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**Safeguarding Review
Diocese of Bristol
(Final Report)**



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Barnardo's Consultant – Steve Kelly

Steve Kelly is the author of this report and completed the review. Steve has worked with BTC since May 2010 in which time he has undertaken consultancy work with a wide variety of organisations from government departments, local authorities and the businesses/ voluntary sector.

From 2006 – 2010 Steve was the Business Manager for Knowsley Safeguarding Children Board during which time he managed the transition from Area Child Protection Committee to Local Safeguarding Children Board which received most positive comment from an Ofsted inspection in February 2010 which achieved an 'outstanding' Safeguarding rating.

From 1976 – 2006 Steve was a Police officer in Merseyside. In 1993 he was tasked to establishing the first Child Protection & Domestic Violence Unit in Liverpool and continued in that field of Police work having influence in the development of police and multi-agency procedure and practice locally, regionally and nationally.

Safeguarding Review – Diocese of Bristol Report by Steve Kelly

Executive Summary

The factors that led to this review being commissioned are detailed in the body of this report. Most significant to me was *‘The desire of the Bishop of Bristol to effect a “step change” in relation to the promotion of safeguarding and to ensure the Diocese is far more confident and proactive in its approach’*

This ‘desire’ was further stated by the Bishop on the Diocese’s website in announcing this review he explained, *‘We want to give confidence to parish churches that they have effective safeguards in place and confidence to communities we serve that children, young people and vulnerable adults are safe and their wellbeing is enhanced in the life of the Church’.*

Throughout this review process in conversations with individuals and groups at all levels in the Diocese I have been struck by the common ‘desire’ to make improvements where required, to develop what is good and to be proactive in demonstrating the measures being taken to make the Church a safe and caring place.

As well as the planned interactions through the widely circulated questionnaire, one-to-one meetings and focus groups I have been contacted by many others who wanted to contribute to the process, both internal and external to the Diocese, with their experiences, expectations and expertise. I am truly grateful for the contributions and support I have received through this process and would want to take no individual credit for any of the proposals made within this review report as these have been reached by means of the consensus of thought processes and contributions to the review.

Two other significant events occurred during the life of this review:

- The publication of the revised version of Government guidance, ‘Working Together to Safeguard Children’(2013), which clearly outlines the expected safeguarding standards for Churches as being at the level of statutory agencies
- The circulation of the final report regarding the Diocese of Chichester and the accompanying ‘Checklist for Bishops’.

The former of these directed the way I undertook the review setting the standards against which to measure current performance and the latter serving to endorse many of the proposals made herein and the direction of travel for the Diocese of Bristol.

The majority of the proposals made are to do with the Leadership and Accountability and if implemented should facilitate the ‘step change’ which is required. The formalisation of accountability frameworks and a strategic approach to safeguarding at all levels will be required. The establishment of a Safeguarding Steering Group (with multi-agency involvement) which will advise and support the Diocese on issues related to all vulnerable groups has been introduced successfully elsewhere and needs to be introduced in the Bristol Diocese. Similarly the introduction of a single clearly defined role of Diocese Safeguarding Advisor suitable resourced and support should be expedited.

Proposals have been made to introduce auditing processes which will support the parishes as well as provide evidence to the Bishop that systems are in place and are effective in their implementation.

Issues relating to communication and how messages are communicated effectively, internally and externally, featured significantly and the establishment of a communication strategy is seen as a way to improve this. Linked to this were the unclear lines of reporting of safeguarding concerns, the paucity of clearly recorded procedures to be followed, as well as the need to develop improved partnerships with other safeguarding organisations both statutory and non-statutory. Recording practice on both staff and case files needs to be improved and would be immediately enhanced by the introduction of a secure computer system, which would enable the tracking of cases and the efficient provision of management and case information.

It is apparent that the Diocese has benefitted from the provision of good quality training and proposals are made on how this could be enhanced and targeted better by linking a training strategy to the accountability framework, as well as using training/ workshop events to promulgate new guidance/ procedure and allowing for the sharing of existing good practice between parishes.

The proposals have been collated in an action plan with a proposed timescale for implementation. It is important that the Diocese takes ownership of this and identifies the actions required and by whom, in order to achieve implementation. (In a small number of cases the proposals will need consideration at national level.) Though the proposals may appear numerous they should not be considered daunting as other Diocese have walked a very similar path and, as I have found within this review process, are very willing to share their experience and good practice. Above all there is a clear 'desire' within the Diocese which I feel confident can drive the necessary change and achieve the most positive outcomes.

Steve Kelly, Safeguarding Consultant

The Commission

The Diocese had determined that an external and independent review of its complete safeguarding function was required in order to ascertain how best to implement and support effective safeguarding arrangements in the Diocese of Bristol.

The timing of this review was influenced by the following factors:

- The absence of any ongoing review mechanism for safeguarding and lack of steering group/ accountable body.
- The recent changes to vetting and barring and introduction of the DBS
- The increased national awareness concerning abuse and widespread suspicion of the Christian Church in relation to safeguarding issues, most recently given credence by abuse cases in the Diocese of Chichester.
- The desire of the Bishop of Bristol to effect a "step change" in relation to the promotion of safeguarding and to ensure the Diocese is far more confident and proactive in its approach.

- The unexpected early retirement of the Diocese’s Child Protection Officer in December 2012, who has been the safeguarding lead since 1998; the need to review where that leadership has taken the Diocese; and the opportunity to look at how safeguarding provision is staffed or resourced.

Terms of Reference

The following terms of reference were agreed.

To review current safeguarding provision in the Diocese of Bristol and make recommendations on how future provision should be made by:

1. Reviewing current safeguarding provision, procedures and practices against the desired provision using face to face interviews, focus groups, questionnaires, and desk top reviews as appropriate.
2. Assessing that against the desired provision.
3. Identifying any further areas of desired provision the Diocese has not identified.
4. Identifying key challenges, areas to develop and areas to improve.
5. Making recommendations on how the Diocese might go about delivering this provision in a way that:
 - is cost-effective;
 - ensures each area has credibility with internal and external stakeholders;
 - separates the provision of different areas appropriately.
6. Outline what management information will be required to know we are achieving these aims.

Introduction

Historically, and sadly in some areas currently, there has been a reluctance to embrace the ethos of Protecting Children & Vulnerable Adults within faith communities often due to a belief that Churches are made up of ‘good people’ and that ‘that type of thing wouldn’t happen in our setting’. This has resulted in such communities falling behind the pace of protection and safeguarding developments and expectations and where issues have arisen the response has been reactive and has resulted in negative publicity and damage to image.

The reality is that Faith communities, more than other organisations, need to be more alert as they openly welcome ‘all God’s people’ and there is an implicit expectation that whilst within that setting everyone will be safe and treated with care and respect. Unfortunately by not wholly embracing the ethos of ‘protection’ and the developing principles of Safeguarding’ the Church has made itself more vulnerable to influences which put, particularly the most vulnerable, at increased risk.

It is, in my opinion, only by adopting a pro-active approach to Protection & Safeguarding that Churches can provided the safest possible environment for employees, volunteers and those who attend in order to minimise risk of harm and respond swiftly and effectively when required.

There are those who would prevaricate and indeed it has been said to me during this review, that Safeguarding is all well and good but the Church cannot be constricted in its work by the constraints. Yet I would suggest that ALL the principles of good and effective Safeguarding are underpinned and demonstrated within the Bible.

Legislation

It is important at the outset to be clear on terminology and key legislation which outlines protection and safeguarding responsibilities in relation to both children and vulnerable adults.

The Children Act 1989 provides legislation regarding the ‘protection’ of children who have suffered or are at risk of suffering significant harm in relation to the 4 recognised types of abuse (physical, sexual emotional & neglect) and the concept that ‘the interests of the child are paramount’.

Safe from Harm (1994) – was the earliest, and still current, code of practice for voluntary organisations (including the Church) and set out principles and guidance the welfare of children with whom they work.

The Children Act 2004 introduced the duty for organisations to cooperate in order to ‘safeguard and promote the welfare of children’ and the concept that ‘safeguarding is everyone’s responsibility’. Safeguarding and promoting the welfare of children is defined as:

- protecting children from maltreatment;
- preventing impairment of children’s health or development;
- ensuring that children are growing up in circumstances consistent with the provision of safe and effective care;
- and undertaking that role so as to enable those children to have optimum life chances and to enter adulthood successfully.

‘Working Together to Safeguard Children’ (Developing Government Guidance March – latest update 2013) is a guide to inter-agency working to safeguard and promote the welfare of children updated earlier this year. The guidance sets out Government expectations on the Church in terms of responding to critical incidents and the embedding of safer processes and training. This latest version prescribes the same Safeguarding requirements on Churches as it does on other statutory agencies within Section 11 of the Children Act 2004. (Appendix 1)

The protection of **Vulnerable Adults** demands considering the nature of vulnerability and support needs of the individual concerned. The **Human Rights Act (1998)** provides the principles to which we should adhere in providing adults with Choice & Control, Safety, Health, Quality of Life, Dignity & Respect.

‘No Secrets’ (DoH 2000) and **‘Safeguarding Adults’**, published by the Association of Directors of Social Services in 2005 provides national guidance for practitioners and standards for effective multi-agency working.

In addition there have been a number of National Church publications which have provided guidance on the various protecting and safeguarding roles within the Church.

Protecting All God's Children (2004 & 2010) promoted the commitment to principles including the care the care, nurture of, and respectful pastoral ministry with, all children and all adults and to safeguarding and protection of all children, young people and adults when they are vulnerable.

Promoting A Safe Church (2006) provided a policy and guidelines for safeguarding vulnerable adults in line with the policies and procedures developed over the previous ten years for the safeguarding of children and was consistent with the 'No Secrets' and 'Safeguarding Adults' guidance mentioned previously.

Responding to Domestic Abuse (2006) provided guidelines to inform, direct and equip ministers, readers, pastoral assistants and anyone else who may be entrusted by survivors or perpetrators of domestic abuse to hear their story and offer the most appropriate care.

Responding Well (2011) provided a new policy and good practice for churches to respond well to those who have been sexually abused and sets out firm expectations for the quality of response to be made by those responsible at parish, diocese and national level. It highlighted the need for each diocese to appoint carefully chosen, competent and trained people who will be able to be 'authorised listeners' for those who disclose, in particular for those who disclose abuse from within the church community.

Safeguarding Guidelines relating to Safer Recruitment (2010) provided clear guidelines, consistent with Safer Recruitment Principles on the selection and training of anyone with responsibility within the Church.

Methodology

Questionnaire

The starting point was to develop and circulate a Questionnaire (See Appendix 2) which was circulated to over 700 Clergy and Lay People with key roles in the Diocese. In total over 100 completed questionnaires were received and a précis of the collated response is available at Appendix 3 and a list of those parishes represented by the response at Appendix 4.

Within the Questionnaire there was an opportunity for respondents to request a one-to-one conversation with the author of this report which was taken up by 9 respondents. In addition the Author was approached separately by 4 individuals who had not completed the questionnaire but wished to contribute to the review process.

Focus Groups

Two Focus Groups were conducted during a site visit, one with clergy and one with ‘Nominated Persons’ providing a representation from across the Diocese.

Individual Interviews

During Site visits I have had individual interviews with the Bishop’s of both Bristol & Swindon, the Archdeacon of Malmesbury, Advisor for Licensed Ministry, Diocesan Secretary, Bishop’s Chief of Staff, Diocesan Director of Education and Diocesan Office Manager. In addition I also met with the Children & Youth Officer and the part-time Safeguarding Officer.

External Contacts

As agreed with the commissioners contact has been maintained with the Church at a national level through which helpful contacts with other Dioceses have been developed.

In addition contact has been made with statutory safeguarding agencies/ partners across the Diocese and conversations had with key professionals.

Confidentiality

All those who have contributed to the review, whether through one- to –one interview, telephone conversation or focus group have been assured of confidentiality as to the attribution of their individual comments in this report subject to the expected conditions within the Safeguarding arena.

Limitations of the Review

It is with regret that, because of the limitations of scope of the review and time scales set it has not been possible to visit individual parishes nor, more significantly, to engage with children, young people or vulnerable adults. In recognising this I will be proposing, in the strongest terms, that these groups are appropriately consulted and allowed to contribute meaningfully to any planned work to take forward Safeguarding within the Diocese. (See Section 7 below)

File Audits

As part of the review I have been given access to files related to on-going enquiries related to both Child & Vulnerable adults. In addition I have visited the Bishop’s Office and perused ‘Blue Files’ in relation to Clergy as well as files related to retired clergy and ‘Permissions to Officiate’. I have also seen evidence of the ‘Past cases Review’ undertaken by the Diocese in 2008/9. The file review part of this was by no means extensive but sufficient to examine and test practice and procedure and draw inferences.

Documents

I have been furnished with and also accessed many documents which have informed national and local practice and guidance as well as articles which reflect the wider perception of the Church particularly in relation to its response to Safeguarding related matters. Included within these are:

- Safe & Sound
- Chichester Interim Report & Final Report (incorporating ‘Bishops’ Checklist)
- Independent Review of a Safeguarding Complaint for the Diocese of Winchester
- Policies & Procedures
- Training programmes
- Existing Job Descriptions for CP & VA
- Diocesan Strategy

It is not unusual that, whilst conducting such a review as this, matters arise which raise questions and concerns about practice and procedure in relation to current or past cases. This review has been no different and a number of such concerns have been raised and referred to the Diocesan Secretary who has, to the best of her ability, set in place actions to alleviate the concerns.

The Review Report, Findings & Proposals

The original tender from the Diocese outlined 9 areas it believed it needed to have in place in order to have effective safeguarding provision:

1. Advice and support to diocesan leadership
2. Policies, guidelines and procedures for parishes
3. Facilitating safe recruitment practices
4. Safeguarding training
5. Awareness raising and communications
6. Offender and case management
7. Relationships and support for survivors of abuse
8. Relationships with statutory agencies
9. Proper oversight and management controls

I have decided, particularly as the latest version of Working Together to Safeguard Children (2013) prescribes the same Safeguarding requirements on Churches as it does on other statutory agencies within Section 11 of the Children Act 2004, to structure this report within an agency audit format which lays out the expected standards within each of the following areas and provides a measure of where the Diocese currently stands as well as the future development required in order to provide a safe environment for children, young people and vulnerable adults.

1. Leadership & Accountability
2. Policies & procedures
3. Recruitment & Selection
4. Training & Development
5. Complaints & Allegations
6. Information Sharing
7. Listening to Children, Young People & VA

1. Leadership & Accountability

Standards:

There will be a named senior manager with clearly defined role and responsibilities in relation to safeguarding

There is a named senior manager(s) who champions safeguarding throughout the organisation.

Everyone in the organisation knows who this person is

The organisation has a clear written accountability framework, which covers individual, professional and organisational accountability.

Staff understand to whom they are accountable and what level of accountability they have.

Staff working with vulnerable groups receive regular supervision and appraisals.

The organisation has in place a programme of internal audit and review that enables them to continuously improve the protection of vulnerable groups from harm or neglect.

Service plans consider how the delivery of services will take account of the need to safeguard and promote the welfare of vulnerable groups.

1.1 Organisational Structure

As with any aspect of operation, for Safeguarding to be successful and effective, committed and unequivocal leadership is essential. Alongside this there needs to be a clear accountability framework which identifies lines of communication, roles and responsibility from top to bottom within the organisation. Within this there will be key roles with very specific responsibilities and all of this needs to be communicated and understood both internally and externally.

Such leadership and accountability needs to be underpinned by policies and procedures which are unambiguous and implemented robustly and fairly/ equally by everyone.

My findings are that currently leadership on Safeguarding by the Bishops Staff is more implicit than explicit. Safeguarding is not currently considered as a strategic focus. Documents such as the Diocesan Strategy 'Releasing the Energy' missed the opportunity to make Safeguarding a clear priority albeit identifying areas covered such as 'structures of oversight and support' which would naturally incorporate good safeguarding practice.

If the step change of approach from 'reactive' to 'pro-active' is to be achieved then the message should come clearly and unequivocally from the top and openly communicated personally, in written and electronic format. It is strongly proposed that a member of the Bishop's Staff is identified to be the Strategic Safeguarding Lead for the Diocese.

A starting point would be drawing up a Safeguarding Accountability Framework for the Diocese which clearly lays out at each level of the organisation (including Directors of the Board) the safeguarding roles, responsibilities, and lines of accountability. This in turn will link into the Training Strategy referred to later (See 4 below)

The importance of such a Framework cannot be understated and was a key focus of Lord Laming in his inquiry into the death of Victoria Climbié (2003) *'The single most important change in the future must be the drawing of a clear line of accountability, from top to bottom, without doubt or ambiguity about who is responsible at every level for the well-being of vulnerable children'*.

Consideration should be given to developing a Safeguarding Strategy which outlines the commitment of the Diocese to Safeguarding and draws together all the key safeguarding processes (e.g. recruitment & selection, training, allegations management & audit) in order 'that children, young people and vulnerable adults are safe and their wellbeing is enhanced in the life of the Church.'

Alongside this a Communication Strategy should be developed to ensure that key messages are promulgated effectively at all levels within the Diocese as well as utilising the Diocese's website and local media to proactively highlight what good work is being done to make Church a safe and welcoming environment rather than waiting to defend negative reporting. Any safeguarding strategy will not be fully effective unless accompanied by a robust communication strategy.

Proposals

- Draw up a Safeguarding Accountability Framework for the Diocese incorporating key roles and responsibilities and lines of communication/ reporting
- A Safeguarding Strategy should be developed including a Communication Strategy to ensure that key messages are effectively communicated internally and externally.
- A member of the Bishop's Staff should be identified as the Strategic safeguarding Lead for the Diocese
- Bishops and Archdeacon should utilise Parish & Archdeacons Visitations as an opportunity to promote Safeguarding messages

1.2 Diocesan Safeguarding Advisor(s)

The critical role within any organisation is that of the 'Safeguarding Lead' whether in relation to Child Protection (CP), Vulnerable Adult (VA) or both. The situation to date whereby two part-time roles, one carrying 14 hours (CP) and which is currently vacant and the other 10 hours (VA) is clearly insufficient when you consider the extent of the roles and the level of demand placed upon the role holders. It is commendable, though not ideal, that post holders commit more time to the role than that for which they are paid (even allowing for additional hours for risk assessment) and this is acknowledged and appreciated by many.

I have been provided with existing job descriptions exist for both CP & VA posts (review dates 2009 & 2010 respectively) these lack clarity on the extent and limitations of the roles and there is evidence that some case work has become unnecessarily complicated because of this blurring of roles particularly in relation to the provision of support to victims and alleged perpetrators. In more than one case brought to my attention the lack of role clarity resulted in over involvement by coordinators and complaints being made against them which precluded their ability to remain involved in the case.

Feedback provided as part of this process about the current roles is mostly positive although recurring themes of the 'lack of availability' for advice and also the provision of 'inconsistent' and 'unreliable' advice was not uncommon.

It would be my view that the separation of the CP & VA roles is not always helpful. Indeed the similarity of processes in relation to both areas of work is striking and does not require extensive experience of BOTH areas in order to carry out the role.

I would suggest that serious consideration be given having a single Diocesan Safeguarding Advisor (DSA) post and realistic and informed scoping be undertaken as to whether this should be a full-time post and also the levels of administrative support required. Clearly a single person post would raise resilience issues (annual leave, sickness etc) but these could be overcome by establishing cross-border 'mutuality' arrangements with DSA or similar in neighbouring Diocese which could in turn have benefits in relation to mutual support networks, information sharing and cascading good and best practice.

A Job Description should be drawn up which has clarity for the postholder and is specific as to the role including the duty to challenge appropriately within the organisation, and specific expectation re how they operate within investigations and the clear lines of reporting and accountability. In addition the Person Specification should be prescriptive of the necessary qualifications, skills and expertise in the fields of both CP & VA in order to fulfil the role.

It is also crucial that those who are carrying out key safeguarding roles are supported and receive appropriate supervision on both welfare and case management matters. The current position where the former Child Protection Officer and the existing Officer covering CP and VA receive all their supervision from the Diocesan Secretary is inappropriate particularly in that the Secretary recognises her broad skill base does not include case management on safeguarding related matters. My proposal in relation to supervision is that 'line management' for issues such as leave, sickness etc. would be the responsibility of the Diocesan Secretary but casework supervision and professional development would be provided by someone with relevant and current safeguarding experience, perhaps through the Diocesan Safeguarding Steering Group (see below).

The existing lines of communication to the Bishop on Safeguarding matters appears ad hoc and somewhat unstructured with those having a safeguarding role (either Child or Vulnerable Adult) having access when required but no formal reporting mechanism or requirement. Senior staff expressed their anxieties about not being well briefed on safeguarding cases. It is vital that the leadership has knowledge and a current understanding of critical and potentially serious safeguarding matters and are updated as a matter of routine. The current ad hoc system provides only intermittent updates and leaves the Bishop often uncertain of how matters are progressing.

The inclusion of Safeguarding as a standing item on the Bishop's Staff meeting with reports from the SDA presented through the Strategic Safeguarding Lead or in person by the SDA ensuring that senior management are regularly and routinely appraised of Safeguarding matters without compromising other business of the Group.

1.3 Administrative Support – Key within the role of the DSA will be the provision of sufficient administrative support. When deciding to what extent this will be resourced consideration should be given to the following issues:

- Support to manage and carry out DBS (CRB) processes
- Support for the provision of, attendance at and evaluation of training
- Support for the DSSG
- Support for the DSA in ensuring the quality, storage and sharing of information

Safeguarding Budget – it is important that an adequate budget is allocated to safeguarding work within the Diocese including training as well as staff costs for the DSA and sufficient administrative support. The adequacy of this budget will be reviewed annually by the Diocesan Safeguarding Steering Group (see below)

Proposals

- A single role of Diocesan Safeguarding Officer is established covering CP & VA
- A realistic and informed scoping is undertaken to make a case for this role being allocated sufficient hours/ full time.
- Job Description & Person Specification is stringently drawn up considering the roles and responsibilities to be carried out and the qualifications and skills required
- Resilience issues within the role are addressed through cross-border collaboration with neighbouring Diocese
- Line management of the DSA is provided through the Diocesan Secretary with caseload supervision being provided by someone with the necessary skills and experience
- Consideration should be given to the appropriate resourcing of administrative support for the DSA
- An adequate budget should be allocated for the safeguarding work of the Diocese
- Safeguarding to be a standing-item on the Bishop's Staff meeting agenda with appropriate attendance of Safeguarding Advisor

1.4 Diocesan Safeguarding Steering Group

There are numerous benefits, not least in relation to a number of the issues raised above, to the Diocese establishing a Diocesan Safeguarding Group (DSSG). There are various models of these that have been established, not just within the Church of England, but in other Churches also. Some have separate CP & VA Groups whilst other have a combined CP & VA Group.

The model I would propose is one I have personal experience of and is in line with similar groups recently established in other Diocese including Chichester and Southwark. It would be a combined CP & VA Safeguarding Steering Group and the membership of the group would consist of key representatives from the Diocese such as the Strategic Lead from the Bishop's Staff, Area Dean, parish Clergy, the DSA and a 'Nominated Person' as well as practicing or recently retired professionals representing agencies including Social Care (LADO), Police, Probation & Health. Additional Lay representation may be included.

The Chair of the Group would have a proven Safeguarding background with an external agency and be clearly independent of licensed or employed members of the Diocese. They would also have regular (initially quarterly) meetings with the Bishop of Bristol in order that meaningful relationships between the Group and the Bishop are maintained and significant issues raised and discussed. Arrangements for vice/ deputy chair of the Group would be considered within the terms of reference.

The Group would meet initially quarterly and agree terms of reference which should be clear as to the advisory nature of the role and be specific as to areas of responsibility

which would include promoting good practice in management of safeguarding children and vulnerable adults in the diocese, advising on annual priorities for the training strategy and areas of work, reviewing and advising diocesan safeguarding policy and procedures, and implications for implementation, taking account of changes in the law or national policy. The Group would provide support and advice to the DSA and ideally a Group member would be able to provide casework supervision to the DSA.

In practical terms the DSSG could establish an operational Sub-group which would meet more regularly to discuss and be consulted and advise on active cases and ‘blemished’ DBS (CRB) returns and this Sub-group would, in turn, report to the DSSG. This Sub-group would also serve to provide additional support and guidance to the DSA and parishes.

The effective establishment of such a DSSG would also considerably enhance the relationships between the Diocese and other Safeguarding agencies and professionals.

As part of this process I have had constructive discussion with representatives of key safeguarding agencies from across the Diocese. As part of these discussions agencies have expressed keenness to contribute to such a DSSG often based on positive experiences of such Groups in other arenas.

Proposals

- Consideration is given to developing a DSSG, (with the potential of an operational sub-group) in line with the above outlined remit, with representation from both inside and outside of the organisation
- Consideration should be given to the resourcing of administrative support for the DSSG linked into that of the DSA

1.5 Nominated Persons

One of the key roles for ensuring safeguarding is active within Parishes is that of the, quaintly named, ‘Nominated Person’. From this review it is apparent that this role is performed in various ways:

- split roles of CP & VA,
- joint CP & VA role,
- nominally as ‘there are no children attending the church’,

My first observation, which is in line with many contributors to this review, is that the name is not descriptive of the role they carry out or the ‘authority’ they have. Consideration should be given to changing the name to something more descriptive of the role and that would, in any promotion of safeguarding within the Church, convey an indication of importance of the role. I would suggest Parish Safeguarding Coordinator, which incorporates both child and vulnerable adult roles, but other more suitable titles may be considered. It may be that, as already occurs in some larger parishes, this role may require two people in order to provide the necessary resilience.

Very many of the ‘Nominated Persons’ who have contributed to this process have described the role as ‘isolated’ and ‘unsupported’ (at parish or Diocesan level) with many parishioners not fully understanding the role and how it varies from that of parish clergy. There was frustration also as to how the role was not effectively linked in the Parochial Church Council (PCC) with many nominated persons not feeling they could report to or even, if needs be, occasionally attend PCC meetings when issues arose. But at the same time there is clear evidence that there is huge commitment to this role and some have developed, often with the help and support of Diocesan staff, some effective and innovative systems and initiatives.

I understand that across the Diocese there is huge variance of parish settings, congregations and local need. I also understand that these and many other Safeguarding roles in Churches are performed on a voluntary basis and suitably experienced people are often difficult to find. But my experience, through focus groups and conversations with individuals

in the Diocese, is that there is a lot of good and sound practice going on in the parishes which is not always being recognised and shared with others.

The level of commitment demonstrated by some of the ‘Nominated Persons’ I interacted with was commendable but there was a tangible frustration in many cases that they could, and wanted, to do a better job but with the appropriate levels of acknowledgement and support.

Some of the examples of good practice brought to my attention included:

- various ways of promoting the role and identity of Nominated Person to the wider congregation,
- taking up fresh references for volunteers when DBS (CRB) checks are due
- developing an abbreviated ‘easy to understand’ 1 page version of the parish safeguarding policy in order to make it more accessible,
- displaying ‘Golden Rules of Safeguarding’ in prominent places including activity areas,
- recruiting ‘Children’s Champions’ in each Children/ Young persons Group so children know who they can approach,
- ‘Safeguarding’ as standing agenda item on PCC meeting agendas
- Establishing a Safeguarding sub-group of the PCC whose role includes undertaking risk assessments on activities/ outings involving Children, Young People & Vulnerable Adults.

I am sure that these are not the only examples of good practice but there needs to be a way of gathering and sharing so that others may benefit.

Proposals

- Serious consideration is given to the title of the role which more accurately describes the role they perform (e.g. ‘Parish Safeguarding Coordinator’).
- Communications with and within parishes about who fulfils the role and how to contact them will form part of the communications strategy
- Nominated persons should have right of access to PCC meetings when necessary and appropriate
- Any initiative to promote Safeguarding within the Diocese is utilised as an opportunity to promote and value this key role within parishes
- In addition to training (see 4 below) consideration is given to holding workshops at which good and developing practice can be shared and areas of procedural difficulty within parishes can be aired and addressed.

1.6 Audit & Review

There are no lucid structures in place that would provide the Bishop or his Staff with an understanding of the current status of safeguarding performance at parish level or the effectiveness, or not, of any local policies and procedures which may be in place. It appears totally reactive where questions are not asked until an incident occurs and then weaknesses are identified.

The concept of auditing does not need to be threatening indeed it can be a means of supporting those who are not meeting standards or are unsure of expectations. Through my conversations during this review Clergy and Nominated Persons were particularly open to such processes in particular seeing a ‘Parish Safeguarding Checklist’ of what should and could be in place in parishes would be helpful and they too provided suggestions as to how this may be managed locally such as including this within the ‘Annual Return’. This approach is already in place in other Diocese and has had a positive reception.

I have been alerted to the Bristol Diocese’s ‘Child Friendly Church – Award Scheme – Self-Assessment & Guidance Form’ which would require some amendment to make it applicable to Vulnerable Adults but would be a very useful starting point for developing a ‘Parish Safeguarding Checklist’. I would also suggest that this ‘scheme’ could be developed into a broader ‘safe and friendly church scheme’ which would incorporate the needs of all vulnerable groups.

Other methods of testing embeddedness of safeguarding procedures could be achieved through ‘Archdeacon’s Triennial Parish Inspections’ as well as the Visitations by Bishops and Archdeacon. I have been provided with the template for the Triennial Inspection where there is a requirement for checking and reporting on policy documents such as Child Protection & Vulnerable Adults. I would recommend that any inspection should go further than checking on the existence of such policies but also look at how these key policies are communicated and how they are embedded in practice. The Inspection Report would then highlight perceived good practice or weakness and this would be communicated to the DSA.

The DSA would be the central point for collating any Safeguarding inspection or visitation findings and could then be more targeted with ‘intelligence led’ contacts with or visits to parishes in most need of support as well as highlighting and disseminating good practice.

The establishment of such auditing processes and the collated output would also inform the Bishop’s Staff group of progress and potential weakness.

Proposals

- A ‘Parish Safeguarding Checklist’ is introduced to support parishes in what should and could be in place
- Safeguarding measures within the Triennial Inspection process are reviewed in line with the Parish Safeguarding Checklist and extended to ensure that not only are policies and procedures in place but that they are communicated and embedded in practice.
- Safeguarding should be a key subject for enquiry during Bishop/ Archdeacon visitations to parishes
- Reporting structures on levels of compliance should be put in place for the Bishop’s Staff meeting

2. Policies & Procedures

Standards:

The organisation has a written policy (and where applicable a procedure) for safeguarding and protecting

The above policy & procedure is readily available to all staff

The policy and procedure is reviewed on a regular basis to maintain compliance with new legislation and service and personnel change

All staff are aware of their own roles & responsibilities and those of the organisation for safeguarding and protecting vulnerable groups

The policy and procedures help staff to recognise the additional vulnerability of some children and adults.

The above policies are mandatory for staff and volunteers.

2.1 Policies & Procedures for Parishes

The main form of providing policy and procedures to Parishes is through the ‘Safe & Sound’ Guidelines for Protecting Children which is available in the form of a folder containing paper copies as well as on the Safeguarding page of the Diocesan website. From conversations it was apparent that nearly everyone was aware of the existence of the guidance and that most of them referred to the ‘folder’ with few realising it was

available electronically. 'Safe & Sound' is also available easily accessible on the Safeguarding page of the Diocesan website.

My concern, which was echoed by others was that the version currently in paper circulation is dated 'April 2006' and I was unable to see on-line when the electronic version or any part of it was last updated.

It was also apparent from conversations with key staff that there was no process for the routine review of the guidance/ procedure and in the midst of busy lives it was not prioritised.

There is always a difficulty when relying on paper copies that even if relevant sections are routinely updated and copies circulated there is no certainty that all folders in every parish will be amended and so working with older versions and thus inconsistent practice will occur. Similarly working with 'static' paper copies the sharing of new information/ practice/ guidance tends to wait 'until the next review' whereas using electronic systems allows for a more efficient sharing more quickly. In any cases any amendments or updates should be clearly marked with the date they were made.

It is also dangerous to rely on the use of e-mail as a means of circulating amendments as from experience, again supported in conversations as a part of this review, although proof of 'sending' can be assured that does not ensure 'receipt', or that people will 'open and read' or that if they do their means of accessing e-mail gives access to printing off the necessary paperwork. An example of this has been with the recent circulation of updated guidance on DBS (CRB) processes – within focus groups it was highlighted the low success rate at which this information was received and passed on.

Generally Safe & Sound provides good guidance and advice but could be enhanced to show the wider roles and responsibilities of the PCC and Clergy as well as providing a section of 'Whistleblowing'.

There was less clear guidance on the response to and management of Vulnerable Adult concerns with only limited 'guidance' available on the Diocese website. This was explained as being that this was a relatively new area of work and the limited hours to complete the role of coordinator meant that priority was given to active cases not developing procedural guidance.

It was suggested within this review whether it would be practical to provide a single source of guidance for both CP & VA. It was considered by many to be helpful to have one single point of reference for guidance and advice with no one vehemently opposing the suggestion.

As the guidance would be covering the general principles of establishing safe environments and the initial responses to concerns, disclosures or allegations I can see only benefits for one combined source which, makes clear any variance in procedure for any particular group, and would be easier to routinely manage and review.

It is important that each Parish has its own bespoke Safeguarding policy and procedure, based on an agreed template, but which reflects its congregation and activities and is reviewed regularly by the PCC. It should be noted that for those parishes who provide multiple activities and/ or hire out rooms for others to provide such activities the development of a meaningful Safeguarding Policy and, in particular procedures and processes, can be complex and require the assistance of specialist input.

As mentioned earlier (see ‘Audit’ above) it is important that measures are put in place to ensure that not only are these policies in place but that they are implemented effectively. Also they must be made accessible and meaningful to members of the congregation including children, young people and the vulnerable and this should form part of the communications strategy.

Proposals

- ‘Safe & Sound’ should be updated in an on-line version with clearly marked dates of any amendments and ‘what has changed’.
- Current content to be updated in line with Working Together 2013
- The development and dissemination of bespoke parish safeguarding policy and procedures, and their accessibility to all, should form part of the communications strategy
- Consideration given to expanding the remit of Safe & Sound to cover Children & Vulnerable Adults

2.2 Diocesan Policies & Procedures

A concern raised in this review is the limited availability of clear policies and procedures available for dealing with specific Safeguarding duties. A number of people were concerned that even where there were processes in place there was a lack of discipline in adhering to the procedures. As one person reported ‘This is a very bureaucratic organisation – but nothing is written down!’ It is apparent also in the case work I have had access to, because procedures are not written down individual cases are handled differently and inconsistently which in itself is poor Safeguarding practice.

During the review I have seen limited evidence that there are procedures in place for key processes apart from references in documents such as the ‘Clergy Handbook’ and some Church of England guidance. It is important that Bristol has its own clear processes and procedures which take account of local structures and circumstance and which are able to be easily understood and followed.

In particular clear procedures need to be drawn up around recruitment, the handling and management of allegations made against Clergy and Volunteers (including links into

external multi-agency procedures, the provision of consistent and appropriate support to alleged perpetrators, victims, whistleblowers and congregations during and after investigations), and the administration of 'Permissions to Officiate'. Only by doing this can you avoid individuals and congregations feeling 'abandoned' or 'uninformed' and ensure that all cases and individuals are treated fairly, equally and in a transparent fashion.

Proposals

- All safeguarding related procedures are reviewed and thorough and clear Bristol Diocese specific procedures are compiled
- Priority is given to the development of effective procedures in relation to 'Allegations Management' and administering 'Permissions to Officiate'.

3. Recruitment & Selection

Standards:

The organisation has a recruitment policy in effect which ensures professional and character references are always taken up.

Any anomalies are resolved (i.e. gaps in employment history)

Identity and qualifications are verified.

Where appropriate 'enhanced plus' or 'enhance' DBS (CRB) checks are completed on all those staff and volunteers

Face-to-face interviews are carried out.

Previous employment history and experience is checked.

Employees involved in the recruitment of staff to work with vulnerable groups have received training as part of the 'safer recruitment training' programme.

3.1 Recruitment processes

The importance of this area of Safeguarding is highlighted by the publication in 2010 of **Safeguarding Guidelines relating to Safer Recruitment.**

In relation to the recruitment of volunteers this guidance is made clear with 'Safe & Sound' and, from conversations I have had, this practice is being adhered to, and even enhanced by good practice, in some parishes.

One area of concern was the oversight of volunteer recruitment at parish level by the PCC and the failure to record DBS (CRB) clearances within PCC minutes. Confirmation as to the level of embedded practice at parish level can only be determined through the audit processes mentioned earlier.

The process of initial recruitment of Licensed Ministers Lay and ordained has been described to me by the Advisor for Licensed Ministry and I have been provided with copies of Central Ministry Division Guidelines and Local Discernment processes which encompass detailed vetting procedures throughout, including DBS (CRB) checks. The processes and guidance are clear though I would suggest safeguarding as a theme is more implicit than explicit. However, my conversations with those who deliver this process

within the Dioceses have reassured me of their safeguarding awareness and its importance within the process.

Clergy 'Role Descriptions' are currently drawn up by parishes and currently would not include explicit safeguarding roles and responsibilities.

I would propose that the Diocese reviews all 'Role Descriptions' for clergy and 'Job Descriptions' for all paid and voluntary positions and ensure that safeguarding roles and responsibilities, in line with the Safeguarding Accountability Framework mentioned earlier, are explicit included within them.

3.2 Disclosure & Barring Service (DBS) & Criminal Records Bureau (CRB)

It is important that as part of any Safeguarding Audit DBS (CRB) issues are addressed. It is deliberate, however, that I include it here and not as a bespoke area. This is done to emphasise the common misconception, which has sadly been reiterated to me in this review that 'safeguarding is all about CRB checks'. DBS (CRB) is only a part of the 'safer recruitment process' which forms a part of the necessary system whereby we can ensure a 'safe environment' for staff, volunteers and those who use our service. In turn, as you see here, Safer Recruitment is only a part of the Safeguarding requirement.

It was not unexpected that within the responses to the questionnaire there were varying levels of satisfaction with the DBS (CRB) process albeit when these were followed through in discussion the main reason was often because of uncertainty of the process particularly at the current time when the national process is subject of change and some uncertainty is bound to exist. I was informed by one parish that they had 'opted out' of the Diocese's DBS (CRB) process, because of the difficulty of accessing 'checkers' and delays in returns, and commissioned an external organisation to complete the process. Interestingly when DBS (CRB) was discussed with those who were a part of the Diocesan process (Administrators, Counter-Signatories, Checkers & Nominated Persons) there was much greater satisfaction with the process and confidence to manage the current change.

There are options for the Diocese for the future management of DBS (CRB) processes, either to continue to manage the process in-house or to commission it outside to a commercial enterprise. My observation would be that the procedure within the Diocese is currently fit for purpose and based on considerable effort to streamline systems. In addition I am reassured that Diocesan staff are responding to the current changing situation, liaising appropriately with national bodies and providing timely updates to parishes and those involved in the existing process. Consequently I would propose that no changes are made at this time and that a further review takes place once the extent of the impact of the new processes is known. At that point a review should be undertaken then if the decision is to maintain control of the process consideration should be given to:

- Reviewing numbers and training of 'Checkers' & 'Counter-Signatories'
- Review the Administration System in Diocesan Office and whether the administrative support function is adequately resourced

➤ Audit the processes at parish level to ensure they comply with DBS requirements
An area of concern in relation to the existing processes was that parishes felt isolated when making decisions on ‘blemished’ disclosures. The resolution of such issues, particularly in more complex cases, could be taken on by the DSSG as described earlier.

Proposals

- As a part of the development of the Safeguarding Accountability Framework all Role and Job Descriptions should be reviewed to ensure that Safeguarding Roles and Responsibilities are clearly described.
- The Parish Safeguarding Checklist to include effective recruitment processes for volunteers and oversight by the PCC
- DBS (CRB) Processes to be reviewed once the extent of the impact of the new processes is known

4. Training & Development

Standards:

The organisation has an induction process for all staff and volunteers that includes familiarisation with policy and procedures.

Appropriate staff and volunteers who work with or have contact with vulnerable groups receive training on their professional roles and responsibilities and those of their organisation.

Appropriate staff and volunteers are trained to recognise signs of abuse and neglect.

Outcomes and findings from reviews & inspections are disseminated to appropriate staff and volunteers.

There is no doubt that Clergy and volunteers have been provided with a variety of safeguarding training over recent years and that generally it has been very well received. I have been provided with copies of training packs and presentations and am similarly satisfied that the presentations and materials achieve the above standards. Training attendance management and evaluation processes are piecemeal and this is explained by the lack of administrative support available.

Induction/ refresher training courses parish clergy and volunteers are run regularly for those working with both CP & VA and there is a training plan for more specialist training on topics such as domestic abuse and mental health which is promoted both by e-mail and on the Diocesan website.

As well as that provided by the CP & VA Coordinators the Diocesan Youth & Child Worker has provided safeguarding related training to parishes from a package called ‘The Key’ which is locally developed primarily for volunteers who work with children and

young people and includes safeguarding awareness. The materials are very relevant and the evaluations suggest that the package has been well received.

Feedback from conversations was generally positive about the training provided although some felt the refresher training was repetitive and many wanted more interactive sessions with greater emphasis on good practice and advice on signposting. The delivery or co-delivery of training in specialist areas by outside agencies such as the police was particularly valued.

There is a need to develop a clear Training Strategy which links into the Safeguarding Accountability Framework and identifies the frequency and content of training required by people at all levels within the Structure. Administrative support should be provided not only to support the planning and delivery but also to enable systems for monitoring attendance and evaluation to be maintained. It would be one of the responsibilities of the DSSG to oversee the Training Strategy as well as content, attendance and evaluation.

Improved links with external agencies will also provide greater opportunities for specialist input to the Training content.

Proposals

- Training Strategy should be developed and linked into the Accountability Framework with clarity regarding frequency on who should receive what training and when
- There should be closer collaboration between Safeguarding staff and the Department of Children & Education over the delivery of safeguarding related training
- The training strategy and content should be ratified by DSSG and evaluation of training monitored by the same Group
- Records of attendance/ non-attendance should be maintained by the DSA and monitored by the DSSG

5. Complaints & Allegations

Standards:

The organisation has effective complaint policies & systems in place for professionals and service users, which are compatible with LSCB Procedure and Guidance.

The organisation has effective whistle blowing policies & systems in place for professionals and service users.

All incidents, allegations of abuse and complaints are recorded, monitored and available for internal and external audit.

All incidents, allegations of abuse and complaints are dealt with in an appropriate manner inline with policy and procedure.

5.1 Procedures

As already alluded to there is an identified need to develop robust and clear procedures for the management of allegations against paid and unpaid positions within the Diocese. (The proposal earlier also requires consideration within these procedures to cover ‘whistleblowing’ and support considerations for all involved) This is not unique to Bristol nor the Church indeed it is highlighted in recent publicity and reports from across the country.

Similarly the current situation in relation to file management and recording is uncoordinated and inefficient. There is no electronic reporting, recording or management systems in place which results in the current situation where files related to Licensed Clergy (Blue Files) are stored and managed at the Bishop’s Office and there are separate systems for ‘Lay Ministers’ and ‘non-clergy’ (including files in relation to the management of potentially dangerous individuals) at Diocesan Office.

Downsides to this current system include the lack of coordination of information and an over reliance on the knowledge and awareness of key staff which is easily lost and difficult to rebuild. Another concern raised within this review is the secure storage of information. It has become apparent that CP & VA Coordinators, as well as some ‘Nominated Persons’ routinely store safeguarding files and information at home either ‘to be able to fulfil a part-time role’ or because of ‘lack of facilities for storage in the parish’.

5.2 The Files Audit

Within this process I have been given access to the following files:

- Investigation files relating to CP & VA concerns including assessment of risk cases
- Blue Files – Licensed Clergy
- Retired Clergy Files
- ‘Permission to Officiate’ Files
- Details of the ‘Past Cases Review’ (2008/9)

My audit of the files, though by no means involving looking at all files, was facilitated by Diocesan staff in enabling me to access individual’s and case files to test the extent of ‘joined-up’ processing and appropriate information recording and sharing.

Across all the files I have viewed the lack of clear policy, procedure and systems specific to this Diocese in relation to allegations management and multi-agency engagement is highlighted. Furthermore there is an apparent reluctance to engage with external or statutory agencies when, in reality, to do so would assist processes and improve outcomes.

Policies and procedures when developed should be clear on the status and timing of all elements of Allegations Management processes (Protection & Safety, Criminal, Civil, Disciplinary, Canonical etc) to ensure that investigations are thorough, fair and that no rights or processes are compromised.

The processes are also compromised by the levels and quality and lack of joined-up recording practice as well as the lack of clarity of individual's roles and responsibilities together with blurred boundaries for key Diocesan personnel within the processes. Decision making with rationale is generally poor and there is rarely reference as to whether agreed actions have been completed and by whom.

5.3 Investigation Files

These are maintained by Diocesan CP & VA Coordinators and comprise of loose pages contained in plastic wallets with a mixture of handwritten notes, e-mail trails, typed letters, minutes of meetings and contracts with individuals. There is secure storage available at Diocesan Office though practice has developed for coordinators to keep hold of 'live' case files, as previously discussed. There were also a number of investigation files which had been handed over by the departing CP Coordinator which were made available to me and formed part of the audit.

In relation to all investigation files notes are mostly handwritten with consequent issues regarding interpretation and although some entries are dated the time of recording is rarely recorded. The lack of administrative support for the CP & VA Coordinators was the main reason provided for the quality of the record keeping but there has certainly been reluctance expressed by a post holder to move towards electronic based systems which has hindered progress.

The quality and content of the recording of meetings is generally lacking detail of actions to be taken and timescales, making logical sequencing difficult, and is stark against the quality of external agency recording of meetings which appear on some files.

Overall case management such as the number of live investigations and the names of parties involved is inefficient and hampered by the lack of a central register of cases and so relies on physically counting files and the intimate knowledge of cases by those involved

Investigation files tended to be identifiable by the name of the 'alleged perpetrator' which coincided with a perceived focus on their support. In one case there was apparent consideration given to support for the victim until the prospect of a court appearance had passed whilst means of support for the 'alleged perpetrator' were documented. The lack of clear guidance and procedure was also apparent in cases with one case being treated as a 'low level' concern but because of lack of a structured approach and uncertainty over roles and responsibilities of support for the 'victim' the case developed into a more complex and time consuming investigation.

Contracts with individuals are key to promoting safety with the Church Community and any such contract should be informed by rigorous risk assessment which should include external agencies as appropriate. There is evidence of the use of contracts and some are evident on the files but there does not appear to be a built in review process for such contracts which is pro-active rather than reactive. In one case file there was no record of

review processes which were later referred to in external communication. It was not apparent that a recognised risk assessment model was utilised which would have provided a consistent and thorough approach. In one case the terms of the ‘contract’ did not take account of one of the key types of offending behaviour (internet) which was apparent at the time. In another case there was mention of an assessment being completed by a recognised external organisation and that a copy had been requested but this could not be found on the file and begs the question was it received and if not why not?

I was able to conduct a limited cross checking of investigation files with Clergy files and found that key information including risk assessments regarding suitability to officiate was not included on some clergy files.

Effective safeguarding practice is reliant on learning lessons from review of practice – the lack of developed procedures within the Diocese means that when reviews are undertaken or good practice is identified nationally or locally, there is no means to effectively share it or ensure it is put in practice. For example, following one investigation file a review had been undertaken by a senior member of the clergy and relevant findings were made but there was no apparent mechanism for these findings to influence future practice. Similar examples were found of advice from the Church of England Safeguarding lead and clarity on process provided at a meeting of the Bishop’s Staff which could not be communicated or implemented because of the lack of written procedure

5.4 Blue Files, Retired Clergy Files & ‘Permission to Officiate’ Files

I preface this section by referring to two key factors which will influence the future management of Clergy Files in the Diocese in the near future:

1. The recent circulation of Guidance for Bishops and their staff on Personal Files Relating to Clergy (March 2013) which is already being processed into an action plan for implementation by the Bishop’s Chief of Staff
2. The imminent recruitment of a Bishop’s Chaplain whose job description clearly requires oversight of clergy files and data management.

Both of these developments should improve the current situation which I will now describe from the limited file review I undertook. Files of newly inducted clergy were ordered with DBS (CRB) disclosures and ‘confidential disclosures’ prominent at the front of the file. Older files had the ‘Past Cases Review’ checklist stapled inside the front cover together with the latest DBS (CRB) disclosure with evidence of pro-activity in chasing up the process when deadlines approached.

In files where there was relevant safeguarding information there was inconsistency as to whether this was stored in the ‘health & finance section’ or stored loosely in a red plastic wallet. I would propose that in future all such information should be stored in a ‘safeguarding’ section of the file and this would be consistent with the latest guidance. It

was also apparent that in older files some ‘culling’ of information had taken place albeit in one case it was apparent that the very limited historic information available on the ‘Blue File’ was better than that retrieved by other agencies.

I have been advised that the ‘Clergy Current Status Letter’ (CSSL) processes had recently been reviewed to become more robust and this was evident in the cases I was able to view.

5.5 ‘Past Cases Review’ (2008/9)

The review requested by the House of Bishops to conduct this review was conducted effectively in the Diocese who were fortunate to be able to call on someone eminently qualified to carry out such a sensitive and specialist task. The review was suitably resourced by the Diocese. Copies of letters sent to and responses received from serving and past clergy were stored and appropriate investigation followed there from. As part of the past Cases Review all Blue Files were examined but Lay Ministers and ‘other’ files were only reviewed where concerns were highlighted as the result of consultation with current or past clergy.

I have had sight of Interim Reports (June 2008 & May 2009) with issues arising and a statistical return to the Archbishops Council (June 2009) with a summary of ‘recommended action’. I was not able within this review to confirm that all ‘recommended actions’ have been satisfactorily completed and would propose that this is an action from this review.

5.6 A Safe Working environment

Throughout this process a recurrent theme from questionnaires, focus groups and interviewees has been the safety of workers and the anxiety of being subject of an allegation by a member of the Church. Many have suggested that there should be a Code of Conduct for staff and volunteers which reflects ‘professional boundaries’ and simple ‘do’s and don’ts’ in a variety of church settings.

This anxiety includes activity on and off Church premises and concerns many engaged in visiting vulnerable parishioners, often housebound elderly.

In this area too there have been many examples of good practice put forward including avoiding possible 1-to-1 situations at church or in homes by meeting people in neutral venues such as cafes, home visits being recorded along with any outcomes, and doubling-up on home visits.

The development of a Code of Conduct and good practice guidance for Home Visiting are to be encouraged but I would suggest that, rather than being designed and imposed from the centre, time is invested with those people who it affects, who can bring the necessary experience to facilitated workshops, in order to develop exactly what is needed and this will create a sense of ownership.

Proposals

- Consideration is given to the introduction of electronic recording and monitoring system within the Diocese
- An audit is undertaken to ensure that all clergy and lay files are audited in respect of Safeguarding and Data Protection issues.
- Clear policies & procedures for the management and investigation of allegations, which link into local Multi-Agency procedures, are developed, agreed and made available
- The Diocese introduces a register of incidents, allegations of abuse and complaints
- Recording systems are introduced which allow for effective recording practice and the secure storage of information
- Training is appropriately provided on single and multi-agency processes as well as the importance of effective recording and storage of information
- Bishops staff and Safeguarding staff within the Diocese work closely to develop processes that ensure that safeguarding related information on Clergy files is accurate and current
- The structure of 'Blue Files' is amended to include a section for the storage of all safeguarding related information
- Measures are put in place to ensure that all identified 'recommended actions' arising from the 'Past Cases Review' have been satisfactorily completed
- Facilitated workshops are held with Clergy, 'Nominated Persons' and Volunteers to develop of a Code of Conduct and good practice guidance for Home Visiting

6. Information Sharing

Standards:

The organisation has identified principles of working with vulnerable groups and their families for all staff to work within.

Staff understand when to discuss a concern about a child's welfare with a manager. Staff understand the threshold for making a referral to Children's/ Adult Services or raising a Common Assessment Framework (CAF).

Staff have access to inter-agency guidance and procedures.

Staff know how and when to share information in a way that is both legal and ethical to safeguard and protect children (e.g. CAF, child & adult protection & welfare concerns).

Data collected is made available to LSCB, practitioners, users and commissioners.

6.1 Internal

Although Safeguarding features large on the Diocese website and the existence and awareness of 'Safe & Sound' appears wide, the downward cascading of information in relation to Safeguarding would still seem weak as reflected in the responses to the Questionnaire. Significant gaps in knowledge appear on basic issues such as to the roles and responsibilities of the CP & VA Officers and in some cases the names of the office holders or even, apparently, their existence!!

This may be in part due to the reluctance of people to accept the need for such roles within a church setting but whatever the reason it is something that would need to be addressed within any Communication Strategy which results from this review process and indeed a clear leadership from the top of the organisation on the principles and importance of Safeguarding would assist greatly.

There was concerning feedback from the questionnaire and interviews about the availability of advice and limited knowledge of the services available for support outside of the Church. Contact numbers for local safeguarding agencies should be available to clergy and 'Nominated Persons' as should other local support services where people can be signposted for support, for example Domestic Abuse services which was a recurrent theme.

I would therefore propose that immediate action is taken to provide parishes with a current list of contact numbers for statutory agencies and other available services, both in and out of hours, that this is dated (with the date of compilation) and circulated with immediate effect and routinely reviewed to ensure that the numbers are current.

From discussions there is apparent uncertainty at Parish level how, when and what information can be shared and who with. The fall back position would seem to be seek advice from Diocesan safeguarding staff whose advice is usually valued, but their lack of availability does cause problems. But even in these cases there is uncertainty amongst clergy and 'Nominated Persons' what the threshold is for reporting and the extent of information to be shared.

Within the File Audit area of this review it was apparent that the collation of relevant information at the point where a concern is raised is inconsistent and generally poor. This results in the need for additional phone calls to gather the necessary information and inevitably delays in response. I believe the introduction of a generic 'reporting Concerns' form which triggers the collation of the basic necessary information to be provided to the Nominated Person, Diocesan Coordinator/ external agency would improve the information sharing and investigation process.

Training on the completion and sharing of this form would be provided within 'Recording Training' which is discussed later.

Similarly knowledge of multi-agency procedures at parish level is limited and awareness should be raised with Clergy & 'Nominated Persons'. Consideration should be given to having links on the Diocesan website Safeguarding page to the LSCBs within the

Diocese which would provide information not only on multi-agency procedures but also training opportunities.

Clergy also expressed concern that when they moved to a new parish that the sharing of, often low level, Safeguarding concerns were not a part of the ‘handover procedure’ and later difficulties could be averted if this was done.

6.2 External

The Diocese’s links with Safeguarding Boards are poor and this is due in no small part to the business and limited time available to the previous and current Safeguarding staff. Current and former Diocesan staff expressed to me their desire to build on external agency links but also their frustration that ‘fire-fighting’ cases means insufficient time is available.

Engagement with such Boards would be a great support to the Diocese on a number of levels and should be a priority of any SDA. LSCBs, for example, already have Faith Networks in Bristol and an Awareness & Engagement Working Group in Swindon which from my conversations would be natural and welcoming points of entry.

Amongst the advantages to creating such links – together with those on the DSSG, would be to improve awareness of Diocesan issues, information sharing and improved multi-agency working. The lack of information sharing protocols with other agencies is an area which needs to be addressed going forward.

Within my discussions with Safeguarding agencies concern has been expressed about the low level of referrals received from the Church in relation to concerns, disclosures and allegations against staff and volunteers considering the vulnerable nature of many church attendees and the intensity of the contact.

Proposals

- The output from this Review is utilised as an opportunity to promote the key Safeguarding roles within the Diocese
- A generic ‘Reporting Concerns’ form is developed and circulated with appropriate training for use.
- Up to date Local Safeguarding Agency and Support Service contact numbers should be made available through the Diocese Website
- Consideration is given to facilitating access to Multi-Agency procedures for example, via the Diocesan website
- Meaningful links are made with Safeguarding Boards locally and information sharing protocols are agreed with external agencies

7. Listening to Children, Young People and Vulnerable Adults

Standards:

Service development plans are informed by the views of children and vulnerable adults

Individual case decisions are informed by the views of children and vulnerable adults

Service users are made aware of their right to be safe from abuse. This is achieved through information made available about where to go for help in relation to maltreatment and abuse.

Service users are listened to, taken seriously and responded to appropriately.

Information provided is in a format and language that can be easily understood by all service users.

As a minimum the organisation evaluates outcomes from the perspective of child or vulnerable adult.

As previously referred to a weakness of this review process has been the lack of opportunity to interact with children, young people and vulnerable adults in order to obtain their perspective on how they feel treated and provided with the opportunity to be heard.

I have heard of some really good practice at parish level including the appointment of a 'Youth Warden', designated 'Children's Champions' in youth settings, proactive promotion of the 'Nominated Person' as someone who can be approached, the efforts made to improve accessibility of policies, as well as local practice for on-going support for vulnerable adults. But these seem ad hoc and inconsistent across the Diocese.

It is difficult to see how, other than locally, the voices if these groups are heard if at all. These groups, arguably, represent those who could most benefit from what the Church can offer but have little say on how it is provided. Numerically young people particularly are under represented in Church attendance rates – so how is this being addressed?

Some parishes, having recognised the 'loss' of young people from their congregations described to me how they have circulated questionnaires engaging with these age groups to find out which activities, at what time and where would they attend.

Much needs to be done to ensure that children and young people, especially those who have become separated from or never experienced Church environment, see the Church as a safe and encouraging environment to be heard.

I have met with the Diocese Child & Youth Worker and also had the opportunity to speak with a number of volunteer and full-time Child & Youth Workers. Again there are various examples of good practice in parishes but there seems to have been a lack of joined up working between the Department of Children & Education in which the Diocese Child & Youth Worker is located and the Diocesan CP Coordinator.

Initiatives such as the ‘Child Friendly Church Award’ and ‘The Key’ awareness training (which promotes listening to children and young people) have been promoted by the Diocese Child & Youth Worker and are good practice and should be developed in the future to incorporate VA issues and with improved cooperation from the DSA as well as being incorporated into the Safeguarding Training Strategy and the Safeguarding Communication Strategy.

Within case files I can see where a victim’s voice is ‘heard’ but not ‘listened to’ or ‘understood’. I emphasise again here that the procedures I have proposed are developed around allegations management need to be clear in acknowledging the difficulties to be overcome in making disclosures/ complaints and the on-going need for the right sort of support whilst such disclosures/ allegations are investigated.

Significantly the guidance within ‘**Responding Well**’ particularly around the training of ‘Authorised Listeners’ has not been implemented in the Diocese. I am assured that plans to introduce this role were put on hold pending the outcomes of this review process and that names of prospective volunteers have been gathered following ‘Responding Well’ training which has been delivered.

As it is a failing of this review process, it should therefore be a priority within the implementation of the proposals that the voice of children, young people and vulnerable adults are heard **and** listened to.

Proposals

- Consideration is given to how Children, Young People & Vulnerable Adults can be consulted meaningfully on the implementation of the proposals of this review
- Good practice in the engagement with vulnerable groups is disseminated Diocese wide
- Urgent consideration is given to implementing fully the guidance in ‘Responding Well’ including the training of ‘Authorised Listeners’
- Links between the DSA and Child & Youth Officer roles should be enhanced
- The ‘Child Friendly Church Award’ and ‘The Key’ awareness training should be developed in the future to incorporate VA issues and be incorporated into the Safeguarding Training Strategy and the Safeguarding Communication Strategy.

8. Other matters

8.1 Education

I have been struck in this review by the number of ‘Church’ Schools and the increasing evolution of Academies described as ‘sponsored by the Diocese’. This begs the question as to what extent is the Bishop accountable and how does the bishop satisfy himself of the Safeguarding effectiveness within these establishments.

Proposal

- In light of the changing picture and the increasing evolution of Academies revision is undertaken locally (and nationally) as to the lines of accountability particularly into safeguarding standards.

8.2 Safeguarding Within a Cathedral Setting

Within the review the ‘different’ relationship between the Cathedral, as opposed to Parishes, and the Diocese in relation to safeguarding has been brought to my attention. That relationship being that the Cathedral is considered to be ‘independent’ of the Diocese. In relation to safeguarding whereas the Cathedral does work through the Diocesan Office for DBS (CRB) processes the links to the Diocesan CP & VA Coordinators is not established with the potential loss of expertise and advice in a specialist field.

Proposal

- Constructive discussions should be held to consider how the Cathedral can effectively link into developments arising from this review in order that vulnerable groups across the Diocese are provided with consistent and the best possible safeguarding

9. Conclusions

I would like to place on record my gratitude to everyone, both within and outside the Bristol Diocese, who has contributed to this review process and supported me through it. The sharing of information, experience and good practice has been of the highest standard and I hope it is recorded in a fitting manner. I have referred during this report to some good practice which has been brought to my attention but that by no means reflects all the good and innovative work that is being carried out in the Diocese and beyond and this is acknowledged here.

I outlined at the beginning of this report the reasons why this review was initiated by the Diocese of Bristol. It was not, as is often the case, in response to any particular case or expose but rather a recognition of a potential area of weakness as experienced elsewhere but also a moment in time which presented an opportunity to take stock and move forward positively.

The outcomes of the review are not, in truth, surprising or untypical:

- Despite the clear links between safeguarding principles and Biblical teaching the safeguarding message from the Diocese has been implicit rather than explicit and reactive rather than pro-active
- Specialist safeguarding roles have been under resourced and lacked direction which has in turn diluted the importance of the Diocese’s safeguarding roles and responsibilities and fed the underlying belief that ‘this type of thing doesn’t happen in churches’

- Diocese' procedures have developed over years to meet a mixture of internal and external needs but they are generally not clearly documented which has resulted in selective interpretation and inconsistent practice
- There has been a reluctance to grasp the multi-agency safeguarding ethos of 'working together' with external agencies for the greater good.

The response to the review, from the unusually high levels of response to the questionnaire to the one-to-one discussions, has demonstrated an overwhelming sense of openness and a desire to improve areas of perceived weakness as well as developing and promoting the good work and practice which is quite clearly going on across the Diocese.

At first sight this review makes numerous proposals (some of which will need national consideration) which may seem daunting but they are in effect indicators of how to harness the desire and clear commitment of clergy staff and volunteers in the development a Diocese which overtly places the safeguarding of children, young people and vulnerable others at the centre of its Mission.

The challenge now is to take this desire and commitment forward in a structured and managed way. The action plan (Appendix 5) will provide the structure to describe what needs to be done, by whom and within what timescales. I have entered suggested timescales against each action as a starting point for discussion. But I would propose the establishment of a 'management group' led at a senior level and with appropriate representation to reflect the work required to complete the action plan and to report back directly to the Bishop's Staff meetings. The building of multi-agency links and the establishment of a DSSG will also facilitate the process with the implementation of effective auditing processes enabling the measurement of effective implementation.

Mission and attracting 'All God's People' is central to the work of the Church and so clearly a passion of those who have contributed to this review. Yet how is this being achieved by an organisation where the vast majority of publicity is negative and reactive. There is a need to pro-actively promote the positive work being carried out by clergy, staff and volunteers which actively safeguards and enriches thousands of people on a daily and on-going basis and is striving to make Church, at all its points of contact with all classes of people, as safe as is possible in an often challenging world.

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