

Building the Foundations of a New Safeguarding Model

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In response to GS 2429: *'Church Safeguarding Structures: Next Steps on Implementation'*

Strategic Alignment with Audit Findings

As the Lead Auditor for the Church of England Independent Safeguarding Audit Programme, I welcome the strategic direction outlined in [GS 2429](#). The proposed shifts in safeguarding structures are not only timely but are directly supported by the evidence gathered during the 23 independent safeguarding audits we have completed to date. Both the forthcoming National Safeguarding Team (NST) audit and the Year 2 Annual Report reinforce the logic of this trajectory, providing a clear evidence base for the structural evolution of the Church's safeguarding framework.

The formulation of an ombudsperson's office, a separate charity and the strengthening of operational independence at a national and local level is the foundation upon which the new model can seamlessly evolve.

Soon-to-be-published reports contain recommendations that, if adopted, align with the new Safeguarding Structures approach. These include, but are not limited to:

- The formulation of an independent Safeguarding Charity – the Independent Safeguarding Authority (ISA) with a Board of Trustees with credible safeguarding expertise.
- Operational independence for the Chief Safeguarding Officer (Chief Executive) and a realignment of the current NST operating framework, roles, responsibilities and functions. Such realignment is designed to close the operational and cultural gap between NST activity and operational support and delivery in dioceses and cathedrals.
- The formation of a Church of England Ombudsperson's office, with the power to make findings, instigate, direct or oversee investigations. This is based on a number of existing models including some aspects of the Independent Office for Police Conduct (IOPC) and the Police Ombudsman of Northern Ireland office.
- Strengthening the operational arrangements at diocese and cathedral levels to reinforce and assure the delivery of safeguarding functions free from clergy or church officer influence, direction or control. This will involve the creation of diocese wide safeguarding directorates, incorporating all CofE bodies within the geography of the diocese, led by Directors of Safeguarding. Such directors will be represented by a Director of Safeguarding body/association chaired by the Chief Safeguarding Officer/ISA Chief Executive. Whilst they will be accountable to the appropriate governing bodies, (Chapter and DBF), they will be the single authoritative voice on all safeguarding matters at diocesan and cathedral levels.

- Distancing clergy and church officers, other than professional safeguarding staff, (the director, ADSOs and caseworkers etc) from roles and functions that directly oversee, policy development or operational safeguarding practice.
- In keeping with the first Annual Report 2024, we will reinforce the recommendation for the provision of funding via the Archbishop's Council and Church Commissioners alongside a safeguarding directorate resource model.
- Reconfiguring the safeguarding framework to place victims, survivors and their families at its centre. Prioritising the mitigation of anxiety and the minimisation of trauma, to ensure that engagement remains both persistent and consistent throughout the safeguarding process.

The Trajectory of Progress

Our ongoing work at INEQE Safeguarding Group continues to highlight a positive trend. Notwithstanding the current line management model, which we believe is not fit for purpose, we continue to see evidence of the increasing level of competence of blended and well led (former multi-agency) diocesan and cathedral safeguarding teams.

Furthermore, we are witnessing a Church that is increasingly willing to engage with rigorous scrutiny. However, to maintain this momentum, the Church must address the systemic bottlenecks that threaten to impede professional standards.

Addressing Structural Resistance and Barriers

It is a notable irony that in our experience, the primary resistance to a fully independent and functional safeguarding operation at a local level, seldom originates from the clergy. Instead, we frequently observe pushback from a very small but influential number of Diocesan Secretaries. While these individuals possess significant professional strengths in other areas, they lack the substantive, frontline safeguarding experience required to manage and / or directly or indirectly influence safeguarding decisions.

This represents a risk to progress. For example, when following up on actions from safeguarding audit reports, some recommendations made by auditors are disregarded by non-safeguarding professionals as unnecessary. This is justified by them on the basis that they believe - *things are already working well*.

The Case for a ‘Director of Safeguarding’ and a ‘Safeguarding Directorate’

In the opinion of the Audit, the current reporting lines are fundamentally flawed. In many cases, Diocesan Secretaries line-manage Diocesan Safeguarding Officers (DSOs), effectively relegating these specialists to middle-management positions. This hierarchy subordinates professional safeguarding expertise to general "church business" logic. The Audit has seen numerous examples of this, not least a controlling influence about how safeguarding actions and updates were being provided to the Audit team.

The CofE has a number of Director roles in its management/leadership arrangements. These range from Directors of Communications and HR, to Education and Finance. However in the context of safeguarding, we have found that the ongoing resistance to adopting the title ‘Director of Safeguarding’ (in those areas resisting the recommendation) is more than just a semantic dispute; it is a refusal to grant the role the seniority and authority required for it to be truly effective. Independent safeguarding cannot flourish if it is viewed as a subordinate administrative function rather than a primary leadership pillar.

Moving Forward

INEQE Safeguarding Group welcomes the leadership demonstrated by the Safeguarding Structures Programme Team and their continued willingness to listen, reflect and engage substantively with independent audit findings. To maintain the credibility and momentum of the Safeguarding Structures Programme, it is essential that this level of engagement is not only sustained but deepened. Our independent audits provide a critical evidence base for the Church’s safeguarding improvement journey, and consistent engagement with these findings is necessary to ensure reforms are grounded in lived operational realities across the Church. With the established connections now in place, we expect a continued, structured dialogue that enables thematic lessons from our audits to be fully integrated into the development of a more professionalised, independent and accountable safeguarding framework.



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Date of Publication: 10/02/26

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