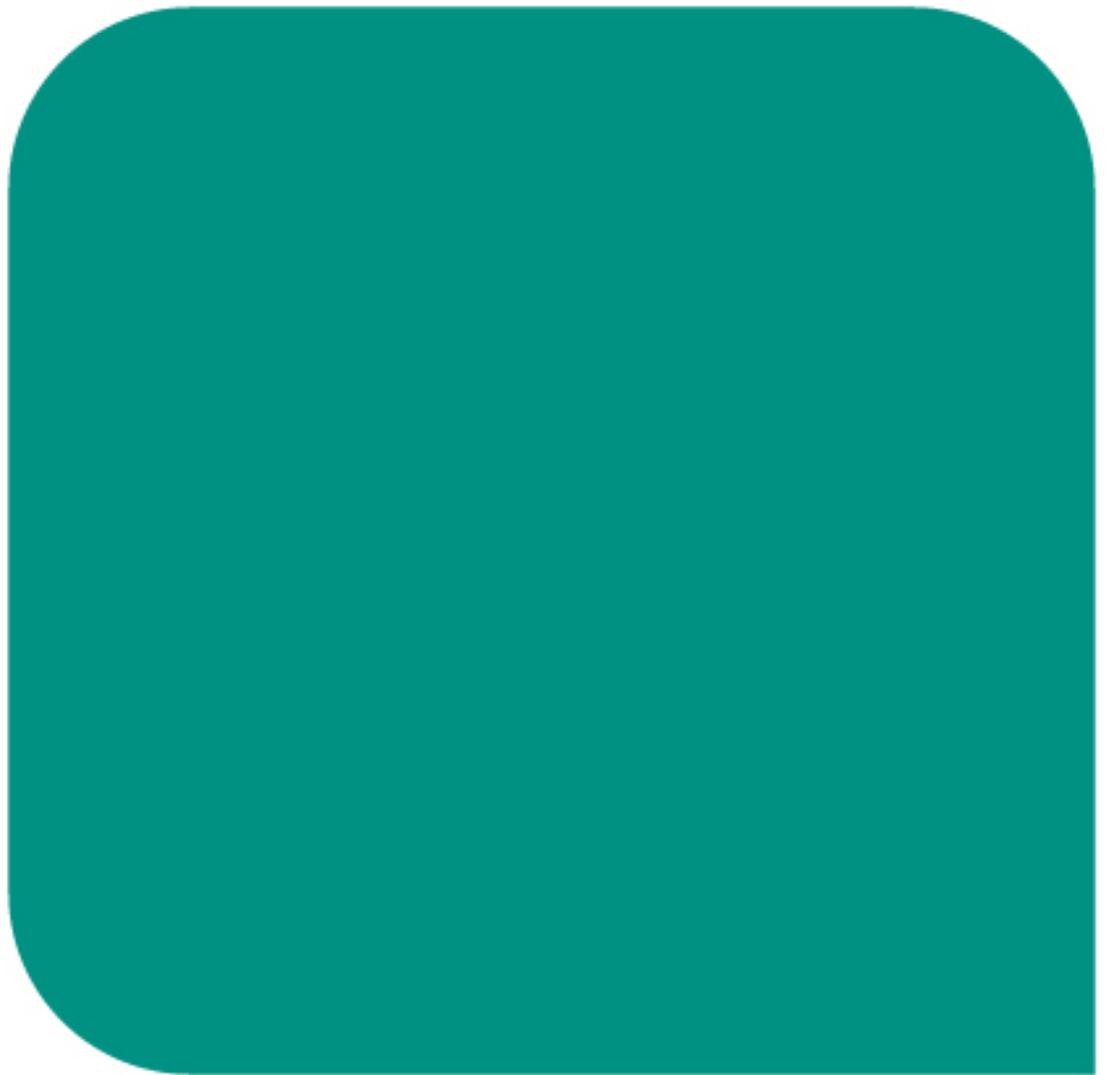




social care  
institute for excellence

# **Diocese of St Albans independent safeguarding audit (September 2017)**



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

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

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

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

First published in Great Britain in January 2018  
by the Social Care Institute for Excellence and the Church of England

© Church of England

All rights reserved

Written by Hugh Constant, Lucy Erber and Edi Carmi

**Social Care Institute for Excellence**

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



# Contents

<b>1</b>	<b>INTRODUCTION</b>	<b>1</b>
1.1	Context	1
1.2	The Diocese	1
1.3	Structure of the report	1
<b>2</b>	<b>FINDINGS</b>	<b>3</b>
2.1	Safeguarding management	3
2.2	Diocesan safeguarding adviser/s	5
2.3	Diocesan Safeguarding Group	8
2.4	Guidance, policies and procedures	10
2.5	Casework	10
2.6	Training	13
2.7	Safe Recruitment of clergy, lay officers and volunteers	15
2.8	Disclosure and Barring Service (DBS)	15
2.9	Complaints and whistleblowing	16
2.10	Quality assurance processes	16
2.11	How diocese provides support and Monitoring of safeguarding in parishes	17
2.12	Resources for children and vulnerable adults	18
2.13	Information sharing	19
2.14	Links with National Safeguarding Team (NST)	19
<b>3</b>	<b>CONCLUSION</b>	<b>21</b>
3.1	What's working well?	21
3.2	Areas for development	22
	<b>APPENDIX: REVIEW PROCESS</b>	<b>23</b>
	<b>DATA COLLECTION</b>	<b>23</b>
	Limitations of audit	24

# 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 how safeguarding is working in each diocese, and to support the continuing improvements being made. Following pilot audits of four dioceses in 2015, an agreed audit model was applied nationally from 2016.

The audit of the Diocese of St Albans was carried out by Hugh Constant (the lead auditor for this diocese) and Lucy Erber from 19 to 21 September 2017. The audit process involved an examination of case files and other documents, along with conversations with key individuals and focus groups of parish representatives in the diocese. Details of the process are provided in the appendix.

This report was written by Hugh Constant with support from Lucy Erber. Quality assurance was provided by Edi Carmi, the senior auditing lead.

## 1.2 THE DIOCESE

The Diocese of St Albans was created in 1877. Its boundaries, largely unchanged since 1914, cover Hertfordshire, Bedfordshire, and a small part of the London Borough of Barnet. One parish falls within Cambridgeshire, so in total the diocese spreads over six local authority areas (there are three within the county of Bedfordshire), and four police forces.

Supporting the Diocesan Bishop of St Albans are the Suffragan Bishops of Hertford and of Bedford, and there are three archdeaconries, of Bedford, Hertford and St Albans. At the time of the audit, all these posts were filled. The diocese includes 338 parishes, supported by close to 250 stipendiary clergy, a similar number with Permission to Officiate (PtO), 45 non-stipendiary clergy, and over 175 lay readers. There are approximately 180 Fresh Expressions communities within the Diocese, mainly within existing parishes. The Diocese has c.30,000 regular worshippers.

Approximately two million people live within the Diocese. Parts of it are very rural, but it includes sizeable urban centres, such as Luton and Watford. There are areas of deprivation, but parts of the Diocese are affluent, high-cost areas to live, reflecting the close proximity to London.

## 1.3 STRUCTURE OF THE REPORT

This report is divided into:

- Introduction
- The findings of the audit [links have been made with the s.11 (Children Act 2004) Church of England national audit form]
- Considerations for the Diocese are listed, where relevant, at the end of each finding

- Conclusions of the auditors' findings: what is working well and areas for further development
- An appendix sets out the audit process and any limitations to this audit

Please note that 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.

## 2 FINDINGS

### 2.1 SAFEGUARDING MANAGEMENT

#### 2.1.1 Leadership

The Bishop of St Albans has overall responsibility for safeguarding in the Diocese, supported by the safeguarding lead on the Bishop's staff, the Bishop of Hertford. The Bishop of St Albans described his own role as an overarching one of making sure that whatever needs doing to make safeguarding work in the Diocese gets done, and of enabling the creation of systems, for example around training, that support the goal of a safe diocese.

The engagement of the Bishop with safeguarding is active and varied. His picture and words are on the safeguarding website, on the first safeguarding newsletter, and on the recruitment papers for the Diocesan Safeguarding Adviser (DSA), so that it is hard to miss the message that this is a priority for him. Senior clergy and members of the Parish Focus Group alike were aware that the Bishop draws an uncompromising line about clergy, including those with PtO, needing to be trained and DBS-checked in order to retain the Bishop's License. The Bishop himself referred to having developed 'steel in his soul' when it comes to decisions as to whether people with safeguarding offences should ever again have positions of authority within the Church. The auditors saw evidence of this in case files, with the Bishop taking a firm line, sometimes in the face of parishioner or clergy pressure. The auditors noted that the Bishop was willing to engage in at times protracted, in-depth debate about the legal, moral and theological position he was taking. It contributed to a sense that safeguarding is taken seriously, even when people disagree.

Case files also revealed the engagement of all three bishops in case meetings and discussions. The Bishop of St Albans was clear that any safeguarding decision is ultimately his to make, but that he would be loath to go against the professional advice of his DSA. The DSA could not bring to mind an instance of his advice not being followed.

The core group model is well used in the Diocese (see 2.5), and both suffragan bishops sit on them, with attendance divided on a geographical basis. The Bishop of Hertford, as safeguarding lead, also sits on the Safeguarding Management Group (SMG – see 2.3), and acts as the primary link between it and Bishop's Staff team. Until recently, the safeguarding lead was an archdeacon, but the Diocese wanted to emphasise the importance of this work by making the lead a more senior figure. The auditors were told that by making the lead a bishop – with one of the characteristics of a bishop being that they hold a number of roles within one person – it stressed the point that within the Diocese, safeguarding informs everything, and everything informs safeguarding.

Both bishops to whom the auditors spoke talked of their own awareness of safeguarding developing over the years, and how that development has occurred too across the Church. Both spoke also about how the culture change within the Diocese has further to go, with pockets remaining of the view that the Church, being populated

by those presumed to be 'good' people, need not engage so thoroughly with safeguarding. The Bishop of Hertford said the Diocese had to get rid of any 'he couldn't possibly have done this' assumptions, as well as challenging any defensive response to a disclosure of abuse that started with 'what will this make us look like?'

In trying to address this, it is positive that all clergy training sessions in the first tranche of the new national training framework were introduced in person by one of the three bishops. The message that the bishops give about safeguarding is also positive: that it is not simply a compliance issue, in which the necessary protections have to be properly implemented, but that it is a good thing in itself, as part of making the Church a safe and welcoming place for all. The bishops, and others to whom the auditors spoke, saw this positive message about the 'theology of welcome' as an important part of changing attitudes among clergy and parishioners.

Another important leadership figure is the Diocesan Secretary, who has been in post since 2001, and who manages the DSA. Like the Bishop of Hertford, she sits on SMG and the Bishop's Staff, and as the person in charge of the diocesan office, has the responsibility to ensure that safeguarding is operating within a well-functioning and adequately-resourced organisation. The Diocesan Secretary has officially only been the manager of the DSA since the current post-holder started in September 2016, but that simply formalised the gradual shift from the safeguarding adviser being directly accountable to the Bishop, to a situation in which the post was part of the main diocesan organisational structure.

The Diocesan Secretary has been instrumental in expanding the safeguarding resource within the Diocese – a part-time assistant DSA (ADSA) starts in October 2017 – even at a time when budget savings have had to be made in other departments. She leads a diocesan office in which safeguarding appears to be well-integrated, and the case files reflect this. The involvement in cases of the Director of Education and – consistently – the Communications Officer was a positive feature of the Diocese's work.

Another figure who features strongly and helpfully in casework is the Diocesan Registrar, giving the DSA and the bishops ready access to a legal perspective when this is required on case issues.

### **2.1.2 Structure**

The Bishop of Hertford and the Diocesan Secretary both sit – as does the Archdeacon of Bedford – on the SMG and the monthly Bishop's Staff meetings, where safeguarding is a standing agenda item. The two groups are therefore strongly linked, and there is also a straightforward arrangement by which the SMG reports annually to Bishop's Council (see 2.3). The DSA, at the Bishop's invitation, reports on safeguarding to the Bishop's Staff team, and has done so twice in the year he has been in post.

The Bishop does not have regular, scheduled meetings with the DSA, but both expressed satisfaction with the arrangement they do have, whereby each has ready access to the other as it is needed. This, from the evidence of case files and from what the auditors witnessed themselves, works well, but the Diocese ought to keep the arrangement under review, especially as and when personnel change, as the

informality of it relies to some extent on the goodwill and personalities of the current post-holders. The lack of structured contact could potentially be problematic should there be a less confident DSA or a less engaged Bishop.

### 2.1.3 Links with Cathedral

St Albans Abbey is a parish church, as well as the Cathedral of the Diocese. It employs its own professional safeguarding officer, who leads on Cathedral safeguarding cases, DBS checks, and policies. Closer links between the Diocese and the Cathedral on safeguarding are developing, with the Cathedral receiving diocesan training, and a Cathedral representative now sitting on SMG.

### 2.1.4 Culture

The auditors felt that there was a strong sense of cohesion within the leadership of the Diocese in addressing safeguarding. There was a shared sense of the positive potential of safeguarding to make the Church a more welcoming place, and a good degree of teamwork on cases, with people being involved appropriately, and respecting each other's professional expertise.

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

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

*Contact arrangements between the Bishop and key safeguarding personnel to be kept under review, especially as and when there are changes among post-holders.*

## 2.2 DIOCESAN SAFEGUARDING ADVISER/S

### 2.2.1 Roles and responsibilities

The Diocese employs one full-time DSA, who has been in post since September 2016. Prior to that, there was a part-time DSA, who started about ten years ago, on a half-time contract, but who in the intervening years built up to working four days a week, plus a great deal of overtime, reflecting the increased workload.

The Diocese, at the time of the current DSA's appointment, recognised that one full-time person was unlikely to be adequate, and set aside money in the budget for more staffing, but awaited the input of the new DSA before deciding what additional role would be of most benefit. A trainer and administrative support were both considered, but the Diocese decided upon additional casework resource, and has accordingly just appointed a half-time ADSA, who will begin in October 2017.

Certainly the additional casework resource will be useful. The DSA reported feeling overwhelmed upon starting, when he realised how much work there was, including the necessary tasks of bringing the Diocese fully up to speed after the inherent limitations of the previous DSA's part-time position. The current DSA, therefore, has had to develop a database of cases, and catch up on a backlog of work (see 2.5), and this, alongside new and ongoing casework, means he on occasion works considerably over his contracted hours. The appointment of the ADSA demonstrates that the DSA is not alone in recognising the workload is too great for one person to manage.

There is no dedicated administrator for safeguarding. The Ministry Development team, however, do all the safeguarding training administration, and there are administrators who deal with clergy and reader DBS matters. While the DSA feels that an administrator who knew safeguarding well enough to answer basic queries would be useful, the Diocesan Secretary takes the view that the existing pool of administrators can be flexed sufficiently to support the DSA, and that queries can better be addressed by someone with proper safeguarding experience, which the ADSA will bring. The auditors would concur that an administrative role does not at the moment feel like a priority on which to spend a limited available budget.

As the only safeguarding staff member, the DSA covers casework, training and policies and procedures across children's and adults' safeguarding. The Diocese will need to develop systems to parcel out work between the two staff members when the ADSA starts.

A significant part of the safeguarding resource in the Diocese is a lay canon of the Cathedral, who was given the honorary role by the Bishop to reflect her safeguarding work for the Church within the Diocese. She sits on SMG, is the DSA's professional supervisor, helps him deliver much of the clergy training, is her local parish safeguarding coordinator, is an Authorised Listener, and acts as a reference point for the Bishop should he want advice from a number of perspectives. The lay canon is by background a social worker, and was the Head of Child Protection for Hertfordshire County Council, a post from which she retired in 2008. The lay canon does everything for the Diocese on a voluntary basis. It seems improbable that the Diocese could find another person to take on the varied functions of the lay canon, and this should be considered in preparation for a time when the lay canon chooses to step down from some roles.

Holiday and weekend cover for the DSA is provided by the Churches' Child Protection Advisory Service (CCPAS), who will take details of a case and alert the Diocese when office hours resume. The DSA does frequent work in the evenings.

### **2.2.2 Qualifications and experience**

The DSA is a policeman by background, and retired from the Metropolitan Police, for whom he worked for 30 years, shortly before taking on the DSA job. Twenty years of his police career was spent on child protection, child sexual exploitation and online child abuse teams, so he has considerable experience in the world of children's safeguarding. While it is an inherent factor of a police safeguarding background that one's experience is focused on the relatively small number of serious cases that reach the threshold for police involvement, the auditors saw good evidence of the DSA's skills in managing a wide range of cases (see 2.5).

The DSA has less experience of adult safeguarding than of children's work, but it is developing quickly, and he can seek support and advice from former colleagues in the Metropolitan Police, and contacts in adult safeguarding departments. Training – in adults' and children's safeguarding – is available, but the DSA has not often been able to make use of it because of workload pressures. This should be monitored, and training prioritised for the DSA and ADSA. The auditors recognise that this ought to become easier to manage with the ADSA's arrival.

The ADSA is also a former policeman, reaching the rank of inspector within child

protection services. This means the Diocese does not have social work experience within the immediate safeguarding team. The steer from the national Church, set out draft practice guidance being considered by the House of Bishops<sup>1</sup>, recommends a social worker for the DSA role, but the Diocese was clear that police expertise, especially around offender management, is useful for them. The lay canon, a social worker by profession, described to the auditors how she has come to be convinced by the benefits of having a police officer in the DSA role. That said, the Diocese was clear that they would simply appoint the best-scoring candidate, and in interviews for both the DSA and ADSA role, that was a police officer, and in both cases they outscored social work candidates.

### **2.2.3 Employment, management and supervision arrangements**

The DSA is paid, and employed directly by the Diocese of St Albans. He is line managed by the Diocesan Secretary, with whom he has regular meetings, and the arrangement appears to work well. The Diocesan Secretary, by virtue of being on the SMG, and Bishop's Staff, is well placed to take an overview of safeguarding in the Diocese, which is an asset in her role as the DSA's manager.

The DSA receives monthly professional supervision from the lay canon who plays a key role in safeguarding locally. Because she is so involved in the Diocese, she and the Diocesan Secretary know each other well, and so can cooperate in their support to the DSA in a way that would not be possible were the professional supervisor a figure who was organisationally remote from the Diocese. The DSA has yet to have his first annual appraisal, but the lay canon expressed her willingness and intention to cooperate with the Diocesan Secretary in doing it, and both were confident that they could raise any concerns they might have with the other. This would be strengthened by a written agreement.

Both the DSA and the lay canon spoke positively about the supervision arrangement, and the lay canon, with a long and senior career in children's safeguarding, as well as an in-depth knowledge of the Diocese and the wider Church, has the ideal set of experiences to fulfil the role, and thus fulfills the requirements of DSA Regulations 2016 that the supervisor be 'a person with experience of work that is concerned with the safeguarding of children or vulnerable adults'<sup>2</sup>. The lay canon provides the supervision on a voluntary basis.

The auditors explored some potential issues with the supervision arrangements. As a member of the SMG, the lay canon is part of the body whose role is, in part, to hold the Diocese to account for the safeguarding service that it provides. As the supervisor of the DSA, the lay canon is part of that safeguarding service. There is, therefore, a potential conflict of interest. The auditors saw no indication of this actually being problematic, and nor is it easy, with the current people involved, to imagine it being so. In terms of developing systems that can promote good practice whoever is involved,

---

<sup>1</sup> Key Roles and Responsibilities of Church Office Holders and Bodies Practice Guidance, House of Bishops, May 2017

<sup>2</sup> Diocesan Safeguarding Advisors Regulations, 2016

however, it may be something the Diocese wishes to consider.

As mentioned, the lay canon is hugely experienced, but her social services practice experience is now nine years past, and she is not registered as a social worker with the Health and Care Professions Council (HCPC). She described to the auditors her ongoing engagement with the safeguarding sector, which mitigates the length of time she has been away from day-to-day work, and again the auditors could not identify actual difficulties arising from this. But, as the lay canon acknowledges, it is an issue the Diocese may want to consider in the future.

#### **2.2.4 Any potential conflicts of interests to DSA's independence**

The DSA's wife's family was heavily involved in setting up CCPAS, which provides out-of-hours cover and training services to the Diocese, and they remain closely involved. The DSA himself, however, is not the commissioner of these services, so they do not obviously compromise his independence.

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

*Part 6: The DSA's role is clear in the job description and person specification. And The DSA has sufficient time, funding, supervision and support to fulfil their safeguarding responsibilities, including local policy development, casework, advice, liaison with statutory authorities, training, personal and professional development and professional registration.*

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

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

*Ensure training opportunities can be taken up by the DSA and ADSA.*

*An agreement to be put in place to manage the roles of the lay canon and the Diocesan Secretary in the DSA's appraisals and supervision.*

*The Diocese to consider whether the evident benefits of the lay canon supervising the DSA are outweighed by potential difficulties with her role on SMG and her lack of recent social work experience.*

*The Diocese to plan over time how best to cover the various tasks carried out by the lay canon.*

### **2.3 DIOCESAN SAFEGUARDING GROUP**

The Diocese has a long-standing Safeguarding Management Group (SMG), which has been chaired for the last ten years by a family court judge, who fulfils the role on a voluntary basis. The Chair lives locally, worships at, and is on the chapter of, St Albans Cathedral. He is closely involved in the Diocese, therefore, without his independence being compromised. Nonetheless, the recently produced practice

guidance, *Key Roles and Responsibilities of Church Office Holders and Bodies*<sup>3</sup>, recommends a three-year term for management group chairs, possibly to be extended for a further three years. The Diocese may want to consider the new guidance in its planning.

The group is active, and effective. It meets every two months, and from the evidence of recent minutes, attendance is consistent, and the group appears successful in getting things done. Recent fruits of this include organising the Deceased Clergy File Review, a training strategy (see 2.6) and a strategy for safeguarding more generally within the Diocese.

The safeguarding strategy is quite a high-level document, setting out the general aims for the Diocese. While there are some priority areas noted, the Diocese could usefully consider whether a more focused action plan, with target dates, and clear roles and responsibilities, may help the strategy come to life, and avoid the developmental goals being lost amid the daily pressures of the safeguarding function.

Membership is quite settled. A little over a year ago, the Bishop of Hertford joined, upon taking over the lead safeguarding role. The Archdeacon of Bedford has also just joined, replacing the Archdeacon of St Albans, who had served on the group for a number of years. Other diocesan representatives include the Diocesan Secretary, youth and children's workers, and, naturally, the DSA. The safeguarding officer from St Albans Cathedral is also on the group. The names and roles of group members are listed on the diocesan website, which helps develop a sense of accessibility and accountability.

There is less strong representation from outside the Diocese, and this is something the group is working to address. The lay canon brings extensive children's safeguarding expertise, although is not currently in local authority practice, and there is voluntary sector representation from the Bedfordshire area, ensuring different geographic parts of the Diocese are covered. The Cathedral representative on the group also has a professional social work background. Adult social care, police and probation services are not represented, and bringing these perspectives in would likely serve to improve the working of the group.

The Chair described the purpose of the group as overseeing the safeguarding work of the Diocese, developing strategies, liaising with the Bishop, and ensuring links with the parishes are working effectively. There are clear Terms of Reference which cover similar territory, and also list policy development and training as key priorities. The terms that are publicly available are nearly seven years old, but the auditors have seen a draft update which will shortly be on the diocesan website and which more accurately reflects the current situation.

At each meeting, the DSA reports on casework, but with the aim of keeping the group informed on workload and major issues; the group does not have a casework advice function. Prior to each meeting, if necessary, the DSA meets with the Chair and the lay

---

<sup>3</sup> Key Roles and Responsibilities of Church Office Holders and Bodies – Practice Guidance; House of Bishops, October 2017

canon to assess any blemished Disclosure and Barring Service (DBS) returns that have come in.

The group reports formally to Bishop's Council annually. In addition, the Chair meets the Bishop of St Albans a couple of times a year, as well as more *ad hoc* meetings.

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

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

*Consider new practice guidance in relation to the longevity of the chairing role.*

*Consider whether a more detailed work plan would help with putting the safeguarding strategy into action.*

*Build up statutory/external representation on the group.*

## **2.4 GUIDANCE, POLICIES AND PROCEDURES**

The Diocesan Synod formally adopted all House of Bishops' safeguarding policies in October 2016. These are easily accessible on the diocesan website, and are introduced there by the Bishop.

In addition, the Diocese has its own suite of good practice guidelines, templates, suggested parish policies, Safer Recruitment documents, consent forms and information sheets. These have the advantage of being listed individually on the website, so people can find the form or information they want, without having to search for it in one, large compendium document.

There are helpful, concise guidelines to good practice in safeguarding children; one for adults would be useful, and would demonstrate that the Diocese takes both issues equally seriously.

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

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

*Develop good practice guidelines for adult safeguarding.*

## **2.5 CASEWORK**

### **2.5.1 Quality of response to allegations**

The quality of casework in response to allegations is strong. As a starting point, and despite his workload pressures, the DSA responds promptly to concerns. This was evident from the case files, where the auditors saw core groups arranged within 24 hours of a referral, and was commented on positively by members of the Parish Focus Group. One group member noted that even though she had called the DSA at 10.30pm, he responded within ten minutes. Even during the audit, a new referral was

a discussed at a core group the day after the referral came in. There was a sense of people feeling reassured that a timely response would always be available to them.

As well as timeliness, the responses from the DSA are of good quality. He is thorough, and makes consistent and appropriate use of key safeguarding tools such as Covenants of Care, Type A and Type B Risk Assessments<sup>4</sup>, and core groups. This provides a structure and consistency to his work which is beneficial in a field where difficult, nuanced decisions will always need to be made. Parishioners had a sense that they could rely on the soundness of the DSA's judgement, a view the auditors would tend to endorse, and liked the fact that they felt that there was no question too simple to put to the DSA. They valued his approachability.

Another positive feature was the communication of the DSA, with case files evidencing prompt, clear and supportive communication, be it dealing with alleged perpetrators, victims, or other interested parties. This quality was also noted by the Parish Focus Group. Similarly helpful communication in cases was evident from the bishops, including a visit to a fractured parish congregation from the Bishop of Hertford. He told the auditors that an area he wanted to see the Diocese improve on was the support offered to those tangentially involved in a case, such as, for example, the spouse of an accused vicar, or hurt and anxious congregants.

There was also appropriate and timely engagement with local statutory partners, such as Local Authority Designated Officers (LADOs) and the police. In every case the auditors reviewed in which collaboration with such agencies would have been beneficial, it had occurred. The auditors saw two cases in which bishops vigorously challenged statutory agencies where the DSA felt that the statutory response had thus far been inadequate. There was evidence also of good liaison with other dioceses – including, where necessary, overseas ones – and other faith groups.

This reflects a real strength of the diocesan response to safeguarding concerns: a sense of team work. In most cases, this is formalised in the use of core groups, which are brought together swiftly, and which appear to work effectively. Each group would include the DSA, the Communications Officer, the Diocesan Registrar, and either (or sometimes both) the relevant archdeacon or suffragan bishop. The regular episcopal engagement can be seen as a sign of safeguarding being taken seriously. Additionally, the availability and involvement of the Registrar on such a consistent basis provides the Diocese with ready access to a legal perspective on issues – such as the basis on which churchwardens are selected and deselected – which strengthens the holistic response the Diocese can offer.

The team work was a feature outside of actual core groups as well. All three bishops and all three archdeacons are, the case files demonstrate, actively and appropriately

---

<sup>4</sup> Type A Risk Assessments are used either to manage immediate risks prior to a Type B assessment, or where there are concerns about the risk posed by a non-church officer – typically a member of the congregation. Type B Risk Assessments are used where church officers are alleged to have caused harm, or where there are other complexities or conflicts of interest.

involved in case discussions, in support of the work of the DSA. There is a sense of people respecting each other's professional opinions and perspectives, and debating matters accordingly.

The cohesion between the key people involved means that clear decisions get made, even if they are reached after extensive discussion. The decision is supported by all involved, even where there is considerable pressure from, for example, offenders, congregations, or incumbents to get people to change their stance.

### **2.5.2 Quality of risk assessment and safeguarding contracts**

The DSA makes consistent use of Type A and Type B Risk Assessments, in accordance with House of Bishops practice guidance. Type B assessments are commissioned appropriately for church officers, and the auditors saw their use in situations where there were a number of voices arguing such a measure was disproportionate.

Type A assessments are employed regularly, and the only note the auditors would make is that where people who may pose a risk hold more than one function within the church, risk assessments need to cover all relevant roles.

A number of the Type A Risk Assessments were more descriptive than analytical, in that they talked about offences or concerns, but did not go on to fully assess what the resulting risks were. Factors such as people's attitudes to the offending behaviour – whether they fully acknowledged it or seemed to minimise it – are pertinent risk factors, but at times were not fully explored. The assessments needed at times to move beyond what was known as an absolute certainty, and to more confidently include an assessment of less certain risk factors.

Safeguarding agreements, known locally as Covenants of Care, are well used, even though the DSA has a backlog, which he is working through, of agreements drawn up by his predecessor which are overdue a review. The covenants the current DSA has done are regularly reviewed to reflect changing circumstances, and set out clearly the rationale behind them. They are signed by representatives of the relevant parish, the DSA, and the person causing concern, so there is a sense of ownership of the document by all three parties. Where appropriate, Covenants of Care are used even when there is no conviction against the subject.

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

### **2.5.3 Recording systems**

The DSA's recording is generally good, although he acknowledges that occasionally record-keeping is delayed under the pressure of work. He has, though, brought more order to arrangements in the year he has been in post, and maintains a clear log of all the casework he is doing.

Records are kept electronically on a diocesan computer, but in a regular file for each person, not in a tailored database or case management system. Case files tend to be, therefore, a collection of emails and meetings relating to a case, and while these are well-ordered and easy to follow, the auditors did see examples of key phone calls and

discussions that are mentioned on file, but not actually recorded. This means important parts of the case record are missing, which could be problematic for future case management, and if the matter should ever go before a court, for example. This should be rectified.

The auditors did not see any file evidence of supervision discussions informing casework. This too ought to be addressed.

Where clergy are the subject of safeguarding concerns, this was recorded on their Blue Files. In one instance, however, all the paperwork was actually in a separate, loose folder, meaning it could potentially get lost, and in another the safeguarding concern was filed in the finance section. Blue Files do not readily lend themselves to the storing of safeguarding papers, but a flagging system and consistent filing may make safeguarding concerns easier to identify.

### **Considerations for the Diocese**

*Move towards more holistic and analytical risk assessments.*

*Develop a system for ensuring all interactions about a case are recorded.*

*Develop a clearer system for recording safeguarding concerns on Blue Files.*

## **2.6 TRAINING**

Put together by the SMG, the Diocese has a training strategy that sets out how it plans to meet the considerable challenge of training all licensed people, and all relevant volunteers, in children's and adults' safeguarding. It lays out, by module of the national learning and development framework, which roles need to do each course; the numbers of people therefore involved; and the number of people that can attend each session. This gives the Diocese a clear structure for planning the number of sessions to be delivered.

Clergy training (the C3 module), is delivered by the DSA and the lay canon. The DSA has not previously had a great deal of training experience, but is developing this rapidly, and appreciating the opportunity the sessions give him to meet clergy across the Diocese. Deanery training (a combined C1 and C2 course) for volunteers at parish level such as churchwardens and pastoral visitors, is done by a team of volunteers. The team is nine strong currently, but five more people have just been recruited. The model is a new one; until May 2017, the sessions were done by the former DSA.

The Diocese has commissioned CCPAS to deliver specialist training in Safe Recruitment and Domestic Violence, as there is insufficient internal capacity to do these. These courses begin in October 2017.

The lay canon potentially had capacity to deliver these courses, but does not feel the Domestic Violence course is adequate, and so would not do it. Some volunteer trainers have expressed similar concerns about the content of the C1 and C2 course, although they are delivering them. Among a number of people to whom the auditors spoke, there was disquiet about the manner in which the learning and development

framework was introduced, which they felt paid no heed to diocesan capacity to deliver it. The effort to put together a training schedule to meet expectations has absorbed a lot of diocesan time and resource.

Training is administered by the Ministry Development team, which helps project the concept that safeguarding is core church business, as it sits alongside all other clergy training. This is a relatively new development, and the change has been eased by bookings now being done using Eventbrite. This in part lies behind a significant step up in training delivery; about 250 people attended deanery training in 2016, and in 2017 the target is 1,600 people over 40 sessions (two per deanery), with just over 1,000 people trained by the end of July. A similar target is planned for 2018. Similarly, 54 clergy, two people with PtO, and 173 readers had safeguarding training in 2016. For 2017, the aim is to do refresher training for all existing licensed people, and full C3 courses for all new clergy in the Diocese. To date, 217 clergy have been trained this year, with a further 95 booked on 2017 courses.

Clergy on the Parish Focus Group – admittedly a small sample – spoke warmly of the new clergy training, one saying it was ‘100 per cent better than anything that had gone before’. There was enthusiasm too for the deanery training aimed at volunteers, and the auditors were told that evaluation forms are broadly favourable. Some focus group feedback was less positive, however, with a number of people reporting negative feedback, either on their own account, or that of other people in their parish. The model of training volunteers to do the bulk of the deanery training seems an appropriate one to tackle the scale of the work, but such a dispersed model makes the quality assurance function of those at the centre – the DSA and lay canon, in the main – all the more important.

The training strategy makes it clear that the Bishop expects training attendance from all relevant people, and that people’s positions and insurance may be otherwise compromised. There was some acknowledgment that people who have received safeguarding training in other aspects of their lives grumble a little at having to do it in a church context, but mostly they are assuaged by the training, which does focus on the specific issues of Church of England safeguarding. There was also mention made of the speed with which safeguarding training gets booked up, so that it can be difficult to attend, especially as some courses are only accessible by car.

The presence of a bishop at all recent clergy training sessions was commented on favourably, and would have lent weight to the sessions. The Bishop of St Albans, and others, recognised that training does not automatically equate to improved practice, and expressed concern that the actions of some clergy belied the fact that they had been trained. This clearly needs to be monitored (see 2.11) at the same time as the recent improvements in training are being consolidated.

*(Reference: part 1 of S.11 audit: Select and train those who are to hold the Bishop’s Licence in safeguarding matters. Provide training on safeguarding matters to parishes, the Cathedral, other clergy, diocesan organisations, including religious communities and those who hold the Bishop’s Licence. And to part 8: Those working closely with children, young people and adults experiencing, or at risk of, abuse or neglect ...have safeguarding in their induction and are trained and have their training refreshed every three years.)*

### **Considerations for the Diocese**

*Develop a quality assurance function for volunteer trainers, to promote consistency.*

*Explore mechanisms to monitor the impact of training, as well as attendance.*

## **2.7 SAFE RECRUITMENT OF CLERGY, LAY OFFICERS AND VOLUNTEERS**

The auditors looked at six clergy Blue Files for evidence of Safe Recruitment practices. DBS checks were consistently recorded and up to date, and most files contained a confidential declaration and proof of identification. There was inconsistent practice in terms of filing people's references and application forms, and this could improve.

Lay recruitment files, of which the auditors saw four, were more consistent in having full recruitment information.

*(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**

*Develop more consistent storage of clergy recruitment papers and references.*

## **2.8 DISCLOSURE AND BARRING SERVICE (DBS)**

The Diocese contracts with CCPAS to administer its DBS checks, and broadly this works well. Members of the Parish Focus Group reflected on how the system is now much easier for being online, and that this is of benefit in tackling residual attitudes that question the need for a DBS at all. Members also spoke of there being an ongoing lack of clarity about whether particular roles are eligible for a DBS check, but there was general agreement that the CCPAS helpline was a useful and reliable assistance when people were unsure.

Blemished DBS checks are considered by the DSA, SMG chair, and lay canon, prior to meetings of the SMG (see 2.3). The Diocese was not able to include precise figures for how many blemished DBS checks they have had back, because they are working on getting this information from CCPAS.

### **Considerations for the Diocese**

*Ensure DBS information is consistently available from CCPAS in ways that are helpful to the Diocese.*

## 2.9 COMPLAINTS AND WHISTLEBLOWING

### 2.9.1 Complaints

The Diocese has a very clear complaints policy, which sets out the timescales that complainants can expect from the Diocese, and routes for external escalation of a complaint if people are not satisfied. It clearly distinguishes between a safeguarding referral, and a complaint about how a safeguarding referral is handled.

### 2.9.2 Whistleblowing

Similarly, there is a strong whistleblowing policy, which explicitly covers safeguarding concerns, and has recently been updated. The policy extends its protections to volunteers, and directs people to Public Concern at Work if they want further information.

Procedures for what to do if the whistleblower is dissatisfied with any internal response are also laid out.

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

## 2.10 QUALITY ASSURANCE PROCESSES

With a long-established and well-functioning SMG, the Diocese is in a good position to embed quality assurance efforts into its safeguarding work, but has not clearly done so to date. Quality assurance is not explicit in the Terms of Reference of the SMG, but in monitoring the caseload of the DSA, in commissioning a review of deceased clergy files, and in the priorities within the safeguarding strategy, there are clear elements of it in its work. If the group does review its Terms of Reference (see 2.3), there is an opportunity to set out explicitly any quality assurance function it wishes to have.

The newly-developed spreadsheet of parish safeguarding returns is another place where the Diocese can look for evidence over time to assure itself that its safeguarding efforts are having an impact. It may also be helpful, given the awareness that training someone will not always lead to behavioural change, to develop a quality assurance function around the impact and outcomes of training (see 2.6).

The DSA is beginning to engage with regional and national networks of his peers, and this too opens up opportunities to benchmark what is going on in St Albans with activity in other dioceses.

As part of her supervisor role, the lay canon carries out file audits. This is positive, but is not clearly set out anywhere as part of her role. This hints again at the issue that quality assurance is taking place, but is not explicitly recognised as such, and that therefore it could be enhanced by more focused consideration.

*SMG to explicitly consider its quality assurance function, and quality assurance mechanisms more widely in the Diocese.*

## **2.11 HOW DIOCESE PROVIDES SUPPORT & MONITORING OF SAFEGUARDING IN PARISHES**

### **2.11.1 ARCHDEACONS' RESPONSIBILITIES**

There is a concern among senior clergy that some parish priests, despite their training, are not fully engaging with safeguarding (see 2.6). The auditors saw case evidence of, for example, delayed referrals to the DSA of important safeguarding information, the minimisation of concerns, and ill-judged attempts by incumbents to handle matters themselves. This suggests that, for all the progress towards a changed safeguarding culture, there are still pockets where the subject is not wholly understood.

The three archdeacons are making efforts to tackle this over time. All three were seen to be actively involved in core groups. Safeguarding is one of the topics that features every year on the Articles of Enquiry sent to each parish. This year, for the first time, the Diocese has pulled responses to the Articles together in a spreadsheet that allows each archdeacon to see, for each of their parishes, whether key people have been trained and have current DBS checks, and whether there are up-to-date policies. This is potentially useful data in identifying where to target efforts in the ongoing work of tackling any parochial resistance to the safeguarding agenda. To make sure the information is as effective as it can be, it should be shared widely, and used by the DSA, area deans and others as part of their work.

Every year, each parish receives a Visitation, either from an archdeacon or an area dean, in which the Articles of Enquiry answers can be followed up in more detail. This is an opportunity also to promote the positive message of safeguarding as an integral part of the effort to make churches a welcoming place for everyone. It was noted that one incumbent said she sometimes makes safeguarding the subject of sermons, whereas even a few years ago, it would have seemed strange to the congregation had she done so.

The DSA raised a concern that, when incumbents or churchwardens leave a parish, a lot of local knowledge goes with them, and there does not appear to be a reliable system for making sure that important safeguarding information is not lost during transitions and interregnums.

The auditors spoke to the Archdeacon of Bedford, who shared the view of the bishops and others that progress is being made, but shared as well a lack of complacency, and a belief that the Diocese needs to progress yet further. He identified adult safeguarding as being less well understood generally than safeguarding children. The Parish Focus Group recognised this to some extent also, and talked of the developing challenge of supporting more people who perhaps in the past would have received charity or social services support. Similarly, the Bishop talked about the way some Fresh Expressions congregations drew in vulnerable people, and the adult safeguarding challenges that brings.

The Archdeacon of Bedford has recently replaced his counterpart from St Albans on

the SMG, so two of the three archdeacons have experience of the group. The Archdeacon of Bedford appeared to be genuinely pleased to be on the SMG.

### **2.11.2 SUPPORT GIVEN TO PARISH SAFEGUARDING COORDINATORS**

The Parish Safeguarding Coordinators (PSCs) to whom the auditors spoke were uniformly positive about the support they received from the Diocese with casework (see 2.5). More general, non-casework support to PSCs, many of whom will not have much prior safeguarding experience, is yet to be significantly developed. PSCs and others were pleased that a safeguarding newsletter has been started, and were keen to explore developments such as annual get-togethers, or deanery networks, of PSCs, so there can be more mutual support.

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

*Ensure full use is made of archdeacons' data on parish safeguarding that is gathered in the Articles of Enquiry.*

*Develop systems to ensure local safeguarding information is not lost when key parish figures leave.*

*Consult with PSCs about possible improvements to the support they receive in their role.*

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

### **2.11.3 RESPONDING TO VICTIMS/SURVIVORS**

There are two Authorised Listeners in the Diocese: the DSA and the lay canon. This means that the Diocese's aim of having one male and one female Listener, which seems sensible, is fulfilled. The DSA has never been called on to fulfil the role, and the lay canon, who has been doing it for much longer, has only twice been used, and not very recently.

The DSA ought not to be an Authorised Listener, and the draft House of Bishops document on roles and responsibilities makes this explicit<sup>5</sup>. He cannot be expected to serve both as the Diocese's main case worker, and as a supporter to a victim. While the National Safeguarding Team is planning a rethink on how support to victims and survivors is best structured, it may be that this takes some time. In the interim, the Diocese should consider how to address the issue of the DSA being the Authorised Listener, and whether there are specific issues locally that are inhibiting take-up of the Listener service.

---

<sup>5</sup> Key Roles and Responsibilities of Church Office Holders and Bodies Practice Guidance, House of Bishops, May 2017

#### 2.11.4 PROACTIVE EFFORTS TO CREATE A SAFE CULTURE

The Children's Mission Enabler and Diocesan Youth Officer are part of the SMG, bringing a useful perspective to safeguarding strategy. The Diocese has a youth strategy that includes actively involving young people in the life of every parish, but the auditors did not have time to explore the progress this has made.

In addition, the Bishop uses the places on Diocesan Synod which are reserved for him to fill to nominate young people, which adds their voice to a central decision-making forum.

A number of parishes have developed particular approaches to welcoming, for example, people with learning disabilities or mental health problems, sometimes in local ecumenical partnerships, or to reaching out to older people in residential care. These schemes appear to be well-established, and to be aware of Safe Recruitment practices. Innovative schemes such as these could be publicised across the Diocese so other parishes can learn from their good practice.

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

*Address concerns about the Authorised Listener service.*

*Promote awareness of the positive schemes that reach out to vulnerable adults.*

#### 2.13 INFORMATION SHARING

Within the Diocese, information sharing seems strong. As part of the cohesive approach to safeguarding, information appears, on the evidence of the case files, to be shared promptly and appropriately.

Externally, as discussed in 2.5, the DSA works closely, and thus shares appropriate information, with statutory partners. There are no formal information sharing protocols with local agencies, but this does not appear to hamper good working relationships. Information is also shared fittingly with other dioceses and other faith groups.

Safeguarding information on the diocesan website is well-presented, and easily accessible. The current DSA has introduced a safeguarding newsletter, which primarily focuses on training arrangements. There is scope to make it wider-ranging, and to be a vehicle for positive safeguarding messages, but parishioners commented that communication about safeguarding has greatly improved lately.

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

*Consider how best to use diocesan publications to share safeguarding messages.*

#### 2.14 LINKS WITH NATIONAL SAFEGUARDING TEAM (NST)

Another strong feature of casework in the Diocese is the cooperative way in which it is done with the national and provincial safeguarding teams. There was a straightforward view that the NST, and the Provincial Safeguarding Adviser (PSA) at Lambeth Palace,

are helpful resources, and should be used. The auditors saw a number of instances in which the PSA and/or the national team were consulted in complex situations.

Generally, people in the Diocese were pleased at the expansion of the NST, and the message this sends about the seriousness with which safeguarding is viewed centrally. As mentioned in 2.6, there was a degree of disquiet about the introduction of the learning and development framework, but on the whole the Diocese shares the ambitions of the NST, and appears to work well with it.

Some matters that arose in case files feel that they present general challenges beyond the boundaries of the Diocese. The issue of how to define adult vulnerability, and who it is that defines it – the person themselves or safeguarding professionals – was evident, and seems pertinent in the light of the recommendations in *An Abuse of Faith*<sup>6</sup>, the review into the Bishop Peter Ball, that the Church handles the safeguarding of vulnerable adults better. How churchwardens are selected, and what checks can be done if someone is thought inappropriate for the role, also came up, and would also need to be addressed at a national level. Finally, concerns about the speed and flexibility of the Type B Risk Assessment commissioning process might best be looked at nationally.

---

<sup>6</sup> An Abuse of Faith – the Independent Peter Ball Review, Dame Moira Gibb, 2017

## 3 Conclusion

### 3.1 WHAT'S WORKING WELL?

There is a Bishop and a senior staff team who are clearly very committed to safeguarding. The Bishop is visible across all safeguarding communications, and a bishop was present at all recent clergy training sessions. This sense of it being a priority was reflected in the feedback from the Parish Focus Group. There is active engagement by bishops and archdeacons in case work, and a firm line taken when the Bishop has to make difficult decisions.

The Diocese has a positive culture around safeguarding that welcomes the high priority given to it, and is not defensive about its practice.

Safeguarding is very much at the centre of the diocesan office and its work. The Registrar is actively involved, as is the Communications Officer. There is a cohesive approach to the work at hand.

There is also a lack of complacency. Safeguarding is thought about and wrestled with, and ongoing challenges are recognised as such, with consideration given as to how to tackle them.

The Diocesan Secretary has overseen an expansion of the safeguarding service, and has provided the leadership needed for the cohesive approach to safeguarding by the diocesan office.

Communication, including that from the Bishop and the DSA, is thorough and clear regarding why and how they have arrived at certain decisions, and is transparent about future actions that will be taken.

The DSA is highly experienced, efficient and effective. He is a good communicator and has the respect of the Bishop, his senior team, the Diocesan Secretary, and parishioners. The DSA makes good use of the structures in place to support his work such as core groups, the National Safeguarding Team and his Provincial Safeguarding Adviser. He has good links with statutory safeguarding agencies, and he works promptly within required timescales.

Articles of Enquiry from the archdeacons have been extended with more questions concerning safeguarding, and efforts are being made to use the data from the Articles and archdeacons' Visitations effectively.

The SMG is well-established, clear about its role, and effective.

There is a training strategy in place, which is signed off by the Bishop. Training is organised by the Ministry Development department, which demonstrates that it is seen as a mainstream part of the diocesan office.

The safeguarding pages on the diocesan website are very good, and make policies and procedures very accessible.

## 3.2 AREAS FOR DEVELOPMENT

Risk assessments needs to be more holistic and analytical.

Professional supervision is clearly working well, but because of the strength of the individuals involved. In system terms, there is an issue with someone providing a professional service without professional registration, or recent professional practice. There is a potential conflict of interest in having the supervisor on the SMG, although again, it does not appear to be problematic on a day-to-day basis.

The lay canon who provides the DSA's supervision fulfils a number of roles, and some thought needs to be given to planning for when she does step back from them.

Ensure consistency in the quality of training, with the DSA taking a quality assurance role.

The use of Authorised Listeners has so far been limited; it is not considered appropriate for the DSA to be an Authorised Listener.

The parish statistics that have been collected could be really useful in targeting efforts to win hearts and minds.

There is an ongoing challenge of embedding the message of safeguarding in every vicar and every parish.

Support to PSCs could be more proactive, with measures such as conferences, buddying/mentoring systems, or thank you events.

Newsletters should cover more than training and should be a medium to get across the positive message about safeguarding.

## **APPENDIX: REVIEW PROCESS**

### **DATA COLLECTION**

#### **Information provided to auditors**

Prior to the audit, the Diocese of St Albans supplied the auditors with:

- 2016 data return to the National Safeguarding Team
- Deceased Clergy File Review 2016, and the response to it by the Diocesan Safeguarding Adviser
- Past Case Review Report 2009
- The diocesan safeguarding policies and procedures
- Minutes of the three most recent meetings of the Safeguarding Management Group
- Details of arrangements for the Authorised Listeners service
- The job description for the Diocesan Safeguarding Adviser
- An overview of safeguarding training provision and statistics
- The diocesan safeguarding strategy
- The diocesan safeguarding training strategy
- An overview of the Diocese
- Information on the parishes represented in the Parish Focus Group
- Four recent safeguarding newsletters

Feedback on the safeguarding work of the Diocese was received in advance of the audit from three statutory partner agencies.

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

During the three-day audit, the auditors had conversations with:

- Bishop of St Albans
- Bishop of Hertford
- Archdeacon of Bedford
- Diocesan Secretary
- Diocesan Safeguarding Adviser
- Chair of the Safeguarding Management Group
- Lay Canon

The auditors also met with a Parish Focus Group comprising: two incumbents, three parish safeguarding coordinators, four churchwardens, one youth worker, and one children and families worker.

## **Records and files**

The auditors looked at 15 case files, of which nine related to concerns about children; three related to concerns about adults; one related to concerns about both children and adults; and two related to concerns about safeguarding practices in parishes more generally. Where concerns related to members of the clergy as perpetrators, the relevant clergy Blue Files were looked at also.

Six clergy Blue Files and four lay recruitment files were looked at for evidence of Safe Recruitment practices.

## **LIMITATIONS OF AUDIT**

There were no limitations to the audit.