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Peterborough diocese independent safeguarding audit (February 2016)



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Independent auditing of diocesan safeguarding arrangements for the Church of England

Diocese of Peterborough

Audit undertaken 23, 24 and 25 February 2016

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1 INTRODUCTION

1.1 CONTEXT

The Social Care Institute for Excellence [SCIE] has been commissioned to undertake an audit of the safeguarding arrangements of each diocese of the Church of England. The aim of these audits is to work together to understand the safeguarding journey of each 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 Peterborough was carried out by Susan Ellery (the lead auditor for this diocese) and Meiling Kam on 23, 24 and 25 February 2016. This report was written by Susan Ellery with support from Meiling Kam and quality assurance provided by Edi Carmi, the overall lead auditor for the project.

1.2 THE DIOCESE

The Diocese of Peterborough serves most of the City of Peterborough (a unitary authority), and the counties of Rutland and Northamptonshire. The Diocese is landlocked and abuts six other dioceses; Ely, Lincoln, Leicester, Coventry, Oxford and St Albans. The Cathedral, Bishop's Office and Diocesan Office are in Peterborough, at the northern end of what is a long and narrow diocese, with the Mission, Training and Education teams based more centrally in offices on the southern edge of Northampton, where the majority of committee and other meetings take place.

Although it is an ancient market town, Peterborough was designated a new town in the 20th century and continues to undergo rapid growth and increasing ethnic diversity. By contrast, parts of the diocese are still very rural. Other significant urban areas are Corby, Kettering, Wellingborough and Northampton.

The Diocese is divided into two archdeaconries, Oakham and Northampton, with a suffragan Bishop of Brixworth.

The Diocesan Safeguarding Adviser notes in his annual report a year-on-year increase in case work, with a 9 per cent increase between 2014 and 2015. We were told that the Bishop's agenda for the diocese is one of growth of clergy and of congregations. Increasing numbers will inevitably produce more safeguarding issues.

1.3 STRUCTURE OF THE REPORT

This report is divided into:

- Introduction
- An overview of what is working well, what needs to work better and a summary of considerations for the diocese
- The Findings of the auditors: links are made with the S. 11 (Children Act 2004) audit form completed by the diocese in preparation for the audit
- Considerations for the Diocese are listed, where relevant, under each finding section
- An appendix sets out the review process.

2 OVERVIEW

2.1 WHAT'S WORKING WELL?

The Diocese of Peterborough has the benefit of having had a competent and social work-qualified Diocesan Safeguarding Adviser (DSA) in post since 2009 and a supportive Bishop, who brings a marked clarity of opinion to safeguarding, since 2010. He pointed out that this comparatively long period of good quality safeguarding means that sometimes issues that are current elsewhere, such as gaining compliance with the stance that an offender should never hold any position of responsibility within the church, have been worked through in Peterborough. The auditors were satisfied that there were no known exceptions to such practice.

The Bishop described a journey of improvement since 2010, when he discovered a number of unresolved cases. He started the practice of including the DSA in interviews, when telling clergy why they were losing their licence, which promotes the professional authority of the DSA's role. The auditors saw evidence from case records of the Bishop taking a strong line in support of the DSA, for example, refusing a request for Permission to Officiate despite the fact that, in the particular circumstances, the reasons could not be divulged. The Archdeacon who was interviewed, and has worked in the diocese for 22 years, talked about the regime regarding safeguarding now being very different to how it used to be.

The Bishop is a member of the National Theology and Doctrine Group, which is in the process of producing a book on the theology of safeguarding. The DSA is a member of the Joint Safeguarding Working Group chaired by the Bishop of Durham, which he feels makes him closer to the perspectives of the national church than he might otherwise be.

The DSA has strong links with statutory partners in the three local authorities and the police, and he works at making and maintaining these links. The auditors received written feedback from a local authority Designated Officer (children's safeguarding), a probation officer and a police officer from the Dangerous Persons Management Unit. All spoke positively of working with the DSA.

There are effective systems in place for complete and secure record keeping.

One interviewee, new to this diocese, talked about a 'Can Do' attitude to safeguarding and it was agreed that, if something needs to happen to support safeguarding then the funds are found to do it. The DSA's hours were increased to a full-time post a couple of years ago and recruitment is underway for an additional assistant DSA, plus increased administrative support. The DSA is arranging his professional supervision.

The Diocesan Safeguarding Management Group (DSMG) has been re-modelled and has new terms of reference and an independent chair, recognised by others as being dynamic. The Bishop states openly that he wants the DSMG to hold him to account and that the Chair should provide him with legal and moral challenge. Although the appointment of the Chair did not happen via a process of advertisement and recruitment, the Bishop deliberately chose a Chair with the personal and professional qualities to operate effective scrutiny. The auditors were satisfied that the Chair has been enabled to undertake, with the two independent members of the DSMG, a thorough review of a case that was acknowledged not to have been handled by the clergy involved as well as it should have been.

The parish focus group showed that there are people at parish level who understand safeguarding and want to do it well. The group comprised two parish safeguarding officers (PSOs), a parish administrator and assistant PSO, a lay reader who also coordinates children's and youth activities and a vicar. Collectively, members of the focus group had a spread of experience in safeguarding and talked about some sensible responses to managing risk, such as insisting that two people lead groups but not allowing 'husband and wife' teams.

The auditors found the safeguarding page on the diocesan website easy to use and comprehensive and members of the focus group independently said the same. The sample safeguarding posters were seen as useful and widely used. There is a very good 'Who to contact if you have a concern' page directing users to statutory services.

The DSA runs some 22 training courses every year, including, in 2015, six on Saturdays. The training was well regarded by the parish focus group. In 2015, two of the courses were on domestic abuse awareness (delivered by an external trainer), two were specifically for curates and one was for parish interns.

The Cathedral has recently become less isolated than previously in terms of safeguarding. The Bishop's Chaplain, appointed in autumn 2015, is also a Residentiary Canon at the Cathedral and, as such, takes services and is part of the Cathedral team. Following a recent safeguarding case that caused concern, the Canon Missioner has joined the DSMG and the DSA formally provides a service to the Cathedral. It is too early to assess the impact of these initiatives but they would seem to be a step in improving safeguarding in the Cathedral.

2.2 WHAT NEEDS TO WORK BETTER?

In recent years there has been a large increase in referrals for safeguarding adults, and all policies have been rewritten to unite adult and children safeguarding. The safeguarding of adults who are vulnerable is not yet as well understood or embedded throughout the Diocese as the safeguarding of children, and this raises some difficult problems such as the management of risk. The parish focus group was very alert to the potential pitfalls of lone working when, for example, visiting a person with dementia. Guidance is available on the website but the focus group suggests that it may not yet be widely used.

The Diocese (in common with some other dioceses audited to date) has a problem in needing to deliver basic safeguarding training to everyone who requires it or is strongly recommended to undertake it. The estimated number of people in these categories is 3,000, needing basic training and then refresher training every three years. Allowing for turnover (which is reckoned to be fairly low in this Diocese), this may, according to the DSA's calculations, amount to about 1,200 people a year.

The face-to-face training provided by the DSA is valued and it is important that it continues as there is an accepted correlation between training and subsequent referrals and it helps the DSA to be a known figure the length and breadth of the Diocese. The auditors, and some of the interviewees, saw the need to consider supplementary online training/e-learning as well as face-to-face, perhaps for the refresher training, because the DSA cannot resource all the training required. The auditors also suggested the Diocese write a training strategy that sets out the needs and numbers, plus the plan to get training on the required scale in place.

The Blue Files for the clergy sometimes lacked all the evidence of safer recruitment, and the archdeacon interviewed told the auditors that, although the appointing panel sees references and the application form, historically these had not necessarily been put on the file. However, standard practice in relation to current appointments is now that copies of application forms and references are always kept on file, in line with the latest (2013) guidance from the House of Bishops. The auditors were unaware of this guidance and did not see sufficient Blue Files that post-date 2013 to form a view about current practice. The status of the DBS check can be hard to find on a Blue File but the auditors were shown a sample of a separate and effective spreadsheet tracking this.

The Diocese uses a system of separate Red Files that sit with the Blue File where there has been a safeguarding concern. The auditors had a concern that there is the potential for the Red File to be lost and suggest that a process is put in place to ensure that the Blue File is immediately updated to show the existence of the Red File.

The (Children Act 2004) S. 11 audit, prepared in advance by the DSA, flagged up that aside from formally agreed arrangements with the Northamptonshire MAPPA and the Police Dangerous Persons Management Unit in Northampton, the Diocese does not have information-sharing protocols, although it does have good information on confidentiality and information sharing on the website. The DSA shared that sometimes he finds it difficult to get local authority officers to share information and to see the value of including him in, for example, strategy meetings. This difficulty was seen by the auditors on one of the case records. The auditors suggested that one of the Local Safeguarding Children Boards in the Diocese may be willing to take this piece of work on in the wider context of information sharing with all voluntary and faith groups, and it might then be taken up by the others.

The auditors saw examples of agreements made by parishes with people who pose a risk, to enable them to continue to worship, and evidence on files that such agreements are reviewed after six months and then annually. However, the risk assessment is not yet a formal and recorded process shared with professionals and the subject. The auditors' view is that a shared risk assessment gives weight to the subsequent agreement.

The auditors did not see any spreadsheets recording basic safeguarding information parish by parish; whether there is a safeguarding policy, whether a parish safeguarding officer is in place, who has been trained and when, etc. The value of such recording is that it helps to highlight gaps in compliance and concentrate effort.

There is not yet a whistleblowing procedure on the diocesan website, although one is in preparation. There is a model complaints procedure for parishes but if a parishioner wants to whistleblow about a church warden and a vicar at the same time, for example, it was unclear how they would go about it. In practice, complaints are sent to the Bishop who acknowledges them and forwards them to the appropriate person. The Bishop feels it is important that the complainant knows he has seen their letter or email and this is accepted. The auditors would suggest that this process is formalised and published.

The diocesan secretary is sensibly thinking in terms of succession planning and the auditors discussed the need to ensure that good safeguarding is dependent on the role rather than on the person. A strategic plan for safeguarding might support the

process of making safeguarding 'business as usual'. The DSMG has a plan in terms of priorities for the year and these are reflected in the minutes, and the auditors would suggest making this a more formal plan of what the Diocese wants to achieve in terms of goals or objectives and how they will do it with a review at the end of the year. At the same time, a more formal appraisal process for the DSA might be linked to the strategic plan.

2.3 SUMMARY OF CONSIDERATIONS FOR THE DIOCESE

The considerations for action are found at the end of each of the following sections, where applicable. For ease of reference they are also listed below:

- To provide professional supervision for the DSA as soon as possible*
- To continue with plans to recruit a social work qualified assistant DSA and additional administrative support for the two DSAs.*
- Consider the use of a strategic plan for the year with defined objectives, plans to meet those objectives and your criteria for measuring success in order to assist identification of any obstacles and how to overcome them, and what needs to be taken forward in the next year.*
- Consider how you might use the parish survey as a means to collate basic safeguarding information parish by parish, and assist in identification of priority areas to focus efforts. There may be some cross-referencing with the Articles of Enquiry.*
- Consider the obstacles there have been in the recruitment of current, or recently retired, professional safeguarding personnel to the DSMG and develop a plan to overcome these.*
- Consider whether the diocesan synod should be asked to approve the national policies, procedures and guidance each year.*
- Agree a strategy to further improve the standard of risk assessment practice by: devising and implementing a format for risk assessments; engaging with relevant partners about the consistent need for the DSA to be a member of the multi-agency risk assessment process for relevant individuals; consistent sharing of risk assessments with the subject alongside the agreement.*
- Draw up a training strategy that sets out the need for training and how it will be met.*
- Commission e-learning to complement the delivery of face-to-face training, in line with the national training and learning framework. This might cover the basics before a training session, or deliver some of the refresher training.*
- Consider how to change practice so that when an essential requirement for a post is waived for an applicant, the reason why and the plan to address the gap in skills or competence is routinely added to the HR file; a process is implemented for a Blue File to be routinely updated immediately a Red File is made up.*
- Compile and publish a procedure for complaints about safeguarding that includes how to make a complaint and what to expect in terms of timeliness of response as*

well as the mechanics of who will respond.

Where a complaint is found to be reasonable, and an apology is made, ensure that the learning is shared with the DSMG and any action taken is noted in the minutes.

Complete and publish the whistleblowing policy and procedure, ensuring that it differentiates between a complaint, a grievance and whistleblowing.

Evaluate the current demand need for and provision of the Authorised Listener role and whether to explore alternative ways to deliver this service.

Using the contact established between the Chair of DSMG and statutory partners, the DSA should seek to agree an information sharing protocol with children's and adults safeguarding boards.

Consider how the DSMG role is developed to provide a comprehensive quality assurance process of the safeguarding work of the diocese

3 FINDINGS

3.1 SAFEGUARDING MANAGEMENT

Safeguarding is the ultimate responsibility of the Bishop of Peterborough. The Bishop's Management Team (Bishop of Peterborough, Suffragan Bishop of Brixworth, Archdeacons of Northampton and Oakham, Diocesan Secretary, Bishop's Chaplain) are collectively responsible for safeguarding within the Diocese, with the Bishop's Chaplain having specific delegated responsibility. The management team meets every four weeks, and safeguarding is always an agenda item. In addition, the DSA reports to alternate meetings.

The Bishop's Chaplain attends the Bishop's Management Team and the Bishop's Leadership team. The latter is a meeting occurring every three months of all members of the Bishop's Management Team plus the Directors of Mission, Training and Education and the Communications Officer. The Bishop's Chaplain is also a member of the Diocesan Safeguarding Management Group. It was explained that, in this diocese, the Bishop's Chaplain is a senior member of staff, at the same level as the Archdeacons.

The Diocesan Safeguarding Management Group, which is constituted in line with national recommendations, has an independent (lay) chair. Its other members are:

- Two further independent members (both lay)
- Diocesan Children's Missioner (lay) (full-time employee)
- Clergy Training Officer (ordained) (full-time employee)
- Diocesan Director of Education (lay) (full-time employee)
- Bishop's Chaplain (ordained) (full-time employee)
- Cathedral representative (currently a residentiary canon) (ordained)
- Northamptonshire Police representative (Detective Inspector)
- Healthcare chaplain (ordained)

The DSA, Diocesan Secretary and Assistant Diocesan Secretary (who acts as Secretary) are in attendance.

The DSA is line managed by the Diocesan Secretary.

(Reference to 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 is currently one DSA, employed by the Diocese and on a full-time contract (since 2014), with plans in place to appoint a second. The DSA is social work-qualified and had a lengthy career in practice and management in children's services, in local authorities and the voluntary sector, before taking up this post. The salary for the post has been increased once and will further increase to keep pace with national guidance.

The working conditions for the DSA are good and the post is based in the diocesan office, which is itself in a wing of the Bishop's Palace, alongside key people such as the Diocesan Secretary and the Bishop's Chaplain. The DSA has good access to the Bishop when needed, meets monthly with the Chair of the DSMG and talks with her more often.

The DSA has responsibility for case-work for both children and adults, training and policy. He runs, typically, 22 training sessions a year including some on Saturdays.

The DSA has full access to clergy files.

The Diocese has adopted the model job description for a DSA produced in 2014 by the national team. The auditors did not see an additional Person Specification.

The DSA has not had professional supervision to date and is currently in the process of arranging it. Agreement to the funding of supervision was readily made.

The DSA's positive links with statutory partners were demonstrated in the written feedback received from a local authority Designated Officer (children's safeguarding), a probation officer and a police officer from the Dangerous Persons Management Unit. The comments from the police officer are worth quoting:

'[The DSA] has proved an invaluable contact to us, as his knowledge of individuals and processes within the Diocese is second to none. He regularly assists in brokering agreements with suitable conditions to allow the sex offender in question to worship in a way that is safe for everyone concerned. I would also like to add that [the DSA] has set up an information-sharing system with an officer from my team, to allow concerns about individuals within congregations to be discreetly researched, and for any information about risks that is revealed to be shared and acted upon. The DSA has kindly taken a major role in a project run by the Northamptonshire MAPPA team. He attended meetings and provided advice and documentation to allow a faith-based risk screening tool to be developed for use with ministers and people of prominence within any faith. The pack allows ministers to ask the right questions and report back to police and probation officers if there are any changes or concerns with the offender in question. The DSA also worked hard to find a generic set of conditions to allow a benchmark for safe worship, which can be amended for specific cases. The faith-based risk screening tool has been sent to the East Midlands Regional Management of Sex offenders and Violent Offenders forum for consideration of adoption at a regional level.'

(Reference to part 1 of S.11 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. Also to part 6: The DSA's role is clear in the job description and person specification. And, also in part 6: The DSA has sufficient time, funding, supervision and support to fulfil their safeguarding responsibilities effectively, including local policy development, case work, advice, liaison with statutory authorities, training, personal and professional development and professional registration. And to 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

To provide professional supervision for the DSA as soon as possible

To continue with plans to recruit a social work-qualified assistant DSA and additional administrative support for the two DSA's.

3.3 DIOCESAN SAFEGUARDING MANAGEMENT GROUP

The Chair of the DSMG has been an independent appointment since October 2014. It is a volunteer role taking up about 30 hours a month; the Chair receives travel expenses only. The current Chair has a legal background and was latterly a senior civil servant. She has safeguarding experience through her legal career.

The Chair rewrote the Terms of Reference for the DSMG to reflect the more 'muscular' approach expected by the Bishop.

The Chair described the role of the DSMG being to provide an independent eye for the Diocese, to give assurance (and not reassurance) to the Bishop and to build and maintain a safeguarding strategy for the diocese. The DSMG decides on priorities each year; in 2015 it was training and risk assessment and this year it is training again and responding to this audit. The safeguarding strategy would benefit from a more formal approach, with agreed objectives and criteria for achieving them.

The DSMG has instituted a safeguarding survey of all parishes, sent by the Archdeacons to all Parochial Church Councils. To date, there has been a response from two thirds of parishes. The responses have been used, for example, to estimate the numbers needing safeguarding training and to inform planning. There is scope to expand the use of the parish survey to enable a greater concentration on areas or parishes that are known to be weaker, and to identify issues that the DSA and/or DSMG should address.

The Chair has brought in wider membership of the DSMG, including two independent members, one a very experienced magistrate and the other a recently retired Crown prosecutor. In addition, the Director of the Diocesan Board of Education, the Bishop's Chaplain and (a recent addition) the Canon Missioner at the Cathedral have joined the DSMG. A police representative was on the DSMG but has had to step down and the group shares with other DSMG's the difficulty of persuading managers in the public sector that membership is a good use of their time. The Chair talked about how she has direct personal contact with the safeguarding boards for children and adults but would prefer active membership of the DSMG.

The Chair has good access to the Bishop, who sees it as his duty to respond immediately and to make changes in response. In addition, the Bishop's Chaplain is a member of DSMG and able to act as liaison.

Considerations for the Diocese

Consider the use of a strategic plan for the year with defined objectives, plans to meet those objectives and your criteria for measuring success in order to assist identification of any obstacles and how to overcome them, and what needs to be taken forward in the next year.

Consider how you might use the parish survey as a means to collate basic safeguarding information parish by parish, and assist in identification of priority areas to focus efforts. There may be some cross-referencing with the Articles of Enquiry.

Consider the obstacles there have been in the recruitment of current, or recently retired, professional safeguarding personnel to the DSMG and develop a plan to overcome these.

3.4 POLICIES, PRACTICE GUIDANCE AND PROCEDURES

The diocese has adopted the national set of policies (2015) and published them on its website. The only anomaly seen was that the template for a parish safeguarding policy and procedures referenced the national Safer Recruitment guidance of 2013. The toolkit dealing with Safer Recruitment used the 2015 version. The DSA undertook to put this right.

The use of six clearly labelled ‘toolkits’ on the website to break down policy and procedure into navigable elements is a good idea.

The DSA was not clear whether the diocesan synod has formally adopted the national (House of Bishops) safeguarding policies, procedures and guidance. The synod does approve the DSAs annual report which references all current policies, procedures and guidance every year.

(Reference to 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.)

The Diocese has adopted the national policy ‘Responding to Serious Safeguarding Situations Relating to Church Officers and Other Individuals’ (May 2015)

(Reference part 9 of S. 11 audit which calls for such a policy to be implemented. Also parts 10 and 11 of S. 11 audit: ...all allegations are dealt in line with Responding to Serious Safeguarding Situations Relating to Church Officers and Other Individuals (May 2015).)

Considerations for the Diocese

Consider whether the diocesan synod should be asked to approve the national policies, procedures and guidance each year.

3.5 RESOURCES OF SAFEGUARDING SERVICE

At present, the DSA can access support from one of the PAs in the Diocesan Office. In practice, this means, for example, that the DSA does not have to maintain the spreadsheet of who has trained and when, but he does have to book the venues.

The decision had already been made at the point of audit that administrative support to the DSA should be increased and a second DSA appointed. The latter will make Peterborough a well resourced diocese in comparison with some of the other dioceses, audited to date. It seems that sometimes things take a while to happen; there was a reference to a long wait for a new laptop for the DSA, but they do happen.

In terms of the mechanism for increasing the budget share for safeguarding, there was a general view that, if the case is made, and the Bishop and Chair of DSMG support it, the funding will be found. Obviously, that stance has its limits but the impression given is that the risks are too high to not take action when action is clearly needed.

(Reference to part 6 of the S.11 audit: The DSA has sufficient time, funding, supervision and support to fulfil their safeguarding responsibilities effectively, including local policy development, case work, advice, liaison with statutory authorities, training, personal and professional development and professional registration.)

3.6 RECORDING SYSTEMS AND IT SOLUTIONS

This section addresses recording practice and systems; there are sections further in the report about the quality of the documents and processes.

Records are kept at the Diocesan Office of clergy and diocesan officers who have had a DBS check and when it is due for renewal. DBS checks for posts at parish level have been contracted out to CCPAS (The Churches' Child Protection Advisory Service) and, as elsewhere, it is the responsibility of the appointing parish to track the DBS application and subsequent renewal. One member of the focus group described CCPAS as 'brilliant' and commented that, if they think a parish will have difficulty persuading the DBS staff of the need for a check, they will phone the parish officer and discuss how best to phrase the request. It was agreed that DBS checks can be hard to obtain when people are going to be volunteering with vulnerable adults.

Records of who has been trained and when are also kept on a spreadsheet at the Diocesan Office by the PA who deals with individual bookings for training.

Casework is recorded electronically and stored on a diocesan laptop. The DSA shares access to records with the Diocesan Secretary (his manager) and the IT manager.

The auditors did not see any separately recorded complaints but did see two cases where a family member had written to the Bishop to complain about the DSA's response. These had not been logged as separate complaints and were on the casefile.

The auditors saw two examples of recruitment to lay posts and looked at Safer Recruitment in seven Blue (clergy) Files.

No risk assessments were seen as these are not yet recorded (see below).

(Reference to 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.)

3.7 RISK ASSESSMENTS AND SAFEGUARDING CONTRACTS / AGREEMENTS

There is not currently a format and procedure for risk assessments in use in the Diocese, despite the existence of national practice guidance. The DSA referred to adopting risk assessments done by other professionals, usually probation officers or the Dangerous Persons Management Unit (police). However, risk assessments are not always made available to the DSA and may not include the particular risks attached to church membership and attendance. Neither is the DSA routinely included in the risk assessment process by statutory partners.

The Diocese has not yet needed a 'Type 2' risk assessment, i.e. an assessment undertaken by an external and independent person. The DSA was not confident that he could set up a reciprocal arrangement with any of his peers. The national team might consider setting up a list of suitable experts.

(Reference to 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.)

The process for putting in place agreements with offenders and those thought to be a risk is stronger, and several examples were seen. All parties with full names and roles, including the subject and the DSA, had signed them.

Examples were seen of the DSA reminding people at parish level that a review date was coming up, and of attending. The auditors did not see examples of revised agreements and, where the DSA had not been able to join the review, it was clear that there could be a time delay and some chasing up before he received an update.

Considerations for the Diocese

Agree a strategy to further improve the standard of risk assessment practice by:

- devising and implementing a format for risk assessments - engaging with relevant partners about the consistent need for the DSA to be a member of the multi-agency risk assessment process for relevant individuals.*
- consistent sharing of risk assessments (as well as the resulting agreement) with the subject.*

3.8 TRAINING

All basic safeguarding training is currently delivered face to face by the DSA alone. It was felt, although not tested out, that the DSA would have concerns about the potential dilution of the quality and accuracy of training if others delivered it for him, although one PSO in the focus group delivers brief awareness training to volunteers for a one-week holiday scheme annually.

The Diocese is getting into its stride in terms of ensuring that everyone who must or is strongly recommended by the national team to receive training does so, hence the suggestion that a training strategy be agreed. The people trained are recorded at diocesan level by a named Personal Assistant who also produces certificates of attendance. There is agreement that refresher training should be every three years but the take-up and tracking of that seems less embedded.

There is general agreement that the use of e-learning to supplement basic safeguarding training is inevitable, probably for the refresher training, but it hasn't yet been commissioned. The funding was not seen as a problem and the outline plan is to buy from another diocese and customise it.

Two of the 22 training sessions delivered in 2015 focused on domestic abuse awareness.

In addition to the training provided by the DSA, the Independent Chair has brought in an expert to train all senior clergy and rural deans on talking with victims. This will take place in March and the Chair referred to a 'three-line whip' on attendance. This will supplement the basic training provided by the DSA.

All the senior team attended the safeguarding training provided for senior clergy nationally in 2015 and all are up to date with their safeguarding training.

The DSA does not provide training to religious communities in this Diocese.

(Reference to 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 three years.)

Considerations for the Diocese

Draw up a training strategy that sets out the need for training and how it will be met.

Commission e-learning to complement the delivery of face-to-face training. This might cover the basics before a training session, or deliver some of the refresher training.

3.9 SAFE RECRUITMENT OF CHURCH OFFICERS

Recruitment, consistent with the Safer Recruitment policy, was in evidence in the two HR files for lay diocesan appointments audited. On one file, it was obvious that an essential requirement for the post had been waived for the successful candidate, who undertook to complete the qualification in question. It would make sense to include a brief explanation of the rationale when this course is taken.

The auditors pulled some Blue Files at random and found, in a sample of seven files, a lack of evidence of Safer Recruitment for clergy. This is partly because one appointment was to a school chaplaincy and one to a prison chaplaincy and recruitment was done by those organisations. The auditors were concerned to hear that it is by no means automatic for the Diocese's offer to join interview panels for chaplaincies to be accepted and as a result the Diocese has no say in the appointment. This is despite an assumption that the Bishop will license the successful applicant.

The lack of application form and/or references on older Blue Files is explained by the fact that national guidance from the House of Bishops has evolved, and in the past, dioceses were advised not to keep them. This can result in somewhat lopsided Blue Files in which one can trace the journey to ordination but details subsequently are missing. It was, however, possible to trace where members of the clergy had worked previously.

Where a member of the clergy is the subject of a safeguarding concern, the DSA makes up a Red File (more or less a duplicate of the casework record) which is stored next to the Blue File. The diocesan view is that this is standard and recommended practice; it was the first time the auditors had seen this system but the sample to date has been very limited. The practice would seem to carry with it an inherent risk of the separation of files and it is vital that the relevant Blue File is updated immediately to show that a Red File accompanies it. On two Blue Files seen a safeguarding concern had not yet been referenced; one was recent (January 2016) and one was from September 2015.

The sample of cases seen by the auditors did not include any in which domestic abuse was identified by the DSA and/or the auditors. The DSA confirmed that domestic abuse between clergy and partner would be a safeguarding issue and would go into a red file. Also that, although domestic abuse referrals are not uncommon, he had not had any involving clergy, as yet.

Because the Diocese keeps a spreadsheet of DBS checks, on several Blue Files the cross reference was a tick in the box for a current DBS on a standard checklist at the front. Some also had a screen shot of the DBS number and date.

(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

Consider how to change practice so that:

- when an essential requirement for a post is waived for an applicant, the reason why and the plan to address the gap in skills or competence is routinely added to the HR file.*
- a process is implemented for a Blue File to be routinely updated immediately a Red File is made up.*

3.10 RESPONSE TO ALLEGATIONS

A total of 18 case records were audited. Four concerned allegations by vulnerable adults and the rest were concerns or allegations by or about children. Six concerned allegations against members of the clergy of which four were historic, in one case dating back to the 1950s.

The date of first referral was clearly recorded on a specific form that included the relevant basic details. There was no discernible gap between referral and action, especially where allegations were current. Where allegations were of historic abuse there was evidence of painstaking detective work to try to establish what allegedly happened, where and when. For example, the auditors saw an email to a senior member of the clergy who had made a referral which asked for clarification, point by point. Sometimes it was impossible to get a clear picture but the DSA was not deterred from taking action such as insisting on an agreement.

Overall, the Diocese benefits from having dealt with (or having resolved) the legacy of unresolved cases, and having established clear patterns of response. It was probably beneficial that the Past Cases Review more or less coincided with the arrival of the DSA and the Bishop; two of the cases seen had been picked up by the review and dealt with at that time.

3.11 QUALITY OF RECORDING

Recording is generally clear and the story is usually understandable, although sometimes the auditors had to read a chain of emails to get it. The use of a chronology, and a case summary when a case is closed, might be worth considering. Recording was also up to date. The auditors raised the point of ensuring that roles are identified where emails don't have a 'footer' giving the information.

3.12 COMPLAINTS

There is a template for a complaints and grievance procedure at parish level in Toolkit 5 on the website. This states that; a complaint is a written or verbal expression of dissatisfaction or disquiet about an action, or lack of action by a person acting on behalf of the church, or about the policies and procedures of the church. And it adds that when the complaint is made by someone who is deployed within the parish, whether paid (for instance, paid youth workers and administrators) or holding unremunerated office (for instance, Sunday School leaders, servers), it is usually referred to as a grievance.

The template procedure states that complaints and grievances against clergy are handled through the Clergy Discipline Measure, and that complaints or grievances against clergy should be addressed to the Archdeacon or the Bishop. In addition, complaints and grievances against licensed or commissioned ministers (e.g. Readers) are handled through a separate diocesan procedure, and these complaints or grievances should be addressed to the incumbent of the parish.

There is not a complete guide to making complaints as yet. There seems to be a general acceptance that complaints will go to the Bishop but the auditors could not find a procedure which sets out how to complain and what to expect in terms of, for example, response times or final adjudication (other than at parish level).

The auditors saw a letter from a woman who had disclosed past intra-familial abuse to members of her church some years ago, when she was a young adult, and had, in effect, been advised to forgive her abuser. She wrote to the Bishop after she had taken her complaint to the police and the offender had been sentenced. While the Bishop pointed out that the events in question had taken place some years previously, he readily apologised for the then response of the church.

(Reference to 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

Compile and publish a procedure for complaints about safeguarding that includes how to make a complaint and what to expect in terms of timeliness of response as well as the mechanics of who will respond.

Where a complaint is found to be reasonable, and an apology is made, ensure that the learning is shared with the DSMG and any action taken is noted in the minutes.

3.13 WHISTLEBLOWING

The DSA has drafted a whistleblowing policy and procedure but this was not seen by the auditors.

The auditors were told that there is a whistleblowing procedure in the staff handbook but this applies to employees only.

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

Considerations for the Diocese

Complete and publish the whistleblowing policy and procedure, ensuring that it differentiates between a complaint, a grievance and whistleblowing.

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

The auditors interviewed one of the two archdeacons, who share responsibility for appointing clergy and the Articles of Enquiry. The Articles always have a safeguarding question. It was acknowledged that some parishes do not have a safeguarding officer or the role is undertaken by the incumbent or their partner, which is not good practice.

Not all Articles of Enquiry are returned and every three or four years a parish is inspected by the archdeacon or rural dean. Then the Articles are returned in person and this gives greater leverage.

Every incumbent must have a current DBS before they are licensed by the Bishop and their appointment letter, which must be returned signed, spells out their safeguarding responsibility.

Overall, the archdeacons use persuasion and influence and work through the rural deans where there are evident shortcomings in the parish approach to safeguarding. The distinction was made between clergy who have freehold (about 20per cent) and those who have common tenure and from whom a greater degree of compliance can be demanded.

The auditors did not see any spreadsheets recording, parish by parish, the existence of a safeguarding policy, the appointment of a PSO, which roles have received training and when, etc.

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

Considerations for the Diocese

Devise, populate and maintain basic information about safeguarding on a parish by parish basis, using the parish survey and (to a lesser extent) the Articles of Enquiry. The information should be analysed by the DSA and used to inform planning.

3.15 RESOURCES FOR CHILDREN AND VULNERABLE ADULTS

There are two authorised listeners and the auditors were provided with a clear account of their purpose, how referrals are made and a detailed role profile and person specification. There is also a briefer explanation of the role and function for people who may wish to use them.

Both the authorised listeners appointed have a counselling background but know that this is not a counselling role. They have received the basic safeguarding training in addition to any training provided through their counselling role. Only one of the listeners has been used, once.

It is the view of the Independent Chair of DSMG that it would be better to fund a particular charity to undertake authorised listening as staff already employed in that organisation already undertake regular training and have supervision. Whether the charity the Chair has in mind would take the role on has not been tested.

The auditors were told that a structure is not in place to hear the views of children and young people at diocesan level but that some parishes have put this in place.

(Reference to 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.)

Considerations for the Diocese

Evaluation of the need for and provision of the Authorised Listener role and whether to recommend exploring alternative ways to deliver this service.

3.16 INFORMATION SHARING

Within the Diocese, there is good information sharing and the auditors got no sense of information being withheld from the DSA. Recent developments in the Cathedral approach to safeguarding should improve the speed and quality of information sharing with the DSA.

The DSA works cooperatively with peers in neighbouring dioceses and, being an inland diocese, there is a high number: Ely, Lincoln, Leicester, Coventry, Oxford and St Albans. The auditors saw a case taken on behalf of another diocese. The DSA provides and receives cover during leave periods in a reciprocal arrangement with two other DSAs.

The auditors saw one example of liaison with another faith group, where a person about whom there are historic allegations has been received into another denomination. Full information was offered.

Information sharing is more problematic with statutory organisations. One case seen noted a lack of information from a police colleague and the auditor was left with the feeling that the Church of England was expected to safeguard with very limited information about why it was necessary and the degree of risk. An information-sharing protocol was discussed with the Diocese at the end of the audit.

(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 Bishops' 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 are clear information-sharing protocols in place.)

Considerations for the Diocese

Using the contact established between the Chair of DSMG and statutory partners, the DSA should seek to agree an information sharing protocol with children's and adults safeguarding boards.

3.17 QUALITY ASSURANCE PROCESSES

Responsibility for the quality assurance of safeguarding work lies firmly with the DSMG and the Independent Chair, and that was recognised by the Bishop and the Chair. The Bishop talked about DSMG being the DSA's reference group and of it having a monitoring function.

Going forward, the QA role of DSMG might be developed to include audits of Safer Recruitment and the casework of the DSA.

Considerations for the Diocese

Consider how the DSMG role is developed to provide a comprehensive quality assurance process of the safeguarding work of the diocese

3.18 LINKS WITH NATIONAL SAFEGUARDING STRATEGY AND TEAM

As a member of the Joint Safeguarding Working Group, the DSA is aware of the direction of travel nationally.

The only example of the DSA asking for advice from the national team was a question sent to the legal team, and not the safeguarding team, and this was not answered. The issue, of whether the Bishop has to give a reason for declining a request for Permission to Officiate, was resolved and a form of wording was found locally.

3.19 WHAT NATIONAL SYSTEMIC SAFEGUARDING ISSUES HAVE ARISEN

Four issues arose in the course of this audit which have national implications:

- **What is recorded on Blue Files in terms of safeguarding concerns and how?** The value of the Red File used in Peterborough is that, if it contains all the safeguarding information, it can make the redaction of a file much simpler. But the auditors had some concerns about the cross referencing of Blue and Red Files and noted that this diocese was the first where Red Files were found (but only the third where auditors had access to Blue Files). It may be that there needs to be a re-issuing of national guidance.
- **Appointments can be made to chaplaincies, usually with hospitals/hospices, schools or prisons, without reference to the diocese.** There is the potential for people who would not be appointed by a diocesan panel to slip through the net. A consequence can be that the bishop then has to decide whether to license a member of the clergy whose appointment they might not have agreed, in order to have some control, or to refuse a license knowing that the person will practise as an interdenominational minister unlicensed. This would seem to be a loophole that should be closed.

- **The possible creation of a list of independent risk assessors with the necessary skills for type 2 assessments.** This is clearly an issue that dioceses meet only occasionally and, while it should be funded locally, the support of the national team would be useful.
- **The Diocesan Director of Education has raised the point that the audit, in its present format,** does not test the quality of joint working between the Board of Education and the diocese on safeguarding issues in church schools. The point being made was that, although a parish and school are distinct domains, there will inevitably be crossover between them.

APPENDIX: REVIEW PROCESS

DATA COLLECTION

Information provided to auditors

Information provided to the auditors before or during that audit:

- The DSA's annual reports for 2013, 2014 and 2015 covering national and local developments in safeguarding, data about case work and training, and links to all policies and procedures
- A self-audit using the S. 11 (Children Act 2004) format
- Information about Authorised Listeners
- The Job description and Person Specification for the DSA post
- A Role Description for the Independent Chair of DSMG
- Feedback from three statutory partners (Children's Services, Probation and Police)
- Safeguarding newsletters (all 2015) compiled by the DSA and emailed to clergy, licensed lay ministers, parish safeguarding officers and church wardens
- The DSA's own summary of the recommendations arising from the Past cases Review in 2009
- A sample report presented by the DSA to DSMG covering trends in casework, data about training and links to policies
- Minutes of the three most recent meetings of DSMG (May 2015, October 2015 and January 2016)

Participation of members of the diocese

The auditors had face to face conversations with:

- the DSA
- one of the two archdeacons
- the Bishop's Chaplain
- the Diocesan Secretary
- the Bishop of Peterborough
- the Independent Chair of the DSMG and one of the two independent lay members.

The parish focus group comprised:

- two parish safeguarding officers
- a lay reader who is also a youth leader
- a parish administrator who is also assistant parish safeguarding officer

The audit: what records / files were examined?

The auditors examined:

- a total of 18 case files. Six of these related to members of the clergy, and the Blue and Red Files for these people were also read. Five of the cases concerning clergy were about children and four of those were about historic allegations of abuse. Overall, four of the 18 cases related to an adult and the other 12 related to children
- two HR files for lay diocesan officers

- seven Blue Files which were read for evidence of Safer Recruitment and were unrelated to the Blue Files mentioned above.