local safeguarding complaints policy.
 - b) Individual experiences of making/handling safeguarding complaints.
 - c) Outcomes or remedies that a complainant should expect from a complaint that is upheld
 - d) The recording and monitoring of complaints data to inform service improvements
37. Each stakeholder group brought valuable and distinct perspectives. Survivors supported the notion that there needed to be a clear and publicised definition of a complaint. Some groups and individuals support a broad definition of a complaint encompassing process and outcome of safeguarding cases and investigations. Other stakeholders share concern about the inclusion of outcome in a safeguarding

⁷ [Safeguarding and independence | The Church of England](#)

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complaints policy, noting that an appeals process could call into question the professional opinions of safeguarding teams working to manage risk.

38. An overall picture has emerged that complaints about safeguarding are complex and multifaceted. The concept of “safeguarding complaint” is used widely to mean many different things. By necessity, complaints about different matters need to be handled in different ways. In reality, this has proven difficult to manage where complaints involving safeguarding have involved matters that are not solely safeguarding related, such as conduct issues or data protection complaints. In future, a common framework for triaging and dealing with complaints will also help dioceses and cathedrals to manage a complainant’s expectations and communicate effectively and in a trauma-informed way.
39. In GS2378 it was envisaged that Diocesan Safeguarding Advisory Panel (DSAP) Chairs would become the delivery function for local safeguarding complaints prior to escalation (if required) to the Scrutiny Body for end-stage complaint process (GS2378, paragraph 97d). This option is being tested following feedback from DSAP Chairs and from data protection experts regarding its feasibility. At the same time, other options for delivery are being explored.
40. The Safeguarding Structures Team will hold further workshops in late June, based on the information and insight gathered to date, where various options will be tested and discussed before these are presented to the Scrutiny Project Board for discussion and decision making.
41. The purpose of this work is to make sure that people who are using local safeguarding services in the Church of England can know what to expect and can reasonably assume that their concerns will be addressed fairly and consistently, across dioceses and cathedrals. Therefore, the final stage of this work will be to agree with all diocesan boards of finance (DBFs) and Cathedrals that this policy will be implemented in all dioceses and cathedrals⁸.

Section 8: Timeline

42. An indicative timeline, which is consistent with that presented in GS2378, is presented here. Since February, we have added to this timeline the work required to respond to General Synod’s questions about the feasibility of staff transfer from multiple charities to one single external employer.
43. At this stage, the programme board and executive chair are not yet in place and therefore this timetable is illustrative until they have done detailed work on feasibility. We look forward to their advice and wisdom but until that work has been completed planning should be regarded as provisional. In addition, good practice in programme management requires constant monitoring to identify the right path to delivery. It may prove possible to deliver elements of the change sooner and/ or other elements may need to be delivered later.

⁸ Throughout this paper, “Cathedrals” is used to refer to the Cathedrals covered by Section 52, ‘Application and Extent’, of the [Cathedrals Measure 2021](#).

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	Timeline																																																
	01/2025	02/2025	03/2025	04/2025	05/2025	06/2025	07/2025	08/2025	09/2025	10/2025	11/2025	12/2025	01/2026	02/2026	03/2026	04/2026	05/2026	06/2026	07/2026	08/2026	09/2026	10/2026	11/2026	12/2026	01/2027	02/2027	03/2027	04/2027	05/2027	06/2027	07/2027	08/2027	09/2027	10/2027	11/2027	12/2027	01/2028	02/2028	03/2028	04/2028	05/2028	06/2028	07/2028	08/2028	09/2028	10/2028	11/2028	12/2028	
Set up and project governance																																																	
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General Synod Dates 2027-2028																																																	
Scrutiny of Church Safeguarding																																																	
Local complaint process																																																	
Interim end-stage complaint process:																																																	
Scrutiny Body design																																																	
Legislative development (drafting and deliberations)																																																	
Implementation planning and delivery																																																	
Operational Delivery of Church Safeguarding																																																	
Feasibility of model 4																																																	
General Synod decision on model 4																																																	
Implementation of staff transfer (including legislation if required)																																																	

The Right Revd Dr Joanne Grenfell, Bishop of Stepney and Lead Bishop for Safeguarding Structures

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Appendix 1

Skills Matrix for Safeguarding Structures Programme Board

Skill, competency or experience	All members must have	At least one member must have	More than one member must have	At least half of members must have
Commitment to delivering mandate from General Synod	x			
Knowledge and experience of safeguarding policy or practice	x			
Senior leadership experience of safeguarding within social work, health services, local government or other setting where safeguarding services are delivered or referred to		x		
Personal experience of abuse perpetrated in a faith setting (accompanying support is offered to Board members who have this experience)			x	
Understanding of safeguarding in the context of the Church of England				x
Experience of leadership in context of commissioning and procurement			x	
Experience of major (public or charity sector) reorganisation or change management, including transfer of staff via appropriate processes			x	
Experience of working at a leadership level within an audit, ombudsman or regulatory type body or similar.		x		
Experience and understanding of the functions, structures and powers of regulatory and scrutiny type bodies.		x		

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Experience in law, particularly in areas relevant to the Church's operations and governance		x		
Experience of people/culture leadership, particularly in contexts where people are likely to become directly affected by processes to transfer staff		x		
Experience of working on controversial and/or sensitive issues	x			
Sensitivity to the trauma that victims and survivors of abuse within the Church of England have experienced	x			
Experience of designing, developing and implementing new functions and organisations.			x	
Christian faith				x
Ability to think innovatively and creatively about complex problems	x			
Strong experience of operating within complex risk frameworks				x
Experience of engaging with a diverse range of groups and individuals to solve complex problems	x			
Experience of developing policy and/or legal frameworks	x			
Knowledge of monitoring and evaluation frameworks				x
Ability to interpret data and empirical research inputs in order to make major decisions	x			
Previous experience of serving on boards or committees	x			