The Future of Church Safeguarding

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Preface

The Archbishops of Canterbury and York commissioned this report in July 2023. They wished me to make recommendations for how Church safeguarding, and the scrutiny of Church safeguarding, could be made fully independent of the Church.

I was assisted in this by John O'Brien, CBE. We established the Future of Church Safeguarding Programme to support this work, and in particular to support the engagement of a wide range of people with knowledge and direct experience of the subject.

This was not a review, inquiry or consultation exercise. Nor was its purpose to ascertain whether independence of Church safeguarding was supported. Its focus was not on whether it should proceed but on how it was to be achieved. We also sought to obtain views on what the strengths and weaknesses of the present arrangements were, in order to inform the development of the new models.

We held no meetings in Church premises and consulted legal advice which was independent of the Church. I sent a copy of the report to nominated individuals in the Church for fact-checking.[1] I did not accept fresh evidence as part of the fact check, except where I considered that it clarified existing facts which I had relied upon. I will publish this report on the Future of Church Safeguarding website.

Alexis Jay CBE

[1] See Annex F

Executive Summary

This report makes recommendations for how the Church of England's safeguarding of children and vulnerable adults, and the scrutiny of this service, could be made fully independent of the Church. It was commissioned by the Archbishops of Canterbury and of York.

Background

At present, safeguarding is carried out through teams of staff within each of the church's 42 dioceses. In many instances, these teams also provide safeguarding support to cathedrals and other Church institutions. There is also a National Safeguarding Team.

This was not a review, inquiry, or consultation exercise. Nor was its purpose to ascertain views on whether the independence of Church safeguarding was supported. Its focus was on how this was to be achieved, and followed the termination of the contracts of two members of the Church's Independent Safeguarding Board (ISB) last June. Phase 2 of the ISB's work was to have included making recommendations for the independence of Church safeguarding.

We conducted an extensive engagement programme with a wide range of people including victims and survivors and clergy to provide views on the strengths and weaknesses of the present system. This process enhanced relevant background information provided by reports of the Independent Inquiry into Child Sexual Abuse (IICSA). It is important to stress that the criticisms of the system set out below are not a reflection on individual safeguarding professionals but rather of current structures and processes which need to change.

Conclusions

The Church needs to take action urgently to restore trust and confidence in its safeguarding by victims, survivors, those wrongly accused and the general public. There have been attempts over many years by the Church to improve how it responds to safeguarding concerns and allegations. Some of these have led to improvements, but overall Church leaders have failed to allay suspicions and belief that the underlying intention of the Church is to retain control of safeguarding inside the Church, and to protect its reputation. The dissolution of the ISB, and the dismissal of two board members, marked a further deterioration in the Church's relations with victims and survivors.

The Church's system of operational safeguarding is not compatible with best practices whilst its management and accountability remains within the 42 dioceses. The dioceses are largely autonomous, and each may interpret guidance, definitions of safeguarding and professional practice in its own way, leading to wide variations across the Church. Bishops, other clergy and church officers, with little safeguarding knowledge or experience manage safeguarding on a daily basis and take important, often life-changing decisions. This underlines the need for change to be far-reaching.

Several other issues emerged from the engagement programme, the most egregious of which was the use of safeguarding to address matters of conduct which had nothing to do with risks to children or vulnerable adults. At its most extreme, this was described as the 'weaponising' of

safeguarding, and was frequently seen as a pretext for removing people on the basis of moral judgements or simply because they were seen as a nuisance. Examples of matters referred to safeguarding staff included parishioners, with no vulnerabilities, who were having extra marital affairs, and a lay preacher who was accused of praying too vehemently. There were also many examples of alleged bullying. The processes involved, as reported from different parts of the country, did not routinely include fact finding, details of allegations, provision of evidence, or clarity about an appeals process.

For those who were being complained about, the impact of being wrongly recorded as a 'safeguarding risk' often placed them on a path that could devastate their lives, in some cases losing their livelihood, their accommodation and their faith community.

Other concerns we identified included inequity of funding across dioceses, lack of a uniform complaints system, poor data collection, and no independent system of scrutiny of Church safeguarding. Further weaknesses were variable interpretations of guidance, a lack of clarity among parish safeguarding officers about their role and inconsistent professional support and supervision to safeguarding professionals.

Overall, Church safeguarding falls below the standards expected and set in secular organisations. We concluded that the only way in which this can be addressed is by making safeguarding of children and vulnerable adults truly independent of the Church. Further tinkering with existing structures will not be sufficient to make safeguarding in the Church consistent, accountable and trusted by those who use its services.

Recommendations

We recommend the creation of two separate charities, one for independent operational safeguarding and one for independent scrutiny of safeguarding.

These charities will be funded by the Church but structurally independent of them, in order to ensure that safeguarding decisions are implemented in full, and not subverted, to provide fully independent scrutiny and to mark an unambiguous change of culture.

We further recommend that the General Synod pass a Measure, with Parliamentary approval and royal assent, to create two overarching duties requiring all Church institutions, bodies and personnel, whether ordained or lay, remunerated or voluntary, to refer all safeguarding matters to these independent bodies and to implement all the decisions of these independent bodies.

Introduction

Terms of reference

In July 2023, we were approached by the Archbishops of Canterbury and York to advise on how the Church of England could deliver fully independent safeguarding.

Our final terms of reference were:

- To provide options and recommendations for forming an independent safeguarding and scrutiny body for the Church of England
- To make any recommendations for how further independence of safeguarding might be achieved
- To make any other recommendations that are necessary or appropriate

Methods of working

The intention was to speak to a broad range of those who had experience of safeguarding in the Church of England. This included victims and survivors, safeguarding professionals, clergy, lay church members, volunteers and congregants.

We undertook six diocesan visits in diverse localities. For those unable to travel or attend in person, we offered online interviews. We received unsolicited submissions and information through the Programme email.

We also conducted an online survey through the Future of Church Safeguarding website. There were two prerequisites to participation in the engagement phase of the Programme. The first was to be aged 18 or over, and the second was that the participant's experience had been in the last five years. The latter was to ensure that what we were told reflected the recent past.

We conducted over 120 interviews with more than 135 people in total, in person and online, and reached over 1,000 individuals with the survey. Towards the end of the engagement, we met with most of the diocesan safeguarding professionals in seven separate meetings, comprising 85 people in total. We also met with members of the National Safeguarding Team, comprising 26 people. We also spoke to an additional group of approximately 20 individuals who wished to remain anonymous. They are not included in the figures here.

We engaged the firm Bates Wells (BWB) and consulted a KC with expertise in ecclesiastical law to provide legal advice on the changes recommended to make safeguarding independent of the Church. Their advice is contained in a separate legal report.

Part 1: Safeguarding in the Church of England today

Parish level

There are 12,500 parishes across England, of widely varying sizes. The role of parish clergy in safeguarding is to 'provide leadership concerning safeguarding, and to encourage everyone to promote a safer church'[2]. Parish priests rely on the Church at national and diocesan levels, for training and guidance on safeguarding and for their pastoral oversight of volunteers.

Parishes are expected to recruit a Parish Safeguarding Officer (PSO) to oversee safeguarding activity in the parish, in accordance with national policy. This is a voluntary, unpaid position. The PSO is appointed by, and answerable to, the Parochial Church Council (PCC). The PSO responds to safeguarding allegations and related concerns; monitors safeguarding activity within the parish; and reports to the Diocesan Safeguarding Officer/Adviser (DSO/A) and Parochial Church Council as appropriate.

The key safeguarding responsibilities of parishes are set out in the House of Bishop's Key Roles and Responsibilities of Church Office Holders and Bodies Practice Guidance, issued in 2017.[3]

Diocesan level

The diocese is responsible for supporting parishes and other local Church bodies in their responses to safeguarding issues. They are under a statutory duty to follow the national policy and practice guidance issued in 2016, and are also expected to have in place a safeguarding strategy or plan, as well as a system for responding to, recording, and making referrals of concerns and allegations to the appropriate authorities.[4]

Each diocesan bishop has overall responsibility for upholding effective safeguarding arrangements in their diocese and ensuring there are adequate safeguarding resources. All bishops are required to undertake safeguarding training.

Each diocese employs a DSO/A to whom all safeguarding concerns are referred. All DSO/As are required to have qualifications appropriate to their responsibilities. Most are drawn from a policing or social services background.

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[2]https://www.iicsa.org.uk/reports-recommendations/publications/investigation/anglican-church/part-b-church-england/b1-safeguarding-church-england/b12-safeguarding-structures.html
[3]https://www.churchofengland.org/sites/default/files/2017-11/key-roles-and-responsibilities-of-church-office-holders-and-bodies-practice-guidance.pdf
[4] https://www.churchofengland.org/safeguarding/policy-and-practice-guidance

The DSO/As coordinate the provision of safeguarding training, organise the support given to those who have suffered abuse, and lead any work done by the Church with ex-offenders. They also make referrals to statutory agencies as necessary and carry out risk assessments. They agree joint safeguarding arrangements with cathedrals, religious communities and theological training institutions within their diocese as required.

DSO/As work closely with the diocesan secretary in upholding national safeguarding policy, implementing diocesan strategy and managing risk, especially where allegations involve church officers or diocesan employees.

There are no consistent line management arrangements for DSO/As across the 42 dioceses. Many are managed by diocesan secretaries, some are managed by human resources managers, and some directly by bishops. We heard of one case where a DSO/A was managed by a diocesan registrar. Few, if any, of these line managers had any professional background in safeguarding.

Diocesan Safeguarding Advisory Panel (DSAP)

All dioceses have a Diocesan Safeguarding Advisory Panel (DSAP), which monitors recruitment, training, and criminal record checks, but has no powers of enforcement. Each DSAP is independently chaired, usually by someone with a relevant professional background. Most DSAP chairs and members are unpaid, but some chairs are remunerated.

In the recent past, reports have noted significant inconsistencies between DSAPs in their ways of working, in their levels of professional representation, and in their methods of appointing chairs[5].

Cathedrals

Cathedrals are largely autonomous bodies and are governed on a day-to-day basis by the dean and chapter. Each cathedral is expected to have a safeguarding officer, who should work with the dean and chapter to implement relevant policy and guidance. A small number of cathedrals employ their own safeguarding professionals but the majority have a service-level agreement with their local diocesan team to provide safeguarding services.

The National Safeguarding Team

The National Safeguarding Team (NST) was set up in 2015. It is a team within the Archbishops' Council. Its responsibilities include the development and implementation of national policy, commissioning reviews, supporting survivors at the national level, coordinating independent

[5]https://www.churchofengland.org/sites/default/files/2019-04/a-review-of-the-implementation-of-the-the-church-of-england-safeguarding-training-and-development-framework_0.pdf

audits and sustaining national safeguarding networks. The NST also manages complex safeguarding cases, including those related to senior clergy or covering several dioceses. The NST has 38 full-time equivalent staff. There is a Director of Safeguarding and three deputy directors for partnerships, casework and policy. The NST regularly revises guidance and maintains the e-manual of national safeguarding policies.

Governance

The National Safeguarding Steering Group (NSSG) has strategic oversight of national safeguarding activity. It reports to the Archbishops Council and the House of Bishops. The NSSG was set up by the Archbishops in 2016 to act as the 'primary driver of standards'[6]; to receive and assess 'Lessons Learnt Case Reviews' and other commissioned reports, and to respond to recommendations made by IICSA. It also considers recommendations made by the National Safeguarding Team and those of the National Safeguarding Panel.

In 2018, the NSSG determined priorities for the future, including the selection and discipline of clergy, support for survivors, the handling of complaints and independent safeguarding audits. Membership of the NSSG comprises lay and senior clerical representatives who are appointed by the Archbishops.

The National Safeguarding Panel (NSP) was set up in 2014 to provide strategic advice to the Church with a view to 'attaining the highest standards in policy and practice'[7]. The Panel is an advisory body of external experts, including two survivors of child sexual abuse. It meets six times per year, and its work is generally devoted to studies of single issues linked to safeguarding. Recent investigations have covered training, complaints, disciplinary measures and the implications of the IICSA Final Report.

Review, audit and scrutiny of safeguarding in the Church

Since 2007, several initiatives have been taken by the Church to review its safeguarding practice. A comprehensive programme of audits in all dioceses and cathedrals was carried out by the Social Care Institute for Excellence (SCIE).

Monitoring of safeguarding in parishes should be carried out by an archdeacon in each diocese on an annual basis, but the SCIE audit found this was done inconsistently with respect to frequency, quality and understanding of the issues.

In 2023, the Church commissioned INEQE, a safeguarding consultancy, to carry out a four-year programme of safeguarding audits in the Church, beginning in 2024.

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[6]https://www.iicsa.org.uk/reports-recommendations/publications/investigation/anglican-church/part-b-church-england/b1-safeguarding-church-england/b12-safeguarding-structures.html
[7]https://www.iicsa.org.uk/reports-recommendations/publications/investigation/anglican-church/part-b-church-england/b1-safeguarding-church-england/b12-safeguarding-structures.html

Part 2: Online survey

The Future of Church Safeguarding online survey was open between 15th August 2023 and 17th November 2023. It was accessible on the Programme website and anyone who met the following participation criteria could complete it:

- experience of safeguarding in the Church of England within the last five years
- over 18 years of age.

The focus of the survey was to determine satisfaction levels with current Church safeguarding and to ascertain which functions and aspects of safeguarding would be most important to independent safeguarding in the future.

The key insights from the survey are outlined in this section, and a more detailed analysis of the survey can be found in Annex B.

Overview of survey respondents

We asked survey respondents to select in what capacity they were responding to the survey. Respondents could select as many options as they felt were appropriate. Of those who responded to the question, the most frequent type of respondent was ‘church volunteer’ (39%). This was followed by ‘member of the clergy’ (31%), ‘victim and survivor’ (21%) and ‘church staff’ (17%)

Satisfaction with the safeguarding response

We asked all survey respondents to describe their levels of satisfaction with the response to the safeguarding concern or allegation experienced. Specifically, we asked about the following elements:

- Timeliness
- Quality
- Support offered
- Outcome

Of these elements, survey respondents were least dissatisfied with the timeliness of the response to the concern or allegation. 61% of all respondents were either satisfied or very satisfied. For victims and survivors this was 40%.

However, respondents were most dissatisfied with the outcome of the safeguarding process, with 40% of all respondents feeling ‘very unsatisfied’ or ‘unsatisfied’. This increased to 70% among victims and survivors.

These findings highlight that victims and survivors were consistently less satisfied than other respondents. Only 16% of victims and survivors expressed satisfaction with the outcome of the safeguarding process. This is compared with 46% of all respondents.

Timeliness of the safeguarding response

Of those who responded to the question 'how satisfied were you with the timeliness of the response', 29% were 'very unsatisfied' or 'unsatisfied'.

However, for victims and survivors, the percentage 'very unsatisfied' or 'unsatisfied' rose to 46%.

Support offered during the safeguarding response

Of those who responded to the question 'how satisfied were you with the support offered to you' 37% were 'very unsatisfied' or 'unsatisfied'.

However, for victims and survivors, the percentage 'very unsatisfied' or 'unsatisfied' rose to 64%.

49% of all respondents were 'satisfied' or 'very satisfied' but only 22% of victims and survivors were 'satisfied' or 'very satisfied' with the support offered.

Quality of the safeguarding response

Of those who responded to the question 'how satisfied were you with the quality of the response from the individuals responsible for dealing with the concern or allegation', 39% were 'very unsatisfied' or 'unsatisfied'.

However, this was higher for victims and survivors, with 64% feeling 'very unsatisfied' or 'unsatisfied' with the quality of the safeguarding response.

Only 27% of victims and survivors were 'satisfied' or 'very satisfied' by the quality of the response from the individuals responsible for dealing with their concern or allegation. Overall, 51% were 'satisfied' or 'very satisfied' with the quality of the response to the concern or allegation.

Outcome of the safeguarding process

Of those who responded to the question 'how satisfied were you with the outcome of the safeguarding process', 40% were 'very unsatisfied' or 'unsatisfied'. However, 70% of victims and survivors were 'very unsatisfied or 'unsatisfied'.

Only 16% of victims and survivors who responded to this question were ‘very satisfied’ or ‘satisfied’ with the outcome of the process. Overall, 46% of respondents to this question were ‘very satisfied’ or ‘satisfied’ - nearly three times higher than the percentage of victims who were ‘very satisfied’ or ‘satisfied’.

Part 3: Analysis of current operating model

The IICSA investigation reports on the Anglican Church provided relevant background to Church safeguarding, and was enhanced by the engagement work undertaken by the Future of Church Safeguarding Programme. This formed the basis of this analysis, which identified seven key issues.

- Collapse of confidence in the present system of operational safeguarding
- Inconsistent safeguarding practice across dioceses
- Inequity in funding and resources for safeguarding
- Data collection and analysis
- Definitions of Safeguarding
- Inappropriate Use of Safeguarding resources
- Lack of independent scrutiny of safeguarding

3.1. Collapse of confidence in the present system of operational safeguarding

Our engagement with victims and survivors, those supporting them, safeguarding professionals, church staff, volunteers, and people who had allegations made against them, highlighted a lack of confidence in the present system of Church safeguarding.

For victims and survivors, their lack of confidence generally arose from their experience of reporting concerns and the handling of their cases.

A victim and survivor described that they had "lost faith and trust" in the Church safeguarding systems. They also described the lack of support they received from the Church, as well as a perception that alleged abusers were treated better than their victims.

> "I had no one, I had to deal with it by myself."
>
> *Victim and survivor*

> "Support for the complainant has often been very poor…it's definitely worse than poor."
>
> *Member of the clergy*

There was a perception of some ingrained attitudes to safeguarding across the Church, reflecting scepticism about the necessity for the scale of response to allegations

> "...There is still a great deal of quite powerful resistance to the concept of safeguarding among parish members, particularly volunteers and still some clergy. This manifests as failure to complete training, continuous complaints about safeguarding administration and disrespect of safeguarding personnel. This serves to undermine morale and

> reduces the effectiveness of the safeguarding processes."
>
> *Church staff*

A member of the clergy who had previously worked in safeguarding told us:

> "In my experience, many colleagues in the Church do not take safeguarding seriously. Attending regular training has become a tick-box exercise. I was stunned by discovering how little the Church knew about safeguarding when I was ordained, and have been ashamed by the appalling pathetic responses of the C of E. Time and again 'lessons learnt' reviews result in nothing being learnt."
>
> *Victim and survivor and member of the clergy*

Underpinning the lack of trust and confidence amongst victims, survivors and others was a concern that the reputation of the Church still mattered more to some people than the well-being of those who needed safeguarding. The tendency of many institutions to protect themselves was well established and recorded in IICSA's investigation reports.

> "The Church cares more about protecting its reputation than carrying out proper safeguarding aligned to the statutory standard."
>
> *Online survey*[8]

> "..... I was the supporter of two individuals following allegations against them… in both I found that the process was very poorly managed. The diocesan staff seemed to be fundamentally driven by protecting the church and the accused (in this case) were pretty collateral to that. Processes were not followed, unofficial processes were used instead of published ones, conflicts of interest were ignored, confidentiality was broken, complaints were ignored, and I was made to feel as if I was doing something wrong in complaining… It all just felt totally incompetent and things were just made up as they went along."
>
> *Church volunteer*

Professionals were concerned about absence of process, lack of procedural clarity and poor communication.

> "We [people working in safeguarding] all have gaps in our knowledge. It's very siloed. And there is a lot of suspicion, so it's not good. The communication doesn't work properly."
>
> *Safeguarding professional*

Some felt the safeguarding system was "stacked in favour of the clergy" with congregants not taken seriously.

[8] Some respondents to the online survey did not state which category of participant they were. In such cases quotes are attributed as 'online survey'

> "There is no way a lay person without status in the congregation will be treated fairly if the only way is through church personnel, functionaries, office holders."
>
> *Church volunteer*

Others highlighted the lack of rigour around safeguarding decisions.

> "At present, we are self-protective and risk-averse. We are (effectively) removing people from their parishes on the basis of mere suspicion."
>
> *Victim and survivor and church volunteer*

A lack of confidence regarding proper referral to statutory authorities was highlighted.

> "I was also concerned that until recently safeguarding advice to clergy and laity focused on reporting to an identified lead rather than reporting concerns to the relevant agency be that police and or adult/children's social services."
>
> *Safeguarding professional*

Conflicts of interest

Conflicts of interest are described in church guidance as 'situations of potential or actual risk that the judgement, decision-making and commitment… has been (or may be) affected by secondary issues'.[9]

Participants told us about perceived and actual conflicts of interest in safeguarding decisions which undermined good quality safeguarding and affected trust and confidence in the system.

As a matter of principle, circumstances where conflicts of interest might arise should be avoided and, as a matter of good governance when they arise, they should be declared, recorded and fully explored. The Church uses a self-declaration approach to conflicts of interest on the basis that only the individual can know if they are potentially conflicted.

Parish priests and bishops are responsible for their parish or diocese and the potential for them to have a conflict of interest, for example, through knowing the accused person or the complainant or to have a personal interest in the outcome of a safeguarding decision, is significant. This is not a fair or proper way to investigate or adjudicate on safeguarding.

While many people we spoke to were at pains to say that their bishop or their priest would step back from any safeguarding case and not be involved if they had personal knowledge of anyone concerned, this seemed to rest entirely on the person's attitude, rather than on a specific process. It also seemed to lack provision for appealing against the continuing involvement of the individual concerned.

[9] https://www.churchofengland.org/safeguarding/safeguarding-e-manual/section-1-purpose

Lack of transparency and poor communication

Victims and those subject to safeguarding complaints also highlighted the absence of process, the lack of clarity over procedures and poor communication.

> "There needs to be better and quicker communication at all levels."
>
> *Member of the clergy*

One person stated that the way the Church communicates is a key shortcoming of its safeguarding approach.

> "Often where they have messed up safeguarding cases it's because they haven't appreciated the communication and psychological needs of the people they are working with and the way someone might respond."
>
> *Member of the clergy*

Another person who was both a member of the clergy and a victim and survivor of abuse explained the importance of communication in order to keep them informed about what to expect.

> "Communication needs to be fixed. Communication would have let me have an idea of what happens next and feel like someone has heard me."
>
> *Victim and survivor and member of the clergy*

Role of clergy and other church leaders in safeguarding decision making

Through our engagement with people who have experienced Church safeguarding, we heard a strong desire to move safeguarding decision-making away from senior clergy. This is consistent with a recommendation of IICSA[10]. One diocesan registrar described the power that bishops still have around safeguarding as "slightly horrifying."

One bishop who responded to the survey was clear that safeguarding should not be undertaken by bishops.

> "Safeguarding should be taken out of the hands of the bishops, and there should be properly independent structures at diocesan and national levels."
>
> *Bishop, online survey*

Some participants noted that safeguarding was heavily influenced by the individual views and attitudes of senior clergy, including bishops, given their power within dioceses. This was compounded by the inconsistency of safeguarding practice.

[10]https://www.iicsa.org.uk/reports-recommendations/publications/investigation/anglican-church/part-d-conclusions-and-recommendations/d4-recommendations.html

> "I would like to see safeguarding removed from individual dioceses and bishops. This would avoid the risk of interference from individual bishops and a standard approach across all dioceses."
>
> *Victim and survivor and church volunteer*

> "There is a serious challenge here in dealing with the culture of safeguarding that grows up under the leadership of some parish clergy."
>
> *Member of the clergy*

> We were also told that some bishops behaved in an exemplary fashion in this respect and did not get involved in safeguarding decision-making.

> "The diocese in my area takes safeguarding extremely seriously, runs outstanding training and follows processes well. The relationship between the senior team is strong, meaning that healthy disagreement can take place and the bishop takes the advice of the safeguarding and other senior colleagues very seriously…We are aware of failings elsewhere and bishops' in particular who fail to appreciate the modern safeguarding requirements."
>
> *Victim and survivor and church volunteer*

We also heard of situations in which clergy failed to report alleged abuse to the authorities.

> "Clergy should be accountable for reporting abuse situations in their church, and should not keep them to themselves. Clergy who have perpetrated abuse on children or adults should not be allowed to continue in ministry. Young clergy in a training parish who report abuse that has been perpetrated by other clergy upon them, are fearful of reporting it in case it affects their future. This should not be so."
>
> *Victim and survivor and member of the clergy*

3.2. Inconsistent safeguarding practice across dioceses

The 42 dioceses are the principal institutional unit in the Church, with each headed by a bishop. The Archbishops' Council is a separate church institution. The Archbishops are viewed as the spiritual leaders of the Church, with significant influence, rather than the executive heads of the organisation. The dioceses are virtually autonomous, including in respect of safeguarding. Many people we spoke to lacked confidence that safeguarding in the Church could be made independent of bishops.

Despite changes made to the Clergy Discipline Measure in 2021, there is currently no effective means of compelling bishops to implement safeguarding arrangements in a particular way, nor of disciplining them in respect of safeguarding managerial failures (for example a failure to report

or discipline a member of the clergy). Although they are required to comply with the code of practice concerning the conduct of safeguarding practice reviews.

Policy statements on safeguarding set out expectations that church officers should follow guidance:

'All authorised clergy, bishops, archdeacons, licensed readers and lay workers, churchwardens and PCCs must have 'due regard' to safeguarding guidance issued by the House of Bishops (this will include both policy and practice guidance). A duty to have 'due regard' to guidance means that the person under the duty is not free to disregard it but is required to follow it unless there are cogent reasons for not doing so. ('Cogent' for this purpose means clear, logical and convincing). Failure by clergy to comply with the duty imposed by the 2016 Measure may result in disciplinary action.'[11]

> "Essentially it's the constitution of the church which is the biggest weakness in that every diocese is controlled by the bishop."
>
> *Victim and survivor advocate*

> "You can have that (guidance) but essentially the constitution of the church is the bishop is the boss and whatever your DSO/A might say, the bishop has the last say on it - that's the first structural problem they have."
>
> *Victim and survivor advocate*

Plans are advanced to convert safeguarding guidance into Codes of Practice[12]. As each Code of Practice is issued there is now a 'duty to comply' with that Code. This replaces the current duty to have 'due regard' to guidance on safeguarding. Each Code of Practice will have to be approved by the Synod. The duty to comply extends to a broader group of 'relevant persons' than previously, including those governing cathedrals, and certain other statutory diocesan bodies. These changes reflect recognition of the need for greater consistency in safeguarding practice across the Church.

It was clear from our engagement, however, that dioceses operate their safeguarding services very differently, and that the bishop can exert significant influence over local safeguarding.

> "There needs to be clear guidance, standardised forms from the national church which are legal and should be used across dioceses. Many parishes change [the guidance] to suit them."
>
> *Church volunteer*

> "I, and my local safeguarding officer, have found the information provided both at National level and Diocesan level to be opaque, confusing and complex, on everything from who should do what training, to who requires a DBS, to what happens if they don't"
>
> *Member of the clergy*

[11] https://www.churchofengland.org/safeguarding/policy-and-practice-guidance
[12]https://www.churchofengland.org/sites/default/files/2023-05/gs-2295-safeguarding-practice-reviews.pdf

> "My fear is that every time something is made more complex, harder to find a good definitive answer, or just mystifying, then safeguarding practice will be weakened because people just won't do it".
>
> *Member of the clergy*

> "Documents and processes are repeatedly simply not properly conceived or explained in ways that enable them to be implemented well by the [42] independent dioceses and their 12,500 independent, self-governing parishes."
>
> *Safeguarding professional*

We also heard about inconsistent recording practices. One of the consequences of this is that data collection will be unreliable because of the variation in data sources.

> "Consistency across the dioceses, as the current situation varies so much. Different diocesan bishops and different DSO/As handle the same case in so many different ways."
>
> *Member of the clergy*

While safeguarding in some dioceses might be working well, we heard about concerns over inconsistent quality of safeguarding across the Church.

> "The team here is excellent. However, we know that there are a number of local parish churches who do not apply the same level of safeguarding that we do and feel that more education is needed with regards to exactly what a strong safeguarding process looks like."
>
> *DSO/A*

Inconsistent professional support and supervision to diocesan safeguarding staff

DSO/As are the key operational staff who deliver safeguarding for the Church in dioceses. They are required to have a background in safeguarding. They are mainly former police officers and social workers.

There appeared to be a significant number of former police officers in these roles. Some people expressed the view that this influenced how investigations were carried out. There were examples of investigations being initiated by former police officers before any fact-finding had been carried out.

> "It seems to me that there are two types of people employed by the Church of England to oversee safeguarding: ex police officers or former social workers…[With ex police officers] I have come across responses like 'there's no smoke without fire', 'of course he

> did it, they just can't prove it'."
>
> *Member of the clergy*

When appointing a DSO/A, a bishop must be satisfied that the person has 'appropriate qualifications and expertise'[13] but the meaning of 'appropriate' is not clearly articulated in church guidance. As a result, DSO/As can have a variable level of safeguarding expertise and experience. For this reason, the professional support and supervision of all DSO/As is of great importance.

The bishop in each diocese is also responsible for ensuring that their DSO/A has sufficient time to undertake "continuing professional development in safeguarding matters". We were told the workload of DSO/As in some dioceses meant that there was little time to engage in professional development.

Line management arrangements for DSO/As vary across dioceses. This role was carried out by a range of people, including bishops, human resources managers, archdeacons and diocesan secretaries. In nearly every case, the manager will not have safeguarding expertise.

As the NST forms part of the Archbishops' Council, the National Director of Safeguarding is responsible to the Secretary General (Chief Officer) of the Archbishops' Council.

Separate from line management, professional or clinical supervision should be available to all safeguarding staff, though this was not routinely available in the dioceses.

We also heard from DSO/As who did not consider that they received the necessary levels of support.

> "There is nobody above me in our organisation who can offer me really good robust supervision"
>
> *DSO/A*

The Pathfinder programme is currently underway in a number of dioceses to pilot implementation of the IICSA recommendation that DSO/As are able to take decisions on safeguarding independently of the bishop. This includes arrangements for professional supervision.

Lack of clarity about the role of PSOs

Volunteers play a pivotal role in the Church and are key to its safeguarding system with many safeguarding concerns arising from the parish level. Every parish must have a PSO - a volunteer who in practice sometimes combines this role with others.

We heard from many PSOs that their role felt onerous and that they were ill-equipped to manage the role.

[13]https://www.churchofengland.org/sites/default/files/2017-10/dsa-regulations-as-amended-2017.pdf

> "If there was more clarity on what safeguarding is, it might be easier to volunteer."
>
> *DSAP Chair*

> "The process now in place is very good but reliant on volunteer safeguarding officers who in my case are only doing it because there is currently no one else who can or wants to. I do it to the best of my ability and time but don't feel qualified enough for a serious allegation"
>
> *PSO*

> "I am a Parish Safeguarding Officer and have experienced the many changes in requirements and administration over the past seven years ... The main problems I have encountered are….[lack of] information distribution, both diocesan and national. Drowning in administration, it is very difficult to avoid feeling the constant stream of new documents from the National Team. I know that the issues have to be addressed and that ultimately the parish is responsible, but sometimes it is very frustrating to find the goalposts moved so often and so much being placed on volunteers."
>
> *PSO*

"To be absolutely frank, I would like to be the eyes and ears of making sure nothing untoward happens within my area of concern, but I do not want… input into the detailed nitty gritty of a particular case. I'm not qualified to do that. I'm just the person that says "look I think we've got a problem" and pass this onto someone to look into"

PSO

Part of the reason that so many PSOs felt the role to be onerous was because of the wide range of duties they were expected to carry out. One PSO told us that he was expected to assess the physical and mental health of all the volunteers at his church, including the organist. Frustrated at the many different functions he had to perform, which he did not feel qualified to undertake, he asked for the contact details of other PSOs in the diocese so they could share best practice. He was told that he could not have their details due to GDPR concerns.

It was clear that PSOs needed greater support to fulfil their role and that they were particularly affected by the inconsistency of safeguarding priorities.

Tensions between diocesan safeguarding team and national safeguarding team

We heard from many in the dioceses and parishes who felt overburdened by the number of directives and the amount of guidance coming from the NST that dioceses were expected to implement. Similarly, the NST expressed frustration that they were not able to intervene in diocesan safeguarding even when they felt it was not appropriate or did not meet best practice.

A senior NST member described their inability to be directly involved as their "greatest frustration".

The NST was established to provide a national policy and practice approach and support on casework. Some said how useful this had been in their DSO/A role.

> "I have regular engagement with the NST. My personal experience has been good…. On shared cases I work with the NST casework team, and they help with decision-making."
>
> *DSO/A*

However, in spite of their expertise, they cannot intervene in diocesan safeguarding matters.

> "There are some really good people working in the NST, but their hands are tied behind their back"
>
> *Victim and survivor*

On occasion, this led to tension.

> "The diocesan teams are hugely under-resourced whilst the NST is bloated. This needs to be addressed."
>
> *DSO/A*

> "One of the things I find most difficult to deal with is the tendency of the National Team to set standards based on full-time employment models. They don't seem to understand that the people carrying out their recommendations are volunteers dealing with volunteers, often in an environment where roles are difficult to fill. Sometimes they also appear to be unaware of the structures with which they are dealing"
>
> *Church volunteer*

The NST was an attempt to create greater consistency and drive up standards but the diocesan structure does not support this. This means, in practice, that Church safeguarding service falls below the standards for consistency expected and set in secular organisations.

> "In a string of letters, emails and phone conversations with senior members of the NST, it became very clear that they had no concept at all of the reality of providing good safeguarding in parishes."
>
> *Victim and survivor and member of the clergy*

A bishop expressed their frustration with the NST and its processes:

> "My experience was as a bishop, seeking to do good safeguarding practice in my role. I found that the National Safeguarding Team was largely impenetrable. Cases referred to them disappeared into the abyss, and you could never find out what was going on."
>
> *Member of the clergy*

3.3. Inequity in safeguarding funding and resources across dioceses

Many areas told us they were struggling with caseloads, and a lack of resources to meet demand was often cited as the reason for this.

There has been a significant increase in resources for safeguarding in the last ten years, which has facilitated some improvements in staffing at diocesan and national levels. At diocesan level, safeguarding competes in priority with other demands on funding, and largely depends on the attitude of the bishop and the diocesan secretary to support requests for increased funding. The NST provides grants and 'one-off' funding for specific initiatives. There was a general view that there was a correlation between wealthy dioceses and better resourcing of safeguarding.

In 2013, reported spending on safeguarding in the National Church Institutions was £66,000, which also covered a joint arrangement with the Methodist Church. In 2015, it had increased to £401,000 and in 2020, the National Safeguarding Team's expenditure alone was £2,353,000. In 2022, the NST's total expenditure rose to £5,330,000, and the Church's central safeguarding expenditure was £5,523,000 in 2023. These figures include the expenditure of the Interim Support Scheme for victims and survivors of abuse, established in 2020.[14]

We were unable to obtain reliable information on the safeguarding resources in each diocese as this information is not collected centrally. The NST provided estimated staff numbers from various sources. All data and analysis in this section should therefore be regarded as an estimate. The data gathered provides insight into the following three areas:

- Safeguarding staff in each diocese (staff resources)
- Worshipping population of each diocese (potential demand)
- Number of cases opened in each diocese for every year between 2019 and 2022 (existing demand)

The number of safeguarding staff within each diocese varies considerably. We estimate that most dioceses have between 3 and 4.5 full-time equivalent (FTE) safeguarding staff but with variations such as 1.5 in Carlisle to 6 in Chester. It does not reflect the volume of cases or unmet need.

The safeguarding budget for each diocese can impact the experiences of victims, survivors, and others involved in safeguarding issues. These include possible limitation of caseloads and a variation in the quality or frequency of support available.

> "So you've got financial disparity between dioceses, which means you have financial disparity between the resources to safeguarding, that then flows into disparity in the service provision available to victims and survivors. So what response you get is almost a little bit like a postcode lottery"
>
> *DSO/A*

[14] Financial figures provided on request.

We undertook data analysis to establish whether there was any relationship between resourcing and potential demand. Our analysis found no statistically significant relationship between our estimates of the number of safeguarding staff employed in each diocese[15] and a diocese's worshipping population. One might expect that in dioceses with larger populations, there would be an increased number of safeguarding staff employed to meet potential demand but we were unable to establish such a link.

In a report published in 2023, the Church of England noted that the considerable variation in safeguarding concerns between dioceses may be a result of the worshipping population[16]. Our analysis did not find a relationship between these two factors.

There was also no statistically significant relationship between the number of safeguarding staff employed in each diocese and the number of cases opened annually. We found no relationship between the levels of demand and resources.

To conclude, when analysing the three variables together, no relationship was found between the number of safeguarding staff employed, the size of the worshipping population or the number of new safeguarding cases opened.

3.4. Poor data collection and analysis

The SCIE audits which reviewed all 42 dioceses[17] highlighted that across dioceses there were variable standards of data collection, storage and analysis. In some dioceses, there was a strong emphasis on the importance of data collection and its uses, but in others, there was no data collection or analysis. We also heard that "everyone keeps data in different ways". The overall conclusion was that data collection across dioceses was too unreliable to be used as a basis for future planning and improvement.

Case management is equally flawed. There was no reliable data about the number of cases, start and end dates, the nature and type of cases, outcomes of interventions, and referrals to statutory authorities, for example.

A bishop told us that when he arrived in his diocese he asked about the safeguarding caseload, to be told that they never closed cases. As a result, the permanently open caseload numbered 400, and one of his first tasks was to address this issue.

We asked all dioceses about the recording of case end dates but very few were able to provide this information. Responses we received included:

[15] Measured in Full Time Equivalent because every diocese had a different way of structuring Safeguarding Staff, with different levels of seniority, title and responsibilities
[16] https://www.churchofengland.org/sites/default/files/2023-02/diocesan-safeguarding-data-19-21-final.pdf
[17]https://www.churchofengland.org/sites/default/files/2019-04/scie-final-overview-report-of-the-independent-diocesan-safeguarding-audits-and-additional-work-on-improving-responses-to-survivors-of-abuse.pdf

> "Our system does not instantly tell the dates that you require and I would need to 'go into' each case to gain the start date and finish date"

> "Unfortunately, our current recording system does not allow us to run such a sophisticated report and therefore any data provided would need to be collated manually. This will be a considerable undertaking for which we do not currently have the staff resources."

A national case management system is currently being piloted in some areas, though it is not clear whether the diocesan IT systems and hardware would need to be upgraded or replaced to support changes.

As a result of this inconsistency of data collection and storage, there is no accurate record of demand for safeguarding. As a consequence, it is difficult to review safeguarding across dioceses in a comparable manner.

> "There is no overview, and no way of knowing which dioceses are performing well and which aren't. A major problem is getting the data, and the data we do have is so basic and so unreliable."
>
> *Diocesan Secretary*

Inconsistency in the types of data being collected means that the Church of England has no means of knowing the nature of the safeguarding referrals it receives, it cannot identify the vulnerabilities of those involved or the outcomes of the safeguarding processes, including the number of referrals to statutory authorities.

There is also no accurate record of demand and unmet need for safeguarding and it is almost impossible to make comparisons across dioceses.

In the absence of this data, dioceses cannot accurately determine how many safeguarding staff are required, and at what levels, with the consequential implications for funding allocations.

A number of people we spoke to said that they were 'snowed under'.

> "There doesn't appear to be a diocese which isn't stretched capacity-wise due to the high demands on casework, some being very complex."
>
> *Email response to data request, as above*

3.5. The definition of safeguarding and its variable interpretation in practice

The basic purpose of safeguarding is the protection and support of children and vulnerable adults who have been abused or who are at risk of abuse. This includes online facilitated abuse. The statutory definitions are in Annex C

Safeguarding practice in the Church is defined far more widely and loosely, and frequently includes circumstances which are not safeguarding matters.

> “The Church isn’t very good at saying what is and isn’t safeguarding. People talk about safeguarding in a much wider context of being about wellbeing and vulnerability, rather than in the statutory sense.”
>
> *DSO/A*

In many instances, safeguarding staff were expected to undertake general welfare and pastoral care tasks. A DSO/A in one area worked in the food bank one day per week, for example. Another example concerned the requirement to carry out risk assessments prior to visits to bereaved persons.

> "What often happens in the church is that where there is a vacuum, they [safeguarding] will fill it.”
>
> *Member of the clergy*

> “[I].... don't think this is necessarily a bad thing - dealing with 'lower level issues' may be an opportunity to get to know people in the parish and build relationships [and a] wider safeguarding responsibility about developing a culture of raising concerns.”
>
> *DSO/A*

> “The boundary between pastoral concern and safeguarding is not always obvious.”
>
> *Church volunteer*

> It is recognised that the Church provides pastoral care to those in need, but to use trained and experienced safeguarding staff for this task when there is no safeguarding concern is wasteful of this valuable resource . This is particularly relevant because we heard so much about unmanageable caseloads.

More troubling are the consequences for those wrongly accused of safeguarding allegations or described as a ‘safeguarding risk’ for whom the impact on their lives could be devastating. This is explored further below.

Spiritual abuse

Although the Church has defined spiritual abuse, this definition is subject to much debate.

> "I think spiritual abuse is simply a way of saying those other categories of abuse [for example psychological abuse], happening within an ecclesiastical setting."
>
> *Member of the clergy*

> "They make it seem like you are failing God and they have the power to make you believe that and they use their standing to coerce individuals. I definitely agree that a spiritual safeguarding definition should be included in the overall safeguarding definition."
>
> *Victim and survivor*

> "It should be called emotional psychological abuse, not spiritual safeguarding."
>
> *Victim and survivor and member of the clergy*

Some clergy held the view that spiritual abuse was unique to the Church and therefore was a specialist area that could only be dealt with in a theological context, and by Church members or clergy.

> "The behaviour from some of the bishops on the spiritual abuse issue was the worst experience of my professional career. It felt personal, because I'm female and not a member of the clergy. Not being clergy means you are treated differently, and I felt I didn't have a voice because of my theological opposition to the concept of spiritual abuse."
>
> *Safeguarding professional*

Interpretation of guidance at parish and diocesan level

The guidance on safeguarding allows dioceses to interpret safeguarding to suit their local context. This leads to inconsistent practice and at a practical level, some confusion for those working within the system.

> "As parish safeguarding rep, I do not feel confident that guidelines are rigid enough when involving Diocesan safeguarding leads who interpret them differently. Also, local clergy interpret policies in different ways…"
>
> *PSO*

> "My experience is that [safeguarding] is confused and confusing. I am a churchwarden of a parish... The guidance at diocesan level is frequently contradictory to national Church of England guidance."
>
> *Church staff*

3.6. Inappropriate use of safeguarding resources

We heard many examples of conduct issues which were referred to safeguarding but were more properly problems which should have been dealt with via line management or human resources. Some attributed the workload pressures in part to staff dealing with conduct issues.

> "So you've got a failing [safeguarding] system, lack of good HR, rising awareness of safeguarding issues, increasing dictation from the centre about the levels that should be happening, and people are sinking under it."
>
> *Church volunteer and safeguarding professional (retired)*

Many referred to inadequate HR services and processes in the Church. Several participants referred to bullying as an example of an issue which should have been dealt with elsewhere.

> ".....quite frequently safeguarding and disciplinary processes have a tendency to overlap."
>
> *Member of the clergy*

One survey respondent highlighted the gap.

> "If an area of concern, disagreement or conflict does not fall under safeguarding definitions, then alternative policies and procedures need to be already in place to cope with such situations as HR issues, staff behaviours (if not clergy), etc. Our diocese advised [that] our PCC should pass a dignity at work policy."
>
> *Member of the clergy*

We were told of complaints that had been labelled safeguarding matters which did not relate to safeguarding. Examples included a person who prayed vehemently and was referred to safeguarding staff, and others concerned parishioners with no vulnerabilities who were involved in consensual extra marital relationships; it was notable that several examples related to women and gay clergy.

The absence of a uniform complaints procedure could also account for some issues being referred to safeguarding.

> *"*Then there's the question of complaints and how complaints are dealt with, and the complaint gets really muddled as to are they complaints against an employee or are they complaints against the safeguarding system?"
>
> *Church volunteer and safeguarding professional (retired)*

For those who were being complained about, the impact of being recorded as a 'safeguarding risk' often placed them on a path that could devastate their lives, in many cases losing their livelihood, accommodation and their faith community.

One person we spoke to who was in training to be ordained was identified as a safeguarding risk simply because the person they had entered into a relationship with had a young child.

The person concerned was then suspended from training and a safeguarding investigation was opened.

There was no provision of ongoing information relating to this investigation until they were informed by the bishop that training was to be immediately terminated and that they had only weeks to vacate the home provided by the Church. No evidence that the person posed a safeguarding risk was provided and there was no opportunity to provide a defence. The individual was, however, told that they would be able to reapply to train for ordination after a set period had elapsed. This is difficult to understand given the findings of the investigation.

The person concerned still lives with the stigma of being classed as a safeguarding risk without the presentation of formal evidence and no opportunity to provide a defence.

> "The intersection of the Clergy Disciplinary Measure and the current safeguarding protocols have sometimes led to very unjust outcomes for certain clergy - who have become victims in their own right. For example, the idea that suspension is a "neutral act" is experienced by those who have been suspended as the opposite. The process currently is almost a case-study in 'gaslighting'."
>
> *Member of the clergy*

The absence of any complaints or appeal process alongside the poor communication about the progress of individual cases compounded the unfairness of the experience, with decisions and outcomes often taking years to be concluded.

It was in this context of safeguarding as a pretext for removing people on the basis of moral judgements that many subject to the process described as the 'weaponising' of safeguarding in the Church.

> "As a result of the broad definition of safeguarding and "vulnerable adult", the church is able to categorise a wide range of issues as a safeguarding concern. Safeguarding has become a way of getting people out of the church as there are no other ways to do it."
>
> *Member of the clergy and church staff*

3.7. No formal independent system of scrutiny of Church safeguarding

Several participants thought that scrutiny of safeguarding in the Church had improved but would not be trusted until it was fully independent of the Church.

There is no regular and independent assessment of the standard of practice across the Church. Institutions in the secular world are subject to regulation and inspection of safeguarding for a range of reasons, but primarily to ensure that required standards are being met and to provide assurance about quality to the public and specifically to those who use services and support. The lack of a fully independent system of scrutiny contributes to the lack of confidence in Church safeguarding.

The Church has commissioned multiple reviews and lessons learned reports, but in the words of one contributor to the survey:

> "Who is responsible for overseeing and scrutinising whether any of the recommendations from those reports have actually been implemented?"
>
> *Safeguarding professional*

The audits undertaken by SCIE have provided helpful insights into safeguarding arrangements across the Church. The Church, however, sets the terms of reference for these audits. We were not made aware of any issues concerning the terms of reference or problems with the audit process, but such is the overall lack of confidence in the system that many viewed with suspicion the fact that SCIE had not been recommissioned for a second round of audits.

These audits provided an important assessment of the strengths and weaknesses of the service and made recommendations for change, but there appeared to be no system for tracking or implementing their recommendations nor holding any individuals to account for any failure to do so.

Some contributors highlighted the role of Ofsted in driving up standards in social care services - bringing transparency to the quality of services and providing an important lever for improvement. There are no similar levers to drive improvement in the Church.

Others observed that IICSA had in some respects performed this role - driving improvements but that there would come a point when it would no longer provide that leverage.

Part 4: Features of an effective independent Church safeguarding service

1. Aim and purpose

The organisation's aim is to be professional, accountable, and trusted by those who use its services.

The organisation has a clear definition of its purpose which is agreed, understood and correctly applied by all staff and volunteers.

2. Policies and guidance

Policies should underpin the organisation's purpose and support the wellbeing of those children and adults it serves.

Guidance is clearly defined as prescriptive or advisory. It sets realistic expectations and priorities. Procedures should be easily accessible to all safeguarding staff and volunteers, who should be trained in their use.

3. Workforce

Regular, professional support and supervision are provided to all staff, by persons suitably qualified, and experienced in safeguarding. Training, refresher training and continuous professional development are provided in accordance with roles and responsibilities.

Recruitment and selection of staff should follow best practice, including compliance with equalities legislation.

4. Volunteers

The service recognises the significant contribution made by volunteers to the work of Church safeguarding. It provides appropriate support, training and networking opportunities, and consults volunteers on all relevant safeguarding matters.

5. Resourcing

Allocation of funding should reflect needs at local and national levels and be sufficient to cover an agreed level of service to meet those needs.

6. Responses to concerns or allegations

These responses must follow a consistent and fair process which is set out in accessible form to all parties concerned, and should adhere to agreed timescales.

All decisions about safeguarding, including referral to statutory authorities, must be made by safeguarding professionals alone.

7. Person-centred culture

The paramountcy principle must apply, meaning that the primacy of the child or vulnerable adult's welfare must be accepted and acted upon by everyone who holds a role or responsibility for safeguarding.

Victim and survivor-blaming attitudes and language should not be tolerated.

8. A trauma-informed approach

Trauma-informed practice aims to increase practitioners' awareness of how trauma can negatively impact individuals and communities, and their ability to feel safe or to develop trusting relationships. All safeguarding staff should be trained in this approach.

9. Complaints

The organisation should have a complaints handling policy and a simple process for making a complaint, which is easily accessible to people who use its services. It should also have a process for timely resolution of complaints and disputes.

10. Accountability and governance

Governance should comply with Charity Commission requirements and best practice. It will be essential that independent Church safeguarding organisations have a clear process in place to manage their accountability to the Church for the delivery of safeguarding operations. There should be a legally binding collaboration agreement between the Church and the independent organisations. This should set out:

a) the roles and responsibilities of the independent organisations and the Church of England and how they intend their relationship to work.

b) the parameters they intend to apply to the exercise of any available discretion in the performance, management and enforcement of their respective rights or obligations arising under the Measure or appropriate grant agreements.

11. Data collection and analysis

Data collection and analysis must be accurate and reliable. It should contribute to the organisation's future planning, and provide trend information. It must also contribute to its accountability, and be capable of analysis of variations in both demand and quality of outcomes across dioceses. It will also need to meet the requirements of the independent scrutiny body.

12. Continuous improvement

The organisation should be committed to continuous improvement and systematically obtain feedback on the quality of its services from victims, survivors and other stakeholders.

13. External scrutiny from Organisation B

The organisation should be subject to independent, external audits and scrutiny on a regular basis, the reports of which are made public. These reports should assess the quality of practice and performance in all aspects of the organisation's functioning, and make recommendations for improvement as required.

14. Effective liaison with the Church

The Church and the independent organisations should deal with each other in good faith with the intention of ensuring:

a) high standards of safeguarding practice

b) the effective protection of children and vulnerable adults.

c) the efficient and effective application of resources

d)adherence to the terms of the respective grant agreement

e) the independence of the organisations from the Church.

A joint liaison committee between the Church and the independent bodies should be established.

15. Effective liaison with relevant safeguarding partners

This should be at local, diocesan and national level.

Part 5: Building the model

The shortcomings which have been identified with current safeguarding arrangements in the Church are so widespread and ingrained that it is clear that confidence in the system amongst victims and survivors has fallen steeply, particularly since the dismissal of the ISB in June 2023.

Further changes to the current system will not be sufficient to rebuild trust that the Church is a safe place and a complete change of culture is needed to restore trust and confidence in Church safeguarding.

This can only be achieved by the creation of two fully independent bodies for the operational delivery and scrutiny of safeguarding in the Church of England. There must be a complete transfer of responsibility from the Church to these bodies, whose advice and decisions should be final and not merely advisory. For ease of reference, we have called these A (operational safeguarding) and B (scrutiny).

These organisations will need to be funded from Church resources which are all charitable in nature. We consulted with the Charity Commission and have concluded that the new organisations need to be established as charities. This will mean that the Charity Commission will continue to have regulatory oversight of the new organisations.

Organisation A

This organisation will be responsible for:

1. Receiving referrals, concerns and inquiries in relation to safeguarding matters.
2. Conducting safeguarding investigations into the conduct of people within the Church of England and making directions and recommendations.
3. Providing victims and survivors with appropriate care and support.
4. Providing care and support to those against whom allegations are made.
5. Issuing guidance in relation to safeguarding operations.
6. Providing initial and ongoing training in relation to safeguarding matters for all safeguarding staff including parish safeguarding officers.
7. Publishing reports and making directions and recommendations.

Organisation B

This organisation will be responsible for:

1. Providing oversight and scrutiny of organisation A.
2. Issue a safeguarding code of practice/safeguarding standards.
3. Issuing an inspection framework document and related advice and guidance.

4. Publish safeguarding inspection reports and an annual report.

Conclusions

Trust and Confidence

1. Over many years, the Church has made several attempts to improve its safeguarding and governance. These include the creation of the National Safeguarding Team, compulsory training, the production of detailed guidance, and increased staffing levels.

2. Nevertheless, the process of change has been slow and beset by troubled relationships with victims and survivors, both recent and non-recent. Many of those interviewed across all categories considered the present situation to be 'at an all-time low'. It is certainly the case that relations between senior Church leaders and victims and survivors have deteriorated further in the last year with the dissolution of the Independent Safeguarding Board and related matters.

3. There are conflicts of interest in several aspects of safeguarding, which are not openly acknowledged or addressed in policy, procedures or practice. This serves to further undermine the trust of many of those who need to engage with Church safeguarding.

4. Safeguarding within the Church is flawed and cannot be sufficiently improved whilst it remains within Church oversight. It needs to fundamentally change in order to restore the confidence of victims, survivors and others, including clergy. This can only be achieved by being delivered by a fully independent body.

5. The physical location of safeguarding staff in dioceses should be retained.

6. Criticism of the current system of safeguarding is not a reflection on the individual safeguarding professionals who work at the national and diocesan levels of the Church.

Diocesan structure and inconsistent practice

7. The diocesan management structure for safeguarding is not compatible with the development of a trusted, high quality and accountable system for safeguarding.

8. Inconsistencies in many aspects of safeguarding practice were in evidence across the dioceses. These lead on many occasions to unequal and unfair treatment and variable responses to safeguarding concerns and allegations.

9. The definitions of child and vulnerable adult safeguarding in use need to be standardised and should comply with the statutory definitions, in stark contrast to some of the examples

we have provided in this report. They should be strictly applied within the new bodies.

10. In many dioceses, too much time is spent by safeguarding professionals on non-safeguarding issues.

11. Safeguarding processes have been used extensively to address conduct issues which bear no relevance to child or adult risk. This is wholly inappropriate and likely to be unfair to the parties concerned. It is also a wasteful use of resources when safeguarding professionals frequently reported that they have unmanageable workloads.

12. Processes of investigation did not routinely include 'fact finding' as a first stage, in order to determine whether or not there was a safeguarding element present in the case.

13. Several people who had been subject to this process told us that it had been nothing less than a 'weaponising' of safeguarding. Some had acquired the label of being a 'safeguarding risk' for matters entirely unrelated to safeguarding. Apart from causing great personal distress, in some instances, it also caused them to lose their livelihood, their accommodation and their faith community.

14. Data collection and analysis are basic, inconsistent, and unreliable.

15. Inequity in funding across the 42 dioceses needs to be addressed to better match needs to resources.

Faith issues

16. We heard many firmly-held views that being a Christian should be a prerequisite for the appointment of a safeguarding professional in the Church. We do not agree. The only criteria for selection should be relevant qualifications, experience and evidence of high professional standards.

17. We also heard frequent references to the need for safeguarding in the Church to be rooted in theology or scripture. As a basis for decision-making on allegations or concerns about child and adult protection, this is inappropriate and does not reflect statutory guidance.

18. Some people believed that independent safeguarding would mean that the Church and its institutions would see no need to take any further responsibility for children and vulnerable adults with whom they come into contact. We find that surprising, given the express moral purpose and duty of the Church for the protection of these groups. The Church will not be absolved of its responsibilities to identify and report any concerns about safeguarding to an independent body. Indeed, it could use the opportunity to voluntarily introduce its own form of Mandatory Reporting, ahead of legislation.

Scrutiny, audit and improvement

19. A separate, independent mechanism is required for the scrutiny of safeguarding.

20. The Church should establish a single uniform complaints system with an appeals process to apply across the Church and its institutions. The new Organisation A will also have to establish its own complaints system.

21. The Church recently contracted INEQE, a safeguarding consultancy, to undertake a four-year programme of safeguarding audits. This work will need to be integrated into the work of Organisation B.

Contingent Church projects

22. The work of the team developing the implementation of the IICSA recommendations will be complementary to the new bodies and will support its work.

23. We are also aware of the work of the Church Pathfinder Projects. These also appeared to be complementary to the work of the new bodies.

Recommendations

1. The General Synod of the Church of England should pass a Measure, with Parliamentary approval and Royal Assent, to create two overarching statutory duties which will apply to the Church of England as an institution, members of any council, synod or body and to all personnel, ordained or lay, remunerated or voluntary. The duties will comprise:

    a. a duty to refer all safeguarding matters to the Independent bodies.
    b. a duty to implement all the decisions of those independent bodies.

2. The Church of England should appoint an Independent organisation to oversee the establishment of a new fully independent charitable body (organisation A) for the delivery of the safeguarding operations of the Church of England. Scrutiny of Church safeguarding should also be made fully independent, either by the establishment of a new independent charitable body or by an existing independent charity. Structural separation is essential to provide fully independent safeguarding.

3. The Church of England should appoint an independent human resources organisation to assist in the establishment of the new organisations and to ensure that there is full consideration of the transfer, where appropriate, to those organisations of staff currently employed by the Church in safeguarding positions.

4. Any complaint, concern or enquiry regarding safeguarding shall be referred to organisation A at the first available opportunity.

5. Any safeguarding recommendation made by organisation A or B shall be implemented and carried into effect by the person or body to whom it is directed within the timescale prescribed.

6. The following shall be deemed to constitute misconduct for the purposes of section 8 of the Clergy Discipline Measure 2003:

    a. failure or delay in referring any complaint, concern or enquiry to organisation A or B under (4) above.
    b. failure to follow any code of practice or any safeguarding recommendation made by organisations A or B under (5) above.

7. The Church of England should agree a separate grant agreement with organisations A and B that provides for the payment of a grant to both organisations to ensure that they are able to fulfil their functions effectively.

8. The Church of England should agree to a review of the grant agreement within six months to a year and as necessary thereafter to ensure that organisations A and B have the resources necessary to fulfil their functions. This is essential given the difficulty in accurately estimating, at the outset, the funds that will be required.

9. To ensure that the role of organisations A and B is clear and consistent, the definition of child and adult safeguarding must comply with the statutory definitions.

10. Organisations A and B should use the guidance relating to emotional and psychological abuse pertaining to vulnerable adults and children rather than spiritual abuse in all guidance and training and to determine cases referred under the measure in (1) above.

11. An independent appointments panel should be established to appoint the first board of trustees, including the Chairs of organisations A and B.

12. Independent legal advice, separate from established church legal advisors, should be appointed to provide legal support during the establishment of organisations A and B.

13. Organisations A and B should secure independent legal advice separate from Church legal advisors once established.

Annex A: Details of engagement

We engaged with a range of people who had experience of Church safeguarding in the previous five years. This was done through interviews (both in person and online) and the online survey. We also conducted briefing sessions with groups of safeguarding staff.

The criteria for participation were that the individual

- had experienced safeguarding in the Church of England within the last five years
- was over 18 years old.

Participants	**Interview**	**Survey**	**Total**
Victims and survivors of church abuse and their advocates	41	71	112
Clergy (current and former)	33	103	136
Synod members, registrars and diocesean secretaries) (current and former) and other church staff	29	57	86
Volunteers (includes PSOs)	20	133	153
Safeguarding professionals (including NST; DSO/As, CSAs, DSAP chairs) (current and former)	32	N/K	32
Peculiars and religious communities	7	N/K	7
Other (including charities and the trade union)	1	43	44
Total	**163**	**407**	**570**

Please note that we spoke to an additional group of approximately 20 individuals who wish to remain anonymous. They are not included in these figures.

1. Interviews

- We conducted 125 interviews (in person and online).
- We spoke to 136 individuals.
- Any former staff, clergy, or volunteers we spoke to had left in the last five years.

- The figures in the table above add up to more than 136 individuals because some identified as more than one of the categories set out above. For example, some individuals identified as both victims and survivors and as clergy or staff.

2. Survey

- The survey reached over 1000 individuals with 476 respondents stating they met the criteria to participate in the survey. Not every respondent answered every question. For example, only 337 respondents answered which category listed above they belonged to.
- Respondents were able to select more than one category and 136 respondents selected more than one category. For example, some respondents identified themselves as both 'church staff' and 'church volunteer'. Therefore, the totals above add to more than 337.

3. Interviews with senior church leaders

We undertook interviews with the following senior clergy and staff.

- Archbishop of Canterbury
- Archbishop of York

Bishops

- Bishop of Stepney
- Bishop of Bristol
- Bishop of Lincoln
- Bishop of Newcastle
- (Acting) Bishop of Exeter
- Bishop of Fulham
- (Acting) Bishop of Coventry
- Bishop of London
- Bishop of Birkenhead
- Bishop of Winchester

- William Nye (Secretary General of the General Synod)

Diocesan Secretaries

1. Mark Humphriss (Diocesan Secretary of Oxford)
2. Gabrielle Higgins (former Diocesan Secretary of Chichester)
3. Geraldine Newbold (Diocesan Secretary of Guildford)
4. Shane Waddle (Diocesan Secretary of Newcastle)

5. Derek Hurton (Diocesan Secretary of Carlisle)
6. Philip Poulter (Diocesan Secretary of Portsmouth)
7. Oliver Home (Diocesan Secretary of London)
8. Stephen Hancock (Diocesan Secretary of Exeter)

NST

- Alexander Kubeyinje (Director)
- David Worlock (former Deputy Director)
- Nathalie Ballard (Deputy Director)
- Zena Marshall (Deputy Director)

4. Group meetings with DSO/As, CSAs and NST

We also held a series of online group meetings where we updated staff on the progress of the future of Church safeguarding which was also an opportunity to hear individual views. This covered:

- 85 DSO/As, CSAs and other safeguarding staff
- 26 members of the NST
- Six members of the IICSA project team

Annex B: Survey results

- The survey reached over 1078 individuals of which
    - 105 stated they did not have any experience of safeguarding
    - 35 said they did have experience but it was more than five years ago
    - 462 did not complete these questions
    - 476 respondents met the criteria to participate in the survey[18]
- Not every respondent answered every question.

Demographic profile

Gender

Female	51%
Male	46%
Other	1%

Age

18-29	1%
30-39	7%
40-49	14%
50-59	22%
60-69	33%
70-79	20%
80-89	3%

[18] The survey was accessible on the Programme website and anyone who met the following participation criteria could complete it:

1. experience of safeguarding in the Church of England within the last five years
2. over 18 years of age.

Ethnicity

English, Welsh, Scottish, Northern Irish or British	89%
Any other White background	3%
Other background	3%

Questions and responses

The tables below show the percentage of each group that answered the question and selected one of the options. For example, 14% of all victims and survivors who answered the question 'How satisfied were you with the timeliness of the response to the safeguarding allegation' selected 'very satisfied' (see Table 1 below).

To note, the total number of people who responded to each question varies from the total number of people who completed the survey and met our participation criteria (n=476) as it was possible to skip some questions asked in the survey. Therefore the percentages listed in each table are based on the number of people who answered that specific question as opposed to the cohort of 476.

Satisfaction with response to safeguarding allegation

Table 1: How satisfied were you with the timeliness of the response to the safeguarding allegation?

	Very satisfied	Satisfied	Neither satisfied nor unsatisfied	Unsatisfied	Very unsatisfied
Victims and survivors	14%	25%	14%	16%	30%
Clergy	32%	31%	11%	12%	15%
Church staff	36%	26%	8%	10%	21%
Volunteers	36%	27%	9%	13%	15%

Table 2: How satisfied were you with the support offered to you during the response to the safeguarding allegation?

	Very satisfied	Satisfied	Neither satisfied nor unsatisfied	Unsatisfied	Very unsatisfied
Victims and survivors	6%	16%	14%	30%	34%
Clergy	17%	24%	23%	17%	17%
Church staff	26%	28%	5%	15%	21%
Volunteers	33%	20%	11%	14%	21%

Table 3: How satisfied were you with the quality of the response from the individuals responsible for dealing with the safeguarding allegation?

	Very satisfied	Satisfied	Neither satisfied nor unsatisfied	Unsatisfied	Very unsatisfied
Victims and survivors	9%	17%	9%	27%	38%
Clergy	27%	19%	16%	16%	22%
Church staff	31%	23%	10%	13%	23%
Volunteers	28%	25%	10%	14%	23%

Table 4: How satisfied were you with the outcome of the safeguarding process?

	Very satisfied	Satisfied	Neither satisfied nor unsatisfied	Unsatisfied	Very unsatisfied
Victims and survivors	3%	13%	14%	17%	52%
Clergy	17%	20%	17%	19%	27%

Church staff	26%	21%	18%	8%	28%
Volunteers	19%	30%	15%	12%	24%

Independent safeguarding

We asked respondents to rate how important the following features of independent safeguarding were.

We defined 'independent' as safeguarding not being subject to control or influence by the Church of England.

Table 5: it has its own leadership team and is not accountable to the Church of England

	Very important	Important	Neither important nor unimportant	Unimportant	Very unimportant
Victims and survivors	79%	10%	4%	6%	3%
Clergy	61%	14%	9%	8%	7%
Church staff	57%	13%	6%	13%	11%
Volunteers	59%	25%	9%	4%	3%

Table 6: it has the ability to recruit staff, decide how they are paid and how experienced they need to be

	Very important	Important	Neither important nor unimportant	Unimportant	Very unimportant
Victims and survivors	64%	23%	10%	0%	3%
Clergy	54%	31%	10%	1%	4%
Church staff	57%	20%	11%	6%	6%
Volunteers	50%	38%	9%	2%	2%

Table 7: there is no involvement of individuals employed or appointed by the Church of England in safeguarding

	Very important	Important	Neither important nor unimportant	Unimportant	Very unimportant
Victims and survivors	55%	13%	19%	4%	9%
Clergy	32%	18%	27%	9%	14%
Church staff	31%	17%	19%	12%	21%
Volunteers	31%	15%	26%	17%	10%

Table 8: it has control of its own budget

	Very important	Important	Neither important nor unimportant	Unimportant	Very unimportant
Victims and survivors	60%	15%	21%	3%	1%
Clergy	41%	23%	22%	4%	9%
Church staff	32%	28%	17%	11%	11%
Volunteers	39%	27%	24%	6%	6%

Annex C: Statutory definitions of safeguarding

Safeguarding children

The Children Act 2004[19] sets out the legal responsibilities to protect or safeguard children under 18. Safeguarding is an activity that is undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.[20]

Safeguarding adults

The Care Act 2014 sets out the legal duty to protect and safeguard vulnerable people over the age of 18. The duty to safeguard an adult applies where an adult:

(a) has needs for care and support (whether or not the authority is meeting any of those needs),

(b) is experiencing, or is at risk of, abuse or neglect, and

(c) as a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it[21]

The Care and Support statutory guidance[22] identifies ten types of abuse, these are:

- Physical abuse
- Domestic violence or abuse
- Sexual abuse
- Psychological or emotional abuse
- Financial or material abuse
- Modern Slavery
- Discriminatory abuse
- Organisational or institutional abuse
- Neglect or acts of omission
- Self-neglect

[19] https://www.legislation.gov.uk/ukpga/2004/31/section/11
[20]https://assets.publishing.service.gov.uk/media/65803fe31c0c2a000d18cf40/Working_together_to_safeguard_children_2023_-_statutory_guidance.pdf
[21] Care Act 2014 Section 42
[22]https://www.gov.uk/government/publications/care-act-statutory-guidance/care-and-support-statutory-guidance

Annex D: Glossary of terms

Term	Definition
Archbishops Council	The Archbishops' Council is a statutory body established by section 1 of the National Institutions Measure 1998. It is established for charitable purposes and its objects are to coordinate, promote, aid and further the work and mission of the Church of England.
Bishop	In the Church of England, the bishop is the central focus of organisation and ministry within his/her diocese. They are the chief pastor and authority and share the cure of souls with all the incumbents of that diocese. They are also the chief representative of the diocese in the work of the wider church.
Cathedral	The seat of the bishop and a centre of worship and mission for the Church of England.
Church Peculiar	A Peculiar is a parish, chapel or church that is not under the jurisdiction of the bishop and archdeacon of the diocese in which it is geographically located. Peculiars owe their status to their royal connections (Royal Peculiars) or to other factors which meant that they have been historically separate from the diocesan structure of the Church.
Church premises	Premises which are used solely or mainly for religious purposes.
Clergy	The collective term for all ordained individuals in a number of religions.
Congregation	A group of people who have come together for worship or prayer.
Disclosure and Barring Service (DBS)	The UK government department that allows employers to check whether a person has a criminal record that would make them unsuitable to work with children or vulnerable adults
Diocese	Geographical area by which the Church of England is divided for religious, administrative and pastoral activities. A bishop is typically responsible for a diocese.

Diocesan Safeguarding Officer/Adviser (DSO/A)	DSA: Advise the diocesan bishop on matters relating to the safeguarding of children and vulnerable adults, including by making referrals to statutory services, conducting risk assessments, managing safeguarding risks, advising and supporting victims and survivors, and coordinating training on safeguarding matters. DSO: The senior safeguarding officer in the diocese, responsible (independently of the bishop) for providing leadership and management of activities in the diocese relating to the safeguarding of children and vulnerable adults. This role is being introduced in 2024, in accordance with IICSA Recommendation 1, replacing the role of Diocesan Safeguarding Adviser.
Diocesan Safeguarding Advisory Panel (DSAP)	A group that provides advice, scrutiny, and where necessary, challenges the bishop, diocese and cathedral regarding the safeguarding of children and vulnerable adults.
House of Bishops	The House of Bishops is one of three Houses that make up the General Synod. Among other roles, it has the right to amend some legislation as it sees fit before the legislation is put before the General Synod for approval.
Independent Inquiry into Child Sexual Abuse (IICSA)	The Independent Inquiry into Child Sexual Abuse published 19 reports on 15 investigations covering a wide range of institutions, including religious institutions. These reports were used by the Chair and Panel to help inform findings and shape recommendations to better protect children in the future. IICSA was chaired by Professor Alexis Jay.
Independent Safeguarding Board (ISB)	A body set up in 2021, following a decision by the Archbishops' Council and House of Bishops to support the development of an independent safeguarding oversight body.
National Safeguarding Panel	An advisory body of external experts who provide strategic advice to the Church intending to attain the highest standards in policy and practice concerning safeguarding.
National Safeguarding Steering Group (NSSG)	Has strategic oversight of national safeguarding activity. Its membership consists of a range of

	representatives from across the Church.
National Safeguarding Team (NST)	Manages complex safeguarding cases (involving several dioceses) and those relating to senior clergy including bishops and deans. The NST is also responsible for leading on House of Bishops policy and practice guidance and developing safeguarding training.
Parish Safeguarding Officer (PSO)	The Parish Safeguarding Officer (PSO) is a volunteer role and serves as the key link between the diocese and the parish/s, concerning safeguarding matters. They have an overview of all church activities involving children, young people and vulnerable adults and will seek to ensure the implementation of safeguarding policy.
Priest	An ordained person who preaches, celebrates the sacraments, and provides pastoral care. They may be allocated to a particular parish.
Synod	The General Synod is the national assembly of the Church of England. It considers and approves legislation affecting the whole of the Church of England, formulates new forms of worship, debates matters of national and international importance. The General Synod also approves the annual budget of the Archbishops' Council, including those elements of expenditure which are funded by contributions from diocesan boards of finance.
Victims and survivors	Defined in this report as individuals who have been abused in the context of the Church of England.

Annex E: Diocesan safeguarding resources

We have noted in the report the absence of the routine collection of data on the resources for safeguarding in dioceses where most operational safeguarding is undertaken.

We asked the NST for data on the number of safeguarding staff in each diocese. The NST were able to provide information which they described as providing 'an approximate steer' based on gathering information from different sources (from websites, existing knowledge and seeking information directly from dioceses) and emphasises that it would not provide a true reflection of staff numbers. However as this is the only information we were able to collect, we have set it out in the table below.

	Full Time Equivalent (FTE)						
Bath & Wells	4	1 Safeguarding Manager	1 DSA	1 Safeguarding Coordinator	1 Trainer		
Birmingham	2.1	1 DSA	1 Safeguarding Development Officer	1 ADSA			
Blackburn	2.8	1 DSA	1 ADSA	1 Admin			
Bristol	3.5	1 DSA	1 ADSA/Safeguarding Caseworker	1 ADSA/Caseworker	1 Safeguarding coordinator		
Canterbury	3.4	2 DSAs	1 Trainer	1 Admin			
Carlisle	1.5	1 DSA	1 Admin				
Chelmsford	5.8	3 DSAs	1 Caseworker	2 Admins	1 Trainer		
Chester	6.2	1 DSA	1 Deputy DSA	1 ADSA	1 ADSA	1 Service Delivery Manager	2 Admins
Chichester	3	1 DSA	3 ADSAs				
Coventry	3.5	1 DSA	2 ADSAs	1 Trainer			
Derby	5.6	1 DSA	1 Co-ordinator	3 Caseworkers	2 Admin		
Durham	1.8	1 DSA	1 Trainer				
Ely	5.4	1 DSA	2 ADSAs	1 DSO	2 Admin		
Exeter	3.6	1 DSA	2 ADSAs	1 Admin + DBS			
Gloucester	3.4	3 DSAs	1 ADSA				
Guildford	3.3	2 DSAs	1 Trainer	1 Admin			
Hereford	2.4	1 DSA	1 ADSA	1 Admin			
Leeds	*Data missing*						
Leicester	4	1 DSA	1 ADSA	1 Trainer	1 Admin		

Lichfield	*Data missing*						
Lincoln	4	1 DSA	1 ADSA	1 ISVA	1 CSA	1 Trainer	1 Admin
Liverpool	*Data missing*						
London	7.6	1 Head of Safeguarding	7 DSAs				
Manchester	4	1 DSA	1 ADSA	1 Caseworker	1 Admin		
Newcastle	1.8	1 DSA	1 Admin				
Norwich	3.3	1 DSA	1 ADSA	1 Admin	1 Trainer		
Oxford	4.5	1 DSA	3 ADSAs	1 Admin			
Peterborough	3	1 DSA	1 ADSA	1 Trainer/Caseworker			
Portsmouth	4.6	1 Head of Safeguarding	3 Caseworkers	1 Trainer			
Rochester	3.9	3 DSAs	1 Admin	1 Trainer			
Salisbury	3.4	1 DSA + Team Leader	1 DSA	1 Trainer	1 Safeguarding Support Officer		
Sheffield	4.5	1 DSA	2 ADSAs	1 Admin Officer	1 Trainer		
Sodor & Man	*Data missing*						
Southwark	*Data missing*						
Southwell & Nottingham	5.8	1 DSA	1 ADSA	1 Caseworker	1 Cathedral Adviser	2 Admins	1 Trainer + PSO Support
St Albans	4.4	1 DSA	2 ADSA	1 Trainer	1 Admin	1 DBS Admin	
St Edmundsbury and Ipswich	3.4	1 DSO	1 ADSO	1 Admin	2 Trainers		
Truro	2.6	1 DSA	1 ADSA	1 Governance and Policy Officer	1 Trainer		
Winchester	3	1 DSA	1 Trainer	1 Admin			
Worcester	1.9	1 Safeguarding Lead, Independent Chair & DSA	1 Delegated Safeguarding Lead	1 Independent Professional Supervision	1 DSA	2 Assistant DSA	1 Training Team Chair
York	4.3	1 DSA	1 ADSA	1.5 Admins	1 Trainer		

Annex F: Fact-checking

A copy of the report was sent to nominated individuals in the Church for fact-checking purposes only. These individuals signed undertakings to keep the report and its contents confidential ahead of publication. No fresh evidence was accepted as part of the fact check, except where it was considered it clarified existing facts relied upon.

These individuals were:

- William Nye (Archbishops Council Secretary-General)
- Simon Gallagher (Director of Central Secretariat)
- Elise Sandham (Policy Manager)
- Katie Harrison (Senior Responsible Officer)
- Paul Stevenson (Deputy Head of Legal)
- Alex McGregor (Head of Legal)
- Alex Kubeyinje (National Safeguarding Director)
- Zena Marshall (Deputy National Safeguarding Director)
- Edward Dobson (Deputy Head of Legal)