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# **Diocese of Chichester independent safeguarding audit (November 2016)**



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# 1 INTRODUCTION

## 1.1 CONTEXT

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

The audit of the Diocese of Chichester was carried out by Hugh Constant (the lead auditor for this diocese) and Lucy Erber on 15, 16 and 17 November 2016.

The audit process involved an examination of case files and other documents, along with conversations with key individuals and a Focus Group of parish representatives. Details of the process are provided in the appendix.

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

There were significant practical limitations which affected the audit, and these are set out in the Appendix. This effectively limited the number of cases it was possible to audit, so that the balance of this exercise is more heavily (than in audits from other dioceses) weighted to the views of the key people that participated.

## 1.2 THE DIOCESE

The Diocese of Chichester has been in existence since 671, with a cathedral in Chichester itself since 1075. Today, there are 365 parishes in an area almost precisely matching the counties of East and West Sussex. This means that the Diocese stretches for about 100 miles along the south coast, with Chichester itself being near the far western end.

The Diocese is organised into four archdeaconries, of Chichester, Horsham, Hastings and Brighton & Lewes, and 21 rural deaneries. The Diocese is led by the Bishop of Chichester, and is served by two Suffragan Bishops, of Horsham and of Lewes.

Chichester Cathedral is in the West of the Diocese. The diocesan offices are in Hove, about an hour's drive away.

There are three local authorities within the Diocese – East Sussex, West Sussex, and Brighton & Hove – and one police force, Sussex Police.

Since the 1990s, escalating in the late 2000s, and still ongoing, the Diocese of Chichester has been beset by a high number of cases involving child sexual abuse by members of the clergy (and by others with positions of responsibility in Church

settings); sometimes very senior members. The cases mainly involve non-recent<sup>1</sup> allegations, some dating back to the 1940s and 1950s, but they have an ongoing impact on the Diocese generally, and on its safeguarding professionals more particularly – not least because they have to balance the challenges of handling very high-profile non-recent allegations with more recent casework.

There have been many past and two current independent reviews and reports into individual cases and the underlying contextual problems in Chichester, and the Diocese is to be a key part of the investigation into the Anglican Church by the Independent Inquiry into Child Sexual Abuse (IICSA). The SCIE audits have a clear focus on current safeguarding practice, so the auditors did not look at historical cases except in terms of how they affect the safeguarding culture today and where, as was sometimes the case, they were ongoing, and reflected upon current safeguarding approaches.

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

This report is divided into:

- Introduction.
- The findings of the audit [links have been made with the S. 11 (Children Act 2004) Church of England national audit form].
- Considerations for the Diocese are listed, where relevant, at the end of each finding.
- Conclusions of the auditors' findings: what is working well and areas for further development.
- An appendix sets out the audit process and the limitations to this audit.

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

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<sup>1</sup> The term 'non-recent' has been used as opposed to 'historical', reflecting feedback, to Chichester Diocese, in relation to such terminology from victims / survivors of abuse.

## 2 FINDINGS

### 2.1 SAFEGUARDING MANAGEMENT

Leadership for safeguarding in the Diocese of Chichester sits with the Bishop of Chichester, who delegates day-to-day responsibility for safeguarding to the Suffragan Bishop of Horsham.

The Bishop of Chichester has been in post since 2012, and understands that his post, given the Diocese's recent history, necessarily involves a very strong safeguarding role. His recruitment process included a sizeable safeguarding element. The Bishop identified his procedural safeguarding responsibilities as:

- making safe appointments (he centralised a recruitment process that used to sit with the two Suffragan Bishops)
- promoting training
- liaising with the Diocesan Safeguarding Adviser (DSA) and his team, and the Safeguarding Advisory Panel (SAP).

He also felt his cultural responsibilities were even more important, including:

- being the public face of the Diocese to the media
- tackling fears around safeguarding
- sending the message that safeguarding is integral to the Church's mission, and not a bureaucratic exercise.

Another important function, which the Bishop takes very seriously and which it was reported he handles very sensitively, is making himself available to survivors of abuse in the Diocese.

Several people spoke to the auditors about the changes the Bishop has brought to safeguarding. There is a more centralised approach, such as holding all Blue Files in the Bishop's Palace, and better engagement with safeguarding discussions at Bishop's Staff meetings. He was described as a leader on the topic, who keeps a close eye on what is happening in safeguarding. The auditors saw evidence of a good level of engagement in cases, by the Bishop (but without any attempt to control decisions or responses).

As the public face of a diocese with such a troubled safeguarding history, the Bishop of Chichester has a very difficult communication challenge on his hands. Non-recent cases, such as that of a former (now deceased) Bishop of Chichester can cause the current Bishop difficulties: the case, now subject of a national independent case review, still divides opinion. In that context, the messages communicated by the Bishop remain pertinent to setting the current safeguarding agenda. The Bishop made public statements in support of the survivor, and about the decision to publicly name the former Bishop even though, as he had long since died, there was no conviction. The decision to go public was so that the survivor did not have to see her alleged abuser publicly venerated with no balancing message about the harm he has been alleged to have caused, and to see if other survivors might come forward. It was also to be clear that the Church of England was now dealing with safeguarding openly. In keeping with this, the Bishop also met with the survivor. This case is

subject to a current national investigation, so the auditors will make no further comments on it or its management, except to acknowledge that the Diocese's public communications about it remain challenging whilst awaiting the outcome of the investigation.

More generally, communication about safeguarding (and a recent communication strategy made the point that 'communicating about safeguarding *is* safeguarding', because of the importance of what messages are sent and received) is a vital issue in a Diocese where feelings run very high on some safeguarding issues. Skilled media and communications support is going to be an important requirement for the foreseeable future, and the Diocese needs to be confident in its ability to manage this.

The Bishop of Horsham is the delegated lead for safeguarding. He has in essence had the role ever since the previous diocesan bishop left in 2012, having been asked to take it on by the Archbishop of Canterbury following the archiepiscopal Visitation to Chichester to examine what was happening with safeguarding. More formally, he has been the safeguarding lead since February 2013 and the national Deputy Lead Bishop for safeguarding in the Church of England since late 2014.

As the lead, the Bishop of Horsham is the first point of contact for the DSA and his team within the senior clergy, and meets with the team at the case-focused pre-meetings of the SAP (see 2.3), and at the full SAP meetings, which provide the strategic overview of safeguarding in the Diocese. As the most senior member of the clergy on the SAP, he provides a key link between it and Bishop's Staff, and is in close liaison with the Diocesan Secretary.

The DSA reported a very strong relationship with the Bishop of Horsham, and particularly valued the support he offered the team during periods when they were especially weighed down by the pressures of work. Both the DSA and the Suffragan Bishop discussed the manner in which they can disagree, and healthily challenge each other as to their roles. It felt like a positive relationship between the two.

The Bishop of Horsham seemed to be well aware of the ongoing challenges for the Diocese, acknowledging that adult safeguarding has not been focused on as it should, and that this needed to change as increasing numbers of retired people attended church. He felt, though, that the Diocese was beginning to emerge from the woods on safeguarding, and now had a strong SAP, a culture of openness, and competent, trusted staff in key positions.

Both the Bishop of Chichester and the Bishop of Horsham recognised that, while the Diocese may be able to move forward from a situation in which it is dealing with multiple cases with many survivors, it must not ever forget the harm done to those survivors.

One of the key staff to whom the Bishop of Horsham referred is the Diocesan Secretary, a former barrister who has been in post since January 2015. Coming to the role, the Diocesan Secretary was faced immediately with the workload pressures and media storms surrounding allegations against two former Bishops in the Diocese, and five other cases being in court simultaneously. She received valued support from senior clergy, and offered it to the safeguarding team, with whom she has developed a good relationship.

The Diocesan Secretary sits on the SAP and on Bishop's Staff, and line manages the DSA. As such, she fills an important role linking the clerical and non-clerical management of safeguarding. The auditors noted in case files that the Diocesan Secretary finds time to praise and support the team, and pass on messages of thanks from people with whom they had worked.

Also on the SAP is the safeguarding representative of Chichester Cathedral, and the DSA reviews the Cathedral's safeguarding policy annually. There is a collaborative working relationship reported to exist between the diocesan safeguarding team and the Cathedral's safeguarding representative, albeit the geographical distance (an hour apart) means that this can be time-consuming when there is need for face-to-face contact.

Overall, the structure and management of safeguarding within the Diocese is clearly defined and generally reported to be working well. See 2.2 for comments on the structure of the safeguarding team itself.

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

## **2.2 DIOCESAN SAFEGUARDING ADVISER/S**

### **2.2.1 Composition of team**

There is a sizeable safeguarding team within the Diocese:

- Diocesan Safeguarding Adviser (DSA) – full-time
- Assistant Diocesan Safeguarding Adviser (ADSA) – three days per week
- Independent Domestic and Sexual Violence Adviser (IDSVA) – three days per week, worked across five days
- Safeguarding Consultant (SGC) – two days per week
- Safeguarding Administrator – full-time

For detailed discussion of the (IDSVA) role, please see section 2.12 – Resources for Children and Vulnerable Adults.

The current DSA has been in post since 2011. He has a probation background (as well as an MA in Advanced Child Protection), and for one year prior to taking the job sat on the Diocese's previous version of the Safeguarding Advisory Panel as the probation representative. Originally, the DSA was supported solely by an administrator (who also joined the team in 2011), but the large amount of casework necessitated an expanded service. The IDVSA joined in January 2013 and the ADSA in 2014. The ADSA was originally on secondment from West Sussex County Council, but since 2016 has been employed directly by the Diocese. The ADSA is an experienced child safeguarding social worker.

The SGC, with whom the auditors did not have a formal conversation, has a senior police background, and has worked alongside the DSA for a number of years, and filled the DSA post on an interim basis before the current DSA began. She rejoined the diocesan team in early 2016, and does casework alongside the DSA and ADSA.

The team has its own office within the main diocesan office building in Hove.

The safeguarding team is large and well-established and benefits from the varied and complementary professional background of its members:

- The DSA's probation history means he is skilled and experienced working with offenders;
- The ADSA brings considerable social work safeguarding expertise;
- The SGC has a police background and worked on many of the serious cases in the diocese;
- The IDSVA has a background working with survivors of abuse.

The team appears to work cohesively and collaboratively together, although the pressure it is under does mean that time cannot always be taken to plan how best to structure and organise its work. For instance, there is not always clarity about who will lead on each case, or focus on a new project. Both the DSA and the ADSA spend a lot of time in court, which is time-consuming, and could perhaps be handled by getting feedback from the investigating police officer. Apart from the somewhat separate IDSVA role, there seems to be an attitude of everyone 'mucking in' on everything, which reflects the mutual trust and respect in the office, but may not be the most efficient and focused way of working and planning.

### **2.2.2 Management and supervision**

The DSA is line managed by the Diocesan Secretary (with whom he has a positive working relationship) and provides management and supervision to other members of the team. The DSA used to have a formal professional supervision arrangement, but found separating clinical supervision from line management different to previous experience of professional supervision. The Diocese is of the view that with the co-working arrangements within the team, there is effective group supervision, further complemented by the case-focused pre-meetings of SAP, with the Bishop of Horsham and SAP Chair (see 2.3). This latter is perceived as case supervision and a deliberate attempt to 'close the gap'. It does though mean that the SAP Chair is becoming involved in operational management, which could have unintended consequences (see 2.3).

The lack of professional supervision for the DSA remains problematic. It is not in line with the advice from the National Safeguarding Team (NST) and means the DSA does not have the benefit of reflective supervision from an experienced safeguarding professional. Such a process is very different to that of group supervision or of case-focused pre-SAP meetings, albeit it does, according to the DSA, resemble his previous probation experience of supervision.

### **2.2.3 Pressures on the team**

The skills and qualities of the safeguarding staff are justifiably well-regarded by those around them. Senior clergy talked about their good working relationships with, and trust in, the team. The Parish Focus Group expressed confidence in the expertise and calm judgment of all the team, and stressed in particular their accessibility. One person cited the offer by a member of the team of availability as required, for example being able to call for advice 'if you're awake at three in the morning'

worrying about safeguarding. This reflects an impressive level of commitment, albeit may not have been meant literally. The DSA has explained that this is a misunderstanding, as the consistent message by the safeguarding team has been that out of hours, anything that cannot wait till the morning, needs to be directed to police via 999, or to the out-of-hours local authority duty teams.

The pressures facing the team have been considerable, and remain so to a great extent. The simple question of workload is itself an issue, with multiple ongoing cases, usually involving the police and criminal justice system. The nature of some of the work, dealing with serious child sexual abuse, adds to the strains on the team. Moreover, the fact that the work is carried out in the spotlight of local and national publicity, has placed a heavy pressure on the team. This highlights the profile of the safeguarding situation in the Diocese, but also might prompt reflection on how people in the team look after themselves. The DSA initiated a session with a trauma counsellor for the team (and others who have been affected by the work in recent months), in recognition of the impact and to help support people and build resilience for the ongoing challenges they face. This initiative feels positive and timely.

A further pressure on the safeguarding team is that it sometimes become involved in matters beyond their remit, due to perceived lack of structured processes in relation to aspects of HR and media communications.

For the future, the Diocese will need to satisfy itself that the safeguarding resource is adequate, substantial though it is. There are some areas of work to which it has not always been possible to pay sufficient attention, such as adult safeguarding, domestic abuse, and broader aspects of child safeguarding such as neglect. Whilst these seem, to some extent, to have taken a back seat to the child sexual abuse casework, training since 2014 has covered neglect more fully to raise awareness in the Diocese (see 2.6).

As things stand, the team remains under considerable workload pressure. The extent to which this pressure reflects any shortage of resources is not able to be judged within the scope of a three-day audit. Whilst there are signs that the Diocese is perhaps beginning to be able to step away from its complex safeguarding history, the future remains uncertain, especially in terms of the unknown impact of the IICSA. There may be scope for working more efficiently, if the team changes its working method to one with more individual case responsibility. This may though provide less support to team members. If it should be decided that more resources are required, the Diocesan Secretary is of the view that funding would probably be available, citing the fact that she secured money for two half-time posts in January 2016, but only one was filled.

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

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

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

## **Considerations for the Diocese**

*The Diocese to satisfy itself that arrangements for the DSA's case supervision are adequate, given NST recommendations.*

*A business plan for the developmental aspects of the safeguarding work may help to prevent the team being swamped by the pressures of day-to-day case work, and may help them plan their efforts more systematically. It might mitigate against good ideas being developed, but not followed through. This might also help to make sense of the many recommendations for various reports and audits over the years. Adult safeguarding should be prominent.*

*The Diocese to consider how to enable the most efficient use of resources in the team, in terms of case management and focus on safeguarding as opposed to HR and communications.*

## **2.3 DIOCESAN SAFEGUARDING MANAGEMENT GROUP**

Within the Diocese, the strategic oversight body for safeguarding is called the Safeguarding Advisory Panel (SAP). It was reconfigured into its current form in 2014, there being a feeling that the previous iteration had slightly lost its strategic purpose, and lacked people of sufficient seniority to address the challenges of the Diocese.

The current Chair is a former Chief Constable of Sussex Police, having served in the police for over 30 years, and so has considerable safeguarding experience, supplemented by being a safeguarding governor in a local school. The Chair was formally recruited following a competitive appointment process, and is paid for the work that he does. This reflects the seriousness with which the Diocese views the role of the Chair, and by extension the SAP. The Chair began his role in August 2014.

The SAP has clear terms of reference, with a focus on advice to the Bishops and the Diocese, support with policies and procedures, support to the DSA and his team, and strategic liaison with statutory partners. This last element is made easier by a strong engagement from the Diocese's safeguarding partners, with good attendance at the SAP by people at a senior level in the police, probation and adult and children's social services. Such seniority of attendees may in part be because of the seniority and profile of the Chair, and perhaps also reflects the high profile of the Diocese in the workload of safeguarding agencies in Sussex over the years.

As well as good representation from the statutory sector, the SAP includes the Bishop of Horsham as lead safeguarding Bishop, the Diocesan Secretary, a Cathedral representative, the Director of Education, and the safeguarding team. The SAP meets quarterly, and provides an annual report to the Bishop's Council.

An aspect of the SAP's role that the auditors discussed at length was its scrutiny of casework. Prior to each SAP meeting, there is a pre-meeting at which the safeguarding team, the lead safeguarding Bishop, and the Chair of the SAP go through all current cases to see what is happening with them. The Chair then

decides which cases could usefully be discussed at the full SAP meeting, basing his choices on whether there are themes to be drawn out, particular issues to be considered, or particular risks to individuals or the Diocese. The involvement of the Chair of the SAP in operational case supervision and decisions could become a conflict of interest with his independent role of monitoring and scrutiny of safeguarding.

The auditors were concerned that the subsequent case discussion at the SAP could lead to just the sort of casework-by-committee that the previous SAP had slipped into, and that such scrutiny of casework may be more intimidating than supportive to the safeguarding team. But, reflecting perhaps their confidence in their work, and their desire to improve, the safeguarding professionals reported that they relished the scrutiny, and also that they did not feel that casework unduly dominated the agenda of what is, ultimately, a strategic body. The SAP has arguably not paid enough attention to some overarching priorities, such as training, so maintaining a clear strategic focus is important. It would seem more appropriate for the SAP's attention to casework to remain focused around its QA role, looking at emerging themes and issues arising from file audits.

On a couple of issues crossing the boundaries between HR and safeguarding, the diocesan bishop has made use of the SAP Chair's advice and expertise (even though outside the remit of his SAP role). This has been done with the full knowledge of the DSA, and represents no conflict of interest. Everyone should be conscious, though, of any perceived compromising of the independence of the SAP Chair role.

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

### **Considerations for the Diocese**

*The business plan (see Considerations in 2.2), if adopted, to sit with the SAP for monitoring.*

*The need to maintain the role of the SAP and its Chair as one of strategy, scrutiny and quality assurance and avoid its involvement in case management and/or supervision of the safeguarding team.*

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

All the House of Bishops' safeguarding policies of the Church of England were adopted by the Diocesan Synod in Chichester in November 2016, and a link to them is on the safeguarding section of the diocesan website. Only the main safeguarding children policy, Protecting All God's Children, is listed separately. If the main adult policy, Promoting a Safe Church, were also there, it would help as part of the effort to focus on adult safeguarding.

The Diocesan Synod when adopting the policies also adopted any forthcoming ones, so the Diocese can more swiftly link itself to House of Bishops' policy developments from now on.

An endorsement of the national policies by either the diocesan Bishop, or the Suffragan Bishop who holds the lead responsibility for safeguarding, would emphasise the importance that senior clergy place on this agenda.

The House of Bishops' policies are complemented on the website by some helpful local tools such as checklists for safer recruitment in the parishes.

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

### **Considerations for the Diocese**

*The Bishop of Chichester or the Bishop of Horsham to give a personal backing to the newly-adopted policies.*

*To display the current Church of England policy for safeguarding adults, Promoting a Safe Church, on the diocesan website, to demonstrate parity of importance with child safeguarding.*

## **2.5 CASEWORK**

For the reasons listed in the appendix, the auditors looked at only nine cases. Much of the casework is of a high quality, but some cases were less strong, with elements that could be improved. There are some indications that the areas which need improving exist because of the volume of work, which makes covering every base difficult.

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

The auditors saw no risk assessments on file, but two safeguarding agreements. The safeguarding agreements were appropriate, in that they were signed by the offender, a parish representative, and someone from the diocesan safeguarding team. They were not, however, reviewed on an annual basis. Also, there were no risk assessments found on file by the auditors, to provide the rationale for the safeguarding agreements. A third case should have had a risk assessment.

The lack of agreements and agreement reviews on the files audited perhaps highlights a theme of the audit: that the pressure of high-profile casework, often involving a lot of time in court, means that elements of the basic safeguarding framework (in this case consistent application of Risk Assessment for Individuals who may Pose Risk to Children or Adults (2015)) are not able always to be prioritised. But there is evidence that work is being done in this area despite that. There are, according to the Diocese's 2015 safeguarding statistical return to the National Safeguarding Team, 30 safeguarding agreements, two Type A Risk Assessments, and one Type B Risk Assessment.

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

## **2.5.2 Quality of response to allegations**

The quality of casework is a strength in the Diocese, reflecting the skilled practitioners carrying it out. In the cases audited, there was evidence of good decision-making, with complex risk factors being weighed intelligently. For instance, decisions such as whether a priest about whom an allegation had been made could lead a funeral for a well-known parishioner the day after the allegation surfaced, or what constitutes a proportionate level of monitoring of a priest prior to a Clergy Disciplinary Measure, were on the whole well-judged.

A good degree of internal and multi-agency consultation was involved in these cases, with close working with the police, good liaison with other dioceses, and effective working relationships between senior clergy and the safeguarding team. The work with safeguarding partners included, where necessary, a clear drawing of the line as to what was and was not the team's responsibility. This willingness to argue their corner was a strength of the safeguarding team that was also picked up on by the Parish Focus Group.

Where senior clergy were involved in cases, it was evident that they respected the expertise of the DSA and ADSA, and made themselves available for discussion and support, but typically left the key safeguarding decisions to the safeguarding team.

The commitment of the team to its work was clear. In one particularly complex case, the effort of the team to work across international borders was impressive. In a number of cases, the team, including the IDSVA, worked hard to consider the case holistically, looking at the risk to any victim, the pastoral responsibilities to any alleged perpetrator, and any media/communications perspective. One example saw it working closely with another diocese, so that one survivor of abuse, employed in that diocese, could maintain the privacy of their personal file as much as possible. In another instance, sensitive consideration was given to the support needs of a parish in which a safeguarding incident was alleged, but also where a previous priest had recently died.

There were some difficulties, brought about by excessive work, evident from the case files. In a number of cases, there are references made to delays, for example in returning a phone call, or scheduling a meeting. One case saw a significant problem arise from press coverage that may have been avoided if the time had been available to discuss the case more fully in the team. The auditors had the sense that the focus of the team has understandably been predominantly on allegations against church officers, and that other cases, for example those involving congregants and less high-profile safeguarding matters, including adult cases, received a less timely response.

## **2.5.3 Recording systems**

At present, recording systems are in a state of transition, meaning that currently cases can be hard to track and collate information from.

The Diocese is moving to a case management system, CPOMS. In the two cases that the auditors saw in which the whole case is on CPOMS, the narrative of the case, and the key documents, were easy to track. In most cases, however, the work

of the team is divided between an internal computer drive where risk assessments are kept, CPOMS for recent case work, and the email folders of the DSA and ADSA. Quite appropriately, but adding to the difficulty of getting the whole picture on a case, the IDSVAs keep entirely separate records. It is thus extremely difficult, should anyone need a quick snapshot of a case, to get a clear sense of what is going on. Given the complexity of some of the cases – which means that the email folders can stretch to many hundreds of emails (exacerbated by the fact that every email is stored, even ones that merely express polite thanks for the previous email) – the benefits of getting a swift overview are all the more apparent.

The auditors saw two cases in which emails about other cases were stored incorrectly on case files.

As mentioned, it feels right that the IDSVAs keep separate records; her work should be detached to some extent from that of the diocesan workers, as people may want certain matters kept confidential from the Diocese. Using a similar standard to the one for the DSA and ADSA the IDSVAs' records need to give a clear sense of what is going on and, as a minor consideration, be wary of copying and pasting long text message exchanges, where it quickly becomes difficult to ascertain who is saying what.

It is a small but positive thing that the team does its filing by the name of the survivor, rather than the perpetrator, which can only help the effort to take a survivor-focused approach to its work.

#### **2.5.4 Any other issues arising in casework?**

Sussex Police, in response to the standard request to statutory agencies to comment on safeguarding in the Diocese being audited, told the auditors that joint working is generally extremely good. They raised one case, however, in which they were dissatisfied at the lack of suspension of someone working in the Church. Because of the delay in asking for statutory feedback (see the Appendix) the auditors were not able to look at this case during the site visit, however, the Diocesan Secretary has explained that the decision was taken at the time on the basis of multi-agency consultation and advice from both the Local Authority Designated Officer (LADO) and the police officer in the case. Subsequent information has now changed that advice and appropriate action taken.

A case that the auditors did look at, in which historical abuse was alleged, involved the alleged perpetrator very properly being asked to step down from their parish role, but then given administrative work to do elsewhere, in a context where no contact with children or vulnerable adults was possible. The auditors were satisfied that this posed no risk to anyone, and was known to only a small number of people. They understood also the context in which the offer was made. This included it being a period of heightened concern for the wellbeing of accused priests, and specific family issues in the case. Given that, the auditors are not saying that the decision was wrong. There remains, perhaps, a reputational risk, not least in a diocese with Chichester's history, of placing a member of the clergy, against whom an allegation of abuse had been made, in such a role.

## **Considerations for the Diocese**

*A business plan (see Considerations in 3.2) that allows for important work such as adult safeguarding to be prioritised.*

*Consistent implementation of the House of Bishops' practice guidance Risk Assessment for Individuals who may Pose Risk to Children or Adults (2015) including a reliable system to track safeguarding agreement reviews, and to ensure that they are done in a timely way.*

*To improve the quality, accessibility and maintenance of case records through:*

- a) ensuring the backlog of case material being transferred to CPOMS is completed in a timely fashion*
- b) ensuring that casework, risk assessments and safeguarding agreements are all collated in one place, demonstrate a clear narrative of what has happened, a list of the key protagonists involved and a brief case summary.*

## **2.6 TRAINING**

Considerable effort goes into safeguarding training. For some time, this was led by the DSA and ADSA, but often to groups of such a size as to make interactive training unrealistic. The 'Safer-Churches' training, delivered in 2014 and 2015 (and according to the DSA, very similar to the current 'C2' training), was systematically delivered to each Deanery across the Diocese, with each Rural Dean being given the task of ensuring the relevant personnel from each Deanery attended. Approximately 1,200 people across the Diocese attended in those two years.

The volume of training required, coupled with the amount of casework, led to a decision in 2015 to take a Train the Trainer approach, in which about 20 people, with safeguarding backgrounds of various sorts, were trained by the DSA and the ADSA, in partnership with a Local Safeguarding Children's Board, to deliver the courses. This allows for smaller, more manageable sessions, and the model will soon be strengthened by a licensing scheme, in which the volunteer trainers are more frequently observed by the safeguarding team, and officially badged as safeguarding trainers in the Diocese.

The auditors had some concerns about the extensive reliance on a very large number of volunteers to deliver training. It is acknowledged that the Church has a long tradition of using volunteers in training, and the concern here is more around being able to manage and monitor the quality and scale of the voluntary input. Even with a licensing scheme, it is hard to maintain a consistent level of quality and commitment across 20-odd people: volunteers can more easily than paid workers walk away from a commitment.

That said, significant numbers of people have been trained. Over 50 training events

took place in 2015, and a similar number in 2016, with close on 1,000 people being trained each year. The auditors were struck by feedback that when a volunteer was poorly on the morning of a training session, the Diocese was able to supply a replacement, and the training went ahead – clearly having a large pool of trainers is a strength in this regard. And the training is well-regarded. The people to whom the auditors spoke in the Parish Focus Group who had been trained said it was stimulating and varied, and reported on very sceptical people coming out of the training enthused about safeguarding.

The Parish Focus Group also spoke, however, about training being patchily organised, with more being promised than is always delivered, and it being hit and miss whether one sees the communication about training. Some people spoke about no-one in their Church having had training in the last three years, and others talked of technical and administrative difficulties that had contributed to poor sessions, although they acknowledged these were exceptional. The Chair of the SAP also used the term ‘hit and miss’ in relation to training, and acknowledged that the SAP needs to pay closer scrutiny to it.

The auditors were concerned that the current system does not provide systematic delivery, with training mainly done on a request basis: a parish will call the safeguarding team and ask for a session. It is encouraging that this happens as often as it does – as has been noted, very large numbers of people are being trained. But it is perhaps those who do not ask for training who are most in need of it, and the Diocese could usefully take a systematic approach to training, based on a three-year rolling cycle, as recommended by the National Safeguarding Team. As it stands presently, there are both licensed clergy and people with Permission to Officiate (PTO) who have not had training in the last three years.

A lot of recent training has been done without covering adult safeguarding, which was a missed opportunity. This is being rectified, and the safeguarding team has started to do training on domestic violence and other adult safeguarding issues.

The Diocese has also begun to better track who has done training, and who still needs to do it. The plan to use the national Church of England portal should make this much clearer, and will enable the Diocese to monitor the roll-out of the new national learning and development framework, which some Chichester staff were involved in developing. Closer monitoring through the Simple Quality Protects system (see 3.10) and Ministerial Development Reviews will further bolster this effort.

*(Reference: part 1 of S.11 audit: Select and train those who are to hold the Bishop’s Licence in safeguarding matters. Provide training on safeguarding matters to parishes, the Cathedral, other clergy, diocesan organisations, including religious communities and those who hold the Bishop’s Licence.*

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

### **Considerations for the Diocese**

*To develop a training strategy, setting out a rolling programme to train all parishes systematically in the new learning and development framework in a way that does not depend on parishes requesting training, and to monitor this, so that renewal dates are tracked and used.*

*The oversight of the training strategy by the SAP: this should include quality assurance of the training, taking into account the qualifications, safeguarding experience, content delivery and consistency of the volunteers and consideration of alternatives if there are concerns.*

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

Due to the limitations of the audit (see Appendix), the auditors did not see any Blue Files, and cannot therefore comment on the Safe Recruitment of clergy. The auditors only saw two HR files of people who may have any contact with children or vulnerable adults. Neither had references on file, but the auditors were told that one department within the diocesan office keeps any job references separate from the person's main HR file. This potentially makes it more difficult to collate any necessary information.

Further than this, the auditors do not feel able to express a view as to the safety of recruitment in the Diocese, beyond noting that the SQP tool should bolster Safe Recruitment at a parish level by prompting people to make the necessary checks.

*(Reference to part 7 of S.11 audit: The Diocesan Secretary has implemented arrangements in line with the House of Bishops' policy on Safer Recruitment 2015. And to part 1: Keep a record of clergy and church officers that will enable a prompt response to bona fide enquiries...where there have been safeguarding concerns, these should be clearly indicated on file.)*

### **Considerations for the Diocese**

*To collate HR files so that all necessary Safe Recruitment information is in one place.*

*Given the limitations of this audit, the SAP to urgently consider what steps need to be taken to be confident that Safe Recruitment is now in place for clergy.*

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

DBS checking within the Diocese has been contracted out to the Churches' Child Protection Advisory Service (CCPAS) since 2012. This appears to be working smoothly, and the members of the Parish Focus Group felt the DBS system operated well. Group members were also warm in their praise of the safeguarding administrator for the support she offers with DBS checks.

In 2015, there were over 1,500 DBS checks done, of which eight came back with a concern, and were referred to the DSA. Most of the checks were at parish level, for volunteers, youth workers and so forth; 273 were carried out on clergy. No-one was referred to the DBS for barring following a concern.

## 2.9 COMPLAINTS AND WHISTLEBLOWING

### 2.9.1 Complaints

There is no complaints policy for people who may be dissatisfied with the service they receive from the safeguarding team in the Diocese. Having one would benefit the people the Diocese serves, and they should be offered a range of methods to contact whoever is nominated to handle such complaints. Any policy would be strengthened by clear timescales, and clarity about any escalation processes if the complaint cannot be addressed at the first time of asking.

### 2.9.2 Whistleblowing

The auditors have seen the whistleblowing procedure within the Diocese's staff handbook. It is detailed and clear, but the Diocese is also consulting on a revised version, which is more comprehensive, and explicitly includes safeguarding. If adopted, it would be a useful reinforcement to the Diocese's safeguarding response.

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

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

*To develop a complaints policy which addresses clearly how complaints about the quality of the safeguarding service (as opposed to concerns about safeguarding) are to be made.*

*To adopt the proposed new whistleblowing procedure.*

## 2.10 QUALITY ASSURANCE PROCESSES

Safeguarding in the Diocese of Chichester has been subject to a great deal of scrutiny in recent years. Numerous reports and reviews have taken place, usually led by high-profile and well-informed people, each making a number of recommendations for the Diocese. There is no shortage, then, of measures against which the Diocese can test itself. Further lessons, and recommendations, will no doubt arise from the Diocese's involvement in the Independent Inquiry into Child Sexual Abuse (IICSA).

The Diocese has struggled to focus on all the recommendations, in large part because the work from the cases the recommendations relate to is often still ongoing. The Diocese has collated the recommendations and these have been presented at the Safeguarding Advisory Panel. The next step will be to develop an

implementation plan, so as to prioritise the actions needed, and to track the progress made.

While this sort of developmental effort has proved difficult, hard work has gone into some planned initiatives, and a key one in this regard is Simple Quality Protects (SQP). SQP is an online quality assurance tool for community organisations, in which they can demonstrate the extent to which they comply with certain standards. The tool has been approved by all three LSCBs in Sussex. The Diocese has paid for the system to be the underpinning safeguarding quality assurance tool for each of its parishes, because some parishes were becoming very uneasy about what they needed to do in order to be deemed 'safe' in the context of the Diocese's safeguarding history.

SQP is currently being piloted in six parishes, with a view to it being rolled out across the Diocese from January 2017. The tool sets out a number of requirements – for instance on training and DBS checks – and each requirement comes with a set of standards, which can be met at either basic or enhanced levels, or not met. Each parish can therefore see – as can the Diocese – where it is strong or less strong in terms of its safeguarding work. The website is thorough and easy to use, and the auditors felt that SQP has the potential to provide a systematic and detailed picture of safeguarding in the parishes, and identify where effort is needed in terms of training, parochial safeguarding policies and other measures.

One detail where it could be improved is to prompt parishes to put safeguarding agreements in place not only where someone has a conviction, but where there are genuine concerns about an unconvicted person, in line with House of Bishops' practice guidance.

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

*A business plan (see Considerations in 3.2).*

*To change the terms in SQP under which someone may be subject to a safeguarding agreement.*

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

The Diocese has four Archdeacons, of whom the auditors met one – the Archdeacon of Brighton & Lewes. He, along with other members of the senior clergy, had recently been trained in safeguarding, but spoke too about how safeguarding is high on the agenda of all senior clergy, given the diocesan history.

The Archdeacon demonstrated a good understanding of safeguarding, recognising the importance, but also the limits, of DBS checks and safeguarding policies, and seeing that good safeguarding is more about culture than procedure. He spoke of the importance of an unequivocally survivor-focused approach. He spoke too of a recent incident in which, supported by the DSA, he shut down a parish youth club which was ignoring basic good practice. The Archdeacon offers a mixture of support and direction to priests who are struggling to keep on top of safeguarding processes,

especially when this is part of a pattern of struggling to keep on top of most processes.

Other roles for the Archdeacons include chairing core groups, feeding back on safeguarding concerns to Bishop's Staff meetings (which the Archdeacon of Brighton & Lewes reported is now happening more systematically), and being involved in Clergy Disciplinary Measures against priests where appropriate.

The formal monitoring of safeguarding is done through Archdeacons' Visitations, and the annual Articles of Enquiry. Because the Bishop of Chichester, upon his appointment, embarked on a full round of detailed episcopal Visitations to the parishes, the cycle of Archdeacon Visitations fell into abeyance as Archdeacons are unable to conduct these when the Bishop is doing so. The auditors understood that these Visitations have not yet been comprehensively revived. Of the Archdeacons, one has been in post for over 12 years, but two have been in the Diocese only for a couple of years, and one for a couple of months, and so they may not yet have had the chance to make their commitment to safeguarding clear in their parishes.

Articles of Enquiry, when it comes to safeguarding, typically focus on two questions: does a parish have a safeguarding policy, and when was it last approved by the Parochial Church Council (PCC). It may be possible to ask more reflective questions, that require more than a simple yes/no answer, and it may make sense to tie this into the results emanating from the roll-out of Simple Quality Protects in the parishes (see 3.10).

### **Considerations for the Diocese**

*To make safeguarding a key part of a renewed round of Archdeacon Visitations.*

*How to use the Articles of Enquiry alongside data from SQP to target safeguarding questions in the future.*

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

Chichester has employed, on a part-time basis, and seconded from West Sussex County Council, an Independent Domestic and Sexual Violence Adviser (IDSVA) since June 2013. The IDSVA works, as she puts it, 'with, not for, the Church' in supporting people who have been abused by clergy, other Church officers in the Diocese, and – less frequently – congregants. The IDSVA does not offer structured counselling or therapy, but is available to people to listen, talk, help them through court cases, and offer general support. Her role with each survivor lasts as long as feels appropriate in each case; there is no built-in cut-off.

The auditors were very impressed with how the approach worked. The IDSVA reported a take-up of her offers of support of over 90 per cent of people, and the auditors were struck by the proactivity with which such support was offered. The IDSVA herself felt she had developed the experience to strike a good balance between being proactive, but not overwhelming, in how she offered to work with people. Being employed alongside the safeguarding team, but with a separate employer, and a different case load and recording system, helps the model to work.

For many people who have been abused by Church officers, the IDSVA's semi-detachment from the Diocese seems to encourage them to accept her support in a way that they might not have done fully within the structures of the Church of England. The confidentiality of a separate case record also seems to act as a reassurance for some.

As well as the model being a positive one, the current IDSVA brings personal qualities. Her background as a mental health nurse is very relevant, and in the cases the auditors saw, she was willing to work flexibly and creatively. In one case, meetings took place during riverside walks, which may well have been less intimidating an environment for the survivor than a diocesan office.

The IDSVA works well with the rest of the safeguarding team, and she and they give and receive referrals effectively and appropriately. She is line managed by the DSA, and the risk of her being recalled by her substantive employer is mitigated by regular liaison meetings between the DSA and West Sussex County Council (WSCC). Her annual appraisals are done by the County Council, but there are six-monthly meetings between her, her WSCC manager, and the DSA.

Mirroring the challenges around adult safeguarding for the rest of the team, the IDSVA noted that she does not do any adult domestic violence work, despite that being integral to her role, and despite her running two or three training sessions each year on the subject. It would appear that further work needs to be done on communicating that domestic violence support is available.

Given the IDSVA role, the Diocese does not use Authorised Listeners.

### **Consideration for the Diocese**

*How support to survivors of domestic violence can be better promoted.*

## **2.13 INFORMATION SHARING**

Information sharing within the Diocese broadly appears to be working well. Within the safeguarding team, a cooperative attitude and good teamwork means that information is shared as a matter of course in order for people to do their work. A complex filing arrangement (see 3.5) at the moment cannot help this in practical terms, but is being addressed. The relationship between the team and the Diocesan Secretary is also strong and open.

Forged by an unusual amount of joint working over the years, there are good working relationships with local police, probation and social workers, and the files reflected a willingness to share information and work collaboratively. Sussex Police replied to the standard request the auditors ask to be sent out to safeguarding partners, saying that, on the whole, the relationship with the Diocese was very positive, and used as a recommended model to other police forces.

A very good piece of work is a mapping exercise between the Diocese and Sussex Police, to track where there are safeguarding issues, and who is involved.

The DSA works effectively alongside other dioceses and other faith groups. The auditors saw cases involving several dioceses, where swift and effective communication helped the case proceed smoothly.

The DSA reports to Bishop's Staff twice a year.

## **2.14 LINKS WITH NATIONAL SAFEGUARDING TEAM**

Much of the work done in Chichester over the last few years has been very high profile, with regular contact with the National Safeguarding Team (NST). The link is strengthened by having someone who has worked in the national safeguarding structures (at Lambeth) as a safeguarding consultant for two days week.

The auditors did not, however, see specific case evidence of working alongside the NST.

## **2.15 NATIONAL SYSTEMIC SAFEGUARDING ISSUES**

The Diocese is able to access support from the NST for further support in relation to the development of safeguarding arrangements, should it choose to do so.

## 3 CONCLUSIONS

### 3.1 WHAT'S WORKING WELL?

The safeguarding structures and systems in the Diocese of Chichester have undergone a period of major change and development in recent years and now have a team of dedicated and hard-working safeguarding staff, supported by the senior clergy and senior staff in Church House. This is a demonstration of the investment in and commitment to safeguarding of the Diocese.

There is a cohesive safeguarding team of skilled, experienced and qualified people. It is led by a well-established Diocesan Safeguarding Adviser (DSA) with good knowledge of the Diocese and its history, who works in partnership with everyone from parishioners on up within the Church, and with safeguarding partners in the statutory sector.

The DSA is supported by, and complemented by, an experienced Assistant Diocesan Safeguarding Adviser (ADSA), who is approachable and supportive to people. Both of them, from the cases the auditors saw, work well together and do casework to a high standard.

The role of Independent Domestic and Sexual Violence Adviser (IDSVA) is, the auditors believe, a unique one within the Church of England, but this model seems to be a very effective response to survivors of abuse. The proactivity of the offer of support seems to have a huge impact on the amount of take-up. The semi-independence of the role – ‘working with, not for, the Church’ – also seems to help people come forward. In addition, the role is filled by another strong practitioner.

The team is complemented by a fourth safeguarding professional, with whom the auditors did not have a formal conversation, but who is experienced within local and national safeguarding structures in the Church of England.

All safeguarding staff were highly praised in the Parish Focus Group, as was the safeguarding administrator, for her efficiency and support.

There feels like a strong survivor focus in everything the safeguarding team does, not least in having an IDSVA. A smaller but telling point is that filing is done by survivor name rather than perpetrator name, which sends a good message as to the focus of the work.

Senior clergy have a clear grasp of the safeguarding task on their hands, and a genuine commitment to the challenge. The auditors were impressed by their ability to recognise and work for improvements, while not being complacent, and not wanting to set aside the harm that has been done to people.

The Bishop has a firm commitment to be accessible to any survivor who wishes to meet with him, and this sets a clear leadership role model for accessibility of clergy for victims and survivors. There have also been important public statements about the importance of safeguarding.

The new Simple Quality Protects (SQP) appears to be an important initiative which should enable Church members, the parish and the Diocese to be more confident of the safeguarding state of play in each parish.

There are good working relationships with statutory partners, on the evidence of the case files the auditors saw. This has come about because of the extent of joint working over time, and is reflected in the senior level commitment to the Safeguarding Advisory Panel (SAP). The work with Sussex Police to map abuse cases feels like an important piece of casework and preventative work.

The proper recruitment and remuneration of the Chair of the SAP shows a seriousness of intent about doing safeguarding properly.

The Diocesan Secretary is supportive of the safeguarding work in the Diocese, to the team that she manages, and in terms of the necessary financial commitment.

### **3.2 AREAS FOR FURTHER DEVELOPMENT**

The huge amount of casework around child sexual abuse by members of the clergy, while absolutely necessary, has meant that other strands of work have been, to some extent, neglected. This includes other forms of harm to children, adult safeguarding, engagement with parishes, and training.

As much as possible, the Diocese needs to face forward on safeguarding, which will be difficult, even if no more casework comes to light, given the pressures that the Independent Inquiry into Child Sexual Abuse (IICSA) and other investigations into high-profile historical cases will create for the Diocese. This is all the more reason to devise mechanisms to make a future-facing approach easier.

There is scope for further efficiency of working methods within the safeguarding team, with increased individual caseworking and delegation, as opposed to collective responsibilities, and for a tighter focus on casework, in relation to attending court and covering HR and communication responsibilities. It is though recognised that the communication of safeguarding practice with the media is a very sensitive area of work for the Diocese, given its history.

The recording of casework is in a state of transition, with many cases having records in four different places, albeit this includes the IDSPA work, which the auditors do accept should be kept separate.

The auditors recognise that the DSA and the ADSA find the scrutiny of the pre-meetings (with the SAP Chair and the Bishop of Horsham) helpful, but it does risk the independence of the SAP Chair through involvement in operational decision-making. It also does not replace the need for the DSA to receive professional supervision from an experienced safeguarding professional.

Training is well-regarded, but its organisation needs to be further developed to facilitate its delivery to everyone. The auditors question the model of waiting for people or parishes to ask for training – it is the ones who do not ask who perhaps need it most. The model of delivery that primarily uses volunteers could be risky to some extent, without extensive coordination, monitoring and tracking. The SAP

should closely monitor and exercise challenge on the coverage and quality of training delivery.

There is a need to consistently apply the House of Bishops' policy on risk assessments, so that risk assessments and safeguarding agreements (and the review of the latter) occur consistently in line with guidance and the evidence is always on files.

## **APPENDIX: REVIEW PROCESS**

### **DATA COLLECTION**

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

The auditors were supplied, before the audit, with:

- Annual safeguarding plan – 2011/12
- Annual safeguarding plan - 2013
- Safeguarding Communications Strategy – 2012
- A chronology of and report on major safeguarding developments in the Diocese from 1970–2015
- A collated overview of recommendations for the Diocese of Chichester and Chichester Cathedral from various investigations and reports
- Safeguarding Advisory Panel – Terms of Reference, minutes of the three most recent meetings, and 2015 Annual Report
- Job descriptions for the DSA, ADSA, IDSPA, safeguarding administrator, and Chair of the SAP
- Local policies for safeguarding children and adults
- Examples of diocesan safeguarding newsletters

Subsequent to the site visit, the auditors received:

- Training records since 2012
- Safeguarding audit returns to the National Safeguarding Team for 2014 and 2015

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

The auditors had conversations with:

- the Archdeacon of Brighton & Lewes
- the Diocesan Secretary
- the Independent Domestic and Sexual Violence Adviser
- the Chair of the Safeguarding Advisory Panel
- the Diocesan Safeguarding Adviser
- the Assistant Diocesan Safeguarding Adviser
- the Bishop of Chichester
- the Bishop of Horsham

The auditors also met with a Parish Focus Group including two curates and three parish safeguarding officers, one of whom was also a volunteer safeguarding trainer.

#### **3.2.3 The audit: what records / files were examined?**

The auditors looked at safeguarding case files, of which two related to adults.

The auditors saw the recruitment files of a number of diocesan employees, of which two were relevant in terms of contact with children and/or vulnerable adults.

## LIMITATIONS OF AUDIT

The audit did not proceed as smoothly as it might, for a number of reasons. On the first day of the audit, in which the focus is case auditing, the Diocese's case-management system crashed in a way that could not reasonably have been foreseen. This, coupled with inconsistent Wi-Fi and the need for the auditors to log on one at a time to various software applications, significantly reduced the number of files that could be audited. It also meant that, as case material is held on a number of different software applications, it was hard to ensure that all the records on a particular case were accessed.

The distance between the diocesan officers in Hove, and the Bishop's Palace in Chichester, is such that the auditors, having made the journey, did not have time to audit Blue Files, either for safer recruitment practices or where members of the clergy had been involved in safeguarding alerts.

Not all of the paperwork that SCIE requested to be sent to auditors in advance was able to be supplied before the audit visit, including the annual statistical returns to the NST from which the auditors draw useful information in preparation for the on-site audit. The reason for this is that the online form by which they must be submitted does not automatically generate a copy for the Diocese to keep and this cannot be generated after the event, meaning that this had to be obtained from the NST. This did not happen in time for the audit in this Diocese

In addition, because the call for feedback from statutory partners was not made before the audit, comments from the police expressing a specific concern (see 2.5) – in the midst of generally positive comments – only came to SCIE after the site visit, meaning the case in question could not be audited.