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# Gloucester diocese independent safeguarding audit (July 2016)



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

**Diocese of Gloucester**

Audit undertaken 5, 6 and 7 July 2016

**Hugh Constant, Susan Ellery and Edi Carmi**

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# 1 INTRODUCTION

## 1.1 CONTEXT AND BACKGROUND

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

The audit of the Diocese of Gloucester was carried out by Hugh Constant (the lead auditor for this diocese) and Susan Ellery on 5, 6 and 7 July 2016. This report was written by Hugh Constant with support from Susan Ellery; quality assurance was provided by Edi Carmi, the overall lead auditor for the project.

## 1.2 THE DIOCESE

The Diocese of Gloucester covers most of the county of Gloucestershire, as well as small parts of some neighbouring counties. It has 306 parishes, and a population of c.600,000 people. These live in a combination of urban centres such as Gloucester and Cheltenham, small towns, and predominantly rural areas such as the Cotswolds and the Forest of Dean. Fifty per cent of worshippers in the diocese attend 40 churches; the other 50% attend 350 churches, so there are a number of parishes with fairly small congregations. As with most dioceses, Gloucester covers areas of affluence as well as some significant areas of deprivation.

In recent years, the Diocese has had to live through two significant safeguarding situations involving clergy at a very senior level. These, the auditors were told by the DSO and others, 'rocked the Diocese', and appear to have had a lasting impact on safeguarding attitudes locally.

Peter Ball was the Bishop of Gloucester from 1992 until he resigned in 1993 having accepted a police caution for gross indecency. He was not prosecuted at the time, but in 2015 was tried, convicted and jailed for a number of sexual offences, mainly committed in the 1970s and 1980s, when he was officiating in the Diocese of Chichester, including as the Suffragan Bishop of Lewes. Much of the press coverage and publicity, however, referred predominantly to 'the former Bishop of Gloucester'.

Another senior member of the clergy was, in August 2014, questioned by the police about allegations of sexual abuse dating back to the 1980s. The police in October 2014 concluded there were no grounds for action, and following national Church processes, he was granted permission to continue his ministry in retirement in May 2015. Despite the outcome, the process was very stressful for the Diocese and along with the parallel publicity around Peter Ball served to highlight safeguarding issues for all clergy and staff.

While this audit was of the safeguarding arrangements in the diocese of Gloucester, the links and relationships between the Diocese and Gloucester Cathedral are very close, and the cathedral addresses its safeguarding responsibilities by contracting with the diocese to support them in meeting them. The auditors did therefore meet with the Dean and Cathedral staff and look at Cathedral materials in the course of the audit.

There are a number of key people involved in safeguarding in the Diocese:

- Bishop of Gloucester
- Dean of Gloucester Cathedral
- Archdeacon of Cheltenham
- Archdeacon of Gloucester
- Bishop's Safeguarding Adviser
- Chair of the Diocesan Safeguarding Management Board
- Diocesan Secretary
- Head of Human Resources and Safeguarding
- Diocesan Safeguarding Officer
- Head of Communications
- Director for the Department of Mission and Ministry

### **1.3 STRUCTURE OF THE REPORT**

This report is divided into:

- Introduction
- An overview of what is working well, where improvements can be made, and a summary of considerations for the Diocese.
- The findings of the auditors: these are linked to the safeguarding requirements for faith groups set out in section 11 of the Children Act.
- Considerations for the Diocese are listed, where relevant, under each finding section.
- An appendix sets out the audit process.

### **1.4 LIMITATIONS ON PROCESS**

The auditors did not focus on any cases that had been or were part of other case review processes. Rather, the auditors have looked at what the responses to the cases suggest about the extent to which the Diocese is a reflective safeguarding organisation.

## 2 OVERVIEW

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

### 2.1 WHAT'S WORKING WELL?

The culture appears to be one where safeguarding is everyone's business: it is covered in lots of training, not just formal safeguarding courses, and safeguarding training itself is offered imaginatively, e.g. to the property management team. There is a wide understanding of safeguarding as about potential harm rather than just actual harm – e.g. Parish Giving Scheme [see section 3.20], and listening sessions for children and young people about what a safe and welcoming church feels like.

There is a clear lead from the Bishop through the senior teams on safeguarding:

- The Bishop acts as an excellent role model. She is very clear that safeguarding is something that has to be done well because it's a legal, societal and reputational duty, but more importantly because it is a theological imperative, and part of the Church's duty of care. Her message, that safeguarding is a positive responsibility, has been heard throughout the audit.
- The Bishop is actively and appropriately involved in case work, and challenges parishes, making them think about safeguarding. The thank you session for safeguarding volunteers [see section 3.1] was hugely well-received and is an example of good practice.
- The senior teams in the Diocese seem to work well together, and have a good grasp of safeguarding.
- The archdeacons are willing to combine encouragement and insistence to get safeguarding done properly. There is a willingness to work with the available tools – e.g. insurance, charity trustee rules, and the Clergy Disciplinary Measures (CDM) – to get what needs doing done.
- The Bishop's Staff Team feels coherent, inclusive, and focused on safeguarding.
- There is a commitment to fund a larger safeguarding team in tough financial times.

Much of the improvement in safeguarding stems from the involvement of the Head of Human Resources (HR) & Safeguarding: there is a clear sense of before and after her appointment. She seems to have been the key to getting safeguarding properly organised and staffed. The Head of HR & Safeguarding is an excellent networker, and is key to developing relationships with the Cathedral and the local authority. She is a supportive manager; a key colleague on the Bishop's Staff team; and she has an excellent grasp of systems and processes. She has developed these so that safeguarding feels embedded and systemically strong.

The Diocesan Safeguarding Officer (DSO) delivers good case work and well-regarded training. She displays an appropriate balance between seeking advice and working on her own. The DSO challenges people skilfully, as part of a developing

growth in confidence. She works to a business plan, and has paid-for professional supervision. She uses risk assessments appropriately and in line with national policy.

The training delivered by the DSO receives much positive feedback as being thought-provoking and well-organised. As necessary, it is tailored and specific – to the Mothers' Union or curates, for example, and on topics such as mental health.

The support offered by the DSO and the Head of HR & Safeguarding to the parishes is much appreciated.

There are notably strong links with the local authority, Gloucester Cathedral, and non-traditional congregations.

The DSMB has a very clear sense of purpose: strategy and quality assurance. It operates to a good clear business plan. Every board member is asked to have a safeguarding ambassadorial role in attending at least one parochial event a year.

Other notable strengths in safeguarding practice are:

- The response group model [see section 3.10] works well
- There is a willingness to learn
- The diocesan HR files are good
- Communications work well, e.g. safeguarding newsletter; links with every response group
- The Disclosure & Barring Service (DBS) arrangements work well

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

The big ongoing challenge is getting safeguarding embedded in every parish – including rural outliers. In the words of the Bishop's Safeguarding Adviser, who works specifically to give the Bishop strategic safeguarding advice, 'there's always someone who thinks it doesn't apply'.

Although the reasons for it are clear, and the case work is very good, there is a vulnerability in the Head of HR & Safeguarding doing operational case work without the relevant qualifications and professional framework.

From DSMB minutes, it is evident that it can be hard to get statutory representatives to attend.

The relationship with statutory partners other than the local authority – police and probation, for example – is good at a case work level, but could be strengthened strategically.

The process for safeguarding agreements needs to be tightened up [see section 3.7], to make sure gaps do not occur, that they are always used when appropriate, and that the DSO reviews them in person as a standard measure.

There is no detailed complaints policy for diocesan or Cathedral staff, however, there is a clear whistleblowing policy within the employment handbook for both Diocese and Cathedral employees, and within the Cathedral's volunteering arrangements. Currently, the diocesan website unduly limits how people can complain to the Chair of the DSMB about their experiences with the safeguarding service.

The combined 68 pages of adults' and children's safeguarding policies for parish-based Nominated People feels too much to take on board for busy people doing this on a voluntary basis.

Recording needs to improve still further. There are still hand-written notes; hard-to-read red sheets; multiple repeated emails; and the files need more structure than simple chronology. Work is not always signed and dated, and professional roles of people involved are not often made clear. Files are not routinely and explicitly closed.

Clergy blue files lack structure. It is hard to know what people do, and two examples of recent recruitment had no evidence of an application or of references being sought or supplied. Safeguarding concerns are not always evident on the blue files.

The safeguarding aspects of the website are good but could be strengthened.

Likewise, communication with the parishes is good, but some Nominated People – the term the Diocese uses for parish safeguarding representatives – were unclear when new material was shared, e.g. the Nine Commandments of Social Media.

## **2.3 SUMMARY OF CONSIDERATIONS FOR THE DIOCESE**

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

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

- Develop the existing work to engage with parishes, to as far as possible complete the journey to every parish fully understanding safeguarding. This could include peer reviews; further get-togethers, perhaps at a deanery level, for Nominated Persons; and the DSO(s) getting out and about even more, perhaps in parish/deanery surgeries. Another suggestion is to set up a social media group within which people could share ideas, ask questions, and seek support.
- The new training strategy should therefore be developed in consultation with parish representatives to ensure their maximum engagement with it. The safeguarding team to liaise with the communications team about how best to present the new training.
- Linked to these points, a standing Parish Focus Group could usefully offer consultation about communications, training etc.
- Consider a clear set of recording standards, looking at, among other issues, hand-written notes, file structures, accountability, and file closures.
- Supervision discussions should be placed on file where key decisions are made.

- The Head of HR & Safeguarding to step back from operational case work as soon as a new DSO is recruited.
- The Diocese to be mindful of the National Safeguarding Team's advice in relation to ensuring that there is some social worker expertise in the DSO role.
- Broadening the statutory membership of the DSMB could lessen the reliance on those statutory people that are members currently, and would strengthen strategic links with key partners such as the police.
- Tightening up the safeguarding agreement system so that each agreement is explicitly linked to a risk assessment; so that there is clarity about when an agreement is needed; and there is a structure for determining in what circumstances, if any, the DSO need not conduct a face-to-face review with all interested parties.
- The safeguarding pages of the website might benefit from photographs of the safeguarding team and a safeguarding message from the Bishop of Gloucester, to help embed awareness.
- Increase the available options for contacting the chair of the DSMB with a complaint, and develop a simple complaints process setting out what people can expect from it.
- Consider making parish safeguarding policy documents briefer and more accessible.
- Take prompt action to implement any reasonable recommendations from the ongoing audit of the clergy personnel blue files held in the Bishop's offices. The SCIE auditors would suggest consideration be given to better structure of the files, and urgent attention being paid to including the basics of safe recruitment, such as references.
- Training for PGS staff in signs and indicators of conditions affecting mental capacity.

## 3 FINDINGS

### 3.1 SAFEGUARDING MANAGEMENT

Safeguarding in the Diocese of Gloucester is very clearly and publicly headed by the Bishop of Gloucester, who from her opening episcopal address to Synod onwards has made her commitment to the safeguarding agenda plain. She was clear that 'I hold the umbrella' on safeguarding, and that she in the end is accountable for everything the Diocese does in this area.

Early on in her time as Bishop, she issued a clear apology for the harm done by Bishop Peter Ball, and the auditors were told that this created a very favourable impression among parishioners, as it suggested that this was a person who understood the seriousness of not getting safeguarding right.

In her conversation with the auditors, the Bishop stressed that safeguarding is not only a societal, legal and reputational imperative –it is also a Christian imperative. There is a clear theological duty of care to all people connected to the church. Furthermore, she made the point that safeguarding is therefore to be seen in a positive light, and not just as a negative task to be done when things go wrong. This message had clearly been heard across the Diocese: the auditors also heard it from other diocesan employees and from parishioners.

The Bishop was actively interested in individual cases, with evidence on case files of her wanting to be kept informed on latest developments, and acting supportively to the DSO where necessary. She has challenged parishes to think through the practicalities of getting safeguarding right, for example by asking them whether their policies sufficiently cover informal coffee-and-socialising sessions after a service, during which children are playing without parental supervision or any explicit parish accountability for their wellbeing. In her work, she is supported by a Bishop's Safeguarding Adviser (BSA), who is a former Director of Adult Social Services in Gloucestershire County Council. The BSA acts as a sounding board for the Bishop, sits on the Diocesan Safeguarding Management Board (DSMB), and takes a lead role in the Diocese's response to the ongoing Independent Inquiry into Child Sexual Abuse (the IICSA, also known as the Goddard Inquiry). The BSA likened her role to that of 'court jester', given licence to speak truth to power. The BSA is unpaid.

One new annual initiative introduced by the Safeguarding Team, and attended by the Bishop was to hold a thank you event for all the parish safeguarding representatives (known as Nominated Persons) in the Diocese. The chance to meet the Bishop and share experiences (and hear her 'uncompromising' stance on safeguarding) was clearly extremely well-regarded by the Nominated Persons to whom the auditors spoke, and seems to have served as a significant boost to the commitment of those involved. This is vital in the recruitment and retention of volunteers who are asked to take on roles which can be time-consuming and difficult. It should be commended as good practice from which other dioceses could learn.

The Bishop is supported by senior clergy and diocesan colleagues who share her commitment to getting safeguarding right. The two archdeacons, of Gloucester and Cheltenham, shared the Bishop's view of safeguarding as a positive duty. Their active involvement was evident from case files, where the auditors saw their willingness to initiate Clergy Disciplinary Measures, and to work closely with the

safeguarding professionals as necessary. The Bishop's Staff team appeared cohesive and effective, with no 'lone rangers on safeguarding', in the words of one archdeacon. The Suffragan Bishop of Tewkesbury post is currently vacant, although subsequent to the audit, the Archdeacon of Cheltenham has been appointed to the post.

There is good overlap between the DSMB and the Bishop's Staff team. Both archdeacons sit on both, as does the Head of Human Resources (HR) & Safeguarding, the Bishop's Chaplain, and the Director of Mission & Ministry. The Diocesan Secretary is a regular invitee on the DSMB, as well as being a key player on the Bishop's Staff. The Bishop's Staff team is responsible for implementing Journeying Together, the overall strategy for the Diocese. Led and very publicly owned by the Bishop, it has a clear safeguarding strand.

The presence of clearly-drafted strategic plans, which are monitored and appear to be acted upon, reflects a strong commitment to running the Diocese professionally and holistically, after a period in which the diocesan structures did not work well. This would appear to be to the benefit of all diocesan functions, but the auditors were certainly satisfied that there is a culture that provides for the professional and effective management of safeguarding.

A key person in this system is the Head of HR & Safeguarding, who is the member of the Bishop's Staff team with the delegated lead for safeguarding. She has worked for the Diocese since 2008, including 15 months as Chapter Steward in Gloucester Cathedral, and a period also of about 15 months from 2012–2014 when she was the sole Diocesan Safeguarding Officer. Described by the Chair of the DSMB as the 'lynchpin' of safeguarding in the Diocese, the Head of HR & Safeguarding has an ability to network, an understanding of systems and governance, and a supportive and collaborative working style, and these combine to make her the heart of a well-run safeguarding system. The auditors came to the conclusion, based on the strength of the structures and strategies in place, that she has avoided the pitfall of making the whole system dependent on her. There are enough good people working in a well-established framework that safeguarding in the Diocese would be able to cope should she be away on leave, or choose to leave.

Another theme that recurred through the audit was the support offered to the growing number of non-traditional congregations. These newly forming groups may be springing up as part of diocesan strategies such as Fresh Expressions of Ministry and Bishop's Mission Orders. Their congregations are linked into the diocesan structures, including safeguarding.

This approach is also used with places like the local Mariner's Chapel, which are Anglican, but do not come into the diocesan structure. There has also been progress with linking strategically and operationally with Trinity Church, Cheltenham – a large, evangelical church that works with significant numbers of children and vulnerable adults – which used to sit somewhat apart from the main diocesan processes. Developing significant positive working relationships has brought Trinity much closer to the Diocese, and the safeguarding representative now sits on the DSMB. It struck the auditors as an example of skilled safeguarding management that this has happened, and it reflects a wide, no-stone-untuned approach to getting safeguarding right.

One notable area of joint working for the Diocese is with Gloucester Cathedral, which like other cathedrals has to manage the safeguarding risk of a large, often transient congregation. The terms of the audit are to examine safeguarding within the Diocese, and not the Cathedral, but the partnership is such that the auditors concluded that it made no sense to maintain the distinction. Following on from a period in which the Head of HR & Safeguarding acted into the job of Chapter Steward at the Cathedral, the two establishments recognised that the best way to cover the safeguarding requirements of the Cathedral was to enter into a service-level agreement with the Diocese. Accordingly, the Cathedral now pays the Diocese annually for an agreement in which it purchases dedicated HR and Safeguarding advice and support. The Cathedral benefits therefore from the DSO's case work and training; for example, she has recently trained vergers, security staff and the music department. Two of the cases audited concerned children at the King's School (which educates the boys in the Cathedral choir) and showed evidence of careful joint safeguarding practice with the DSO, the school and the Cathedral.

Other events have contributed to the Diocese and Cathedral operating 'completely hand-in-hand' on safeguarding, in the words of the Dean of Gloucester Cathedral. He chaired the response group when a safeguarding allegation was made against a senior member of the clergy. This was a significant period but one which appears to have brought the Diocese, and the two organisations closer. The cheek-by-jowl geography of the two bodies helps this too, and the Dean and others are conscious that, in the public eye, the Cathedral and the Diocese are one, so working in partnership makes sense.

Safeguarding management works well within the Diocese: people and organisations working collaboratively, to make sure that a broad understanding of safeguarding prevails, and risks are minimised as effectively as possible. The relationship between Diocese and Cathedral in particular feels important, and could be shared with other areas to see if the model holds an appeal for them.

The auditors concluded too that the people in the diocesan management structures, while experienced in safeguarding cases, are not complacent. In every conversation, there was acknowledgment that parochial understanding and engagement was not yet complete, and that more work needs to be done. As the Bishop said, it is a long road until this is understood in every school and every parish.

#### Relevant Section 11 requirements

*Part 1 Provide a structure to manage safeguarding in the Diocese; (PAGC A.4)*

*Part 2 The Bishop appoints a member of his senior staff team to be the lead person for safeguarding.*

### **3.2 DIOCESAN SAFEGUARDING ADVISOR/S**

The Diocese employs a paid Diocesan Safeguarding Officer (DSO) for 21 hours a week. There is a recognition that this resource is insufficient, and funds have been secured for another 21 hours a week post, which will be advertised in autumn 2016. The DSO has a nursing background, and was formerly a lead safeguarding nurse within the NHS. She has also worked for the NSPCC and in schools. She has worked for the Diocese as DSO since 2014, so is well-established. Prior to her arrival, the Head of HR & Safeguarding also covered the DSO role. Before that, safeguarding was part of the portfolio of the Director for Social Responsibility. The Head of HR & Safeguarding line manages the DSO, a part-time HR Adviser, and a part-time HR and Safeguarding Administrator who leads on all DBS processes.

The DSO covers both children's and adults' safeguarding, and has embarked on an MA in safeguarding, with an international perspective, funded by the Diocese. As well as doing case work, and sharing the Diocese's out-of-hours safeguarding phone line, the DSO is the lead trainer for safeguarding. Prior to her arrival, the training was jointly delivered by the Head of HR & Safeguarding and a Local Authority Designated Officer (LADO) from Gloucestershire County Council (GCC), but the DSO has been able to develop this and make it her own using her own scenarios and case studies.

Funded by the Diocese, the DSO receives professional supervision from a recently-retired designated nurse within the local NHS. This occurs for two hours every three months, although the DSO can (and does) call for advice and support on an *ad hoc* basis. The DSO values the supervision, which helps shape her case thinking, although there may be an issue that the DSO's supervisor, like the DSO, does not have a social work background. These discussions therefore, as the DSO pointed out, should be reflected on the case files. The DSO can also turn to the BSA for advice, which bolsters the amount of support she receives, and increases the range of professional perspectives from which she can seek guidance. She is a member of the South West Ecumenical Safeguarding Group, and linked in to Church of England safeguarding networks.

On Mondays and Tuesdays, and in the DSO's absence such as at holiday times, the Head of HR & Safeguarding covers the post as appropriate and she also shares the out-of-hours phone. The two of them work well together, with the Head of HR & Safeguarding – who is longer-serving and more well-known across the Diocese – making sure that any work directed towards her is appropriately directed to the DSO as soon as possible. The DSO finds the engagement of the Head of HR & Safeguarding very supportive, and it helps her to maintain the boundaries she needs between work, family and studying.

The DSO has strong links with the Bishop of Gloucester. The two meet every two months, and the DSO can phone or email whenever necessary. This contrasts with her relationship with the previous bishop, with whom she had no meetings. The DSO attends Bishop's Staff team meetings whenever safeguarding is a major agenda item.

From the case files the auditors saw, it is clear that the work of the DSO is good, as will be looked at in more detail in 3.10 and 3.11. So too is the work of the Head of HR & Safeguarding, when she covers the DSO role, with sound judgements and good networking to the fore. It is clear, however, that having someone without a formal safeguarding background – albeit someone with a good deal of safeguarding experience and some personal engagement with the topic – runs counter to guidance from the National Safeguarding Team (NST) and the ethos of Protecting All God's Children. The auditors were pleased to see that an additional DSO will be appointed, so that the Head of HR & Safeguarding can step back from case work, and focus more on developing a strategic framework for safeguarding, an area in which she evidently excels.

In recruiting a new DSO, the Diocese should consider that, while PAGC lists a number of safeguarding occupations from which it recommends DSOs be recruited, the NST advises that within a diocese at least one DSA should have a social work qualification and the appropriate experience and skills to undertake the role. Given

the BSA has specialist experience within the field of adult safeguarding, this would ideally be someone from a children's social work background.

#### Relevant Section 11 requirements

*Part 1: Appoint a suitably qualified diocesan safeguarding adviser, and provide appropriate financial, organisational and management support. The adviser must have full access to clergy files and other confidential material (PACG A4.5).*

*Part 1: Ensure that the diocesan safeguarding adviser is informed of any serious safeguarding situation, including any allegation made against a member of the clergy, or anyone else holding the Bishop's Licence, concerning misconduct.*

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

*Part 6: The DSA has sufficient time, funding, supervision and support to fulfil their safeguarding responsibilities effectively; including local policy development, case work – including time for complex cases, advice, liaison with statutory authorities, training (coordination and direct delivery), personal and professional development and professional registration. Communication with parishes (newsletters, website etc.). Also administrative and managerial support arrangements, out-of-hours / leave cover and access arrangements (planned and unplanned) to the senior staff team (PACG A4.5).*

*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**

*Supervision discussions should be placed on file where key decisions are made.*

*The Head of HR & Safeguarding to step back from operational case work as soon as a new DSO is recruited.*

*The Diocese to be mindful of the NST's thinking in favour of appointing social workers to the DSO role.*

### **3.3 DIOCESAN SAFEGUARDING MANAGEMENT GROUP**

The Diocesan Safeguarding Management Board (DSMB) meets four times a year. It is chaired, on an unpaid basis, by a childcare lawyer who had previously chaired Gloucestershire's Local Safeguarding Children's Board. She is the first independent chair and has served since 2012; the Archdeacon of Gloucester held the role initially. The DSMB operates to a clear Terms of Reference.

The DSMB seems clear therefore in its understanding of its task: to provide strategic challenge and support to the Diocese, to make sure it is as confident as it can be that it has the mechanisms in place to safeguard children and vulnerable adults. To do this, it sets an annual strategic plan, of which the auditors saw the last three, and which it regularly updates and shares with the Bishop's Staff team, the Bishop's Council, the Diocesan Board of Finance and the Diocesan Synod. Progress in safeguarding can therefore be tracked, and outstanding areas of development identified.

Thought has been given to the make-up of the DSMB; for instance it includes the Head of Communications, as well as the Director of Mission & Ministry who helps make sure that safeguarding is considered in all clergy development work, and not sectioned off as a discrete topic. The minutes of the meetings indicate that the DSMB is well-attended on the whole, and gets tasks done, with no great sense that actions linger on, uncompleted from meeting to meeting.

One example of strong practice that the DSMB has developed is that the chair encourages each member to attend at least one parish event each year on behalf of the DSMB (the Chair herself has done four) in a safeguarding ambassadorial role. This seems to the auditors to be a positive approach to tackling the risk that a DSMB may seem remote from the daily business of managing safeguarding at parish level. The initiative should perhaps be publicised so that other boards can consider it.

The LADO from GCC sits on the DSMB, reflecting her very close links with the Diocese. She has a social work qualification, as does the Bishop's Safeguarding Adviser who has senior level social care experience in the county, who is also on the Board. The group would perhaps be strengthened by wider statutory representation, for example from the police, adult social care, or probation, although the auditors note the challenges of finding people with the capacity to commit to the meetings.

As set out on 3.1, there are good links between the DSMB and the Bishop's Staff team.

Relevant Section 11 requirements

Part 1: Provide a structure to manage safeguarding in the Diocese; (PAGC A.4)

**Considerations for the Diocese**

*Broadening the statutory membership of DSMB could lessen the reliance on those statutory people that are members currently, and would strengthen strategic links with key partners such as the police.*

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

The Diocese has formally adopted the key national safeguarding policies, most recently the Safer Recruitment policy. These are taken to the Bishop's Staff team and DSMB for discussion and implementation. The auditors saw evidence of the active use of national policies on the case files, for instance in the DSO citing and quoting Responding to Serious Safeguarding Situations in advising a member of the clergy not to write a character reference in support of a server in the parish, and in the regular use of safeguarding agreements.

In addition, the Diocese has put together template safeguarding policies – one for adults, one for children – for parishes. These are comprehensive, with a consequence that between them they add up to 68 pages of material. In the opinion of the auditors, this is too much, and the auditors noted that the policies try to combine elements that feel as if they belong in a training document, such as signs and symptoms of abuse, with procedural detail about how to respond. The Diocese could consider making these policy documents briefer. The auditors saw a good quality safeguarding handbook for staff and volunteers at Gloucester Cathedral. There are also localised adaptations of certain policies, such as Responding to Serious Safeguarding Situations, which is helpful inasmuch as there are relevant contact details appended.

The Diocese has been proactive in developing safeguarding processes, sometimes in the historic absence of national policy. The team evidenced how it pulled together a procedural flow chart and risk management plan for the situation of a senior clergy member being accused of historical sexual abuse, which helped them navigate a

period of considerable organisational stress. Reflecting the Diocese's ability to see safeguarding in a wide context, the risk management plan incorporated aspects such as HR, communications, emotional impacts, and implications for the Cathedral.

Gloucester Cathedral demonstrated a strong approach to safeguarding policies in its engagement with the high-profile Three Choirs Festival, an annual week-long event featuring the choirs of Hereford, Worcester and Gloucester Cathedrals, and rotating between the three venues. This year, Gloucester Cathedral was adamant that the Festival needed a stronger set of safeguarding procedures, and the DSO and the Head of HR & Safeguarding worked with the festival organisers to develop something satisfactory.

Relevant Section 11 requirements

*Part 1: Ensure the Diocesan Synod adopts the House of Bishops' safeguarding policies, together with any additional diocesan procedures and good practice guidelines.*

*Part 9: The Bishop / Diocesan Secretary / CX, in line with should ensure that the Diocese has a written procedure on how to deal with serious safeguarding situations and allegations against church officers. All allegations are dealt with in line with Responding to Serious Safeguarding Situations Relating to Church Officers and Other Individuals Practice Guidance May 2015.*

**Considerations for the Diocese**

*Consider making parish safeguarding policy documents briefer and more accessible.*

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

It has been accepted (see 3.2) that the Diocese needs to bolster its safeguarding resource, and a new part-time DSO will be appointed. The particular driver for the increase was the need to deliver the new learning and development framework from the NST, but the Diocese already had a sense that it needed a greater case work capacity. The appointment will allow the Head of HR & Safeguarding to further develop operational safeguarding capacity and equitably focus on her overall role where, the auditors were told, HR can sometimes take a back seat in the face of a safeguarding priority.

At the moment, with the active support of the Head of HR & Safeguarding, the DSO is able to balance her hours, and take back time she is owed when circumstances require her to work extended hours. While the auditors saw occasional examples of case work being done in the evening, and heard concerns that it is difficult for the safeguarding team to maintain an office-hours culture in a church environment which operates extensively at weekends and in evenings, the DSO was clear that evening case work is atypical.

Nonetheless, the second DSO affords an opportunity to develop the safeguarding role. Nearly all of the additional resources that have been committed to the safeguarding service over the years, including this new post, have come at the expense of redundancies and restructuring elsewhere, as the Diocese is running at a deficit. Decisions about funding are made by the Bishop's Staff team, typically after representations by the Head of HR & Safeguarding. The willingness to take steps such as making redundancies elsewhere would suggest that safeguarding is an organisational priority, for both Diocese and Cathedral.

Safeguarding support is also supplied by the part-time HR and Safeguarding Administrator who leads on DBS administration, and a part-time HR Adviser working across the Cathedral and Diocese, with a focus on safer recruitment. Both are within the HR and Safeguarding team. The HR and Safeguarding team are based at Church House, an historical but refurbished building within the cathedral close. The DSO therefore either shares a building with, or is a very short walk from, most of the people with whom she needs to liaise at diocesan level.

Relevant Section 11 requirements

*Part 6: The DSA has sufficient time, funding, supervision and support to fulfil their safeguarding responsibilities effectively; including local policy development, case work – including time for complex cases, advice, liaison with statutory authorities, training (coordination and direct delivery), personal and professional development and professional registration. Communication with parishes (newsletters, website etc.). Also administrative and managerial support arrangements, out-of-hours / leave cover and access arrangements (planned and unplanned) to the senior staff team (PACG A4.5).*

### **Considerations for the Diocese**

*See considerations for 3.2 about recruiting a new DSO.*

## **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 topic.

The Diocese supplied the auditors with print-outs detailing the latest situation in terms of training and DBS checks within the Diocese, and it is clear that a robust system is in place for tracking that people are up to date on these things. Recent self-audit figures show that 372/385 clergy have had safeguarding training in the last three years, as have all of the Bishop's Staff, and 141/167 other people with the Bishop's Licence. These are strong figures, but of note here are the tracking and administration systems to ensure no one is missed.

The DBS process has been managed by the Churches Child Protection Advisory Service (CCPAS) since 2014, and this is well-regarded locally. Again, it is clear that the Diocese has robust disclosure knowledge and knows where there are gaps in DBS clearances, and can therefore act upon them.

Case files are stored in a locked cabinet in Church House, accessible to the DSO and the Head of HR & Safeguarding, and their administrative support. The files reflect a recent improvement in record-keeping standards, with case summaries and chronologies having been added, and hard-to-read coloured paper being replaced.

Further improvements could be usefully made. Files structured by type of document rather than just chronology would make key documents, such as safeguarding agreements, easier to find. The Diocese should consider never again using hand-written file notes. People's job roles should be explicit on file, and records should be signed and dated. Time could helpfully be set aside to close off files where the matter is now completed. But on the whole, the story was accessible quite readily, and should an urgent call come in, for example from a neighbouring DSO, information could be gleaned quickly enough to be useful.

Relevant Section 11 requirements

*Part 1: Provide access to the Disclosure and Barring Service 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.*

*Part 1: Keep a record of clergy and church officers that will enable a prompt response to bona fide enquiries. This record should include start and finish dates, all posts held and next post when known; where there have been safeguarding concerns, these should be clearly indicated on file.*

**Considerations for the Diocese**

*Consider a clear set of recording standards, looking at, among other issues, hand-written notes, file structures, accountability, and file closures.*

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

The auditors saw on the files examples of Type A<sup>1</sup> Risk Assessments and one Type B<sup>2</sup> Risk Assessment, suggesting an active use of recent risk assessment policy from the NST. While some safeguarding agreements did not have risk assessments explicitly linked to them, these appeared to be older ones, with newer tools appropriately used on more recent cases.

Consideration of the risk posed by people properly extends to those without convictions, but whose behaviour gives cause for concern. The auditors saw some strong work, for example, with an individual who has committed no crime, but who appears to repeatedly cause distress to others. Most safeguarding agreements do apply to people with convictions, however, and generally these are well-managed, with review dates typically set in advance, and adhered to. Signed copies of agreements were evident on most files.

There were examples of cases where a review date was missed, or where reviews happened without the presence of the DSO. The auditors identified one case, involving an individual recently returned from abroad, where allegations had been made against them, and where a safeguarding agreement would have been needed if the individual wished to attend church. Overall the safeguarding agreement system seems to be working; it is a question of tightening it up so it works even better in the future.

Gloucester Cathedral has recently demonstrated robust safeguarding practice in barring a congregant who refused to renew a safeguarding agreement.

Relevant Section 11 requirements

*Part 1: Provide access to a risk assessment service so that the Bishop or others can evaluate and manage any risk posed by individuals or activities within the Church.*

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<sup>1</sup> A Type A Risk Assessment is one normally conducted by the DSO/DSA, taking into account advice and assessments from statutory agencies.

<sup>2</sup> A Type B Risk Assessment is one typically commissioned by the Diocese and carried out by an independent agency or safeguarding professional.

## Considerations for the Diocese

*Tightening up the safeguarding agreement system so that each agreement is explicitly linked to a risk assessment; so that there is clarity about when an agreement is needed; and there is a structure for determining in what circumstances, if any, the DSO need not conduct a face-to-face review with all interested parties.*

### 3.8 TRAINING

The Diocese embarked on a major programme in 2013 to ensure that everyone holding the Bishop's License had attended safeguarding training. The courses were jointly delivered by the Head of HR & Safeguarding and the LADO from GCC, with the DSO taking over the running of the courses upon her appointment in 2014. The training was strongly backed by the Bishop at the time, with him making it clear that attendance was mandatory. This is reflected in the good figures for attendance listed in 3.6, and in total more than 1,400 have been trained in safeguarding since 2013. Impressively, the training has also included Cathedral and diocesan staff, including teams such as property maintenance workers, because the Diocese realised that they might be the first people to spot problems when they go into clergy houses. This reflects a good awareness that safeguarding is not simply the business of people with the word 'safeguarding' in their job title.

Ongoing sessions continue, with all new clergy automatically booked on to training, as are those moving to Permission to Officiate (PTO), and readers. The training slides that the auditors have seen look good, with plenty of challenging case studies and discussion points. They have recently been updated to include adult safeguarding under the Care Act. The DSO stresses the message in training that a culture of openness, and of sharing concerns, is vital to good safeguarding.

Both the content and the organisation of the training were praised by parishioner representatives to whom the auditors spoke, with people appreciating that courses are offered at various places and times. People spoke of the training being challenging and refreshing. Some parishioners called for more training, such as annual online refresher courses (the Diocese does not currently use any online training), and for there to be mandatory tests at the end of all training sessions, to ensure people did not simply attend without fully engaging.

While the parishioners that the auditors met were very positive about training, the collated feedback from the Archdeacons' Articles of Enquiry in 2015 reveal perhaps two areas for further focus. One is that there remains a handful of parishes for whom safeguarding feels like an irrelevant bureaucratic excess: one return asked why 'two tiny rural parishes' should engage with this; another felt that as 'we naturally look after our own', the safeguarding burdens were therefore over-the-top. The second area for development would appear to be around adult safeguarding, with a significant minority of parishes seeking greater clarity about what vulnerability means, and how to respond to it.

The auditors see that there is to be a training strategy for 2016–2020, to plan the roll-out of the new national Learning and Development Framework, and suggest that parishes be consulted to test out practical ways in which engagement with the training can be maximised. The Bishop of Gloucester noted that there is a communications

challenge in presenting the new training as extra learning, which does not invalidate the input that people have already had.

As well as the main training programme, the DSO has developed and run more bespoke sessions. Examples include looking at working with mental health issues; and working and supporting offenders in worshipping communities. The Diocese has for the past two years, in networking with the LADO, funded from the HR and Safeguarding budget, a theatre production of *Chelsea's Choice*, a play that illustrates the issue of child sexual exploitation. The production is open to all clergy, church youth workers and advertised widely within the church network in the Diocese.

Relevant Section 11 requirements

*Part 1: Select and train those who are to hold the Bishop's Licence, in safeguarding matters. Provide training and support on safeguarding matters to parishes, the Cathedral, other clergy, diocesan organisations, including religious communities and those who hold the Bishop's Licence. Provide a complaints procedure which can be used for those who wish to complain about the handling of safeguarding issues.*

*Part 8: Those working closely with children, young people and adults experiencing, or at risk of abuse or neglect (clergy and lay people) have safeguarding in their induction and are trained and have their training refreshed every three years.*

**Considerations for the Diocese**

*Develop the existing work to engage with parishes, to as far as possible complete the journey to every parish fully understanding safeguarding. See Considerations in 3.14 for further detail.*

*The new training strategy should be developed in consultation with parish representatives to ensure their maximum engagement with it.*

*The safeguarding team to liaise with the communications team about how best to present the new training.*

### 3.9 SAFER RECRUITMENT OF CHURCH OFFICERS<sup>3</sup>

The Diocese performs strongly on its DBS checks. In 2015, 1,004 DBS checks were made, of which five were blemished, i.e. they were returned with some concern recorded. To mid-July 2016, 473 have been completed, of which seven are blemished. No DBS checks are outside the renewal period for anyone working or volunteering for the Diocese. Parishioners to whom the auditors spoke particularly valued the support they received from the diocesan DBS administrator, praising her for never tiring of their repeated questions, and for never making them feel silly for asking them.

The auditors examined three diocesan recruitment files, which demonstrated very strong safe recruitment practices. All had a job description, person specification and application form, listing two references, and all the files had the two references in them. Each file listed the DBS record of the employee, and the date they last did safeguarding training. Although the sample was small, the quality of files reflected the clear focus on proper procedure promoted by the Head of HR & Safeguarding.

By contrast, the clergy blue files do not meet the Protecting All God's Children requirement to allow for a 'swift response' to enquiries about clergy. The auditors looked at six, in addition to those about whom there was a safeguarding case file. The blue files were poorly organised, and it was difficult to establish where the person worked, and where they had come from. In two instances where a person had recently been appointed to a post, there was no evidence of safer recruitment at all: no application or interview process, and no references. When asked what on the safeguarding agenda kept her awake at night, the Bishop of Gloucester said it was the state of the blue files, and accordingly, the Diocese is addressing the issue. The Head of HR and Safeguarding has recently commissioned a full review of all clergy files (within the past cases review process), and the SCIE auditors suggest that the Diocese prioritise implementing any reasonable proposals he might make that are in line with the 2013 clergy files guidance from the NST.

More positively, where there was a safeguarding concern, it was evident on the blue files seen (one or two were not seen as the person was no longer in the Diocese); and in one case where the current Bishop had to write a Current Clergy Status Letter about an individual moving diocese, the issues involved were discussed with the DSO, and then clearly stated, with no hint of minimising the concerns.

#### Relevant Section 11 requirements

*Part 1: Provide access to the Disclosure and Barring Service 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.*

*Part 7: The Diocesan Secretary / CX has implemented arrangements in line with the House of Bishops' Policy on Safer Recruitment 2015.*

### Considerations for the Diocese

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<sup>3</sup> A church officer is anyone appointed by or on behalf of the Church to a post or role, whether they are ordained or lay, paid or unpaid.

*To take prompt action to implement any reasonable recommendations from the ongoing audit of blue files. The SCIE auditors would suggest consideration be given to better structure of the files, and urgent attention being paid to including the basics of safe recruitment, such as references.*

### **3.10 RESPONSE TO ALLEGATIONS**

The auditors looked at 19 case files, which included some chosen by the Diocese to cover the types of case set out in the SCIE briefing pack, and some chosen at random by the auditors.

The response to allegations was, in general, strong. It was certainly prompt, with the case files showing no concerns about delayed responses, and occasional use being made of the out-of-hours number. This availability was well-regarded in the Parish Focus Group, where people spoke of how the easy access to the DSO and/or the Head of HR & Safeguarding allayed their anxieties. Others spoke of 'brilliant' and 'thorough and professional' responses, which people felt gave the Diocese credibility with statutory services, and which prevented people feeling overwhelmed by the pressures of safeguarding. The fact that the diocesan team respected the expertise in the parishes about the people and cultures involved in safeguarding cases was particularly well-received. One parishioner spoke of an 'accompanied journey': safeguarding is hard to get right, but they are always supported when they need to be.

Parishioners were confident that they could contact the DSO, the Head of HR & Safeguarding, or the DBS administrator, as appropriate, and that whatever needed to be shared would be. This was reflected on case files, where good handovers and communication between members of the safeguarding team was clear. The auditors saw a case, for example, in which the Head of HR & Safeguarding took a referral and set an initial meeting, but ensured the DSO took over the case from there.

The basic diocesan model for managing the response to an allegation against a church officer is to set up a response group. This is always chaired by the Archdeacon who does not cover the relevant area, to build in an element of independent oversight, and typically includes the DSO, relevant clergy, and the communications team. The response groups are brought together swiftly, and meetings are scheduled and adhered to, and the action points are generally dealt with effectively. The involvement of the communications team was useful, the auditors saw, in managing how to break difficult news to congregations. The response groups mirror the requirements for core groups as detailed in Responding to Serious Safeguarding Situations.

The willingness to take a broad view as to what would constitute the best diocesan response was evident in a situation with complex housing implications. The role of the wider diocesan staff in resolving this was impressive.

#### Relevant Section 11 requirements

*Part 9: The Bishop / Diocesan Secretary / CX, should ensure that the Diocese has a written procedure on how to deal with serious safeguarding situations and allegations against church officers. All allegations are dealt with in line with Responding to Serious Safeguarding Situations Relating to Church Officers and Other Individuals Practice Guidance May 2015.*

*Part 10: The Bishop / Diocesan Secretary / CX, should ensure that all allegations are dealt with in line with Responding to Serious Safeguarding Situations Relating to Church Officers and Other Individuals Practice Guidance May 2015.*

### 3.11 QUALITY OF CASEWORK

The case files showed good quality casework. The auditors noted evidence of a growth in confidence of the current DSO, who early on in the role would consult extensively before acting, but who now – while absolutely maintaining an appropriate degree of collaborative working – will act with greater decisiveness. The multi-agency aspect of the work is a strength, with good liaison evident with the local authority, police, probation, other faith groups and other dioceses. This reflects a real strength of the Diocese – its joint working, which was also seen in a generous response to the Director of Education in one case, and the Cathedral choir in another.

One impressive area of practice is the DSO's skill in politely yet firmly challenging others when they fall short of what she requires of them: criticising a vicar for inappropriately sharing information with a congregation; challenging a local authority on an inadequate response; and rigorously picking up on breaches of a safeguarding agreement by someone who consistently sought to push the boundaries of it.

A number of cases involved perpetrators who were also vulnerable adults: people with mental health problems, learning disabilities, and autism, for example. Good liaison and mutual learning was evident – the police, for example, discussing with the DSO how best to interview a person with autism – and the Diocese has responded with training courses where it was felt that people needed greater knowledge in handling these situations.

In one case, the auditors were initially critical as it seemed that in one safeguarding context an individual's role as a chaplain had not been considered in the situation. Although it was explained that the person had resigned the role some months earlier (which was not evident from the blue file) and the allegation proved to be unfounded, the auditors thought that joined-up checking with the previous employer would have been good practice.

As mentioned earlier, there is a need to tighten up on procedures around safeguarding agreements.

#### Relevant Section 11 requirements

*Part 1: Provide access to a risk assessment service so that the Bishop or others can evaluate and manage any risk posed by individuals or activities within the Church.*

*Part 9: The Bishop / Diocesan Secretary / CX, should ensure that the Diocese has a written procedure on how to deal with serious safeguarding situations and allegations against church officers. All allegations are dealt with in line with Responding to Serious Safeguarding Situations Relating to Church Officers and Other Individuals Practice Guidance May 2015.*

*Part 10: The Bishop / Diocesan Secretary / CX, should ensure that all allegations are dealt with in line with Responding to Serious Safeguarding Situations Relating to Church Officers and Other Individuals Practice Guidance May 2015.*

*Part 11: The Bishop / Diocesan Secretary / CX, should ensure that all who fall into this category are dealt with in line with Responding to Serious Safeguarding Situations Relating to Church Officers and Other Individuals Practice Guidance May 2015. The category is: If an organisation removes an individual (paid worker or unpaid volunteer) from work such as looking after children (or would have, had the person not left first) because the person poses a risk of harm to children or adults, the organisation must make a referral to the Disclosure and Barring Service.*

### 3.12 COMPLAINTS

It is clear on the diocesan website how to complain about the service from the

safeguarding team – one is invited to write to the Chair of the DSMB. It would promote accessibility were it possible to email and/or call. In addition, while there are detailed policies and procedures for raising complaints about clergy, there is no similar process – setting out timescales, how to escalate a complaint etc. – for complaints about the safeguarding service.

Relevant Section 11 requirements

*Part 4: There is an easily accessible complaints procedure including reference to the Clergy Discipline Measures and whistleblowing procedures.*

### **Considerations for the Diocese**

*Increase the available options for contacting the chair of the DSMB with a complaint about the safeguarding service, and develop a simple complaints process setting out what people can expect from it.*

## **3.13 WHISTLEBLOWING**

There is a whistleblowing policy for all Diocesan Board of Finance and Cathedral employees, within each organisation’s Employment Handbooks. Clergy are not included within whistleblowing legislation so the Diocese ensures that complaints are dealt with under the six-step process outlined in the diocesan Clergy Terms of Service handbook available on line. The Archdeacons lead on each process and would pass concerns directly on to the appropriate system e.g. safeguarding, finance, CDM.

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

The Archdeacons, as noted earlier, appear to be actively engaged with the safeguarding agenda, and their role within it they described as ‘multi-faceted’. The Archdeacon of Gloucester is Vice-Chair of the DSMB, on which the Archdeacon of Cheltenham also sits, and both discuss safeguarding regularly as part of the Bishop’s Staff team. Each chairs response groups for safeguarding allegations that arise in the archdeaconry of the other.

Part of their safeguarding role is carried out via the Articles of Enquiry, and the auditors saw the enquiry questions for each year dating back to 2013. In each iteration, the safeguarding enquiries mixed concrete, tick-box questions (‘Do you have a safeguarding policy?’) with more reflective, open ones (‘What else would be helpful for you in terms of safeguarding?’). The Diocese also supplied the full set of parochial answers to the 2015 Articles of Enquiry, which reveals broad confidence in and understanding of the safeguarding agenda, mixed with indications that there remain parishes where more input is needed. Some of these issues are discussed in 3.8: the lower confidence about adult safeguarding, and a lingering sense from parishes that this isn’t relevant to them. But both Archdeacons, in conversation, were clear that the numbers of parishes taking that line is reducing year on year.

The Archdeacons were also united in saying that their main challenge is not getting people to complete forms, but in getting cultures to change. They ask safeguarding

questions in interviews, and in exit interviews (to see if there are any safeguarding agreements in place), and it is a key part of the six-month probationary check-in with new clergy. But while all of this helps, they said, the real task is to embed the recognition that safeguarding is part of the theological and moral duty of care that is owed to everyone, and not simply an externally-imposed necessity.

Both auditors were struck that neither Archdeacon even referred to the fact that parishes are independent organisations, and that this limits the formal levers Archdeacons have to ensure safeguarding is properly addressed. Instead, they expressed a very proactive attitude, combining the need to persuade and explain, with the use of tools such as highlighting threats to parish insurance cover; charity trustee rules; and the Clergy Discipline Measure process, when they do meet pockets of resistance.

The Bishop and Archdeacons are supported in their recruitment tasks by clear records of DBS checks, safeguarding training and so forth, which allow them to pinpoint where there are problems that may need to be addressed.

In support of the efforts to improve the safeguarding response at parish level, there is a detailed parish safeguarding checklist, which each one has to return. The auditors saw the 2015 iteration, and the much fuller 2016 version. In the Parish Focus Group, the longer document was welcomed, as something that would further help them develop their confidence in their safeguarding work. It too asks clear Yes/No questions, as well as asking what areas of safeguarding parishes feel more and less confident about.

Relevant people in the parishes – incumbents, church wardens, Nominated Persons (parish safeguarding representatives) and the like – receive a quarterly safeguarding newsletter, which is clear and well-written, and appears to contain useful content. The communications team supports the production of each newsletter which is sent via MailChimp to all nominated people and clergy and added online. There is a constantly updated list of Nominated People, so that the Diocese can track changes in personnel, and whether newsletters have been received. The newsletters were favourably referred to in the parish focus group.

Relevant Section 11 requirements

*Part 1: Include the monitoring of safeguarding in parishes as part of the Archdeacons' responsibilities. The expectations of a parish are set out in PACG page 20 paragraph 4.6.*

**Considerations for the Diocese**

*Develop the existing work to engage with parishes, to as far as possible complete the journey to every parish fully understanding safeguarding. This could include peer reviews; further get-togethers, perhaps at a deanery level, for Nominated Persons; and the DSO(s) getting out and about even more, perhaps in parish/deanery surgeries.*

*Another suggestion is to set up a social media group within which people could share ideas, ask questions, and seek support.*

*A standing Parish Focus Group could usefully offer consultation about communications, training etc.*

### 3.15 RESOURCES FOR CHILDREN AND VULNERABLE ADULTS

The Diocese supplies its Authorised Listeners via the Diocesan Professional Counselling Service, made up of trained counsellors. Referrals to the service are made via either the DSO or the Head of HR & Safeguarding. Its usage is light, but the auditors did see it being offered in the case files, and one instance of that offer being taken up. In that case, the person appeared to value the help she received. There was also an example of where the counselling service was offered from someone from another diocese now resident in Gloucester as part of inter-diocesan working.

The Diocese promotes the services of the Gloucester Domestic Abuse Support Service (GDASS), which was used in some domestic abuse cases seen by the auditors. The diocesan website gives links to other organisations locally and nationally that aim to support people experiencing abuse or its after-effects.

The Diocese is currently undergoing a 'vision process' led by the Bishop, and within this is running a series of listening events for ranges of people, including some for children and young people. In these events, children and young people are being asked about what a safe and welcoming church looks like to them.

#### Relevant Section 11 requirements

*Part 3: The Bishop / Diocesan Secretary / CX, in line with PAGC 4.5 should ensure: there is a structure to hear the views of young people; there are children and young people's advocates available; and there are Authorised Listeners in place (RWSA 5).*

### 3.16 JOINT WORKING AND INFORMATION SHARING

The auditors noted good quality information sharing across the Diocese's case work, with appropriate and effective links being made with statutory agencies such as the police and probation, and with other dioceses. There was also no indication that the DSO or the Head of HR & Safeguarding are ever not promptly informed by senior clergy or others of any safeguarding concerns.

This reflects a more general strength of the Diocese, which is its joint working, and the links it makes with other organisations. There are good links with Gloucestershire County Council, made easier by their offices being over the road from the diocesan offices, and also because the Head of HR & Safeguarding had worked there prior to joining the Diocese. The DSO has been able to develop these further. The LADO in particular is very closely linked with the Diocese, and is available to the DSO for support and advice. The auditors spoke to her ahead of the audit, and she fed back positively on the professionalism and helpfulness of the DSO, citing an example when she came to speak to some Congolese churches about physical chastisement, and gained more of a hearing from her religious perspective than the LADO had got from a statutory perspective. She was keen to stress the benefit of having the Head of HR & Safeguarding on the Gloucestershire Safeguarding Children's Board. The helpfulness of the safeguarding team was also evident in the training it offered to the local Mothers' Union.

As mentioned earlier, strategic links with the police and probation services could usefully be bolstered by including them if possible on the Diocesan Safeguarding Management Group.

### Relevant Section 11 requirements

*Part 1: Share relevant information about individuals with other dioceses, other denominations and organisations or the national Church as appropriate.*

*Part 5: The Diocesan Secretary / CX, who will have a lead on DPA matters, should ensure that there are clear information-sharing protocols in place.*

## **3.17 QUALITY ASSURANCE PROCESSES**

The Diocese makes significant efforts to be a learning organisation. With its links, via Peter Ball, to some of the historic failures in the Diocese of Chichester, and to other national reviews as they occur, the Diocese tries to respond to each by reflecting on what learning could be reflected in its plans, and/or to address local concerns.

The auditors read a comprehensive report into the suicide of a parishioner with mental health problems. The report was commissioned by the Archdeacon of Cheltenham, and conducted by CCPAS. The auditors did not themselves look at the case file given the existing report; instead they concerned themselves with looking at the diocesan response. The auditors noted that there has been specific training on the recognition of, and support to, people with mental health problems. The Archdeacons now conduct exit interviews on safeguarding issues with departing incumbents (the suicide occurred during an interregnum at the church), so that they are more aware of any problems they might need to monitor or be aware of. There seems to have been a positive shift in the understanding of how to balance confidentiality and information sharing, with a greater emphasis on passing on concerns. The Bishop of Gloucester had recently updated the Chair of the DSMB on progress towards meeting the report's recommendations. The case, suitably anonymised, is used in training by the Head of HR and Safeguarding in a leadership training session for those moving into incumbency roles and others, entitled 'leading a healthy safeguarding culture'.

Quality assurance is one of the main functions of the DSMB. It exercises it through receiving quarterly reports from the DSO, and exploring themes and problems that these reports reveal. It holds all relevant diocesan staff to account, and monitors process through annual workplans.

The legal firm that the Diocese uses, Veale Wasbrough Vizards, was asked to conduct an audit of safeguarding processes in 2013 when it began work with the Diocese, and CCPAS were also commissioned to conduct an overall audit of diocesan baseline safeguarding arrangements in 2014. Many of its recommendations: more training for parishes; strengthened links between the DSMB and the Bishop and the Bishop's Staff team; a higher parish profile for the safeguarding team; and better DBS arrangements have been acted upon. Others: improved safeguarding agreements; and a better understanding of vulnerable adults, for example, are works in progress. The audit highlighted poor blue files, and this remains an issue. Related to this it is notable that the Diocese unilaterally decided to re-do and update its Past Cases Review, to ensure a thorough methodology and report carried out by one person, to improve consistency. Within this review, further advice and recommendations about file management are being included and it is very important that the necessary improvements happen from this.

As mentioned previously, each parish has to complete a comprehensive safeguarding checklist, and genuine attention gets paid to the returns, by the Archdeacons and the strategic bodies within the Diocese. These bodies work to very clear strategic plans,

meaning progress can be measured and remedies taken where it has not occurred. The auditor's overall impression is of an organisation that takes quality assurance seriously, and genuinely seeks to improve.

Relevant Section 11 requirements

*Part 1: Provide a structure to manage safeguarding in the Diocese (PAGC A.4).*

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

The Diocese is well linked into the national safeguarding agenda. By having response groups in place already, the Diocese was in a good position to adopt the core group model of addressing safeguarding allegations when Responding to Serious Safeguarding Situations came out. As discussed, the Diocese has committed funds to cover the requirements of the Learning and Development Framework, but wants the NST to be mindful of the financial implications for dioceses of so much activity in a short space of time. The new training material is welcomed, but the Diocese and the Bishop are conscious of the communications challenge about the need for further training.

The Dean of Gloucester Cathedral has a national role on the group revising Protecting All God's Children, and on the group overseeing the Church of England's response to the IICSA. This helps link the Diocese to the national agenda, which is positive, although there were calls for the NST to be at least as enabling as they are directive.

The auditors did not see case evidence of the DSO seeking advice from the NST, but there was no sense that she would not do so if necessary.

In all the conversations that touched upon the recent case involving a senior clergy member, there was a sense that the Diocese was dissatisfied with the support from the NST – then a much smaller body, led by different people. Concerns about this relationship were able to be fed into the national review. These included developing trust in a senior staff team able to maintain professionalism and boundaries and offer support appropriately; the lack of a 'national policy' or guidance on how to handle the legalities of such a situation; and being a part of a national response group. The Diocese worked hard to respond to in terms of designing appropriate risk assessments, and follow-up actions, and seeking legal, and technical, advice and support. The visit to discuss the case by the current head of the NST was most welcomed, and this helped improve relationships.

Relevant Section 11 requirements

*Part 1: Share relevant information about individuals with other dioceses, other denominations and organisations or the national Church as appropriate.*

### **3.19 WHAT NATIONAL SYSTEMIC SAFEGUARDING ISSUES HAVE ARISEN**

The Diocese raised some questions about clergy blue files. People were unclear whether they should have to ask permission from the subject to send their blue file to another diocese, and about what CDM info should be sent and to whom.

The Diocese also wanted support in how best to promote the message that the new training is not, because the previous training was, somehow invalid and adapting

national modules to reflect this for refresher training purposes.

There is some good practice that the NST might want to consider sharing nationally:

- The strong relationship between Cathedral and Diocese
- The popularity of the Safeguarding Team's thank you event for parish safeguarding Nominated People.
- The parochial visits by members of the DSMB

### **3.20 ANY ADDITIONAL INFORMATION**

The auditors met with the Chief Executive of the Parish Giving Scheme (PGS), who is also a member of the Bishop's Staff team. This is a charity that was initially designed and operated within and for the Diocese, but now has a much wider Church of England remit. It physically sits within Church House, and currently serves 13 dioceses across the Church of England, with others lined up to come on board. It processes and manages donations from 16,000 parishioners currently with this increasing by roughly 500 new donors each month. The scheme encourages people to sign up to a direct debit to benefit their parish, and to opt in to an annual inflationary increase in their donation. The PGS reminds people each year of the increase, and is very keen to allow people the chance to change their minds, and to pause or reduce their donations.

The PGS is conscious that some donors will lose mental capacity over time, and may not be in a position to actively consent any increases. They ask their staff, therefore, to be alert to signs that people may be losing mental capacity. This is a good initiative, which would be strengthened by formal training in how to spot indications of conditions such as dementia, mental ill health, and learning disability.

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

*Training for PGS staff in signs and indicators of conditions affecting mental capacity.*

## APPENDIX: REVIEW PROCESS

### Information provided to auditors

Prior to the audit, the Diocese supplied:

- a section 11 audit checklist
- a safeguarding timeline detailing important safeguarding events for the Diocese, the Church of England, and society more broadly
- a context document setting out the history and demography of the Diocese
- details of the safeguarding responsibilities of key people in the Diocese
- diocesan and DSMB business plans
- minutes of the last 10 DSMB meetings
- reports for Bishop's Council, and the Bishop of Gloucester's inaugural address
- internal audits, and national safeguarding returns
- Articles of Enquiry questions from 2013–2016, and a breakdown of responses for the 2015 returns
- details of the safeguarding work of Gloucester Cathedral including the Service Level Agreement in place
- details of safer recruitment processes, and DBS returns
- a lessons-learned report into the suicide of a young parishioner
- the complaints process for clergy
- training plans and material, and a breakdown of people who have and have not attended
- links to other organisations involved locally in safeguarding
- newsletters and other resources to support parishes
- templates for parish safeguarding policies and procedures
- details of the support offered to survivors
- case work files
- an overview of the diocesan response to the IICSA.

### Participation of members of the Diocese

During the audit, the auditors had conversations with:

- the Bishop of Gloucester
- Dean of Gloucester Cathedral
- the Head of HR & Safeguarding
- Diocesan Secretary
- Diocesan Safeguarding Officer
- Chair of the Diocesan Safeguarding Management Board
- solicitor with Veale Wasbrough Vizards, and member of the Diocesan Safeguarding Management Board
- Assistant Director of Education, and member of the Diocesan Safeguarding Management Board
- Bishop's Chaplain, and member of the Diocesan Safeguarding Management Board
- Bishop's Safeguarding Adviser

- Director of Mission and Ministry
- Archdeacon of Gloucester
- Archdeacon of Cheltenham
- Head of Communications
- Chief Executive of the Parish Giving Scheme
- Safeguarding lead, Trinity Church, Cheltenham.

Prior to the audit, the lead auditor had a telephone conversation with the senior Local Authority Designated Officer, Gloucestershire County Council.

The auditors also met with a Parish Focus Group, comprising:

- six nominated persons
- four vicars
- a Deanery Lay Chair
- an Area Dean
- a Team Rector
- Dean of Women Clergy
- an Assistant Curate
- a Reader

### **Records / files**

The auditors looked at 19 case files, and the clergy blue files linked to three of them. The auditors also looked at six further clergy blue files and three diocesan HR files.