



social care  
institute for excellence

# **St. Edmundsbury & Ipswich diocese independent safeguarding audit (April 2016)**



The Social Care Institute for Excellence (SCIE) improves the lives of people who use care services by sharing knowledge about what works.

We are a leading improvement support agency and an independent charity working with adults', families' and children's care and support services across the UK. We also work closely with related services such as health care and housing.

We improve the quality of care and support services for adults and children by:

- identifying and sharing knowledge about what works and what's new
- supporting people who plan, commission, deliver and use services to put that knowledge into practice
- informing, influencing and inspiring the direction of future practice and policy.

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

**Diocese of St. Edmundsbury &  
Ipswich**

Audit undertaken 26, 27 and 28 April 2016

**Meiling Kam, Lucy Erber, Hugh Constant  
and Edi Carmi**

First published in Great Britain in August 2016  
by the Social Care Institute for Excellence and the Church of England

© Church of England

All rights reserved

Written by Meiling Kam, Lucy Erber, Hugh Constant and Edi Carmi

**Social Care Institute for Excellence**

Kinnaird House  
1 Pall Mall East  
London SW1Y 5BP  
tel 020 7766 7400  
[www.scie.org.uk](http://www.scie.org.uk)

# Contents

<b>1</b>	<b>INTRODUCTION.....</b>	<b>5</b>
1.1	Context and background .....	5
1.2	The Diocese.....	5
1.3	Structure of the Report.....	5
<b>2</b>	<b>OVERVIEW.....</b>	<b>6</b>
2.1	What is working well .....	6
2.2	What needs to work better? .....	6
2.3	Considerations for the diocese.....	7
<b>3</b>	<b>FINDINGS.....</b>	<b>9</b>
3.1	Safeguarding Management.....	9
3.2	Diocesan Safeguarding Advisor.....	9
3.3	Diocesan Safeguarding Management / panel .....	11
3.4	Policies, practice Guidance and Procedures.....	12
3.5	Resources of safeguarding service .....	13
3.6	Recording systems and IT solutions .....	13
3.7	Risk assessments and safeguarding contracts / agreements .....	14
3.8	Training.....	15
3.9	Safe recruitment of Church Officers.....	17
3.10	Response to allegations.....	18
3.11	Quality of casework.....	18
3.12	Complaints.....	19
3.13	Whistleblowing .....	19
3.14	Monitoring of safeguarding in parishes as part of Archdeacon's responsibilities.....	20
3.15	Resources for children and vulnerable adults .....	21
3.16	Quality assurance processes .....	22
3.17	Links with national safeguarding strategy and team .....	23
<b>4</b>	<b>APPENDIX: REVIEW PROCESS.....</b>	<b>24</b>
	Limitations of the audit process .....	25

# 1 INTRODUCTION

## 1.1 CONTEXT AND BACKGROUND

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

The audit of the Diocese of St. Edmundsbury & Ipswich was carried out by Meiling Kam (the lead auditor for this Diocese) and Lucy Erber on 26, 27 and 28 April, 2016. This report was written by Meiling Kam with support from Lucy Erber and Hugh Constant with quality assurance provided by Edi Carmi, the overall auditing lead.

## 1.2 THE DIOCESE

The Diocese of St. Edmundsbury & Ipswich lies within the area of Suffolk County Council and covers 1,200 square miles. Two thirds of the Diocese is rural, although two thirds of the population live in the urban areas, according to the assistant diocesan secretary and safeguarding officer. There are 454 parishes, some of which consist of small congregations. Due to the numbers of parishes with small congregations, a number have been joined into what are known as benefices. The 125 benefices are ministered to by around 118 stipendiary clergy and 44 self-supporting ministers. The demographic make-up of the Diocese tends towards an older population, although there are significant numbers of children and young people attending church. According to the diocesan website, 19,000 people attend church and there are 88 church schools. The cathedral is located in Bury St. Edmunds and the diocesan office in Ipswich. The Diocese is relatively new in so far as it was formed in 1914 from part of Norfolk, Ely and Chelmsford.

## 1.3 STRUCTURE OF THE REPORT

This report is divided into:

- Introduction.
- An overview of what is working well, areas for improvement, and a summary of considerations for the Diocese.
- The findings of the auditors: the auditors have made links with the S. 11 (Children Act 2004) audit form, completed by the Diocese as part of its self-audit process, dated 2012 and 2016.
- Considerations for the Diocese are listed, where relevant, under each finding section.
- An appendix sets out the review process and the limitations of the audit.

## **2 OVERVIEW**

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

### **2.1 WHAT IS WORKING WELL**

The Diocese falls conveniently within one local authority and one police force, facilitating close relationships between the safeguarding officer and local agencies.

The well-established and stable safeguarding management structure of the assistant diocesan secretary and safeguarding officer along with the systems put in place to support multi-agency working have provided a sound foundation for multi-agency working.

The Bishop's Safeguarding Panel (BSP) has been in place since 2009 and has a broad and robust membership which includes all key safeguarding agencies and an active Independent Chair who is clear about his role and input.

The Diocese as a whole appeared to the auditors to be open and willing to learn from past cases and the experience and views of others, with self and external audit. This was illustrated by their regular section 11 audits, training evaluations and a peer review process with another diocese.

The content of the training is up to date and there are good links with the Care Act, the Mental Capacity Act, and Equality Act. It appears equally balanced in covering both children and adults at risk.

From the cases reviewed, the handling of allegations was appropriate and timely as was the casework and its recording.

The Diocese recognises the need to have a policy and training on social networking. It has established a link to a site intended for children, young people, parents and teachers on e-safety and it is drafting guidance.

The diocesan involvement in the Local Safeguarding Children Board's section 11 audits in 2012 and 2016 is an example of this close working relationship, and demonstrates the progress of the Diocese safeguarding arrangements.

### **2.2 WHAT NEEDS TO WORK BETTER?**

The many years of financial overspend and the current review of spending could potentially bring a level of uncertainty and may impact on whether the safeguarding officers feel they can ask for more resources for safeguarding. However, to date, this has not been a problem.

Both the safeguarding officer and assistant safeguarding officer lack professional supervision.

There is no complaints procedure or policy in place.

Information provided at the focus group indicates there have been some issues around allegations of bullying and the responses to such allegations. This linked to concerns expressed that the culture was not open to whistleblowing.

The monitoring and quality-assuring of safeguarding at the parish or benefice level, through the role of archdeacon/rural deans, could be made clearer. This is explained in the Findings section.

The safeguarding links with the Cathedral are in the process of being strengthened further with their representation on the Bishop's Safeguarding Panel (BSP) and closer working with the assistant safeguarding officer.

## 2.3 CONSIDERATIONS FOR THE DIOCESE

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

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

- Both Assistant Diocesan Secretary (Operations) and Safeguarding Officer ADSSO and Assistant Safeguarding Officer (ASO) to access professional supervision: a suitably experienced social work manager should have the appropriate training and skills to undertake this role.
- Consider whether or not there is a potential conflict of interest in terms of independence, arising from the ADSSO being a lay minister: the National Safeguarding Team to be consulted on this.
- Maintain the commitment to safeguarding even in a climate of financial review and overspend.
- Invite a representative from the Cathedral to sit on the Safeguarding Panel.
- Table the core safeguarding document, 'Protecting all God's Children' for the next Synod meeting, or as soon as is feasible.
- Review the Diocesan Register of Safeguarding Policies and Procedures and ensure it is aligned with the key documents published at national level.
- Liaise with the National Safeguarding Team about the progress in adopting national policies and the preference for some local ones over the national policies.
- Ensure that Synod and the Board of Finance are aware of the key documents and adopt them as appropriate to the Diocese.
- How to work more proactively with safeguarding officers at the parish level – this could involve the use of networks and focus groups.
- Review the extent that information is collated and used to obtain an accurate safeguarding picture of progress in the Diocese, and use this to inform the safeguarding strategy.
- Evaluate the use of the risk assessment form, once approved by BSP.
- Refresh the paper-based induction training to reflect the language and intention of the face-to-face training.

- Consider how to track and refresh the training of those working closely with children, young people and adults at risk of abuse or neglect.
- Consider how to monitor the 'no training, no licence' approach.
- Consider how to involve senior clergy in training as a way of encouraging the take-up of training.
- Review the arrangements in place in relation to safer recruitment of clergy in line with both House of Bishops' Safer recruitment 2015 and the most up-to-date Guidance on Personal Files relating to Clergy.
- Formulate an action plan to work with the Cathedral to facilitate closer working relationships in regard to safeguarding matters.
- Initiate a benchmarking exercise with a diocese with a similar demographic profile in relation to number of cases.
- Develop and publish a complaints procedure with clear stages and indication of who to complain to. The procedure should refer to Clergy Disciplinary Measures and reflect the requirements of the House of Bishops' recommendations.
- Formally distinguish between complaints and whistleblowing.
- Provide the option of a postal submission, by adding an address to the current information.
- The Bishop's Safeguarding Panel to consider the concerns raised in this audit about bullying and plan how they can best be both assessed and then addressed.
- Consider how to develop the monitoring and quality assurance of safeguarding, including safe recruitment, in all parishes through the visitation process.
- Develop a plan to enable the views of children and vulnerable adults to be heard and this should inform both service delivery and practice.
- Review the section 11 audits undertaken for the local authority to make sure it works in tandem with s.11 audit developed by the national safeguarding team.
- Consider how the role of Rural Dean, the Archdeacon role and the safeguarding advisor role can work together to quality assure safeguarding at the parish and/or benefice level.

## 3 FINDINGS

### 3.1 SAFEGUARDING MANAGEMENT

With regard to the current situation, the Bishop acknowledges his responsibility for safeguarding in the Diocese. He is supported by the Assistant Diocesan Secretary (Operations) and Safeguarding Officer who is the Bishop's Safeguarding Officer (here after the ADSSO) and a part-time (20 hours a week) Assistant Safeguarding Officer (ASO). The Diocese also had a service level agreement with Suffolk County Council for its LADO (Local authority designated officer) to provide professional advice and assistance and training, until the arrival of the ASO.

The Diocese has experienced a period of uncertainty with regard to its senior leadership. Firstly, it was without a bishop for 18 months and it experienced a change of bishop prior to that due to a 'promotion'.

The Suffragan Bishop of Ely (The Bishop of Huntingdon) 'acted up' during the interregnum until the current Bishop came into post in June 2015. Added to this, the Diocesan Secretary has been absent for much of the last two years due to long-term health issues.

There is currently a review of diocesan spending, structure and governance following a historical financial overspend in the Diocese. However, both the Bishop and his senior team have indicated that the funding for safeguarding will remain a priority,

The Bishop's Safeguarding Panel (BSP – see 3.3) takes an active part in managing safeguarding and advising the Bishop, reporting annually to the Bishop's Staff. The Bishop does not have a clergy lead for safeguarding although the ADSSO is a lay minister and a senior member of his administrative staff, as well as Secretary to the BSP (see section 3.2 for discussion about the ADSSO and ASO role).

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

### 3.2 DIOCESAN SAFEGUARDING ADVISOR

There are 37 hours a week of paid Diocesan Safeguarding Advisor time allocated between two posts. The ASO has 20 hours and is responsible for case management, liaison work and training and the Assistant Diocesan Secretary (Operations) has 17 hours for his role as Safeguarding lead (ADSSO). The ASO is line managed by the ADSSO.

The ADSSO has been in post for 12 years. His professional background is as a JNC-qualified youth and community worker and has a Bachelor of Theology and postgraduate qualification in management. His role is to continue to work on policy, to line manage the ASO, to cover in the event of absence and to lead strategically on safeguarding ensuring there are appropriate resources available. He is a member of the diocesan office senior administrative staff team and is line managed by the Diocesan Secretary and in his absence the Deputy Diocesan Secretary. He is also a lay minister (see below for discussion about the job).

The ASO has been in post since November 2013. The post-holder is a police officer by professional background and is familiar with the locality through his previous role in the Police Child Protection Unit. He was previously involved in the safeguarding training provided to the Diocese by Suffolk County Council via a service level agreement. The two post-holders work well together in the event of the absence of

one or the other. Both roles have direct access to clergy files and other confidential materials.

Both roles are clearly outlined in job descriptions. The ADSSO's role as a lay minister and possibly as Assistant Diocesan Secretary raises the need to consider his ability to demonstrate professional independence in accordance with A4.9 of 'Protecting all God's Children':

*'The advice-giving part of the role must be provided by a person professionally qualified in the practice of safeguarding children. He or she should be able to demonstrate professional independence.....'*

The key question is whether the lay minister role impacts on the ability to offer independent professional safeguarding advice without any conflict of interest.

Neither the ADSSO nor the ASO have professional supervision; this is something they are aware of and are trying to address. As a social work perspective is missing at this level, the Diocese might wish to consider whether someone with a social work background and safeguarding experience might complement the existing skill set through supervision.

Both the ADSSO and ASO have indicated that they work over and above their paid hours according to the needs of the Diocese. They also indicated that they tend to be reactive to situations rather than proactive. They put this down to the lack of capacity to visit individual parishes, for example, or link with parish safeguarding officers. One parish safeguarding officer in the focus group said that she wished she had had training in the role (as opposed to training in safeguarding) before taking on the post.

As it stands, there is enough funding and resources to fulfil DSA safeguarding responsibilities in terms of reacting to current demand. There has been some innovation in creating more capacity through the 'train the trainer' initiative outlined in the training section of this report. Moving forward, the Diocese may have to consider whether 37 hours of DSA time is sufficient to the task in view of the increasing requirements nationally, such as the 'Practice Guidance: Safeguarding Learning and Development Framework' (2016) and the need to be more proactive in relation to parishes.

There was some concern that the years of financial overspend and the current review of spending would impact on whether the ADSSO felt able to ask for an increase in spending. However, the auditors were assured by the Bishop and his senior team that funding would be made available to meet requirements.

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

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

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

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

### **Considerations for the Diocese**

*Both ADSSO and ASO to access professional supervision: a suitably experienced social work manager should have the appropriate training and skills to undertake this role.*

*Consider whether or not there is a potential conflict of interest in terms of independence, arising from the ADSSO being a lay minister: the National Safeguarding Team to be consulted on this.*

*Maintain the commitment to safeguarding even in a climate of financial review and overspend.*

### **3.3 DIOCESAN SAFEGUARDING MANAGEMENT / PANEL**

In this Diocese the panel is called the 'Bishop's Safeguarding Panel' or BSP. This is well established, having been formed in 2009, and is independently chaired, with membership consisting of:

- Independent Chair
- the Diocesan Bishop
- Assistant Diocesan Secretary (Operations) (ADSSO)
- Assistant Safeguarding Officer (ASO)
- Assistant Diocesan Secretary (General)
- Diocesan Registrar
- Suffolk County Council local authority designated officer for children ( LADO)
- Suffolk County Council Adult Safeguarding Manager
- Suffolk Police Public Protection Unit Rep
- rural dean or clergy rep
- a representative of laity
- a safeguarding administrator/ committee clerk is in attendance.

According to its terms of reference, 'The purpose of the Panel is to provide strategic support and guidance to the Diocesan Bishop and diocesan officers and staff operationally engaged in the management and delivery of Safeguarding.' It also has specific responsibilities, for example, with regard to overseeing the implementation of actions arising from safeguarding audits.

The Bishop is part of the panel and attends the quarterly meetings and therefore has a direct relationship with this group.

The role of independent chair is a voluntary appointment of the Bishop on a two-year tenure. The Chair since 2014 was Chief Constable in the Suffolk Police prior to his retirement. He is currently a member of the parole board and is trained in risk assessment. He believes he spends about half a day a week in the role of Chair. He sees his role as providing advice to the Bishop and leading the BSP in line with its terms of reference. He describes the panel as active and involved, with everyone reading the documents before and offering input consistently. He also attended a

national meeting of diocesan independent chairs in London and was able to link in with the work of other chairs.

The ADSSO is the senior lead on safeguarding and was involved in setting up the panel and creating links with police, probation and local authority. He attends the Diocesan Synod in accordance with his duties as Assistant Diocesan Secretary.

The auditors noted that there was no representative from the Cathedral on the Panel. They felt if this could be addressed this might strengthen the links between the Cathedral and the Diocese in regard to safeguarding.

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

### **Considerations for the Diocese**

*Invite a representative from the Cathedral to sit on the Safeguarding Panel.*

## **3.4 POLICIES, PRACTICE GUIDANCE AND PROCEDURES**

The Diocesan Synod has not officially accepted the House of Bishops' main document on safeguarding ('Protecting all God's Children') and the ADSSO is alerted to the need to table it for Synod as soon as possible.

The Diocesan Synod has not officially accepted: 'Responding to Serious Safeguarding Situations Relating to Church Officers 2015'. They told the auditors that they have an Allegations Management Protocol which they reviewed and felt worked better for them than the 'Responding to Serious Safeguarding Situations'. They told the auditors that they had already informed National Office of this.

Similarly, 'Safeguarding Records: Joint Practice Guidance for the Church of England and the Methodist Church 2015', has not been adopted. The Diocese may wish to inform the National Safeguarding Team that this is in process.

The Diocese, at the suggestion of the BSP chair, has created a Diocesan Register of Safeguarding Policies and Procedures. This register identifies the relevant safeguarding policy with its date and any renewal date if appropriate. The auditors felt that the register was a good idea and suggest that it should be updated/populated with a current list of documents in order to be in line with National Office or its own organisation as opposed to the local authority. The auditors are aware that the BSP will need to consider and agree the proposed changes and that there is a process for bringing documents to Synod and the Board of Finance.

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

### **Considerations for the Diocese**

*Table the core safeguarding document, 'Protecting all God's Children' for the next Synod meeting, or as soon as is feasible.*

*Review the Diocesan Register of Safeguarding Policies and Procedures and ensure it is aligned with the key documents published at national level.*

*Liaise with the National Safeguarding Team about the progress in adopting national policies and the preference for some local ones over the national policies.*

*Ensure that Synod and the Board of Finance are aware of the key documents and adopts them as appropriate to the Diocese.*

### **3.5 RESOURCES OF SAFEGUARDING SERVICE**

There is one full-time safeguarding administrator responsible for administering DBS checks and safeguarding training; collating training evaluations; booking training rooms etc. This appears to be working well.

The auditors were initially concerned that given the current overspend, safeguarding expenditure might be reduced. However, they were clearly informed by the Bishop and his senior team that this would not be the case. They were also told that spending applied for had been agreed. The ADSSO and the Assistant Diocesan Secretary (Human Resources and Administration) described to the auditors the ADSSO's responsibility to request further resources. This works well as the ADSSO, being also the Assistant Diocesan Secretary (a member of the diocesan office senior administrative staff team), is well placed to articulate the need for resources.

The auditors were told that the Diocese had asked for their safeguarding audit to be an early one in order to inform the spending review, should gaps be identified. The ADSSO told the auditors of his concern that perhaps they were being reactive rather than proactive as a result of the lack of finance in the Diocese, and this is something they may need to consider in relation to capacity.

The ASO, when asked to describe what safeguarding might look like if there were no financial considerations, said he felt there was 'no time to get around the parishes to see what the parish safeguarding officers were up to', and that a 'proactive' approach would be his ideal way forward. However, capacity was an issue given the existing work load.

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

*How to work more proactively with safeguarding officers at the parish level. This could involve the use of networks and focus groups.*

### **3.6 RECORDING SYSTEMS AND IT SOLUTIONS**

This section addresses recording practice and systems.

Records of who has had a DBS check and when it is due for renewal are held centrally and managed by the Safeguarding Administrator. The Diocese has been using an electronic system for DBS checks for the past year. Similarly, a record of training is kept centrally.

Clergy and lay staff are trained together and the ADSSO was able to tell the auditors how many people had been trained annually and within that how many are clergy. It was unclear, however, how they would collect information on other church officers and how they would track the follow-up training. The auditors noted the poor take-up of training by those granted PTO (Permission to Officiate) by the Bishop, evidenced in the annual national return. They were unclear whether this was to do with the way information was recorded, whether the people holding PTOs had been trained elsewhere, or whether in fact there was very poor take-up. This is discussed in more detail in the section on training.

Casework records are kept and stored safely in an unmarked cabinet in an office with a keypad. There are two keys to the cabinet.

Clergy blues files are kept at the Bishop's Office and safeguarding files relating to laity and clergy at the Diocesan Office.

Mention was made of an information management system proposed by National Office as a way forward in terms of managing information and using it to shape a safeguarding strategy.

The auditors noted two issues which are closely inter-related. The first is how information is collected and the second is what is done proactively with that information. For example, in the annual return to National Office, it is noted that there are 190 clergy with 72 of them having taken the safeguarding training in the past three years and 202 readers holding the Bishop's licences, with 29 having taken the training. This was explained by the fact that some of the figures were entered differently and this was partly corrected at the audit visit. (See 3.8, training section).

The ADSSO and ASO need to satisfy themselves that the information they collect is accurate and they also need to use it to act on it accordingly.

Similarly, the information relating to policy documents and DBS renewal tracking needs addressing as the annual return showed 'no' to the question of whether there is a central process for renewing DBS checks. The auditors have been informed that the information can be generated centrally, but there is no capacity to implement updating. As a consequence, parishes are asked to maintain records and request renewals as required, for those still in post after 5 years.

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

### **Considerations for the Diocese**

*Review the extent that information is collated and used to obtain an accurate safeguarding picture of progress in the Diocese and use this to inform the safeguarding strategy.*

## **3.7 RISK ASSESSMENTS AND SAFEGUARDING CONTRACTS / AGREEMENTS**

The ASO has drafted a format and procedure for risk assessments. However, this document is in draft form because members of the Bishop's Safeguarding Panel have asked for minor changes before agreeing it.

The chair of the BSP has had training in risk assessment and a background that includes being on the Parole Board. His insight has helped to quality assure the format for the assessment process. He has suggested that risk assessment is one thing that could benefit from national input in terms of having a standard form and he was able to present this idea to National Office at a meeting of panel/ DSMG chairs in London. The form developed by the Diocese is more detailed than the suggested template in 'Risk Assessment for Individuals who may Pose Risk to Children or Adults (2015)' and the Diocese may benefit from monitoring what works best for their locality.

Risk assessments undertaken by police and probation of convicted offenders informs the safeguarding agreement that is signed by the offender and all those overseeing it within the church. The auditors saw one agreement following a risk assessment and it was signed by all the stakeholders. These are reviewed annually.

The ADSSO told the auditors that one of the questions asked of convicted offenders about to be released was whether they planned to worship and where. The auditors felt this was a good example of how well the links with statutory partners work in this Diocese and this could be used as an example of good practice.

The auditors note that the ASO has recently undertaken training in risk assessment and this together with the form and scrutiny from the BSP will make the process more transparent.

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

### **Considerations for the Diocese**

*Evaluate the use of the risk assessment form, once approved by BSP.*

## **3.8 TRAINING**

The auditors were given access to:

- a paper-based safeguarding training tool used for induction in the Diocese
- slides relating to safeguarding training delivered face to face for a variety of roles
- A series of evaluations of the face-to-face training delivered in a variety of settings between October 2014 and February 2015.

The above information was very useful evidence of the quality of the training that is being delivered. The auditors were of the opinion that the slides were current and had appropriate reference to the Care Act 2014 and Mental Capacity Act 2005 as well as to whistleblowing. The slides have been badged and approved by Suffolk County Council and have a good balance between child and vulnerable adult safeguarding. The slides for the face-to-face training were updated with an appropriate extension to contextualise discrimination.

Feedback from the focus group was that the training was very good and that it covered domestic abuse well. Similarly, the evaluations noted different venues, very well attended courses and some adjustments over a period of time in relation to time allowed for discussion. It was felt that the paper-based induction could be updated to reflect the language and practice evidenced in the slideshow and this was accepted.

Training is rolled out to clergy, church officers and laity together, with the result that it is difficult to note who has done the training and when their next update is due. The ADSSO was able to tell the auditor how many clergy had done the training (80 per cent). However, from the annual return it looked as if few clergy with PTOs had taken the training and similarly, few lay readers.

It is suggested that the ASO or ADSSO extract this information (training by role) in order to formulate a strategy around the roll-out of the training. Similarly, the Bishop has commendably initiated the stand that no safeguarding training means no PTO or license will be granted. The auditors suggest that this is a good starting point to address the issue of the poor take-up of training by clergy with PTOs, and that the implementation of the 'no safeguarding training, no license' policy will need to be monitored.

The auditors were told that there was an issue relating to capacity to roll out training and a 'train the trainer' programme was brought in where eight trainers were

recruited and trained. The ASO has implemented quality assurance in so far as he observes the first two sessions each trainer delivers. Furthermore, each participant fills in an evaluation form and these are collated by admin support and reviewed. The ADSSO and ASO discussed impending changes to training brought about by National Office and the additional resources that would be required to implement it.

The auditors noted from the evaluations that training had taken place at the cathedral, but they were unable to tell who attended as the information was not part of the evaluation. However, as part of the wider strategy, this information should be extracted in order to ascertain who is attending and who needs to be reminded.

The auditors learnt from the focus group that there was an annual refreshing of safeguarding training for all roles (staff and volunteers) at the parish level on the initiative of a parish safeguarding officer. This was felt by the group to be practice worth following. The same parish safeguarding officer was also able to explain how she managed to engage an isolated parish and recruit a safeguarding officer.

The auditors note that no senior clergy are involved either in the roll-out of training or input into the content. They wonder whether this might be an opportunity they should consider as a way of integrating safeguarding into ministry so it develops as part of something clergy normally do. It may also motivate more PTOs to take the training.

It is worth noting that the current Bishop has been the head of a theological college and has sat on the National Safeguarding Training Taskforce. His perspective on training would be an additional resource as he will have an idea of what works with regard to the education of clergy as well as being able to point the direction of travel for the Diocese.

It is further suggested that the ADSSO and ASO familiarise themselves with the detail of 'Practice Guidance: Safeguarding Learning and Development Framework' (2016) in order to plan for any resource implications that might be required to meet this expectation.

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

*And to part 8: Those working closely with children, young people and adults experiencing, or at risk of, abuse or neglect ...have safeguarding in their induction and are trained and have their training refreshed every 3 years.)*

### **Considerations for the Diocese**

*Refresh the paper-based induction training to reflect the language and intention of the face-to-face training.*

*Consider how to track and refresh the training of those working closely with children, young people and adults at risk of abuse or neglect.*

*Consider how to monitor the 'no training, no licence' approach.*

*Consider how to involve senior clergy in training as a way of encouraging the take-up of training.*

### 3.9 SAFE RECRUITMENT OF CHURCH OFFICERS

The auditors reviewed eight clergy files: the quality of these in safe recruitment terms was variable.

One from 2014 had all the basic clearances such as DBS check and references, but concerns were raised by one referee who recommended that the person not work with children. This, together with complaints from parents around this person's behaviour, led to the auditors requesting the file be reviewed against other recent concerns. The ASO had been asked to review the information and reopen this case.

In a second file from 2014, the auditors were unable to find references or an application. In a third file, no references or application were evidenced. However, there was reference to the process being followed by a series of emails and a confirmation from the previous Bishop of that person's status.

In a fourth file, it read as if the person was 'asked' into the post prior to 2013. The auditors were unable to establish whether a proper recruitment process took place and there was no evidence to suggest that it had. This same person was later charged with 'historical abuse' and given a custodial sentence. It is interesting to note too that that the main appointment carried another 'attached' appointment of acting as police chaplain which gave the person unofficial access to police data. It is hard to say whether a safe recruitment process would have prevented this situation from arising however, best practice would be to align with the current national guidance on safer recruitment and the Bishop has indicated that he is taking this on board.

All of the blue files reviewed indicated current DBS clearance, but not necessarily linked to the original post they applied for. This suggests that it was done after appointment.

From the files viewed, the auditors felt that safer recruitment needs to be better evidenced and the practice aligned with the House of Bishops' recommendations (see reference below). Furthermore, it would make sense for all files to have a check-list at the front that tells the person reviewing the file whether there are any safeguarding concerns and if possible, the name of the post, references and job application.

The auditors were told that the Bishop's Office (as opposed to the Archdeacon) was now responsible for clergy recruitment and the Bishop would be implementing safer recruitment in line with House of Bishops' Safer Recruitment 2015 as well as following Guidance on Personal Files Relating to Clergy and this would suggest that the Diocese is taking this on board.

The auditors only had time to review two lay files and these were both in order.

The auditors were made aware of a concern regarding implementing safer recruitment at the parish level. This came through a parish safeguarding officer in the focus group and was passed on to ADSSO and ASO. It is detailed in Section 3.14 (the monitoring of parishes in the archdeacon role).

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

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

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

*Review the arrangements in place in relation to safer recruitment of clergy in line with both House of Bishops' Safer Recruitment 2015 and the most up-to-date Guidance on Personal Files relating to clergy.*

### **3.10 RESPONSE TO ALLEGATIONS**

The case files reviewed suggest a good quality response in terms of timing, action and outcome. The auditors were also struck by the good partnership work with police, probation and county council demonstrated in the files. They explored the lack of social work perspective and felt that this was addressed in some measure by the direct access to the Local Authority Head of Safeguarding on the Bishops Safeguarding Panel. They considered that this could be further addressed through professional supervision by someone with a social work background (see 3.2 diocesan safeguarding officer).

The auditors noted one case of concern that had been referred in from the Cathedral. The man making the allegations had disclosed his information to senior clergy at the cathedral, but it was only some weeks later that an actual referral to the DSA was forthcoming. The man concerned returned to the Cathedral as no action had been taken and again made his disclosures to the head of HR – who immediately referred them to the ASO.

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

*Formulate an action plan to work with the Cathedral to facilitate closer working relationships in regard to safeguarding matters.*

### **3.11 QUALITY OF CASEWORK**

It was stated from the start by the ADSSO that the Diocese was 'case-light', meaning there were fewer cases than one might expect. This was apparent from the list sent from the Diocese and from the files. For example, there was only one Safeguarding Agreement reviewed, and several of the files relating to adults were, in effect, pastoral matters, rather than safeguarding issues. The auditors were unable to say why the Diocese was 'case-light' and whether it was simply something particular to the size and demography of St. Edmundsbury and Ipswich. One suggestion is that they benchmark themselves against another diocese with a similar demographic profile.

From the files reviewed, both auditors felt the quality of the casework was good, as was the recording. Both auditors were able to understand what had happened and what the outcome was. They felt the cases were well presented, easy to follow and appropriate in outcome. The decision-making was sound with appropriate advice sought from the LADO and appropriate safeguarding referrals to the local authority 'customer service'. A fairly prompt response was noted from the LADO and from customer service, for example, in relation to whether the referral met the threshold.

### **Considerations for the Diocese**

*Initiate a benchmarking exercise with a diocese with a similar demographic expect in relation to number of cases.*

## **3.12 COMPLAINTS**

The auditors were unable to locate a specific procedure for those wishing to complain about the handling of a safeguarding issue. They were given access to a complaint concerning the ASO and whilst this was dealt with fairly and promptly, they had no way to judge whether a process had been followed or not. The auditors were advised that a human resources process, in consultation with employment specialist lawyers, was followed and documented, as the ASO is an employee of the Diocesan Board of Finance.

A clear distinction was not made between whistleblowing and complaints.

Moreover, any subsequent complaints procedures produced by the Diocese will need to make reference to the Clergy Disciplinary Measures as required by the House of Bishops' recommendations referenced below. This has the advantage of showing people that the Church has a process for calling their clergy to account, not closing ranks and dealing fairly with complaints against their members.

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

### **Considerations for the diocese**

*Develop and publish a complaints procedure with clear stages and indication of who to complain to. The procedure should refer to Clergy Disciplinary Measures and reflect the requirements of the House of Bishops' recommendations.*

## **3.13 WHISTLEBLOWING**

The auditors were shown information on how and when to whistle blow about poor practice (created in 2014, and undated in 2016) and this was available on the website with information about a range of people to contact. The information does not formally distinguish between complaints and whistleblowing. It allows for a telephone call but not a postal submission, which may be an obstacle for some who wish to use this process.

The existence of bullying was mentioned in the focus group discussion and in an individual interview.

In the individual interview, the interviewee reported knowledge of an incumbent being bullied by the previous incumbent, along with the mention of the recent introduction of a bullying policy.

In the focus group, a person raised the issue in relation to two parishioners being bullied by an incumbent. The group discussed this in some detail and another person referred to the tendency to 'close ranks' if problems were raised.

A third person in the group said that the new Bishop has made it clear that a culture of bullying would not be tolerated, but others suggested that the Bishop was referring to the specific bullying of an incumbent by two parishioners.

The auditors had a sense that several people did not feel that the environment was supportive of whistleblowing, although they were aware that individuals could ultimately 'write to the Bishop'.

Such a perception of the culture is a concern, as it could discourage people from coming forward to disclose any current or historic safeguarding issues. Due to these issues being raised the auditors suggest that the Bishop's Safeguarding Panel, with its external membership and challenge, would be the appropriate place to consider and plan how such perceptions of a bullying culture can best be assessed and addressed.

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

### **Considerations for the Diocese**

*Formally distinguish between complaints and whistleblowing.*

*Provide the option of a postal submission, by adding an address to the current information.*

*The Bishop's Safeguarding Panel to consider the concerns raised in this audit about bullying and plan how they can best be both assessed and then addressed.*

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

The auditors were told that the Rural Deans mainly undertake visitations in this diocese. The questionnaire /enquiries are usually completed before the triennial visit and the parish chased up if it is not submitted and any safeguarding issues brought to the attention of the ADSSO or ASO immediately. Information such as DBS checks and who has been appointed is collated centrally on the information system, 'my diocese'.

In reviewing the template '2016 Articles of Enquiry from the Archdeacons of Suffolk and Sudbury', the question relating to safeguarding asks the parish to fill in the name and address of the PSO (parish safeguarding officer). The auditors felt that this might be a gap in the quality assuring of safeguarding as it only flagged up the existence of a safeguarding officer or not as opposed to the quality of the work. The Archdeacon with whom the auditors spoke felt that the question about parish safeguarding officers was always answered but he worried if people really understood. He said that most parishes/benefices had a safeguarding officer but it was hard to know 'how good they were'.

The auditors were told that some parishes were so small they struggled to fill even the role of churchwarden and thus a short form identifying the officers and then a box for comments was the most expedient way to gain information prior to a visitation.

However, not all the parishes are small and the Diocese may wish to consider how the safeguarding officers, the rural deans and archdeacons could work strategically and proactively to quality assure safeguarding. The advantage of having Articles of Enquiry that pose more detailed questions about safeguarding is that it formalises the process of quality assuring within the visitation process. However, it is acknowledged that this might unbalance the form in relation to the other legal requirements covered by the visitation, and due consideration would have to be given to creating a form that works for the Diocese.

The auditors were made aware within the focus group of a specific individual parish concern regarding implementing safer recruitment at the parish level, which was passed on to the ADSSO. The auditors were of the view that individual parishes may not have got the message about the importance of DBS checks, and may require clear leadership in the importance of taking references and recording concerns in relation to, for example, their youth workers. The auditors were unable to comment further as an audit of parishes was not within the scope of their visit. However, the Section 11 audit (dated 2016) noted that there is limited auditing of parish recruitment (6.3) and this might be an issue. Moreover, there is an action to review whether more detailed training on this is required (6.2). The Diocese may wish to consider both what the focus group concern was in relation to safer recruitment and what the section 11 audit has captured.

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

### **Considerations for the Diocese**

*Consider how to develop the monitoring and quality assurance of safeguarding, including safe recruitment in all parishes, through the visitation process.*

## **3.15 RESOURCES FOR CHILDREN AND VULNERABLE ADULTS**

There are five Authorised Listeners and the ADSSO explained, Listeners are offered to anyone who has made a disclosure. There is also a Listener who has been trained and tasked with listening to offenders.

The auditors were able to meet with two Authorised Listeners, one of whom was a trained counsellor, another had held a similar role prior to retirement. There is a page of information on the website that describes the role and explains that the person will be trained and receives professional supervision during the time they are required to 'listen'.

To date, none of the Authorised Listeners have been used so far, even though they are offered automatically.

The auditors were told that a listening exercise had been conducted with children and young people at parish level regarding 'how safe they felt'. The auditors were unclear how information from this was collated and used to inform how safeguarding was perceived at this level.

It was suggested that going forward this might be a useful exercise to undertake periodically with both children and vulnerable adults. However, it was recognised that parish safeguarding officers might need to be consulted on how to feasibly do this.

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

### **Consideration for the Diocese**

*Develop a plan to enable the views of children and vulnerable adults to be heard and this should inform both service delivery and practice.*

## **3.16 INFORMATION SHARING**

The auditors acknowledge that there is good partnership working and it comes about from the initiative of ADSSO over the past ten years. The auditors note that there are both structures, processes and key relationships to support information sharing. These were largely put in place by approaching the County Council and other agencies to agree structures and relationships that facilitate multi-agency working.

It is noted also that the ASO attends a regional DSA forum as well as Suffolk County Council Adult Safeguarding Board and a sub-group of the Safeguarding Children Board. He is also part of both their training and education subcommittees. Both ADSSO and ASO attended the national office safeguarding forum and were able to discuss the national initiatives and requirements.

In her conversation with the auditors, Suffolk County Council Head of Safeguarding commended the partnership work with the ADSSO. She told the auditors that it was reciprocal in so far as she was able to access advice and assistance in order to connect with other faith groups, indicating the reach of the ADSSO.

The ADSSO has been proactive in getting an information-sharing protocol implemented with partner agencies (police, probation) as this became an issue in the last couple of years. The MAPPA (Multi Agency Protection Arrangements) information-sharing Agreements/Memorandum of Understanding for Norfolk and Suffolk Constabulary are currently being reviewed and the Diocese awaits a decision.

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

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

## **3.16 QUALITY ASSURANCE PROCESSES**

The auditors note that in terms of quality assurance (QA), the BSP provides a QA role as it regularly reviews individual cases being worked on by the ASO.

The case peer review process offers a measure of quality assuring of the casework. This is a process whereby the safeguarding advisor in another diocese reviews a case and makes recommendations which are formally accepted or not.

The Diocese has undertaken section 11 audits in 2012 and 2016, as part of their Local Safeguarding Children Board (LSCB) section 11 audits<sup>1</sup>. These have proved to be a valuable tool in self-assessment and demonstrated progress being made for

---

<sup>1</sup> Section 11 of the Children Act 2004 places a statutory duty on key people and bodies to make arrangements to safeguard and promote the welfare of children.

example in relation to the issue of equality and diversity. The audits are complete with actions and key responsibilities identified.

The auditors considered the section 11 for the local authority against the House of Bishops' recommendations and found them to be similar. What is different is the specific reference to the structure (House of Bishop, Synod, Clergy Disciplinary Measures). The specifics could be reviewed to ensure that it works in tandem with the House of Bishops' recommendations.

Both the ASO and the Archdeacon have voiced concerns about not being sufficiently informed about what is happening at the parish level regarding safeguarding. This may be the point where a joint strategic approach could be considered as to how to monitor and quality assure the work in parishes as well as share good practice.

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

*Review the section 11 audits undertaken for the local authority to make sure it works in tandem with s.11 audit developed by the national safeguarding team.*

*Consider how the role of rural dean, the archdeacon role and the safeguarding advisor role can work together to quality assure safeguarding at the parish and/or benefice level.*

### **3.17 LINKS WITH NATIONAL SAFEGUARDING STRATEGY AND TEAM**

The auditors note that because the links with Suffolk County Council are strong and as the national team has been in existence for a relatively shorter period of time, there may have been a tendency to refer to the County Council in the first instance.

However, there is a realisation that it may be time to forge closer relationships to the national team. The different policy documents being used suggest this would be helpful as this may be a priority for the Church, even though it is unlikely to be so for the County Council.

It is recognised that this relationship with the national team is developing. Both the ADSSO and the ASO spoke of the national safeguarding forum they attended recently and now feel more in tune with the direction of travel of the national team.

## **4 APPENDIX: REVIEW PROCESS**

### **DATA COLLECTION**

#### **Information provided to the auditors before or during the audit:**

- Annual return to national office
- S.11 audits, 2012 and 2016,
- Annual reports to Bishops Council
- Past Case Reviews
- Statistical returns to National Office, 2015
- Local procedures, policies and practice guidance for safeguarding
- Minutes of BSP 2015,2016
- Details of Authorised Listeners including JD
- Governance, structure and job description of DSA , Independent Safeguarding Chair
- Information on safeguarding training 2015 as well as an evaluation of the face-to-face training

#### **Participation of members of the Diocese**

The auditors had face-to-face conversations with:

- assistant safeguarding officer
- assistant diocesan secretary and safeguarding officer
- an archdeacon and Chair of Diocesan Board of Education
- the assistant diocesan secretary (General & HR) representing the DS
- the diocesan bishop
- the independent chair of the Bishop's Safeguarding Panel
- head of safeguarding, SCC

#### **The parish focus group comprised:**

- a churchwarden
- a rural dean
- assistant curate
- a diocesan safeguarding administrator
- a lay minister in training
- a parish SO
- a parish administrator
- a trained trainer
- a volunteer coordinator

### **The audit: what records / files were examined?**

Ten case files were reviewed and associated blue files (where relevant) were viewed. The auditors were unable to review the recruitment of a lay post that was the focus of an allegation as it was held at the parish. In retrospect, it would have been helpful to have access to the file.

Eight blue files were reviewed in relation to safer recruitment.

### **Limitations of the audit process**

One of the blue files took some time to review as the person was the subject of an allegation and this then had to count as one of the eight personal/clergy files viewed.

The youth worker/ trainer who was set to attend the focus group was unable to attend it at the last moment and this was seen as a limitation as the Diocese has a major (independently run) project with youth. This was not known in advance and thus another such invitation was unable to be made.