

**Independent Safeguarding Audit of the  
National Safeguarding Team of the  
Archbishops' Council**

2026

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# 1 Introduction

1.1 The Independent Safeguarding Audit Programme for the Church of England (CofE) was commissioned by the Archbishops' Council and is overseen by the CofE's National Safeguarding Team (NST). The programme's scope was defined to include audits of Diocese Boards of Finance (DBFs), Cathedrals, and expanded to include the NST's own safeguarding arrangements. Led by the INEQE Safeguarding Group and working to a consistent framework, these audits test the sufficiency of safeguarding arrangements. They have a particular focus on the CofE's new National Safeguarding Standards that provide the structure for this report.<sup>1</sup>

1.2 Audit findings have taken account of the Past Cases Review 2 (PCR2) audit, Lessons Learned Reviews (LLRs), Safeguarding Practice Reviews (SPRs), service audits and other relevant material as well as evidence from surveys, focus groups, direct correspondence and interviews. For the NST, this involved the following:

- Over 950 documents being collated and analysed prior to and following the Audit's fieldwork.
- A range of interviews being held with Church officers (staff and volunteers), external partners, victims, survivors and other stakeholders.
- 222 anonymous survey responses being received, which gathered input from a diverse range of stakeholders. These were submitted by victims and survivors who have engaged with the Interim Support Scheme (ISS), Casework Team and/or survivor participation opportunities, as well as those working within the NST, and the wider diocesan and cathedral workforces.

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<sup>1</sup> [https://www.churchofengland.org/sites/default/files/2023-10/national-safeguarding-standards-and-quality-assurance-framework\\_sep23.pdf](https://www.churchofengland.org/sites/default/files/2023-10/national-safeguarding-standards-and-quality-assurance-framework_sep23.pdf)

- Seven focus groups.
- A confidential contact form being made available via a dedicated webpage.
- In total, the Audit undertook 68 separate engagement sessions reaching 96 people.

1.3 The report has been reviewed for factual accuracy by the NST.

## 2 Context

- 2.1 The National Safeguarding Team (NST) is the Church of England's central body, established to support and promote a consistently safer environment across all Church structures, including parishes, dioceses, cathedrals, and religious communities. The NST is responsible for supporting a culture where safeguarding is seen as everyone's responsibility, characterised by the proper prevention of abuse, support for victims and survivors, and the appropriate use of authority. The National Director of Safeguarding also holds an advisory role for both the Archbishops' Council and the House of Bishops.
- 2.2 A fundamental element of the NST's mandate is managing complex safeguarding cases (including those requiring cross-diocesan coordination) and cases pertaining to senior clergy (including bishops and deans). The NST provides professional supervision, quality assurance, advice and guidance on casework to those in professional safeguarding roles.
- 2.3 The NST leads the development and revision of national policies, codes of practice, and training, learning and development opportunities. The NST provides guidance to various Church Bodies, such as DBFs, Parochial Church Councils (PCCs), and cathedral Chapters on managing safeguarding concerns and allegations, referencing specific sections of the Managing Safeguarding Concerns and Allegations Code of Practice. While the responsibility for submitting Serious Incident Reports (SIRs) to the Charity Commission rests with each individual Church Body, the NST provides advisory support and resources, including a standardised SCMG template. The Archbishops' Council, under which the NST sits, submits its own referrals via the Director of Central Secretariat.
- 2.4 At the centre of the NST's work is the delivery of a Safeguarding Programme designed around the requirement to implement the recommendations of the Independent Inquiry into

Child Sexual Abuse (IICSA)<sup>2</sup>. A range of activity has commenced to address these recommendations, notably the creation of the Information Sharing Framework (addressing IICSA recommendations 5 and 6). This framework provides essential guidance on the secure and legal transfer of information and has been formally adopted by all 42 Church of England dioceses, the Church in Wales, and all 46 police forces since February 2023. Additional operational workstreams include the introduction of a National Safeguarding Casework Management System (NSCMS) and the execution of the Past Cases Review 2 (PCR2)<sup>3</sup> process.

2.5 In line with IICSA Recommendations 1 and 8, a pathfinder pilot project was initiated<sup>4</sup>. This project saw 13 dioceses and 11 cathedrals volunteer to participate, with one of its key aims being to facilitate the transition from the existing Diocesan Safeguarding Advisor (DSA) role to a new Diocesan Safeguarding Officer (DSO) position, which includes access to individual professional supervision and support. Furthermore, the National Safeguarding Standards (NSS) were created following collaboration with victims and survivors of abuse. The NSS establish a critical framework that constitutes good safeguarding practice. The NST defined and built this collective understanding to support parishes, dioceses, and cathedrals locally in developing a consistent, high-quality approach to safeguarding practice and culture.

2.6 Participation with victims and survivors of abuse is a vital element of the NST's work, ensuring that their experiences inform and underpin the Church's safeguarding work and future planning. Additionally, the NST provides administrative support (e.g., accounting and contract management) for the ecumenical Safe Spaces service, co-funded by the

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<sup>2</sup> <https://www.iicsa.org.uk/reports-recommendations/publications/investigation/anglican-church/part-d-conclusions-and-recommendations/d4-recommendations.html>

<sup>3</sup> <https://www.churchofengland.org/safeguarding/reviews-and-reports/past-cases-review-2>

<sup>4</sup> <https://www.churchofengland.org/safeguarding/safeguarding-programme/iicsa-1-and-8-regional-model-pilot>

Archbishops' Council, administers the Interim Support Scheme (ISS) for those with urgent needs arising from Church-related abuse and leads on the development of the National Redress Scheme.

- 2.7 Despite cultivating a stronger connection with dioceses and cathedrals, the NST continues to navigate significant structural and operational challenges inherent in the Church's arrangements. It is important to note that the NST acts in an advisory capacity, offering support and advice to dioceses, as they do not have control over local matters which do not fall within the NST's national remit. The primary limitation is the reliance on influence and persuasion rather than enforcement for local compliance. This decentralisation reportedly complicates the consistent application of processes and results in a lack of uniform, readily available national safeguarding data. Externally, challenges persist with communication across the complex Church structure and managing the impact of high-profile cases on public trust.
- 2.8 The structure of the NST has evolved over the last five years to respond to recommendations which arose from IICSA. Its structure and governance continue to be reviewed considering changing demands. The work involved in developing the Strategic Plan in 2024, resulted in the development of the Programmes and Operations team. This team was created to support the work of the pre-existing areas; Casework, Survivor Participation and Learning and Development. The NST is currently going through a period of uncertainty, with the Safeguarding Structures Team working on developing the safeguarding system across the Church.
- 2.9 A critical systemic constraint within the Church's safeguarding arrangements is that neither the NST nor the NDS holds formal authority to direct or enforce safeguarding decisions within dioceses or cathedrals. Responsibility for key decisions - including reporting, risk management actions, and escalation - remains locally. As a result, the NST operates

primarily through advice, influence, and escalation rather than direct authority. While this model reflects the Church's constitutional structure, it contributes to variability in practice and, at times, a lack of clarity across the system regarding where ultimate accountability for safeguarding decisions sits.

**Recommendation 1:** To resolve ambiguity regarding the National Director of Safeguarding and the NST's authority when critical local safeguarding issues arise, the Archbishops' Council should agree and define specific circumstances when the National Director of Safeguarding can launch investigations into such safeguarding concerns or adjudicate upon cases escalated from individual dioceses.

## 3 Progress and Impact

3.1 The NST has demonstrated a commitment to continuous improvement by actively contributing to and actioning recommendations from a variety of independent reviews. This work shows a positive attitude towards a safer Church. However, progress has not been at the pace necessary for systemic change, and the pace of work is currently hampered by both operational and systemic challenges. Key areas requiring strengthening and dedicated resource include oversight and implementation of recommendations and addressing compliance regarding the mandatory sharing of all Lessons Learned Reviews (LLRs) and Safeguarding Practice Reviews (SPRs) from dioceses and cathedrals. Addressing these issues is vital for the NST to effectively measure progress and impact and ensure consistent safeguarding standards across the Church of England.

### Scope of Learning Activity

3.2 The *Past Cases Review 2: The National Safeguarding Report*<sup>5</sup> was published in October 2022 by the National Safeguarding Steering Group (NSSG). This report provides an overview of findings collated from the 45 individual reports undertaken and sets out 26 recommendations which the NSSG committed to ensuring were delivered in full. Of these, 14 directly fell to the NST as the responsible body for implementing the recommendation and three recommendations were attributed to all church bodies. The NST has also been involved in work to ensure other recommendations are achievable locally.

3.3 The NST has been engaged in a variety of reviews relating to individual cases, many of which have been subject to independent scrutiny. Given the complexity and depth required for a thorough assessment, the NST received additional, time-restricted resources to

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<sup>5</sup> <https://www.churchofengland.org/sites/default/files/2022-10/past-cases-review-2-national-report.pdf>

manage this workload. Key independent reviews that the team has contributed to and actioned include the Makin Review<sup>6</sup>, the Scolding Review<sup>7</sup>, the David Tudor Safeguarding Practice Review<sup>8</sup>, and the Archbishops' Council Core Group Review. Furthermore, the NST has participated in a Rapid Review concerning a local case. The team is also monitoring progress and anticipating outcomes from four ongoing reviews directly linked to the former Independent Safeguarding Board (ISB).

3.4 In 2023, the NST and the Diocese of St Albans concluded their internal investigation into Mike Pilavachi<sup>9</sup>. Following this, Soul Survivor Watford commissioned an independent review, known as the Scolding Review, led by Fiona Scolding KC. A working group was convened to draft an initial response to the findings and plan how to implement the review's subsequent recommendations across the Church. The Scolding Review delivered 44 recommendations. Approximately half of these were aimed at the National Church Institutions (NCIs). While none directly targeted the NST's core operational work, all pertained broadly to the goal of building a safer Church. Moreover, many recommendations addressed areas that were not traditionally categorised as safeguarding but required safeguarding principles to be applied at their heart for effective implementation.

3.5 Key actions arising from the Scolding Review included issuing a formal apology to all who had experienced abuse by Mike Pilavachi and the development of a case study. This case study is to be integrated into Leadership training within dioceses, especially for those involved in establishing or running Bishops' Mission Orders (BMOs). It should be noted that a case study was already utilised in the Senior Leadership Safeguarding pathway,

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<sup>6</sup> <https://www.churchofengland.org/safeguarding/reviews-and-reports/john-smyth-review>

<sup>7</sup> <https://www.churchofengland.org/safeguarding/safeguarding-news-releases/scolding-review-statement-lead-safeguarding-bishop>

<sup>8</sup> <https://www.churchofengland.org/safeguarding/safeguarding-news-releases/update-safeguarding-practice-review-david-tudor>

<sup>9</sup> <https://www.churchofengland.org/media/press-releases/concerns-substantiated-mike-pilavachi-investigation>

and at the time of Audit, work was being done to analyse and create training that analyses and confronts unrecognised informal, implicit, and abstract patterns of behaviour, relational power dynamics and the methods used to circumvent existing policy and practice.

- 3.6 Following the publication of the Makin Report in October 2024, the Archbishops' Council service area leads met to consider the 27 recommendations made in the report and to consider next steps. Following this activity, a Task and Finish group approach was taken regarding the delivery of the Makin Review recommendations. This group is chaired by one of the Deputy Lead Bishops for Safeguarding and includes a range of stakeholders, including a volunteer with lived experience, external safeguarding experts and Church Officers with relevant experience. Of the 27 recommendations, 24 have been fully accepted with three accepted in part. An interim report was accepted and approved by the NSSG and subsequently published on 4<sup>th</sup> November 2025, which was brought to General Synod in February 2026 for consideration. The Task and Finish Group will continue to meet and review, assess, scrutinise and scope the Church's implementation of each recommendation, using the National Safeguarding Standards (NSS) as a framework for analysis.
- 3.7 Beyond these major independent processes, the NST ensures continuous learning is captured through internal review mechanisms. LLRs are routinely conducted at the conclusion of Safeguarding Case Management Group (SCMG) proceedings, with resulting evidence and actions officially recorded within the National Safeguarding Case Management System (NSCMS). One example provided to the team was the NST's central involvement in a SPR initiated in partnership with a diocese. This demonstrated a commitment to joint learning and systemic improvement across the wider organisational structure.

- 3.8 INEQE were commissioned to provide independent scrutiny of the decision making and processes the NST followed regarding complaints made against the former Bishop of Liverpool. This Rapid Review put forward seven recommendations which the NST has acknowledged. Actions taken include the review of NST practices and re-sharing of guidance via the Safeguarding Newsletter.
- 3.9 Separately, there have been three audits by the NCI's Risk and Assurance team on key projects. These included the Interim Support Scheme (ISS), Redress Project and the Honorariums policy. Recommendations which arose from these audits are monitored by the NCI's Risk and Assurance team via the Rhiza system and reported to the Archbishops' Council Audit Committee.
- 3.10 The NST has reviewed INEQE's Annual Report 2024 recommendations and provided responses to each recommendation made. These responses have been formulated into an action plan by the Data Analysis, Research and Evaluation (DARE) Unit and are monitored by them and fed into the NSSG. The NST has expressed a commitment to implementing these recommendations to enhance safeguarding practice.
- 3.11 A significant focus over the last twelve months has been placed on addressing and improving organisational culture. To drive this, the SLT collectively completed a one-year coaching programme, aiming to enhance leadership capabilities and cultural stewardship. The organisational climate was formally assessed through the NCI's Employee Satisfaction Survey (Staff Survey) and a bespoke NST Healthy Culture Survey, providing data-driven insights into areas requiring improvement. Crucially, safeguarding culture was reinforced through mandatory training for leadership groups. The SLT completed the Senior Leadership Safeguarding Pathway (SLSP), while Band 2 colleagues completed the Leadership Safeguarding Pathway (LSP). Both these pathways heavily emphasise the

creation and maintenance of a robust Safeguarding Culture, with all associated learning materials accessible through the Safeguarding Learning portal.

- 3.12 At the time of Audit, a range of policies and guidance were subject to review, and others in developmental stages. Other innovations highlighted for future development include a National Safeguarding Innovation and Impact Fund and early scoping work on a Chaplaincy for Survivors.

### **Oversight and Implementation**

- 3.13 The National Safeguarding Steering Group (NSSG) is the body responsible for reviewing, accepting, and monitoring the implementation of recommendations arising from these reviews, including from LLRs and Safeguarding Practice Reviews (SPRs). However, the NSSG reportedly lacks the capacity to conduct detailed monitoring of implementation. This led to the formation of the Learning Outcomes Working Group, a subgroup of the NSSG, which was constructed to consolidate recommendations into a single, overarching plan.
- 3.14 The Audit recognises the considerable effort currently underway to strengthen learning from reviews, including the identification and collation of all national recommendations to track actions taken and assess their impact, alongside the systematic collection of all local LLRs and SPRs for thematic analysis. At present, this work is led within the DARE Unit, which provides the analytical capability and oversight required to manage it effectively. Given the scale and complexity of this task, dedicated resource will be essential to ensure timely and accurate delivery. Historically, progress was hindered by disparate tracking methods spread across multiple teams, which contributed to a gap between perceived and actual implementation. To avoid a recurrence of these issues, this function should remain within the DARE Unit in a structured and fully resourced manner, which will be discussed later in the report.

- 3.15 Underpinning this activity is an identified compliance gap concerning the submission of LLRs and SPRs. This issue means that the NST has lacked confidence in its assurance that it receives all necessary reports from dioceses and cathedrals. Correspondence between the Audit and the relevant dioceses and cathedrals exposed reasons for not sending. This included uncertainty regarding whether they were subject to automatic or public circulation, being considered the property of the Diocesan Bishop, and general uncertainty regarding the process for sharing these documents with the NST. Compounding this, engagement with one victim / survivor brought to light a specific case where an LLR had not been shared, a matter that is now entangled in ongoing legal issues. In this particular case, the Audit has been refused access to the LLR in question. This reflects some of the difficulties experienced by the NST and regardless of the rationale, reinforces the impression that the Church is incapable of transparent engagement. This will be further addressed in INEQE's 2025 Annual Report for the Independent Safeguarding Audit Programme's (ISAP).
- 3.16 A separate issue has been noted within the Safeguarding Practice Review Code of Practice concerning SPR submission. While the sub-section titled 'Who needs copies' clearly states that 'The NST must be sent a copy of all completed SPR reports,' the preceding sentence undermines the clarity of the submission requirement. The text before the mandatory statement says: *'In addition to those already mentioned in this section, the following people **may** need to be provided either with whole, redacted or sections of the reports'*. This ambiguous phrasing, using the non-mandatory term 'may,' is considered by the Audit to be a contributing factor to the existing confusion and non-compliance surrounding the mandatory submission of LLRs and SPR reports.
- 3.17 Moving forward, the NST, supported by the Archbishops' Council should clarify the duty to share LLRs and SPRs by updating the Safeguarding Practice Reviews Code of Practice

to clarify any ambiguity of duty to share and establish the creation of a single, streamlined mechanism for submission of reviews.

**Recommendation 2:** The NSSG should mandate the immediate establishment of a single, non-negotiable electronic submission portal or dedicated secure mailbox for all LLRs (Lessons Learned Reviews) and SPRs (Safeguarding Practice Reviews) commissioned by any diocesan or cathedral body.

**Recommendation 3:** The NST must immediately review and revise the Safeguarding Practice Review (SPR) Code of Practice and associated guidance. Specifically, the ambiguous language in the "Who needs copies" section of the SPR code of practice (e.g., the use of "may need to be provided") must be replaced with clear, directive phrasing that reinforces the non-negotiable requirement to send copies to the NST.

3.18 The primary goal of any safeguarding review is not to document failure, but to promote learning and prevent recurrence. The NST should establish a secure, centralised repository for anonymised LLR and SPR findings, modelled on the NSPCC's Case Review Repository. Crucially, this repository would drive local learning by providing staff, volunteers and clergy with readily accessible, context-relevant learning points, anonymised case summaries focused on "What went wrong" and "What must change". The ethical integrity and success of this system depend on rigorous data governance, mandating that all LLRs and SPRs are professionally anonymised to protect victim / survivor identity while retaining learning integrity.

**Recommendation 4:** The NST, in collaboration with the Audit and Information Technology departments, should immediately commission and establish a Centralised Safeguarding Learning Repository for all completed Lessons Learned Reviews (LLRs) and Safeguarding Practice Reviews (SPRs). This repository should:

- a) Be designed on the principles of the NSPCC Case Review Repository, focusing on the collation and thematic indexing of key learning points and systemic failures.
- b) Implement a mandatory, standardised process for professional anonymisation before publishing, ensuring no personal identifying information remains while retaining the critical context required for learning.

3.19 Overall, the NST is engaged in a demanding process of continuous improvement, driven by significant external reports, which have yielded numerous recommendations for building a safer Church. While the NST has demonstrated commitment to cultural change and actioning key findings, its pace of progress is currently hampered by operational challenges, specifically the complexity of tracking recommendations from diverse sources and a critical compliance gap regarding the mandatory sharing of all LLRs and SPRs from dioceses and cathedrals. Addressing these systemic tracking and submission issues is vital for the NST to effectively gauge progress and ensure consistent safeguarding standards across the Church of England.

## 4 Culture, Leadership and Capacity

### Culture

- 4.1 Findings from this independent Audit, incorporating survey data, confidential contacts, focus groups, and one-to-one discussions, demonstrate that an overwhelming majority of NST staff believe a positive culture exists. The environment is predominantly described as 'supportive' and 'collaborative', with many regarding the NST as a 'good place to work' where professional skills are genuinely valued.
- 4.2 This internal confidence is further evidenced by most employees stating they feel safe raising 'safeguarding concerns'. A primary driver of this shift has been the NST's role in redefining the Church of England's safeguarding culture by embedding accountability through mandatory national standards. By establishing these standards across all NCIs as they apply to their particular settings, the NST has delivered its most significant contribution to date, frequently cited as the 'single most impactful' catalyst for driving consistent, professional, and lasting cultural improvement across the Church.
- 4.3 Despite these successes, the NST faces notable internal hurdles. A small but significant minority of staff perceive a lack of openness to external feedback, suggesting that a more receptive approach to criticism could enhance engagement by reframing external evaluation as an opportunity for growth rather than a threat. Furthermore, some colleagues questioned the consistency of hiring practices, suggesting that recruitment processes must be managed more robustly to mitigate the perception of an insular culture.
- 4.4 Some of these sentiments were mirrored in the NST's own *Healthy Cultures* survey, which indicated that internal communication can occasionally be perceived as rushed, unclear, or insensitive. This lack of clarity often creates a sense that staff feedback rarely results in

tangible change. Additionally, some staff report feeling undermined due to a perceived lack of recognition for professional roles falling outside core safeguarding functions. To prevent professional isolation, the NST should work to strengthen the collective understanding of all departments, ensuring the expertise of every team member is further integrated and respected.

- 4.5 A critical finding of this report is the significant disparity between national and local cultural dynamics. While internal NST staff express high confidence in the culture, barely half of local staff share this perspective. This divergence exposes a transparency and trust gap between the national team and those working within Diocesan Boards of Finance (DBF) and cathedrals.
- 4.6 External feedback regarding the NST is highly polarised; while many diocesan and cathedral staff describe the NST as ‘supportive’ and ‘respectful’, praising specific individuals as ‘brilliant,’ others characterise the culture as ‘demanding’ and ‘disorganised’. Reports indicate that criticisms are often met with a defensive tone, which has the potential to hinder true collaboration.
- 4.7 While many respondents acknowledge that the NST operates with good intentions, a persistent theme of inconsistency emerged throughout the feedback. The quality of support and response varies drastically depending on the specific individual NST member engaged, suggesting that safeguarding support is currently driven by individual performance rather than robust, standardised organisational structures.
- 4.8 Consequently, less than half of respondents to the Audit’s diocesan and cathedral survey believe a culture of continuous improvement exists, and notwithstanding the feedback on the National Safeguarding Standards, less than a quarter believe the NST has a positive impact on parish-level culture. Local teams also report being left to communicate changes

in guidance to parishes without a coherent narrative or central support. This is surprising given the role of Regional Safeguarding Leads discussed later in this report.

- 4.9 To alleviate this burden, the NST should ensure that comprehensive supporting documentation accompanies all safeguarding updates.
- 4.10 The environment is further complicated by "relentless, negative media coverage," which safeguarding professionals feel creates a high-stress atmosphere. Many staff perceive a lack of institutional support, noting that senior church leaders frequently fail to counterbalance this narrative by highlighting current good practice. This view is reinforced by survey data showing only a quarter of safeguarding respondents believe senior clergy provide an accurate public account of their work. This creates a risk of a "thankless" culture developing, as many staff feel their dedication goes unacknowledged and voiced concern that organisational decisions were not consistently grounded in contemporary evidence.
- 4.11 The introduction of Regional Safeguarding Leads (RSLs) has been a positive development, lauded for bridging the gap between the workforce and the NST to improve the shared understanding of policy and practice. Both the DSO/CSO and NST workforces noted that RSLs have significantly enhanced engagement, though some observers highlighted that the role is still in its infancy. Consequently, further time is required to fully evaluate the effectiveness of the RSL model across diverse operational contexts.
- 4.12 However, a notable tension exists as individual RSLs receive positive feedback from the same sources that simultaneously feel the NST fails to provide sufficient context when implementing changes. This suggests that RSLs are perceived as entities separate and distinct from the NST, rather than an extension of it. This dynamic is explored in greater detail later in this report.

**Recommendation 5:** To assist in strengthening the NST’s inclusive professional environment the NST should implement a two-phased approach focused on cultural integration and impact measurement:

**Phase One:** Actively educate the wider team on the specific functions of every role to ensure each contribution is understood and respected. Create deliberate opportunities for cross-functional engagement, ensuring that the diverse expertise of every member is both utilised and visibly valued.

**Phase Two:** To ensure these interventions are effective, the NST should re-issue the Healthy Cultures survey at an appropriate interval. This follow-up iteration will provide a data-driven benchmark to measure the impact of the changes implemented and identify any remaining areas for cultural development.

**Recommendation 6:** The NST should administer an annual diocesan and cathedral safeguarding support survey to measure satisfaction with NST support, including communication, the quality of professional advice, and timeliness.

**Recommendation 7:** The NST should proactively supply mandatory, clear, and consistent communication materials (FAQs, explanatory briefing notes, and short narratives) to accompany all new guidance or policy changes.

## Leadership and Capacity

4.13 The journey towards a safer Church at a leadership level has been defined by a complex interplay of mutual respect and robust, most often healthy, tension. At the executive level, spanning the NST, the Secretary General, the National Director of Safeguarding (NDS), and the Lead Safeguarding Bishop, the Audit identified a shared ‘best intent’. These leaders have developed a productive professional relationship, engaging in the rigorous curiosity and respectful challenge necessary for genuine, safeguarding-focused institutional growth.

4.14 The persistence of these relationships and the continued commitment to dialogue, culminating in the 2026 General Synod decision, demonstrate that institutional engagement remained resilient under pressure. This strength enabled a level of debate that has moved the Church of England into a more optimistic space, a position from which the aspirations of those who have suffered at the hands of the Church can finally be addressed meaningfully.

### **The National Safeguarding Team**

4.15 Established in 2015 as a direct response to high-profile abuse scandals and the scrutiny of IICSA, the NST has transformed from a single part-time position into a multi-million-pound operation. Originally designed to centralise the management of complex cases involving senior clergy, the team has expanded to over 26.5 personnel by 2022, with an annual expenditure of approximately £4.4 million.

4.16 Today, the NST operates as a professionalised department with a structured hierarchy of senior leadership and specialist project leads, reflecting a fundamental shift towards institutional accountability. Leading an organisation of this complexity requires significant skill in people management alongside a credible background in safeguarding.

4.17 The current NDS brings this credibility from statutory social care, having operated at both frontline and senior management levels. He has built effective relationships across central Church institutions and strives to deliver support through an uncompromising safeguarding lens. Members of his SLT describe him as “visionary”, “brave”, and “reflective”. The Audit found clear evidence of his ability to speak truth to power and take authoritative decisions, as well as a willingness to adapt his practice through reflection.

4.18 Despite these strengths, the Audit found ambiguity across Church communities regarding who ultimately leads national safeguarding. Many respondents believed this role rested

with the Lead Safeguarding Bishop. This is an unhelpful confusion that has unintentionally fed the perception that safeguarding is directed by the Church hierarchy rather than being operationally independent.

- 4.19 While the Lead Safeguarding Bishop and their deputies have been a significant force for good, remaining victim-centric and focused on advocacy, their titles contribute to this lack of clarity. Senior clergy should continue to hold advocacy portfolios to address safeguarding in clergy forums and debates, but the naming convention must change to distinguish advocacy from operational authority.

**Recommendation 8:** The title of Lead Safeguarding Bishop and associated deputy roles should be abolished. Bishops dedicated to these roles should henceforth be designated as portfolio holders: Lead Bishop Advocate for Safeguarding; Lead Bishop Advocate for Safeguarding Accountability and Learning; and Lead Bishop Advocate for Survivor Engagement and Support.

Given the central safeguarding influence of Archdeacons, the Church should also consider appointing a Lead Archdeacon Advocate for safeguarding.

### **Operational Independence**

- 4.20 It is critical to promote clarity regarding the ultimate independent operational authority for safeguarding, which rests with the NDS, effectively, the Chief Safeguarding Officer envisaged by the Safeguarding Structures Programme (GS 2429). To formalise this, job descriptions must be revised, and the Archbishops' Council should issue a formal position statement to reinforce this mandate. Furthermore, the NDS should be the authoritative independent public face on safeguarding matters related to the Church.

- 4.21 The Audit emphasises the need for a strict differentiation between independent operational practice and the role of governance bodies, whose primary function is strategic oversight and accountability.

**Recommendation 9: A Charter of Operational Independence.** The Archbishops' Council should issue a definitive Charter explicitly mandating that the NDS/Chief Safeguarding Officer holds final authority on all operational matters. This requires:

- a) Realigning the Chief Safeguarding Officer's job description to include 'final operational signatory' status, ensuring they are not subject to secondary approval or a requirement to seek clergy agreement on any safeguarding matter including specific casework.
- b) Formally defining the boundary between the NST (Operational) and the Archbishops' Council (Governance) to prevent encroachment on operational decision-making.
- c) Seeking agreement from every diocese to adopt this position, ensuring a uniform hierarchy of authority across the Church.

The NDS should be the authoritative independent public face on safeguarding matters related to the Church.

### **Organisational Restructure**

4.22 The NDS senior leadership team comprises individuals from diverse complementary professional backgrounds, including policing and probation. Since its inception, however, the NST has grown organically without a formal review, never having been subject to the audit processes applied to DBFs and Cathedrals.

4.23 While some external stakeholders perceive the NST as 'bloated', the Audit found this impression to be inaccurate. Instead, the perceived expansion is largely a byproduct of the ad hoc nature of engagement, particularly the frequent use of external consultants, which creates a false sense of growth.

4.24 Adopting a more structured approach that utilises local resources in partnership would likely dispel these negative perceptions. A good example of this approach was the inclusion of 'Lead User' roles within the IICSA 1 & 8 Project, involving diocesan and

cathedral representatives as well as the Champions involved in the Pathfinders pilot. Furthermore, such a shift would enable greater collaboration between the central organisation and frontline safeguarding operations. To capitalise on this opportunity for reflection and improvement, the Audit suggests that a formal restructure is now essential to future-proof the system.

4.25 Feedback describes the current organisational structure as occasionally ‘inconsistent’ or ‘chaotic’, a perception primarily driven by the excessive breadth of SLT portfolios. This over-extension is often compounded by an unrealistic attempt for the SLT to be seen leading every strategic initiative, which inevitably dilutes sustained visibility and meaningful engagement. These challenges are likely a byproduct of rapid growth and limited leadership bandwidth, but they are further exacerbated by inconsistent information flow and a failure of those with delegated authority to communicate their intentions effectively across the leadership tiers.

4.26 To address these systemic issues, the leadership and governance structure must be reformed to consolidate portfolios and provide more robust support to the NDS, specifically through the introduction of a Safeguarding Secretariat. Central to this reform is the need to strengthen the delegation of responsibility; by allowing those with genuine strategic oversight to act as the Senior Responsible Officers (SROs) for their own work, the organisation can move away from operational micro-management. Ultimately, this transition ensures that senior leaders remain focused on strategic direction rather than being drawn into day-to-day management, enabling a more disciplined and coordinated approach.

### **Reconfiguring Leadership Roles**

4.27 Notwithstanding the work of the Safeguarding Structures Programme, there is a clear need to streamline senior roles to improve strategic oversight and create a more unified

leadership model. The National Director of Safeguarding (NDS) should be supported by a single Deputy Director. This individual will be responsible for managing daily operations and making primary decisions on escalations before they reach the NDS. This change aims to create a more coherent and collaborative leadership environment. Feedback from the Audit indicated that senior leaders could at times act arbitrarily and that their portfolios within the NST were often seen as too broad, with some roles covering several distinct areas of work. This led to a lack of clarity regarding functional ownership and resulted in inconsistent engagement with dioceses. The proposed service area structure addresses these issues by ensuring leadership roles are aligned with the leadership vision within specific, clearly defined responsibilities.

4.28 The proposed move from Deputy Directors to Heads of Service is intended to provide greater clarity, focus, and accountability within the NST's operating model. Establishing clearly defined service areas, each led by a Head of Service, enables more coherent leadership, clearer decision-making accountability, and stronger alignment between strategy and operational delivery. Heads of Service are senior executive leaders within the NST who oversee national safeguarding issues.

**Recommendation 10: Restructuring.**

**The Safeguarding Secretariat**

To ensure maximum efficacy, a dedicated Secretariat, should be created. This unit should manage high-level workflows and act as a strategic gatekeeper, allowing the NDS to focus on core priorities.

The Secretariat will be overseen by a Chief of Staff, reporting directly to the NDS. This role is pivotal in maintaining organisational coherence and discipline. By managing high-level workflows, the Chief of Staff ensures that leadership remains focused on core safeguarding

priorities while the Secretariat manages the complexities to support the organisation and ensure compliance.

**The Secretariat should include:**

- A Compliance Unit. This will oversee regulatory standards and Charity Commission requirements such as annual reporting and Serious Incident Reporting.
- An agile programme/project management function that is scalable when needed. This will avoid over-resourcing after relevant programmes are concluded.
- Dedicated Legal Support. A specialist safeguarding legal advisor to navigate the Church's complex safeguarding landscape. Whilst this person may be linked to a larger legal team, their primary function and expertise must be grounded in safeguarding. Their role will be to ensure that the NDS is given advice, independent of the Church and fundamentally focused on safeguarding and associated legal frameworks.
- A Dedicated Communications Officer independent of the wider Church, fundamentally focused on safeguarding and related matters. Ensuring sensitive and strategically aligned messaging.
- Research Function (the Data Analysis, Research and Evaluation (DARE) Unit). A funded arm for evidence-based policy development. This team should continue to oversee the consolidated organisational action plan they have constructed.
- A Specialist HR Advisor with the skills and abilities to differentiate between conduct, HR and safeguarding issues. This role would provide advice to all regions ensuring conduct issues are clearly separated from safeguarding processes.

**Service Area Framework**

The following provides a high-level strategic repositioning and, where appropriate, a prioritisation of the work undertaken by the current directorates. The specific details should remain subject to the influence and consideration of the NST. These recommendations should

be read in conjunction with the findings and narrative provided throughout the report.

In the opinion of the Audit, the existing business areas and activities, excluding project and programme management, which should be situated within the Safeguarding Secretariat, should be reconfigured into three separate service areas each led by a Head of Service, who by default, would be a member of the Senior Management Team:

**Learning & Development:** The current approach should evolve into a Virtual Church of England Safeguarding College. This would incorporate regional campuses across the eight regions, each with a specialist theme aligned to specific portfolio areas. See Learning, Supervision and Support section of this report.

**Operational Support:** This area should continue to focus on the provision of support via NST Regional Leads, as well as casework, specialist risk assessment and, when required, investigations. Moving forward, all roles should be competence-based, with competencies agreed with the Learning and Development Service area. A professional accreditation process should be established for Investigators to ensure consistent, high-quality investigations and risk assessments.

**Victim and Survivor Participation and Engagement:** To elevate this key priority area and ensure a singular focus, this dedicated Service Area will consolidate all engagement and advocacy initiatives. It should be led by a Head of Service with subject matter expertise, be supported by a Victim and Survivors Advisory Panel with a mandate to critique policy and practice and ensure the integration of survivor engagement principles into the core competencies and mandatory training for all staff.

## Capacity

4.29 Given the nature of a restructuring exercise, appropriate capacity requirements are difficult to establish prior to the scoping work. That said, these and other recommendations

throughout the report will result in an increase in headcount. This is necessary to ensure the NST is fit for purpose and equipped for the challenges it will face as it transitions into its next iteration.

### **The Role of Regional Safeguarding Leads**

4.30 The NST employs a team of nine Regional Safeguarding Leads (RSLs) distributed across eight distinct geographical regions: North West, North East, West Midlands, East Midlands, South West, South Central, South East, and East Anglia. While most regions are covered by one full-time officer, the North West region utilises a job-share arrangement. These roles were established to bridge the gap between national policy and local implementation, providing professional supervision and quality assurance to Safeguarding Officers across 42 dioceses, and quality assurance to 42 cathedrals across the Church of England.

4.31 The current regional model originated from a pilot programme which concluded in March 2024. This pilot was developed in response to Recommendation 1 of the report by the IICSA, which highlighted the need for improved oversight of safeguarding practices. Following the pilot, formal implementation and recruitment for the additional permanent RSL posts across all eight regions commenced in September 2024.

4.32 The following sections detail Audit findings regarding the RSL role following its transition from a pilot programme in March 2024. This examines the consistency, authority, and strategic alignment of the RSL network and provides recommendations to strengthen these arrangements. It specifically addresses how to bridge the 'perception gap' between national policy and local practice.

4.33 A recurring theme from evidence reviewed by the Audit, is whether the high cost of the RSL network is justified by substantive outcomes. The Audit reviewed an extensive range of documentation detailing the benefits of the RSL professional supervision model. The

findings suggest that the model's primary strength lies in providing a credible, reflective process that increases practitioner confidence. These benefits are most evident among staff who previously lacked such support, resulting in measurable improvements in job satisfaction and the perceived quality of practice. Furthermore, the establishment of a strong regional identity has been key in reducing professional isolation.

- 4.34 Despite these strengths, the model faces several structural and operational challenges that must be addressed. The Audit notes that the NST has deviated from the original model. Whilst this may have been a pragmatic response to recruitment issues, feedback indicates that it has been unhelpful. This is a matter for the NST to consider moving forward. Furthermore, the quality of supervision remains inconsistent, with the depth of engagement varying significantly depending on the individual RSL. This inconsistency has led some supervisees to favour their previous local arrangements. While some RSLs demonstrated a more proactive stance 'exemplars', pushing out high volumes of work, some remained in a purely 'relational phase' for an extended period and failed to deliver basic requirements, such as providing written supervision notes for several months. Although this inconsistency may partly stem from some post-holders being relatively new to their roles, the Audit maintains that RSLs must continue to move at pace towards a more rigorous application of their key function regarding quality assurance.
- 4.35 This inconsistency is compounded by a perceived weakening of connectivity with the NST for some DSOs. Some DSOs report reduced direct access and less effective feedback loops, a shift that risks isolating local practice from national oversight. Furthermore, a lingering lack of clarity regarding professional boundaries persists; the distinctions between reflective supervision and quality assurance remain blurred. However, the Audit is optimistic that the recent appointment of a manager for RSLs is likely to improve this.

**Recommendation 11:** In light of the Audit’s findings of the IICSA 1 & 8 Regional Model Implementation, it is evident that some issues remain unresolved. Consequently, this Audit report recommends that the NST takes immediate steps to rectify the inconsistencies in the model’s delivery. Furthermore, the NST should commit to an ongoing review process, or the publication of an annual report, to monitor the quality of supervision and ensure regional consistency, as highlighted in the original evaluation findings.

4.36 Regarding the role requirements for RSLs, the Audit concludes that previous experience as a DSO is highly advantageous for navigating safeguarding within a Church of England context. A DSO background is deemed 'desirable' precisely because the Church's landscape cannot be immediately understood through a purely statutory lens. Furthermore, by positioning the RSL role as a natural step for high-calibre DSOs, the Church can better professionalise its safeguarding workforce.

**Recommendation 12:** For all future recruitment cycles, the NST should update the person specification for the RSL role. The 'desirable requirements' should include demonstrable experience of safeguarding within a church context, alongside prior experience as a Diocesan Safeguarding Officer or Cathedral Safeguarding Officer.

4.37 The Audit identified a profound 'perception gap' between the dioceses and the central NST. It is noted with concern that while many DSOs speak highly of their individual RSLs, they remain critical of the NST as a functional entity. The Audit argues that RSLs have, at times, inadvertently allowed themselves to be perceived as distinct or distant from the central team in order to maintain local relationships. To address this fragmentation and ensure these roles are explicitly aligned with the national body, the Audit recommends renaming RSLs as NST Regional Leads.

**Recommendation 13:** The NST should rename the Regional Safeguarding Lead role to NST Regional Lead to explicitly align post-holders with the NST. By adopting this title, the role will function primarily as a strategic liaison and ambassador, bridging the gap between national policy and local implementation. In this capacity, leads will be responsible for promoting the NST's strategic objectives at a regional level, while simultaneously challenging the national centre to ensure it remains responsive to local operational requirements. As part of this approach, NST Regional Leads should brief local teams including Bishops, Deans, Archdeacons, Diocesan Secretary and COOs on the work of the NST, updating them on policy development, and national plans that may impact local delivery.

4.38 The current RSL role is further highlighted as sitting in an ambiguous 'no man's land' between advisory support and formal authority. Evidence reviewed by the Audit identified instances where risks or poor practice were recognised by RSLs, but the absence of formal authority limited their ability to intervene directly. This reflects the wider structural position of the NST, where safeguarding concerns may be identified nationally but must be acted upon locally. The Audit maintains that RSLs must be empowered with 'teeth' to intervene when substantive risks are identified. This shift is prompted by past instances where RSLs were aware of poor local practices but were unable to address them. By establishing the RSL as a formal 'accountability conduit', a framework should ensure that risks and concerns regarding the DSO's professional competence are automatically escalated to the relevant individual or body.

**Recommendation 14:** The 'supervision agreement' between the RSL/NST, the DSO, and the DSO's line manager should be updated to include formal mechanisms for direct reporting. Specifically, the agreement should be amended to grant the RSL both the right and the obligation to report any concerns regarding the DSO's professional competence directly to the relevant individual or body. Should any party to this agreement inhibit a RSL from escalating a

legitimate concern regarding the application of policy in practice, a formal written letter from the National Director of Safeguarding should be sent to the body concerned (DBF or Chapter) and copied to the NSSG and Archbishops' Council highlighting and formally recording the issues. Furthermore, if such good practice is resisted and the concerns relate to any matter that could undermine any safeguarding practice, a Serious Incident Report to the Charity Commission should be considered.

In any case where a DSO or CSO fails to enter into an agreement which facilitates quality assurance, a formal record should be noted and provided to the appropriate governing body, e.g. the DBF or Chapter.

- 4.39 Finally, the Audit identifies RSLs as the critical link in the NST's broader communication and policy strategy. Currently, a disconnect exists where DSOs often learn about national policy shifts from parishes rather than through their RSLs; this must be addressed to ensure professional consistency.
- 4.40 Given the high calibre of most of the current RSL cohort, the Audit proposes that they adopt specific portfolio leads. For instance, an RSL would lead on the development, review, and revision of a particular policy area. To ensure these policies are informed by frontline experience, the lead RSL would invite a DSO representative from each region to join a dedicated portfolio group.
- 4.41 Under this model, the eight RSLs, in collaboration with the Learning and Development Lead, should establish specific areas of subject matter expertise. These groups will then feed directly into the proposed Virtual Church of England Safeguarding College, spearheading a 'campus' model that specialises in their respective portfolio developments.

**Recommendation 15:** Establish a formal 'Policy-to-Practice Feedback Loop'. While the RSLs lead the portfolios, the inclusion of DSOs should be framed as a statutory consultative step rather than an optional invite. This ensures that policy is not only "informed from the ground up" but also carries the mandate of those responsible for its local implementation. Furthermore, this portfolio model should be integrated into the Virtual College's digital repository, creating a single "Source of Truth" to eliminate the risk of parishes receiving information ahead of regional officers.

## Governance

- 4.42 To an external observer, governance within the Church of England can appear uniquely complex, layered, and multi-faceted. The various governing bodies across the institution hold a vast range of responsibilities that extend far beyond safeguarding; however, the narrative and recommendations within this report focus exclusively on the governance structures directly relevant to the national church and the NST safeguarding remit.
- 4.43 While numerous influential bodies exist within the Church, the primary governing body is the Archbishops' Council. Although other groups and committees may inform and influence strategic direction, the ultimate responsibility and accountability currently rest with it. It is the central pillar around which current national safeguarding policy and executive function revolve and is the body of Trustees responsible for the NST's work.
- 4.44 At the time of writing, the Church's governance landscape is undergoing a period of significant transition. Plans are in place to abolish the Archbishops' Council and establish a new NCI to be known as Church of England National Services (CENS). This new body will incorporate all the functions currently managed by both the Council and Church of England Central Services (ChECS). Parallel to this, the work of the Safeguarding

Structures Programme is actively steering the Church's oversight and governance infrastructure toward a new model, an evolution that this Audit identified at an early stage and fully supports.

4.45 To remain effective during this period of change, the Audit's findings and recommendations are presented in two distinct parts. The first set of recommendations focuses on delivering immediate improvements as an interim measure under current structures. The second set is designed to support and inform the long-term work of the Safeguarding Structures Programme as it shapes the future of the Church's national safeguarding framework.

4.46 At present, the Archbishops' Council whilst retaining ultimate governance responsibility, delegates oversight of safeguarding related matters to the NSSG. Historically, this group has been chaired by the Lead Safeguarding Bishop (a role subject to recommendations in this report) and comprised various individuals from across the Church. While the NSSG has undoubtedly produced positive work, there is a fundamental need for safeguarding oversight to be led by an independent safeguarding professional, distinct from the Church hierarchy and clergy. To address this, the Audit proposes the following structural changes as a matter of priority.

**Recommendation 16:** As an interim measure, the NSSG should be chaired by an appropriately qualified Independent Safeguarding Professional. The membership of the group must be reviewed and refreshed to ensure that independent individuals and safeguarding experts constitute the majority of its membership. Under this model, any Church Officers or clergy participating in the forum would do so 'in attendance'. Their role would be to provide advice on the specific ecclesiastical context and, where relevant, the requirements of Canon Law, rather than holding primary voting or decision-making power.

Until the proposed new national structures are fully implemented, this reconfigured NSSG should serve as the formal interim oversight body for safeguarding. This shift ensures that, even during this transitional phase, the Church facilitates an independent, more objective, professionalised approach to its safeguarding responsibilities.

4.47 The recently reinforced National Safeguarding Panel (NSP) should continue in its present form advising and feeding into the NSSG.

### **Optimising Governance, Oversight, and Accountability**

4.48 Having evaluated the existing governance model, this Audit maintains that any future framework must fundamentally guarantee the independence of the National Safeguarding Team or any body that replaces it. The Audit concludes that safeguarding governance should be vested in an independent charity to ensure the structure is fit for purpose. During early briefings with the Safeguarding Structures Programme team, auditors expressed the view that this represents the only viable long-term solution. This model provides the distance required for objective, independent governance through appropriately qualified Trustees. It also allows for scrutiny of operational safeguarding practice and its impact at national, Diocesan Board of Finance (DBF), and Cathedral levels. The Audit welcomes the Safeguarding Structures Programme's indication that its current 'direction of travel' aligns with this recommendation.

4.49 The Audit recognises that there are several mechanisms through which this independence could be achieved. The primary option is the establishment of a standalone charity, governed by a board of trustees and an independent chair whose professional expertise relates directly to safeguarding. Alternatively, there is the potential to constitute this new charity as a NCI of the Church of England. This approach would integrate the body within the Church's existing governance framework while still allowing for a board configured with the same roles, responsibilities, and independent rigour as a standard charitable entity.

4.50 Ultimately, the specific legal vehicle chosen is a matter for the Church of England's governance regime and the Safeguarding Structures Programme. However, regardless of the final form, the priority must remain the creation of a robust, professionalised, and independent oversight body that can command both public and internal confidence.

**Recommendation 17:** Moving forward, safeguarding activity across the Church of England should be governed and overseen by an independent charity. This entity should be directed by an appropriately constituted independent board, chaired by a credible and experienced safeguarding professional. In developing this approach, the Archbishops' Council and the Safeguarding Structures Programme team should evaluate the most effective commissioning and construction methods, ensuring this body maintains its independence and integrity.

The primary function of this new governance body must be to hold those operationally responsible for the delivery of safeguarding to account. It should be the ultimate reporting line for the most senior safeguarding professional within the Church of England, currently the National Director of Safeguarding.

4.51 While the Audit originally explored redesigning the 'National Director of Safeguarding' role as a Chief Executive to better reflect standard charitable governance, the Safeguarding Structures Programme's alternative proposal is a positive step. By adopting the title of Chief Safeguarding Officer, the organisation achieves a logical balance: it aligns the role with modern executive frameworks while maintaining a clear, specialised focus on its primary safeguarding mandate.

4.52 The National Director of Safeguarding (or future Chief Safeguarding Officer) must be the most authoritative operational voice on safeguarding within the Church. While this officer is inherently accountable to the future governing body, it is vital that this accountability is not confused with the authority to direct operational activity. That authority must rest solely

with the National Director / CSO and the professional safeguarding teams deployed across the Church's geography. This distinction is essential to protecting the operational independence of safeguarding professionals as they deliver their duties at every level of the institution.

4.53 Throughout 2024 and 2025, the Audit gathered extensive feedback from a wide range of individuals and groups regarding how independent scrutiny, beyond the existing periodic Audit framework, can be structurally reinforced. It is critical that a mechanism is established to enable an external body to engage with the Church of England to instigate, direct, oversee, supervise, or deliver investigations into complaints made against the institution and its officers. For such a body to be effective, it must command the full confidence of the general public, the wider Church community, and, critically, victims and survivors.

4.54 In exploring potential frameworks, the Audit has considered models successfully applied in other areas of public life, such as the Independent Office for Police Conduct (IOPC) and the Office of the Police Ombudsman for Northern Ireland. Both entities possess the authority to direct, oversee, or carry out investigations triggered by external complaints. However, a notable limitation in these models is the lack of a formal judicial function. The Audit believes that the Church's oversight processes would be significantly strengthened if the head of such a body had the explicit power to make formal findings and determinations.

4.55 To ensure the necessary expertise and authority, the Audit proposes that a Church Ombudsperson should lead such an organisation. This role should be held by a senior retired High Court Judge, or an individual of equivalent legal standing and credibility. Such a figure would have the requisite professional authority to make final decisions on cases

or complaints that may not meet a statutory or criminal threshold, but where a definitive judgement and outcome are required. Mirroring the established models already discussed, this Ombudsperson would be supported by a deputy, a secretariat, and a cadre of specialist professional investigators. Crucially, the office would require a clear legal basis upon which its findings could be formalised and its directions enforced.

**Recommendation 18:** Moving forward, the Church of England, the Safeguarding Structures Programme, and other relevant stakeholders should consider the establishment of a Church Ombudsperson’s Office. This office would be entirely external to the Church, providing a robust mechanism through which complaints can be independently assessed, actions directed, and formal findings made.

## 5 Prevention

### Safer Recruitment

- 5.1 As the NST is part of the Archbishop's Council, which is a NCI, its recruitment follows the NCI's recruitment policy. This policy adheres to the guidance provided in the House of Bishops' Safer Recruitment and People Management (SRPM) wherever applicable.
- 5.2 Safer recruitment procedures have been incorporated into all roles at the NST. For instance, job advertisements include a statement confirming the NST's commitment to safeguarding and safer recruitment. The essential elements of the person specification and the necessary pre-appointment checks are also clearly outlined. Additionally, interview questions are structured to ensure candidates have a strong understanding of safeguarding, appropriate to the role they are applying for.
- 5.3 Reflecting good practice, the NST has implemented a policy decision that all roles not subject to an Enhanced Disclosure and Barring Service (DBS) check will require a Basic DBS check. The records reviewed by the Audit showed that all NST staff have an up-to-date DBS check recorded within the last three years.
- 5.4 Upon the return of a confidential declaration form or DBS check containing disclosures or a 'blemish', the NST's established procedure outlines that the information must undergo an assessment by a safeguarding professional. The Audit was informed that this can be the appointing manager, provided they hold the necessary safeguarding experience, or a member of the SLT within the NST. The Audit believes this process could be improved by establishing a single, appropriately qualified, designated contact within the NST. This is consistent with the requirements detailed in Section 10 of the SRPM Guidance which states:

*“The process for assessment and decision making must include clear agreement as to who is the appropriate point of contact for advice from within the safeguarding team relevant to the Church body”<sup>10</sup>*

**Recommendation 19:** The NST should designate contacts who are suitably qualified within the team. These individuals will be responsible for providing safeguarding advice, undertaking risk assessments, and making final decisions in respect of disclosures returned via confidential declarations or DBS checks.

5.5 The NCI recruitment policy provides additional requirements and support for recruitment practices, such as mandating 'Confident Recruiter' training. The NST also follows the DBS Eligibility Guidance to determine which roles require an Enhanced DBS check, with or without a barred list check. However, the Audit identified some inconsistencies regarding the appropriate level of DBS check for certain positions. A key example of this is the NST Caseworker role, which is currently only subject to a Basic DBS check. The Audit is of the opinion that the core responsibilities of this role meet the criteria for either an Enhanced DBS check or an Enhanced DBS check with Barred List. This determination is based on, but not limited to, the role's sustained, direct, and advisory contact with survivors of abuse (and others), the advice or guidance provided (which includes advice regarding children), and the responsibility for managing complex, high-profile safeguarding cases. Crucially, this involves accessing highly sensitive information, including local police intelligence.

5.6 In addition, the Audit identified a discrepancy in the level of DBS checks carried out for individuals in the RSL role. Specifically, a small number of RSLs were subject to a Basic DBS check, while the majority of their colleagues in the same role underwent the Enhanced DBS check.

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<sup>10</sup> <https://www.churchofengland.org/safeguarding/safeguarding-e-manual/safer-recruitment-and-people-management-guidance/section-10-criminal-records>

**Recommendation 20:** The NST should review their understanding of the application of DBS eligibility criteria within all available statutory guidance. Following this review, a reassessment should be systematically applied to all roles within the organisation to ensure their correct compliance with the established criteria.

5.7 The Audit identified that some key NCI personnel responsible for recruitment practices held a limited view of 'safer recruitment', believing it only applied to roles requiring a DBS check. However, safer recruitment is a much broader set of practices designed to help prevent unsuitable people from working with children or vulnerable adults. It goes well beyond a simple DBS check, outlining that safeguarding principles are embedded into all stages of the hiring process, from the initial advertisement and shortlisting right through to the final induction. This comprehensive approach includes, but is not limited to, thorough vetting, specific interview questions, and detailed reference verification. That said, this commentary should not be interpreted as suggesting that these practices are currently absent within the NST. Instead, this point is made to ensure uniform understanding of the requirements across the NCI. As such, the following recommendation is made.

**Recommendation 21:** The NST should take action to address the misunderstanding that safer recruitment applies only to roles requiring a DBS check. To achieve this, the NST must ensure that everyone involved clearly understands that safer recruitment is a comprehensive and essential set of safeguarding principles. These principles must be embedded into every single stage of the hiring process, starting from the initial job advertisement right through to the successful candidate's induction. This requirement remains vital regardless of whether the specific position necessitates a DBS check.

5.8 Across the Church of England, the lines between HR and safeguarding are sometimes unclear. On occasions, the Audit saw evidence that issues or concerns in these areas can be blurred and/or misunderstood. Sometimes issues that should be dealt with as HR

conduct matters are passed to the Safeguarding Team to ensure an immediate robust response. It is therefore important to ensure a clear distinction between HR conduct matters and safeguarding to prevent tasking safeguarding resources and diverting them from their primary role.

**Recommendation 22:** The NST should establish a specialist HR capacity to provide expert advice tailored specifically to the CofE context (see Recommendation regarding the establishment of a Safeguarding Secretariat). This provision would offer comprehensive guidance on internal conduct and the crucial differentiation between HR and safeguarding matters. This specialist function would be a resource for all key stakeholders, including the Archbishops' Council, NCIs, dioceses, and cathedrals. A function of this resource could be, for example, to lead the development of a national framework or decision-making tool on classifying a concern as either safeguarding or HR, thereby ensuring essential consistency across the entire Church of England.

### National Safeguarding Standards

5.9 The CofE has established its own National Safeguarding Standards<sup>11</sup> to help it measure the quality and effectiveness of safeguarding. These standards provide a framework that brings together the complex nature of all safeguarding activities across the Church, ensuring that all such efforts, at every level, align with at least one standard. The NSSG approved these standards in July 2023.

5.10 The CofE has also produced a series of documents called 'Our Church'. This resource tailors the information to different contexts, currently divided into 'Our Parish', 'Our Cathedral', and 'Our Diocese'. Findings from the Audit's survey indicated positive perceptions of the National Safeguarding Standards from dioceses and cathedrals, with the majority of survey respondents agreeing that they are 'clear and accessible'.

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<sup>11</sup> <https://www.churchofengland.org/safeguarding/national-safeguarding-standards>

5.11 The Audit also found that the National Safeguarding Standards have been integrated into various other areas of practice within the NST. For instance, a recent training event was organised specifically around these standards. Furthermore, the supervision applied by the RSLs is structured to reflect the five standards, and the NST's three-year Strategic Plan is built on the National Safeguarding Standards. This is good practice.

### **Data-Driven Safeguarding**

5.12 The NST of the Church of England is committed to using a more intelligence-led approach, driven by data and analysis. By collecting and examining data, they aim to accurately assess safeguarding practices throughout the Church. This will enable them to deliver tangible value to local teams by identifying existing strengths and, crucially, areas that require improvement.

5.13 Given the NST's unique role and access to critical data, the Audit suggests that they should develop and agree on key datasets to identify trends, themes, and, if applicable, causal factors. This analysis could be transformed into actionable insights, such as bespoke reports, which would be shared directly with key stakeholders in dioceses and cathedrals. These insights could empower local teams to pre-emptively address emerging risks, identify knowledge gaps, and measure the impact of local, regional, and national initiatives.

5.14 Commencing in April 2025, the new Quality Assurance and Performance Manager began leading the Data Analysis, Research and Evaluation (DARE) Unit. Their main responsibility is to ensure the unit can meet the organisation's growing need for evidence-based safeguarding, strong performance monitoring, and thorough quality assurance. The Audit noted that this role will be instrumental in developing a more structured and systematic approach to gathering, analysing, and applying data. This will allow for more accurate progress tracking, better-informed national oversight and it will also help to inform safeguarding learning across the Church (as noted in the Learning, Supervision and

Support section of this report). Ultimately, this initiative will help the NST transition from providing broad, thematic insights to offering clear, evidence-based metrics that demonstrate how the Standards are being implemented across the Church. Furthermore, with the skills and expertise of its small but highly effective DARE Unit, and with sufficient resources and backing, the NST could and should aim to produce an Annual Strategic Safeguarding Assessment for the Church of England, ensuring a transparent, consistent and intelligence-led approach to safeguarding practice across the entire Church.

**Recommendation 23:** The NST should permanently expand the resource within the DARE Unit to meet the growing need for evidence-based safeguarding, performance monitoring, and quality assurance across the Church of England. It should produce a publicly available Annual Strategic Safeguarding Assessment identifying the progress made, and any persistent or emerging safeguarding trends, themes and patterns.

## Awareness Raising

5.15 As the national body responsible for developing and distributing safeguarding materials, the NST leads initiatives that focus on sharing information, updates, and resources through various internal and external channels. These efforts encompass a range of activities, including:

- **Communication Information Dissemination:** Distributing information through emails, newsletters, and digital and online resources. For example, the NST publishes several newsletters: a National Safeguarding Newsletter for professionals and senior church leadership, and a separate Survivor Participation Newsletter for victims and survivors, their advocates, survivor group leaders and any survivor support and advocacy organisation that acts on behalf of other victims and survivors. Some project board members subscribe to the Survivor Participation Newsletter to stay informed.
- **Meetings and Forums:** Organising planned and ad-hoc gatherings for discussion, collaboration, and peer support with dioceses and cathedrals. These include both

virtual and in-person sessions, such as the Safeguarding Officers Network Day and monthly drop-in sessions for safeguarding and church leaders. They also hold topic-specific drop-in sessions as required.

- Consultation and Collaboration: Engaging in a two-way flow of communication to build trust and jointly develop materials with stakeholders.
- Awareness Raising: Creating initiatives specifically designed to increase knowledge and understanding of safeguarding issues.

5.16 The Audit highlighted a concerted effort and a developing trend towards a more collaborative and integrated approach between national and local teams. The observed activities demonstrate a deliberate effort to bridge the gap and prevent an 'us versus them' mentality from forming between Diocesan Safeguarding Teams (DSTs) and the NST. This is exemplified by several initiatives, including a focus on increased integrated working, co-facilitation involving diocesan and cathedral stakeholders, bespoke coaching for NST staff, and enhanced cross-team collaboration within the NST itself.

5.17 However, the Audit notes that despite these efforts, their full impact has not yet been achieved. Feedback to the Audit from stakeholders within dioceses and cathedrals revealed a mixed perception of the effectiveness, timeliness, and cohesion of awareness-raising initiatives. These initiatives, while generally well-intentioned, did not always achieve their intended outcomes and were not always timely or consistently informed by key frontline data. Furthermore, there was a feeling that stakeholders' needs and desires were not meaningfully considered, resulting in a disconnect between the initiatives and what the community truly need.

5.18 A recent example of the need for a joined-up approach between national, local, and parish levels is the guidance sent to parishes and Parish Safeguarding Officers (PSOs) by the NST. The communication confirmed that the NSSG had directed the removal of several key documents from the national Church of England website, including the Parish

Safeguarding Handbook, the 2017 and 2006 versions of Promoting a Safer Church, and Protecting all God's Children (2019). The NST instructed PSOs to remove any hard copies of these documents and announced that a new Parish Safeguarding Toolkit was currently being created to replace them. This arbitrary move caused considerable confusion, prompting parishes to complain to their DSOs. When engaged by the Audit, DSOs also reflected a significant level of frustration due to the fact that they too had not been briefed and were therefore unable to appropriately pre-empt or respond to parish questions and concerns.

5.19 The NST has undertaken several initiatives to raise awareness of various safeguarding issues. They promoted the issue of domestic abuse (see Learning, Supervision and Support section of this report) through the White Ribbon Launch Event and explored topics associated with spiritual abuse at the Safeguarding Advisers Networking Day in March 2025. The NST has also promoted other learning opportunities, including The Clewer Institute's Modern Slavery Module, and face-to-face and online courses on spiritual abuse (Healthy Cultures) and Forgiveness and Deliverance Ministry. Moving forward, from June 2025, an external provider will provide training on recognising risk posed by those who have sexually harmed, while other training is being made available on Incels and Extreme Misogyny for parishes and safeguarding professionals. See also the section in this report Recognising, Assessing and Managing Risk. To provide the NST staff with a foundational understanding of Trauma-Informed Practice and to build upon their existing expertise, training was delivered by the Association for Psychological Therapies. This training aimed to both establish a baseline of knowledge and enhance their skills in this area.

5.20 Briefings have also covered a range of other issues. These include so-called 'conversion therapy', tools designed for PSOs to raise awareness of safeguarding, a fact sheet regarding youth-produced sexual imagery, guidance on responding effectively to domestic

abuse, and parish-specific resources, such as posters for promoting a safer church and signposting to Safe Spaces.<sup>12</sup>

5.21 The Audit recognises the importance of ensuring that all resources and materials shared by the NST are communicated in a clear and accessible manner. This must be in full alignment with the principles outlined in the Web Content Accessibility Guidelines (WCAG) 2.2 guidelines<sup>13</sup>. Accessibility of material within the Safeguarding Learning Portal is covered in the Learning, Supervision and Support section of this report. Web analytics have shown that the page hosting safeguarding templates and resources<sup>14</sup> for the national, diocesan, cathedral, and parish levels is consistently one of the top three most-visited safeguarding web pages on the site. This clearly demonstrates a high demand for such practical tools and guidance.

5.22 Given the widespread availability and utility of these resources and templates, the Audit recommends a more robust approach to ensuring their accessibility and compliance with the WCAG 2.2. For example, the main Church of England safeguarding landing page on the website, at <https://www.churchofengland.org/safeguarding>, currently has a sub-menu to access other pages. Based on the web analytics data provided, the Audit believes this data should be used to improve the menu's hierarchy. The page for 'templates and resources' is one of the most frequently visited, yet it isn't featured as a sub-menu item on the main safeguarding landing page. This is a key area for improvement.

**Recommendation 24:** The NST should undertake a comprehensive review of the safeguarding webpages on its website. This should begin with an inventory of all existing safeguarding content and an analysis of user behaviour, leveraging website analytics to understand current usage. Following this, the sub-menus and overall content structure should be optimised based

<sup>12</sup> Safe Spaces is a free and independent support service, providing a confidential, personal and safe space for anyone who has been abused by someone in the Church or as a result of their relationship with the Church of England, the Catholic Church in England and Wales or the Church in Wales. <https://safespacesenglandandwales.org.uk/>

<sup>13</sup> <https://www.w3.org/TR/WCAG22/>

<sup>14</sup> <https://www.churchofengland.org/safeguarding/policy-practice-guidance/templates-and-resources>

on both user feedback and the analytics data, ensuring the pages effectively meet the needs of all key stakeholders.

A vital part of this review will be the creation of a dedicated landing page for Victim and Survivor support and engagement, employing clear and relevant sub-menus. This is essential to ensure that crucial victim and survivor information is highly accessible and easy for users to navigate.

Crucially, every page identified in this process must be assessed for compliance with the WCAG 2.2 accessibility guidelines.

**Recommendation 25:** To build on the benefits that the safeguarding webpages provide to dioceses, cathedrals and parishes, the NST should develop a more extensive library of resources and templates. This could be through the creation of a Safeguarding Resource Library.

To achieve this, they could compile a comprehensive list of all relevant documents and resources to host on their website. These can be sourced from existing national materials and good practice examples from different dioceses and cathedrals. An internal team should then review these resources to ensure they are clear and consistent.

Given that many dioceses already have their own local resources and templates, the NST could adopt a collaborative approach by seeking input from dioceses and cathedrals. To streamline this, a process could be established where dioceses and cathedrals:

- a) Identify the resources they have.
- b) Align them with the corresponding national safeguarding standard.
- c) Agree to terms and conditions set by the NST. These terms would ensure the resources meet agreed-upon standards, such as verifying that the copyright of any images or material used is secure and that the resource has been appropriately quality-assured.

## Public Facing Communication on Social Media.

- 5.23 The Audit observed a considered and measured approach at national level to responding to safeguarding media enquiries.
- 5.24 The NST plays a crucial role in providing essential policy, guidance, and resources to various Church of England institutions. However, the Audit has identified a significant opportunity to improve public and stakeholder awareness of these vital materials and activities.
- 5.25 The Audit recommends leveraging existing communication channels to more actively promote the availability of these safeguarding resources. While the NST does not communicate directly with parishioners, a robust network is already in place through the principal Church of England social media platforms. By building proactive messaging about the safeguarding materials into these channels, the Audit takes the view that all stakeholders, including dioceses, cathedrals, and parishes, would greatly benefit. Importantly, these key safeguarding messages must be delivered with nuance and a tone appropriate to the subject matter and platform, moving beyond basic announcements to cover a broad spectrum of topics that fall under the safeguarding banner.

**Recommendation 26:** The NST should adjust its communication plan to include key safeguarding messages via its digital channels. This updated strategy should be explicitly role-specific, ensuring content is precisely targeted and relevant to the diverse stakeholders, be they staff, volunteers, or the general public. In order to enhance this engagement, it should:

- a) Tailor content to resonate with the specific interests and preferences of followers on each platform.
- b) Employ diverse communication strategies suited to each platform's unique features and user expectations. For example, short-form portrait video, polls and support local events with targeted location-specific information.

- c) Capitalise on relevant awareness days, campaigns, and events to amplify key messages and expand audience engagement.
- d) The plan must also incorporate a robust process for capturing and analysing performance data to provide vital insight that will continuously inform and improve all future communications efforts.

### **Multilevel Safeguarding Discussions**

5.26 In addition to the regular NST meetings, the SLT address and support the development of strategic safeguarding issues across the wider church via participation in a range of forums. These include participation in the Clergy Discipline Measure Commission and the Clergy Personal Files Review, as well as engagement with the Christian Forum for Safeguarding, an ecumenical body. The team also works closely with the National Ministry Group, the Parish Safeguarding Network, and the Diocesan Secretary Safeguarding Forum. Further discussions occur at meetings held at Lambeth and Bishopthorpe Palace with the NST, and within the Anglican-Methodist Safeguarding Forum. The SLT was involved with the West Midlands DSAP Chairs Network Meeting, the Wilkinson/Jay Response Group, and the White Ribbon Accreditation Steering Group. Safeguarding is also a key topic at the Scolding Working Group, the HM Government Mandatory Reporting Consultation, and the General Synod, along with six-monthly forums with victim/survivor groups.

5.27 Additionally, the team engages with Local Ecumenical Partnership Policy Leads, the National Working Group on Spiritual and Ritual Abuse, and the Parish Safeguarding Dashboard Executive Group. The SLT's reach extends to the Church of England External HR Network, the Kent art e-book project, and the Cathedral Safeguarding Network. Discussions also take place within the National Safeguarding Casework Management System User Group, the IICSA 1 & 8 Audit Preparation Forum, the Out-of-school Settings

Faith Steering Group, the Theology and Safeguarding Group, and forums for Cross-Denominational Training Leads and the 30K Youth and Lay Workers Project.

**Recommendation 27:** Given the depth and breadth of such engagement and to ensure a coherent and consistent approach, a member of the SLT or the Chief of Staff (if such a post is agreed) should review and ensure alignment with SLT business areas and responsibilities.

## Safeguarding in Children and Youth Ministry

5.28 Children and Youth ministry is an area of significant strategic growth for the Church. A primary objective of Archbishops' Council is 'A Younger Church'. In recognition of this commitment, in 2024 the Council's Strategic Mission and Ministry Investment Board (SMMIB) has supported this objective by significant financial backing, with £97.3 million distributed through the Diocesan Investment Programme (DIP) and a further £3.8 million via People and Partnerships Funding (PPF). Significantly, almost 30% of these total allocations to dioceses were earmarked specifically for youth engagement, discipleship, and leadership development.<sup>15</sup>

5.29 However, feedback suggests the grant application process requires very little detail from applicants regarding their safeguarding arrangements and current stipulations do not explicitly highlight opportunities for financial support directly aligned to such initiatives. Furthermore, the requirements prevent allocated funds from being used to support "business as usual" services from already over-stretched Diocesan Safeguarding Teams. Consequently, the Audit finds it difficult to reconcile the distribution of such significant sums to youth-focused ministries without a proportional allocation for the safeguarding infrastructure required to protect them. To ensure the vision of 'A Younger Church' is both

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<sup>15</sup> The Archbishops' Council Annual Report and Financial Statements, YEAR ENDED 31 DECEMBER 2024, Page 7, Objective 1, A Younger Church, <https://www.churchofengland.org/sites/default/files/2025-07/archbishops-council-annual-report-2024-updated-22-07-2025.pdf>

sustainable and 'safer by design', the financial commitment to growth must be matched by a commitment to protection. By aligning funding criteria with safeguarding requirements, the Church will address the current disconnect between ministerial expansion and the essential support services provided by safeguarding.

**Recommendation 28:** In recognition of the unique risks and complex safeguarding considerations inherent in children and youth-focussed ministries, it is recommended that Archbishops' Council, with the advice of the NST, and the Strategic Mission and Ministry Investment Board (SMMIB) undertake the following:

- a) Integrate Safeguarding into the application process: The SMMIB should mandate that all future funding applications for Children and Young People ministries include a comprehensive outline of safeguarding measures and delivery arrangements. Evidence of robust oversight must be a prerequisite for the approval of any Diocesan Investment Programme (DIP) or People and Partnerships Funding (PPF).
- b) Permit Proportional DIP Funding for Safeguarding Infrastructure: Current DIP funding stipulations should allow for a proportional allocation of grant monies to be directed towards safeguarding support services. This ensures that the expansion of youth ministry is accompanied by the necessary investment in Diocesan Safeguarding Teams and the professional infrastructure required to protect participants.

5.30 An ambitious goal has been set: to double the number of children and young people engaging with the Church by 2030<sup>16</sup>. This objective not only presents a significant opportunity for development but also carries a corresponding and crucial safeguarding responsibility. In light of this ambition, the Audit noted a strong commitment to achieving it

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<sup>16</sup> <https://www.churchofengland.org/about/children-and-young-people/doubling-number-children-and-young-people>

effectively and safely. To this end, the nationally funded 30K Project<sup>17</sup> aims to bring about change by raising up 30,000 new children and youth leaders by 2030. This project has developed resources specifically designed to help churches plan and execute volunteer recruitment campaigns. These national materials provide guidance across several key areas: they equip churches with the necessary resources to run the campaign; they offer a plan to support its success; they give detailed guidance on how to recruit volunteers well and safely; and finally, they provide advice on how best to support and retain volunteers moving forward.

5.31 However, while recognising the value of these ambitions to grow a younger Church, the Audit maintains that the unique safeguarding risks inherent in this area necessitate a concerted, collaborative, and robust response. At present there are currently significant challenges, gaps, and opportunities within children and youth ministry across the Church. For instance, a recent research report ('Taking the Pulse of Ministry' October 2024) highlighted mixed perspectives on youth work conducted in private dwellings, an area which presents specific safeguarding risks for both children/young people and youth workers.<sup>18</sup>

5.32 In addition, it is evident that the online world is now a major part of church life, and this is creating safeguarding risks for children and young people. Existing initiatives and guidance do cover some aspects of digital safety, such as the training recently commissioned by the NST on topics like Incels and Extreme Misogyny. However, the growth of online interaction, social media use, digital discipleship and informal communication channels introduces further vulnerabilities that require specialist expertise. The Audit noted that

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<sup>17</sup> <https://www.churchofengland.org/30kproject>

<sup>18</sup> Within the responses regarding youth work in private dwellings, 20% of respondents were unaware that this was an issue, and a further 15% were unsure or considered the matter difficult. Although 21% expressed positive experiences or could see the benefits, 11% either understood the issues or stated they did not partake in youth work in private dwellings. Tellingly, one-third of all respondents wrote specifically about safeguarding concerns related to this topic.  
[https://cym.ac.uk/assets/files/Taking\\_the\\_Pulse\\_of\\_Ministry\\_Research\\_Report\\_%28Page\\_View%29.pdf](https://cym.ac.uk/assets/files/Taking_the_Pulse_of_Ministry_Research_Report_%28Page_View%29.pdf)

while some staff have strong individual insight in this area, there is not yet a coordinated national approach that fully embeds digital safeguarding into youth ministry policy, training or operational practice. Stakeholders stressed that this gap has the potential to expose young people and adult staff and volunteers to unmanaged risk.

5.33 Crucially, there must be a focus on equipping this workforce to effectively manage the widespread, complex issues they face in their ministry contexts, including the challenges of mental health, support for neurodiversity, Special Educational Needs and Disabilities (SEND) and digital safeguarding. Existing initiatives and guidance do cover some aspects of digital safety, such as the training recently commissioned by the NST on topics like Online Safety as well as Incels and Extreme Misogyny. However, the ongoing growth of online interaction, social media use, digital discipleship and informal communication channels introduces further vulnerabilities that require specialist expertise. Generic digital safety advice is no longer sufficient; instead, training must be tailored to the unique nuances of the church environment. This is particularly relevant for youth ministry, where active engagement and pastoral support can take place through digital channels like WhatsApp. Future training must move beyond merely identifying the scale of these problems. To be truly effective, it must provide practitioners with tangible, actionable solutions and clear guidance that can be applied directly to their specific contexts.

5.34 Furthermore, the impact of austerity measures is evident at the local level, diminishing the capacity of organisations, such as Churches and dioceses, to fund and execute preventative activities within this vital area of work. Given these difficulties, the Audit believes that the NST is well positioned to offer clarity, consistency and outline expectations by issuing a national strategy and framework.

5.35 The Audit found that although there is a strong appetite for formally recording data about

paid staff involved in children's and youth ministry, and a clear understanding of the benefits, the Church does not yet have a national mechanism to identify these individuals or provide consistent oversight.

- 5.36 This lack of quality data and records, makes it challenging to consistently share information, respond collectively and effectively to safeguarding issues affecting youth ministry, or ensure that individuals in youth-facing roles receive the appropriate training and support. Implementing a national system would significantly enhance consistency, establish clearer lines of accountability, and ultimately support a safer structure for children and youth ministry, particularly at a time when a high volume of youth-focused recruitment is likely to happen through the 30k project.
- 5.37 Given the current limitations of the national data collection, the Audit suggests that this area could be significantly strengthened by driving more rigorous, detailed data collection locally within the dioceses. This locally-driven approach would serve to better support the NST in its national oversight role and could be further aided by the expertise of the Data Analysis, Research and Evaluation (DARE) Unit.
- 5.38 Based on the Audit's findings, there was a limited extent of participation, co-production, and engagement with children and young people at the national level. This lack of direct input was further reflected in the Audit's surveys, where a small minority of the workforce, spanning national, diocesan, and cathedral staff, believed that the NST effectively incorporated the voices of children and young people into its policies and initiatives. Specifically, only a little over one in ten respondents agreed with the statement: "*The NST effectively incorporates the voices of children and young people in its development of policies and initiatives.*"

**Recommendation 29:** The NST and the wider Archbishops' Council should establish a national safeguarding strategy for Children and Youth Ministries. This strategy should adopt a collaborative, coordinated, and holistic approach, with part of the implementation and local data collection being driven locally in dioceses in support of the NST's national oversight role.

This national strategy could include, but not be limited to the following objectives:

- a) Mapping of Programme Types: Scope the extent and the types of children and youth activities taking place across the dioceses.
- b) Workforce Oversight and Data: To establish an ambition and work plan to support dioceses in identifying and maintaining oversight of all paid and volunteer children and youth workers, feeding this critical data into a national database.
- c) Stakeholder Participation: To ensure appropriate consultation and engagement with children, youth, and their leaders through specific participation activities.
- d) A Tailored Learning Programme: To develop and implement safeguarding training that is specific to children and youth ministry, ensuring it is effectively tailored to both the individual's role (e.g., volunteer leader, paid worker, clergy) and the regional context in which they serve.

**Recommendation 30:** A collaborative and coordinated approach should be adopted for further development of national safeguarding guidance within the context of children and youth ministries. This should commence with a mapping exercise, conducted simultaneously with the identification of any existing gaps.

This approach should include robust quality assurance mechanisms and specialist safeguarding advice and input. The objective would be to establish a centralised, resource for the House of Bishops' Safeguarding Guidance (specifically as a 'due regard' or 'requirement to comply') and integrate it fully into the Church of England's Safeguarding e-manual.

5.39 Feedback from diocesan and cathedral staff highlighted the need for children and youth focused safeguarding training that is tailored to both role and region. Youth and children’s workers, clergy, volunteers, music department staff and those with governance responsibilities have reported that generic safeguarding training does not always provide the detail or practical relevance required for working safely with children and young people. Whilst it is positive that some safeguarding courses allow for a more specific case study to be chosen for cathedral staff, bell ringers, children and youth workers and chaplains, staff were clear that this does not always meet the specific learning needs of those delivering children and youth ministry or working closely with young people in musical contexts. This challenge is explored further in the Learning, Supervision and Support section with a corresponding recommendation.

5.40 Children and youth ministries operate in diverse settings and encompass a broad range of activities. Consequently, safeguarding in this area is highly specific and necessitates dedicated, specialist expertise. However, the Audit highlighted a significant gap: across the Archbishops’ Council and its associated teams (which includes the NST), there is currently no access to dedicated safeguarding resources with a specific focus on children and youth. For example, the Audit saw and heard evidence that an external consultant was required to review partner policies and provide advice on youth-facing initiatives. Stakeholders, including the Audit’s CofE Safeguarding Audit Reference Group (made up of safeguarding professionals across the Church) described this as a ‘significant vulnerability’, particularly given the rapid growth of youth-focused programmes and partnerships across the Church. The absence of an embedded dedicated resource also limits the NST’s ability to shape policy, influence safer practice and anticipate risk emerging from any new models of youth engagement, such as the use of digital channels and social media for youth ministry.

**Recommendation 31:** Establish a specialist children and youth safeguarding function embedded within the existing NST structure. This dedicated capacity should provide expert advice, strengthen national oversight of youth-facing ministries and partnerships, and ensure the Church's ambitions for children and young people are delivered safely. Whilst this is a decision for the NST, the Audit believes this function should be hosted within the Operational Support Service area.

5.41 The Audit identified a further gap in confidence and capability among staff and volunteers at the parish level regarding offender behaviour. Diocesan teams noted that youth facing adults do not always recognise indicators such as minimisation, grooming, boundary testing or patterns of manipulation. While some bespoke work has begun in certain settings, this is not consistent or widely available. Given the themes emerging from past cases and the increasing complexity of youth ministry, a structured national offer on offender behaviour is required. Again, this is covered in more detail elsewhere in this report.

## 6 Recognising, Assessing and Managing Risk

### Risk Register

- 6.1 The NST recognises the importance of actively monitoring and managing safeguarding-related risks across its specific operations and the wider footprint of the Church of England. In terms of core strategic risks, the primary governance structures within the CofE include mechanisms that facilitate their oversight. Any such risks identified by the NST are formally reported to the Church's senior body, the Archbishops' Council Audit and Risk Committee (ARC). While these are reviewed by the ARC, the six-monthly cycle of scrutiny, is, in the Audit's opinion, too long to sufficiently allow for scrutiny on risk mitigation. This cycle should shift to a minimum of quarterly. Major initiatives, such as the Redress Project, also actively incorporate risk management by maintaining explicit risk registers.
- 6.2 Within the NST, risk identification has been more outward facing, as opposed to an exercise that examines the risks that might be inherent within the NST itself. This has been recognised by the NST, and work is underway to develop a defined, internal risk and issue register. Once launched, the NST's senior leadership team intends to review this register on a quarterly basis. This is positive and the right action to take.
- 6.3 In addition to the evidence that the NST and the wider Church are adopting a more proactive and reflective approach to risk management, the Audit also highlighted the NST's use of overarching trackers. These tools are specifically designed to monitor both Local SPR recommendations and National Report recommendations, ensuring consistent oversight across the organisation.

### Triaging of Cases/Threshold

- 6.4 The NST Casework team's intake system is centralised around the dedicated safeguarding

email inbox, which operates as the 'first port of call' and a vital 'linchpin' for communication during business hours, Monday to Friday, 9 a.m. to 5 p.m. The volume of correspondence is highly volatile, surging significantly following media coverage of high-profile cases. NST caseworkers triage all incoming concerns, applying their professional judgement and experience to determine if the concern meets the safeguarding threshold and falls within the NST's specific national remit.

- 6.5 The Audit saw evidence of good practice by the NST, with caseworkers effectively receiving referrals, collating information and analysing cases. There was evidence of escalation to senior managers as appropriate, swift triage and allocations being accompanied by a written brief from the casework manager.
- 6.6 A persistent operational challenge reported by the NST was the volume of referrals it receives about non-safeguarding cases or those outside of its specific remit. These were said to often relate to conduct or disciplinary issues and while not actionable by the NST, their volume (alongside the many other generic contacts the team receives) was noted to be impacting capacity.
- 6.7 The correlation with the need for clarity on key definitions (such as what constitutes a vulnerable adult) was recognised by the NST, with improvements in this context likely to guide referrers and the NST itself by way of threshold decisions. As such, the final clarification and embedding of the CofE's Managing Allegations Code of Practice (2025) will be essential to help in this context.

### **Case Management and NSCMS**

- 6.8 The NST's casework team is primarily mandated to manage safeguarding risks involving bishops or deans, cases spanning multiple dioceses, or matters deemed as complex or of significant national interest. As of July 2025, the casework team comprised six dedicated

workers. As with local areas, the National Safeguarding Casework Management System (NSCMS) is the official system for recording NST casework activity.

- 6.9 While the NSCMS is viewed as a significant improvement, it was described as 'clunky' and not yet being used to its full potential. A major limitation is the system's limited capacity for performance monitoring and producing strategic reports. This has been previously articulated in other Audit reports. Specifically relating to the NST, not all the contacts it receives are entered onto the system, only those that are 'actioned'. This leaves a gap in terms of the ability of the NST to more broadly analyse the effectiveness of its decision making as it relates to this cohort of cases.
- 6.10 Comparing the NST's arrangements to how a Multi-Agency Safeguarding Hub (MASH) might work in respect of children, when contacts are made to a MASH, these are all formally recorded, even where the threshold for action by children's social care has not been met. This way of working provides an auditable set of data that can be interrogated by managers. It allows for comparisons to be examined about how many contacts translate to referrals; activity that is important when reviewing the impact of early support or the wider understanding amongst professionals about which pathways to use and when. In respect of the NST's functions, the absence of such recording means it cannot explore this in any depth, with the team relying more broadly on its experience and potential anecdote as opposed to hard data that can help determine resource requirements or other activity necessary within (and outside) of the team.

**Recommendation 32:** The NST should adopt a formal recording model by implementing a structured Safeguarding Contact Framework. This transition moves away from a reliance on anecdotal evidence and creates a data-driven approach similar to a Multi-Agency Safeguarding Hub (MASH), ensuring full compliance with UK data protection standards.

The NST should replace informal, memory-based systems with a formal, auditable registry. A standardised 'Initial Contact' protocol should be integrated into the existing Case Management System to ensure every contact is recorded, including those that do not meet the threshold for immediate intervention. This provides a single source of information for managers to analyse trends, identify recurring patterns of concern, and allocate resources accurately.

The NST is required to update its Privacy Notice to satisfy the UK GDPR principles of lawfulness, fairness, and transparency. This update must inform individuals that data is recorded for audit and trend analysis under the legal basis of substantial public interest. Explicitly documenting that this data helps identify cumulative risk over time provides a defence against potential challenges from the Information Commissioner's Office (ICO) regarding the necessity of storing records where no action was taken.

A tiered retention and anonymisation strategy should be introduced to address the principle of data minimisation. A two-stage system is recommended where contacts that do not result in a referral are kept in a searchable format for a set period (based on existing protocols) for example two years or more if permissible, to monitor for repeat patterns. After this window, personal identifiers should be removed, leaving only the data required for long-term strategic planning.

Regular managerial audits should be established to compare the volume of initial contacts against successful referrals. These audits will provide a clear picture of the impact of early support and ensure the NST operates within a professional, auditable, and legally sound environment rather than relying on fallible memories.

6.11 From the data that was available to the Audit, 63 cases were identified as being recorded on the NSCMS as being open to the casework team. The vast majority of these were

initiated between 2022 and 2025, with a single older anomaly dating back to 2013. Eleven were reported in 2022, one in 2023, 11 again in 2024, and 39 in 2025.

- 6.12 The average time these cases had been open was 396 days, with the full range of case duration being varied. The longest running case had been open for over three years, while the shortest, and most recently reported concern, had only been open for six days.
- 6.13 From the case list examined, a distinct relationship was noted between the nature of a concern and its open duration. As would be expected, there was a correlation between case complexity (determined by category) and the time required for resolution. Specific case types relating to historical abuse, spiritual or faith-related abuse, and abuse of trust had all been open for significantly longer on average. This was likely due to the inherent difficulties in investigating older incidents, such as the challenges in gathering evidence or witnesses after a significant passage of time. Conversely, cases with the shortest average open times generally related to advice, communication issues, or very recent concerns.
- 6.14 For most of the open cases, there was evidence of ongoing action and records being kept up to date by allocated workers. There was also evidence of supervision by NST managers. For those where recording was not as recent, the records indicated a relevant rationale, such as the NST awaiting the outcome of criminal action before determining its next steps.
- 6.15 An analysis of the priority marking and risk ratings on the open cases revealed some important issues potentially impacting on case oversight. When viewing cases live in the NSCMS, only one case was formally marked as a *'Priority Concern'* (thus raising its status to the top of the case list). Furthermore, 36 cases were risk-rated as 'High,' 17 as 'Medium', and ten as 'Low'.

- 6.16 However, when viewing this data outside of the NSCMS, the exported data was inaccurate. Despite what had been recorded on the system, the output data showed no cases marked as High risk. Whilst this fault might be known to the NST, its presence represents a potential impediment nonetheless, particularly for managers conducting detailed off-system analysis. The exported data also contained other errors, with a 'Concern Filed' column (duplicating the 'date occurred' column) misleadingly suggesting case closure. These issues with the NSCMS reflect the Audit's previous critique of this system.
- 6.17 In terms of the themes evident within the open cases, '*Failure to meet Safeguarding Requirements*' was the most frequently cited, with 28 instances. Other prominent categories included *Child Protection Sexual Abuse* and *Adult Safeguarding - Sexual Concerns*, both cited ten times.
- 6.18 The largest source of concerns was recorded as undefined 'Other' with 16 instances, followed by '*DSOs*' and '*Other Diocese*'. The geographic distribution, when grouped by UK region, indicated that the highest concentration of open concerns was derived from London with 12 cases, and the East of England with eight. Finally, the workload distribution among caseworkers appeared to be uneven, with two individuals managing the highest caseloads of 15 and 14 cases respectively, while three other caseworkers had eight cases each. This suggests a potential imbalance in resource allocation or a specialisation in case types that may be assigned to the most experienced caseworkers.
- 6.19 To provide an accurate picture of the themes, patterns and trends across all NST cases, the Audit also evaluated a sample of those that had been formally filed (closed). These concentrated on 101 cases with filed dates ranging from 3 January 2025 to 5 November 2025.
- 6.20 The average duration of this cohort of cases was 34 days. This figure is significantly lower

than the average of those remaining open, reflecting activity against which faster processing times were possible. The longest running case closed in this period had a duration of approximately six months. The shortest running case was reported and closed on the same day.

- 6.21 The categories of recently closed cases are highly concentrated in administrative or preliminary categories. The most common category of *'Other/Not Specified,'* accounted for 55 cases. This was followed by *'Failure to meet Safeguarding Requirements'* with 20 cases, and *'Advice/Triage'* with 18 cases. These three categories account for nearly 92% of all recent closures. When examining complexity through average duration, the longest-running filed cases related to *'Abuse of Position of Trust'* and *'Psychological Abuse'*. The pattern of these themes largely aligns with cases likely to require longer investigative periods.
- 6.22 The reasons cited for formally filing a concern offer further insight into the outcome of the triage and/or investigative processes. The most common filing reason is *'No further action required,'* which accounts for 40 of the 101 closures. This suggests that the concerns raised with the NST, particularly those falling into the *'Other/Not Specified'* or *'Advice/Triage'* categories, did not require escalation. Alongside the other contacts that the NST receive (that do not result in a formal entry on the NSCMS), there is the obvious question about whether the NST's optimal performance is being impeded by the volume of referred cases that fall outside of its parameters.
- 6.23 This issue is also reflected in the second most frequent reason identified in the filed cases. *'Not Safeguarding'* was recorded as an outcome against 30 cases, with these being outside the scope of the NST's remit. *'Learning outcome'* was cited for ten cases with the remaining 21 cases being filed for a combination of other reasons, including *'Referred to other body,'* *'Resolved,'* and *'Case transferred,'* among others.

- 6.24 As with the open cases, the highest number of concerns were derived from 'Other' (28 cases), 'DSOs' (18 cases) and 'Other Diocese' (17 cases). The representative DSO and 'Other Diocese' figures in both open and filed cases suggests an appropriate awareness of escalation routes in local areas and the NST's expertise and support being sought.
- 6.25 In terms of geography, 'Not Applicable' remains the highest location, accounting for 22 concerns. This indicates that a fifth of recent closures relate to individuals or issues without a specific geographic link. For dioceses, the South East and East of England both recorded the highest number of filed concerns.
- 6.26 In terms of caseloads, the processing of the filed cases is highly concentrated among a few team members, with the NST's Casework Manager recorded as handling 44% of all cases closed since January 2025. This indicates their direct engagement within the triage process and direct action on particular cases.
- 6.27 Evaluation of the NST's use of the NSCMS identified some good examples of diligent record keeping, with clear evidence of management oversight. Notwithstanding some of the system's limitations, the team was making best use of it. The absence of a consistent naming convention or recording structure for recurring document types continues to make the files section difficult to analyse and is an aspect that could be improved with some clear structure and guidance. There were also some examples seen where draft documentation was being uploaded, creating duplications and making it difficult to identify the final record.
- 6.28 The chronology section in the NSCMS was seen to provide a coherent account of the key events in many of the cases reviewed. While noting the ability to enter an 'occurrence date' within the chronology, the absence of any hyperlink functionality from the chronology to the core documentation (that is saved in the Files section and only ordered by upload date

(not occurrence date)) remains an inhibitor in helping the team utilise the system to best effect.

6.29 Given the Audit's findings, NST casework must be addressed as a priority area. The fact that a 'manager' is holding 40% of cases, and the number which are outstanding for a significant period is concerning. The Audit therefore makes the following recommendations.

**Recommendation 33:** To strengthen practice on casework, the NST should:

- a) Review current caseloads and case allocations to ensure equitable distribution and that those carrying additional cases, including managers, have the necessary support and whether additional resource is needed.
- b) Introduce formal naming conventions for different event/document types and mandate their use.
- c) Cease the practice of uploading draft documentation unless it is clearly marked with proper version control and a consistent naming convention. All such drafts should be hidden/deleted upon completion of the final record.
- d) Explore the potential for the 'Files' section of the NSCMS to identify document dates, as opposed to simply recording their upload date.

### Outcomes of Cases

6.30 For the cases managed by the NST, the outcome process concludes with the caseworker producing an investigation report containing conclusions and recommendations that are specifically focused on managing risk.

6.31 Caseworkers are legally unable to direct action but use a 'coaching' style to help colleagues work through challenges and ensure risk is managed effectively.

6.32 Evidence was seen of the NST's approach to casework being person-centred and trauma-informed, particularly when communicating outcomes to victims and survivors. This typically involved a verbal debrief followed by a formal letter. That said, survey data indicates, that just over 25% felt the outcome of their case was clearly explained to them. In terms of recommending the Casework Team to other victims and survivors, responses were 50/50 with communication being a particular area of challenge.

### **National Direction and Operational Standards for the NSCMS**

6.33 The CofE made the national decision to implement 'MyConcern' as its designated National Safeguarding Case Management System (NSCMS). It was reported to the Audit that the selection of this specific system was driven by it being the lowest-cost option available at the time. Under the initial provision, the Archbishops' Council agreed to centralise funding, covering all participant costs until the end of 2023. However, following the conclusion of that period, service fees for the NSCMS are now met by individual participating bodies through a series of 'back-to-back' agreements.

6.34 The Audit team acknowledges the documentation provided, specifically the Guiding Principles and the NSCMS User Guides. The Audit is also well-acquainted with the remit of the Safeguarding Advisor Reference Group, which is intended to be instrumental in expanding the reach and engagement of the NSCMS project. By refining system requirements, the group aims to ensure the project maximises both the operational benefits and the wider opportunities the system offers. However, the Audit noted observations indicating that critical feedback raised by and to this group was left unaddressed or unimplemented.

6.35 Findings from Audits conducted across 2024 and 2025 highlight challenges regarding the platform's efficacy. Direct observations and stakeholder feedback suggest that, in its current state, the NSCMS is not ideal given the unique operational requirements and

complexities of the Church's safeguarding environment.

6.36 Furthermore, although the system features a standardised configuration with uniform filters and categories, audits conducted across 22 Diocesan Boards of Finance (DBFs) have highlighted a significant lack of consistency in how MyConcern is actually used. This discrepancy suggests that, while the software itself is uniform, its practical application varies considerably from one diocese to another.

6.37 The NST Risk Register acknowledges some of these challenges. Specifically, there is a recorded risk that the 'MyConcern' product may evolve primarily toward the education sector, eventually failing to meet the Church's requirements and necessitating significant reinvestment in a new supplier. Current mitigations include:

- Proactive Supplier Engagement: Maintaining close contact with the provider to monitor their development roadmap and identify any deviations from the Church's needs.
- Governance Reporting: Providing regular updates to governance groups to facilitate long-term budgetary planning.

6.38 In light of these findings, the Audit concludes that current arrangements require further strengthening to ensure risks are managed with sufficient rigour.

**Recommendation 34:** The NST should develop and issue comprehensive national guidance to refine the use of the NSCMS across diocesan teams. This policy should move beyond basic functionality to establish clear, standardised principles for professional recording. Specifically, the guidance should address the following areas:

- Clarity on the specific types and thresholds of safeguarding concerns that require formal entry into the system. This should include a clear protocol for recording 'advice-only' interactions, such as when a diocesan team provides guidance to a parish, to ensure such interventions are captured consistently.

- Provide a framework for the decisions safeguarding teams make when allocating risk levels. This should include the specific criteria to be used when determining a risk rating, ensuring that risk is assessed and recorded uniformly across the Church.
- To improve the quality of casework oversight, the use of chronologies within the system should be reviewed. Recording should shift from a simple index of all administrative activity toward a practice-led approach that highlights ‘significant events,’ providing a more meaningful narrative of the safeguarding journey.
- A requirement that a clear and comprehensive rationale is recorded for all decisions. Documentation should explicitly detail the justification for both the commencement of specific actions and crucially, the decision-making criteria applied when a standard intervention is deemed unnecessary or is intentionally omitted.
- Introduce and enforce formal naming conventions for all file types to ensure data remains organised, searchable, and consistent across different dioceses.

**Recommendation 35:** Given the reluctance of the current provider to adapt the software to meet the specific needs of the church, the NST should undertake a contingency planning exercise to identify a potential replacement to the current NSCMS.

### Implementing a Unified Threshold Tool

6.39 Evidence from the Independent Safeguarding Audit’s 2024 Annual Report suggests that a nationally prescribed ‘threshold tool’ would be beneficial in driving uniformity and improved decision-making across all dioceses. The Audit acknowledges that the NST has already initiated steps to commission this work as part of its current workplan. To be effective, this tool must be carefully contextualised to the unique needs of the Church and aligned with the Managing Allegations Code of Practice. If designed and implemented effectively, it should help to ensure that the assessment process begins from the perspective of any beneficiary or individual coming into contact with the Church, and importantly, help guide

decision-makers as to the most appropriate pathway any referral should follow. It would standardise the criteria for safeguarding intervention within a Church context and in doing so, create a more logical and transparent framework for practice.

**Recommendation 36:** Consideration should be given to designing and implementing a ‘threshold tool’ to be used alongside the Managing Safeguarding Concerns and Allegations Code. This tool should provide a framework and matrix of case examples that can help differentiate the different pathways particular cases should follow.

## Risk Assessments

6.40 The approach to risk assessment and management is underpinned by the commitment of the NST to follow national guidance, which is continually being reviewed and updated. The NST is actively working to develop and refresh its Risk Assessment Handbook and tools, aligning them with current good practice. The new Managing Safeguarding Concerns and Allegations Code of Practice incorporates updated risk assessment and management pathways to support consistency across the wider church. The NST has a designated lead staff member responsible for coordinating the use and quality assurance of the Independent Risk Assessor list for clergy risk assessments.

6.41 Due to the 12-month Audit window and the NST’s specific remit, the available sample of risk assessments was relatively small. The following findings provide a snapshot of current practice within these specific parameters. The Audit examined a dip sample of cases in which safeguarding risk assessments had been triggered for individuals suspected of posing a direct or indirect risk. In each of the cases reviewed, it was noted that the assessments were not carried out by direct employees of the NST. Specifically, the Audit found that these assessments were instead conducted by external parties, including a DSO in one instance and an independent assessor in another.

6.42 The Audit also identified issues regarding data integrity and procedural impartiality. In one instance, a profile on the NSCMS contained incomplete records stored within the 'files' section, which undermines the reliability and consistency of the documentation. More significantly, the Audit highlighted a potential conflict of interest in one instance; a DSO, employed by a DBF, was tasked with conducting a risk assessment for their own Diocesan Bishop. When an anonymised example was tested with a sample of DSOs, none agreed that such an approach was appropriate. The Audit is of the opinion that such an arrangement is not good practice, potentially undermines the objectivity required for such a critical safeguarding process and due consideration should be applied more carefully moving forward.

**Recommendation 37:** More rigorous oversight must be applied when commissioning or directing risk assessments of senior clergy. This is necessary to prevent (perceived or actual) conflicts of interest and to uphold the impartiality and independence essential to a credible safeguarding process.

## Safety Plans

6.43 Safety plans are an essential part of the risk management process in the CofE. There is a prescribed national framework, along with guidance and standardised templates, to support local teams within dioceses and cathedrals.

6.44 In this specific area of activity, the Audit heard mixed views concerning the quality and effectiveness of the support provided by the NST. As part of the Audit's survey issued to DSOs and CSOs, a question was asked whether "*The NST provides effective support to stakeholders in the development of risk assessments and safety plans.*" Just over a third agreed, with just under a half disagreeing and the remainder indicating that they "*didn't know.*"

6.45 Perceptions were equally divided concerning the NST's impact in helping standardise practice. In response to the statement, "*The NST helps ensure consistency and quality in risk management approaches across different diocesan and cathedral contexts,*" the results from DSOs and CSOs showed that 35% agreed, 35% disagreed, and 30% held a neutral position. One DSO commented:

*"There is still some confusion about risk assessments, risk management plans, and so on. There should be a better, rolling programme of CPD-accredited training for Diocesan and Cathedral staff on all aspects of safeguarding delivery, including risk assessment and management. Currently [it] is too ad hoc and piecemeal."*

6.46 Given the substantial risk inherent in this area, the existence of robust and effective risk management processes is critical. The Audit observed a commitment from the NST to both support this area and develop a strong risk management framework. While this commitment is partially evidenced by the NST commissioning training focused on working with individuals who have sexually offended, this training does not currently address the specific requirement for instruction on risk assessment and safety planning for this cohort. Furthermore, the Audit was also advised about planned training scheduled for the first quarter of 2026. This has been specifically designed to standardise and enhance the processes for risk assessment and management across the CofE. The core objective of this initiative is to increase the confidence and competence of DSOs when conducting risk analysis and subsequently developing clear, evidence-based Safety Plans. The Audit, therefore, recommends that the NST should develop a national framework for addressing the issue of risk assessments and safety plans.

**Recommendation 38:** The NST should develop a national framework for addressing the issue of risk assessments and safety plans.

This framework must encompass, but not be limited to, developing a national risk assessment matrix for safeguarding individuals who pose a risk in church settings, context-specific training provisions, including the creation of comprehensive, structured national guidance materials. Crucially, this framework should be designed to directly assist the Diocesan Safeguarding Teams (DSTs) in their work establishing and supporting Reference Groups.

This national resource bundle should include several key elements: detailed Guidance Material for Reference Group Members, which clearly articulates the core purpose and implementation process of a Safety Plan; a defined Role Description providing a national template for the duties, responsibilities, and required personal qualities of Reference Group members; and a formal, mandatory Statement of Confidentiality for anyone with knowledge of a Safety Plan.

The bundle should also include robust operational training materials, offering context-specific practical resources and techniques for applying the Safety Plan within specific parish scenarios and evaluating potential risks; for monitoring individuals, including techniques for conducting necessary conversations.

**Recommendation 39:**

The NST, in collaboration with national ecumenical bodies, should seek to facilitate the development of a formalised National Information Sharing Model. This framework should be designed to mirror the efficacy of the INI (Interpreting National Intelligence) systems used by UK Police forces, ensuring that when a respondent moves between different denominational jurisdictions, the associated risk and oversight requirements move with them.

This framework should codify the "Bilateral Responsibility" for risk disclosure:

The Respondent's Obligation: To ensure full transparency, the framework should mandate that any individual currently subject to a Church Safety Plan (CSP) has a formal requirement to disclose their status to the leadership of any new church or denomination they join.

The Diocesan Board of Finance (DBF) in the "exporting" diocese must have a formalised duty to notify their counterparts in the "importing" body. This must include the transfer of the most recent risk assessments, active CSPs, and Reference Group minutes.

6.47 In addition, the Audit is aware of recent updates to Risk Assessment and Management Resources<sup>19</sup> and updates on the subject within Managing Safeguarding Concerns and Allegations guidance.<sup>20</sup> This area of activity has been a subject of workshops with national safeguarding networking days.

6.48 In addition to the issues raised previously about the NSCMS, the Audit identified a specific issue as it relates to safety plans. The NSCMS incorporates a 'Profile Flag' intended to enable the NST to quantify the total volume of active safety plans across all the dioceses and cathedrals. Given the emphasis previously placed on data, the Audit considers this functionality to be valuable. That said, its ultimate utility is reliant on the quality of the underlying data. Crucially, the Audit was informed that the NSCMS currently lacks the facility to accurately mark a safety plan as 'inactive', for instance, when the individual who was the subject of the safety plan has passed away, or when the plan has ended. While NSCMS users will require appropriate records of active plans, they also require a clear mechanism to indicate those that have ceased. Without this, oversight and monitoring on a national basis is considered to be significantly hindered.

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<sup>19</sup> <https://www.churchofengland.org/safeguarding/safeguarding-e-manual/managing-safeguarding-concerns-and-allegations/risk-assessment-management-resources>

<sup>20</sup> Managing Safeguarding Concerns and Allegations, Section 4C: Managing safeguarding risks in the Church Community, <https://www.churchofengland.org/safeguarding/safeguarding-e-manual/managing-safeguarding-concerns-and-allegations/section-4-pathways/section-4c-managing-safeguarding-risks-church>

**Recommendation 40:** The NST should review and consider options for how the NSCMS can be adapted to best meet the reporting and record-keeping needs associated with inactive or formally ended safety plans. This review should prioritise the introduction of a clear, auditable status field/flag (e.g., 'Inactive' or 'Ended') that allows users to retain the full plan record while accurately removing it from the count of active plans measured by the 'Profile Flag' mechanism.

6.49 The NST Casework team provides advisory support to DSTs regarding Safety Plans but does not engage in direct case management. Consequently, as oversight of these plans remains at a local level, the NST does not hold centralised data on the total number of plans issued.

### **Safeguarding Case Management Groups**

6.50 Over the preceding twelve months, 17 new cases required the initiation of Safeguarding Case Management Groups (SGMG), formerly Core Groups. The Casework Manager also provides input on SCMG chairing training and conducts learning reviews at the conclusion of SCMG processes. Interim Safeguarding Agreements and Church Safety Plans are integral templates used during the SCMG process. The need for a Charity Commission referral (whilst the individual and collective responsibility of Trustees) is included as an item on the standard SCMG template and should act as a prompt to ensure escalation to and consideration by Trustees. This prompt supports local decision-making but does not transfer responsibility for determining or submitting a Serious Incident Report, which remains with the accountable Church body and its trustees.

### **Serious Incident Reports**

6.51 The NST's approach to Serious Incident Reports (SIRs) is primarily to support individual DBFs and cathedrals to submit SIRs in line with responsibilities accrued from their charity status. The NST helps in this respect by issuing bespoke guidance, having RSLs to offer

advice on thresholds, and including the need for a Charity Commission referral as a defined item on the standard SCMG template. As the Archbishops' Council is the overarching charity for the NST, the Archbishops' Council also submits its own referrals to the Commission when necessary. However, the relationship with the Charity Commission involves complexities regarding reporting expectations. While the Commission reportedly seeks a report on every allegation regardless of its nature, the Archbishops' Council / NST has resisted this blanket approach; it maintains that DBFs and cathedrals should remain responsible for determining and reporting their own SIRs based on their specific local context. However, it is important that the NST is in a position to provide expert support and advice for those responsible for compliance with Charity Commission regulations. The recommendations made earlier in this report regarding the establishment of a Safeguarding Secretariat provide a mechanism to address such issues.

### **Information Sharing**

6.52 An Information Sharing Agreement is formally in place between the NST and all dioceses and cathedrals to ensure the secure and justifiable transfer of information.

### **Escalation Process**

6.53 An escalation process has been established and is actively used to address serious concerns when local decisions or practices are deemed inadequate. This mechanism acts as a formal route for RSLs to raise issues to senior leadership, such as the Diocesan Secretary or Bishop, particularly in cases involving competence or significant risk to individuals. However, the structure of the CofE significantly limits the NST's ability to directly enforce safeguarding decisions or practices, meaning the ability to advise and escalate is not equivalent to the authority to directly intervene and mandate change. This lack of direct authority means the NST must rely on influence and persuasion to ensure compliance. See relevant recommendation in the Leadership and Capacity section of this report relating to RSLs.

## **QA and Supervision of Casework**

6.54 The NST Casework Manager has the primary responsibility for quality assurance (QA) and oversight of the Casework team. The Casework Manager performs QA in a multi-faceted manner, covering the whole process and targeting areas for improvement in supervision. This includes dip sampling cases from the NSCMS, reviewing the quality of reports, and checking updates on ongoing SCMGs. These QA activities are routinely fed into formal supervision sessions, where the Casework Manager reviews all an individual caseworker's NSCMS cases and discusses their rationale for decision-making. Team members conduct learning reviews at the conclusion of SCMG processes and have informal peer support as a readily available source of consultation and challenge. This is good practice.

## **Security and storage of information**

6.55 The NST uses three communications systems to securely hold and share data: Microsoft 365 products, the NSCMS, and Box.com for sharing information with external practitioners. All NST staff are required to use non-personal forms of communication and receive mandatory training on GDPR and Cyber Security. This training ensures compliance with UK data protection legislation, including knowing how to identify a Data Subject Request. Confidential casework supervision notes are stored securely, accessible only to the caseworker and their line managers, and are shared with the supervisee in a password-protected format.

## 7 Victims and Survivors

- 7.1 The Church's commitment to victims and survivors is demonstrated by several positive support mechanisms that are currently in place, such as the valued Interim Support Scheme (ISS) and the commissioning of the independent Safe Spaces service. Furthermore, the NST is actively engaging with survivors to inform revisions to core policies and develop new initiatives. Despite these strengths, the Audit has identified key areas that require strengthening and additional resource and attention.
- 7.2 The NST is uniquely positioned to be the public-facing leader for the Church's response to victims and survivors, especially given the powerful role media plays in amplifying the call for systemic institutional change. The placement of Victims and Survivors Support within the current operational structure, alongside casework and investigations, creates an inherent tension and potential conflict of interest. As addressed earlier within the body of this report, it is recommended that Victim and Survivor Participation and Engagement should be established as a separate service area. Many of the recommendations made in this section, are made with this structure in mind.
- 7.3 By shifting engagement from a procedural activity to a dedicated strategic function, the NST can demonstrate its commitment to listening to victim and survivor experiences, understanding the profound impact of abuse, and ensure insights contribute to tangible improvements in policy and practice. This proactive, collaborative approach is essential for systemic reform, enabling the NST to not only fulfil its core duties but also inspire a pervasive culture of accountability and care across the entire institution.

### Policy and Guidance

- 7.4 The National Safeguarding Standards, informed by survivors' insights and voices at the early stages in 2020 and final stages in 2022 and 2023, set the benchmark for effective support, emphasising that survivors must feel heard, understood, believed, and

supported<sup>21</sup>. These standards also require church bodies to promote a safe environment for disclosure, understand trauma, and ensure clear, prompt, and accountable reporting pathways.

7.5 The House of Bishops' 'Responding Well to Victims and Survivors of Abuse' policy is the foundation of the Church's response to disclosures, advocating for a survivor-centred, relational approach and guides Church Officers on how to respond to disclosures regardless if the abuse was Church-based<sup>22</sup>. This critical guidance was developed in response to an IICSA recommendation and with survivor involvement and is currently undergoing revision. The Audit engaged with a member of staff who is working on these revisions, they have used workshops and working groups in cooperation with victims and survivors, and in consultation with the Survivor Participation Lead. This is good practice.

7.6 The Audit process has repeatedly evidenced that apologies have the potential to be profoundly impactful and restorative for victims and survivors when they are delivered sincerely and thoughtfully. While Section 7 of *'Responding Well to Victims and Survivors of Abuse'* currently offers foundational guidance, a significant gap remains as the wider Church lacks the robust, standardised and detailed direction necessary for creating and delivering a truly suitable apology consistently. To ensure consistency, integrity, and a trauma-informed approach across the wider institution, the NST should lead on bridging this gap.

**Recommendation 41:** The NST should consult its in-house expertise to produce formal, comprehensive guidance on how those in a position to do so can give a robust, authentic, and trauma-informed apology. This guidance should complement Section 7: *'The issuing of apologies by Church Bodies'* in *'Responding Well to Victims and Survivors of Abuse'*.

<sup>21</sup> [https://www.churchofengland.org/sites/default/files/2023-10/national-safeguarding-standards-and-quality-assurance-framework\\_sep23.pdf](https://www.churchofengland.org/sites/default/files/2023-10/national-safeguarding-standards-and-quality-assurance-framework_sep23.pdf)

<sup>22</sup> <https://www.churchofengland.org/safeguarding/safeguarding-e-manual/responding-well-victims-and-survivors-abuse>

- 7.7 The Audit heard about an innovative project for raising awareness of stalking: a ‘Know-how’ guide on spotting signs of stalking. This guide is being created by a staff member who drew on expertise from a recent case and their experience of this issue, demonstrating the kind of forward-thinking initiative a Victims and Survivors directorate should lead.
- 7.8 At the time of the Audit, ongoing work included a scoping exercise for a National Chaplaincy for Survivors, directly engaging victims and survivors with lived experience to understand their needs. An essential workshop gathered survivor feedback on existing resources and explored priorities for future support. The Audit views this commitment to evidence-based evaluation, consideration of need, and scoping of options as a positive step.
- 7.9 Currently no formal strategic mechanism is in place to systematically integrate victims and survivors’ lived experience into planning, policy development, or major communications strategies of the Church. This reliance on fragmented engagement means that organisational risk remains elevated due to a potential mismatch between service design and actual survivor needs, leading to policies that may lack a critical trauma-informed perspective and potentially undermine public trust and the efficacy of support initiatives.

**Recommendation 42:** Establish a formally constituted and strategically mandated Victim and Survivor Reference Panel (SRP), composed of diverse survivors, close supporters, and specialist professionals/NGO representatives, tasked with providing high-level, collective advisory input on all major policy, strategic, and communication decisions, thereby embedding survivor expertise at the core of institutional governance and operational effectiveness.

All policies relating to or impacting on victims and survivors should be signed off by the Head of the re-purposed Victim and Survivor Participation and Engagement service.

## Trauma-informed care

7.10 Progress has been made in establishing a baseline of knowledge through organisation-wide, self-directed trauma-informed practice training. That said, a persistent issue is the practical application of this knowledge, with feedback indicating a lack of awareness among some Church Officers regarding the diverse and complex long-term effects of trauma, including its impact on relationships. Trauma-informed care is complex and nuanced; and requires significant organisational change to become embedded. This goes beyond one off training sessions and must become embedded in the culture of the NST, it must be within all engagements and interactions. The reportedly imminent second stage of trauma-informed training for NST staff, which is to be delivered with survivor involvement, represents a good opportunity to ensure staff move beyond baseline knowledge to embrace the complexity of trauma-informed practice.

**Recommendation 43:** The Audit recommends the NST seek to ensure more advanced training on understanding the impact of trauma takes place as soon as possible, especially for those directly engaging with victims and survivors.

7.11 The NST currently delivers robust Support Person training, co-developed and co-facilitated with victims and survivors. Maintaining a pool of trained Support Persons is a mandatory requirement that all church bodies must provide for victims and survivors. However, there is a recognised resource gap in many local areas, which is being addressed in the upcoming revision of *Responding Well*. While access to advocates via Safe Spaces helps bridge this gap, this benefit only extends to those utilising that specific service. The Audit notes this area needs immediate attention but will not make a formal recommendation at this time since it is already incorporated into the planned policy revision.

## Accessibility of information and opportunities

7.12 The Church of England website is a crucial foundation for information, featuring successfully implemented pathways for reporting and signposting for various support

options. Information on Safe Spaces, Survivor Participation, the Redress Scheme, the Interim Support Scheme (ISS), policy and practice and diocesan safeguarding contacts are all included in sub-menus on the central website.

- 7.13 The Audit acknowledges feedback that highlighted room for improvement in user-friendliness and visual engagement of the Church's website. As recommended earlier in the Prevention section of this report, the focus should be on optimising this resource for maximum impact. A focused hub, complete with clear sub-menus, should help provide an effective way to connect individuals with immediate, accessible information and support tailored to their needs.
- 7.14 Accessible visual and audio resources are available on the Church of England website, including a co-produced video series that summarises *Responding Well to Victims and Survivors of Abuse* and a video sharing the lived experiences of victims and survivors of spiritual abuse. These videos demonstrate good practice by providing warnings about possible trauma responses and offering signposts to external support services such as Safe Spaces.
- 7.15 These videos are vital resources which should be utilised and promoted locally. Of those who completed the Audit survey centred on victim and survivor experiences of the National Casework Team, a significant majority were aware of this guidance. That said, under half of respondents felt its implementation can make a difference. More public reassurance needs to be given that church bodies should have due regard to comply with 'Responding Well to Victims and Survivors of Abuse' practice guidance. It should also be noted that, this practice guidance is set to go to General Synod in February 2027 to be passed into a Code of Practice.

**Recommendation 44:** Following the adoption of ‘Responding Well’ as a formal Code of Practice, the NST must ensure its effective rollout and mandate that all dioceses and cathedrals prioritise its promotion and compliance.

7.16 Victims and Survivors can sign up to the Survivor Participation Newsletter via the Survivor Participation webpage<sup>23</sup>. This newsletter ensures those who subscribe are informed of safeguarding-related news, developments and national participation opportunities. The Audit has heard positive reports of value associated with receipt of the Survivor Participation Newsletter. At present, this newsletter is the only formal mechanism whereby opportunities to engage in projects which are expected to last for less than six months are advertised. Longer term projects are advertised through the recruitment platform of the NCIs, Church of England Pathways. The Audit also heard that the Survivor Participation Team will approach volunteers directly if they have expressed an interest in a topic but have not responded to a call in the newsletter, to make them aware of the opportunity.

7.17 Data included in the 2022 Survivor Engagement National Survey, issued in October 2023, indicated that most would like opportunities to be shared through a dedicated central space (website or online application). Utilising the survivor participation webpage, may provide a useful platform whereby opportunities should also be advertised.

**Recommendation 45:** The NST should consider the central advertisement of all participation opportunities on the Survivor Participation webpage.

7.18 Feedback to the Audit highlighted that some survivors believe the NST’s advertisement of participation opportunities could be improved, and that not being selected can leave them feeling as though they have experienced “failure”. Where appropriate, the NST should offer

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<sup>23</sup> <https://www.churchofengland.org/safeguarding/survivor-participation#:~:text=Survivor%20participation%20is%20when%20victims,a%20safer%20place%20for%20all.>

supportive feedback and emphasise that non-selection reflects role requirements rather than personal shortcomings. By being transparent about how it balances equity, expertise, and survivor involvement, the NST can build trust and demonstrate the value of all contributions.

- 7.19 Others reported that some opportunities felt like a “tick box” exercise and that opportunities advertised as co-production did not live up to the definition. The NST should ensure that opportunities for victims and survivors to take part in activities are meaningful. This should entail a rationale for requiring victim and survivor input for activities. This would help to address the concerns of those who feel some activities appear “tokenistic”. A prominent suggestion was the need for opportunities for victims and survivors to propose and lead initiatives, rather than responding to organisational priorities. These concerns suggest a need for clearer messaging around the purpose of activities, the expectations involved, and the value of all forms of victim and survivor input.

**Recommendation 46:** In line with the Survivor Participation Framework, the NST should review and strengthen how they:

- a) Clearly and consistently communicate the purpose and expectations of each participation role and activity.
- b) Ensure there is clarity about what each participation role and activity involves.
- c) Offer alternative ways for survivors to contribute to projects they have expressed interest in.
- d) Provide supportive messaging that non-selection reflects participation role, activity and context of participation. Messaging should be clear that non selection does not reflect personal shortcomings, to build trust and demonstrate the value of all contributions.

**Recommendation 47:** A budget should be allocated for victim and survivor-led projects focused on safeguarding improvements nationally.

## Victim and Survivor Participation

7.20 Participation with victims and survivors has grown over recent years, with a dedicated Partnerships and Engagement lead appointed in 2021. A recent Survivor Participation Annual Report<sup>24</sup>, showed that overall participation of survivors increased by 56.3% from 2023 to 2024. Whilst it is positive that more victims and survivors are being engaged, it is critically important that this engagement goes beyond the sharing of newsletters. Counting subscribers to the newsletter can create a false sense of security not least when the evidence of engagement and participation via co-production represents a much smaller cohort. The lack of a centralised system creates potential for miscommunication, miscounting and over-optimism.

**Recommendation 48:** The NST should ensure that the existing participation tracking system is accurately and consistently applied to all victim and survivor engagement.

7.21 The Survivor Participation Framework, co-produced with victims and survivors, launched in February 2025, seeks to bring clarity to the four main methods of participation: coproduction, co-design, engagement, and consultation. The Framework should enable church bodies and church officers to involve victims and survivors in the safeguarding work of the Church. While it needs time to become fully embedded nationally and locally, it incorporates lessons learned from previous project work. A Safety Task and Finish group was constructed to bring together survivors, church professionals and external experts to co-produce a set of safety principles used to create safe environments for victims and survivors when volunteering and participating in activities. The Survivor Participation team adapted these principles for different environments, resulting in two documents for safe participation in residential activities and General Synod.

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<sup>24</sup> <https://www.churchofengland.org/sites/default/files/2025-02/church-of-england-survivor-participation-report-2024.pdf>

- 7.22 Stakeholder feedback revealed a mixed spectrum of experiences regarding victim and survivor participation in the Church's safeguarding work. The Audit's understanding was informed by INEQE's stakeholder survey, individual discussions, a dedicated focus group, and conversations with staff. Most victims and survivors who engaged with the Audit's survey expressed feeling positive about the opportunity to contribute their voice and the overwhelming majority were willing to participate in similar opportunities in the future.
- 7.23 Some feedback highlighted some positive experiences, where contributions were valued and acted upon, and "genuine co-production" took place. Furthermore, some survivors appreciated the flexible participation options, including evening, online and face-to-face opportunities, though face-to face options were said to occur less often. Many staff members demonstrated a real recognition of the importance of survivor engagement and care.
- 7.24 That said, the Audit also identified key challenges, particularly the feeling among survivors of being "managed", which has the potential to evoke a trauma response. The Audit would like to emphasise the importance of setting and managing expectations at all stages of participation. This requires routine and ongoing transparency and consistency of communication regarding the project's scope and potential outcomes. A theme that emerged was the perceived lack of authentic involvement and influence. This was evident across Audit discussions and emerged as a clear theme from victim and survivor surveys. It has been heard that victims and survivors do not feel their input is used.
- 7.25 The Audit recognises that an Impact and Innovation grant is being designed to enable local church bodies to carry out safeguarding initiatives they might otherwise lack the resources to pursue. Feedback from some victims and survivors indicated a preference to engage in local opportunities not currently offered within their dioceses. The NST should proactively

work to strengthen outreach with dioceses to enhance this aspect of their work through hosting workshops on creating safe and trauma-informed spaces and establishing clear channels for requesting support or advice. Moreover, a culture of genuine engagement must be modelled from the top. The NST should lead by example and create opportunities for victims and survivors to propose initiatives and activities.

**Recommendation 49:** The NST should initiate a formal mechanism whereby the Survivor Participation Lead works with local dioceses to provide local opportunities.

**Recommendation 50:** The NST should lead by example by creating clear opportunities for victims and survivors to propose initiatives and activities, ensuring their voices directly shape projects and decision-making.

### Support During Participation

7.26 Victims and survivors who dedicate their time to multiple or lengthy projects and participation activities often share that they engage without the benefit of de-briefing and receiving support. Given the nature of this engagement, which carries a risk of vicarious trauma, it is important they have a safe space for reflection, discussion of complex issues and focus on their wellbeing. This current gap in support is made more poignant by the perception among some victims and survivors that dedicated resources are primarily accessible to staff.

**Recommendation 51:** The NST should establish mechanisms for victims and survivors to receive support while engaging in project work and participation activities. This should be discussed and agreed with victims and survivors, in line with the Survivor Participation Framework.

7.27 The Audit gathered feedback from both participating victims and survivors and the staff leading Church projects, noting that while some survivors praised the staff they engaged

with, some project leaders felt under-equipped and not as supported as they needed to be. Managing boundaries on long-term projects and handling emotional engagements was also cited by some as an area lacking confidence.

7.28 The Audit gathered feedback on facilitation of victim and survivor participation activities. While some staff are confident in engaging and supporting victims and survivors, drawing on their prior experience, the lack of experience among other staff highlights a potential need for consistent skill development and training. These staff may also benefit from professional supervision to improve confidence and create a safe space for reflection. The Audit is aware that monthly debrief sessions are now in place for NST staff. While this is positive, more formalised supervision is essential, and the Audit therefore makes the following recommendation.

**Recommendation 52:** The NST should implement professional supervision for all staff engaging with victims and survivors on project work, with a particular emphasis on ensuring mandatory, regular supervision for all project leaders.

**Recommendation 53:** The NST should consider implementing training for staff involved in victim and survivor participation activities.

## Honorariums

7.29 For those engaged in participation opportunities, their contribution is acknowledged through an Honorarium payment and expense reimbursement. Through the NST's Risk and Assurance Team an external auditor was commissioned to review the honorarium policy. This consisted of a dip-sample of cases to assess its application for fairness and consistency. In accordance with the Survivor Participation Privacy Notice, personal data was not used for audit purposes.

7.30 Currently, obtaining an honorarium payment requires completing an NCI expenses claim using an Excel spreadsheet. Feedback indicated that this process can feel "clunky" and,

for some participants, creates a sense of discomfort, as though they are “grabbing for money” while having to request the necessary payment details. A key strength identified was the relational support provided by the engagement officer responsible for processing these payments, which helps alleviate the pressure on participants to manage the spreadsheet themselves.

- 7.31 To improve the process, the manual claims system should be phased out. Honorarium oversight should be centrally managed via the participation log. If a Victim and Survivor Participation and Engagement Service is adopted, overall accountability should fall under its remit, with a dedicated staff member responsible for (or designated team member) managing payments. This shift will streamline processing, reduce administrative friction, and mitigate the risk of re-traumatisation for survivors.

**Recommendation 54:** The NST should:

- a) Ensure central oversight of the participation log within the Victim and Survivor Participation and Engagement Service to maintain accountability and monitor all honorarium processes.
- b) Phase out the manual honorarium claims process and replace it with a streamlined system integrated into the central participation log.
- c) Designate operational responsibility for processing payments to the engagement officer (or a delegated team member), while the Service maintains overall oversight.

- 7.32 Recipients of honorariums value the reimbursement of expenses and appropriate payment for their contributions. However, some have raised concerns about inconsistencies in payment rates, the difficulty of accounting for preparation or travel time, and the challenge of balancing multiple projects. For some, this can create a sense that participation feels like employment rather than voluntary engagement, highlighting the complexity of compensating contributions fairly.

- 7.33 The Audit has heard that the NST is exploring options relating to the honorarium policy

and is working with specialists in this area. The Audit is satisfied that the NST is taking this work forward and considering the needs of victims and survivors as central to this piece of work and will not make a recommendation at this time.

### **Evaluating impact and ensuring transparency in communicating outcomes**

7.34 The NST recognise the importance of measuring the impact of participation, as such a survey for victims and survivors about their participation is in development. The successful roll-out of this survey format will be vital for improving systems and listening to the voices of survivors.

7.35 While the majority of survey respondents felt they understood how their input was intended to be used, the Audit heard of instances where victims and survivors had not received updates and outputs from projects were not made publicly available, leaving some feeling that their efforts were in vain. Ensuring that contributors are regularly informed about the progress and outcomes of the work they support would demonstrate respect for their time and expertise, reinforce the value of their input, and align with good practice in transparent and effective communication. Regular updates help maintain engagement, build trust, and ensure participants see the impact of their contributions.

**Recommendation 55:** Victims and survivors participating in the project work should receive regular, timely updates on the progress of the work, information detailing how their contributions have been used, and access to final project outputs.

### **Support**

7.36 The NST offers a variety of support options to victims and survivors of abuse through several key channels. Signposts to support for victims and survivors of abuse are situated in a central location on the Church of England website<sup>25</sup>. These include signposts to internal support, partners and other national support organisations. The NST's dedicated

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<sup>25</sup> <https://www.churchofengland.org/safeguarding/reporting-abuse>

casework team provides support for individual cases, ensuring victims and survivors receive immediate support where required. This includes access to an experienced independent advocate and through referral to the ISS. Furthermore, the NST facilitates support by signposting and making referrals to Safe Spaces. Although not yet operational, the team is also responsible for establishing the independently administered Redress Scheme for compensation.

## **Redress**

- 7.37 The development of the CofE's National Redress Scheme originated from recommendation 7 of the IICSA. Its creation demonstrated the Church's commitment to victims and survivors, offering them potential outcomes including financial redress, therapeutic and spiritual support, acknowledgement of wrongdoing, an apology, and bespoke alternative forms of redress. A dedicated board oversaw the scheme's development, incorporating input from both a Project Team and the Redress Survivor Working Group.
- 7.38 An internal audit report conducted by the NCI's Risk and Assurance team on the key risks of the Redress Project was published in February 2025. Recommendations which arose from this audit were monitored by the NCI's Risk and Assurance team via the Rhiza system and reported to the Archbishops' Council Audit Committee. It was noted that this is more of a forward-facing exercise, as conducted towards end of the development stages. Following a decision to outsource the administration of the scheme, the procurement exercise was carried out in line with the NCI's procurement policy and processes which also included a formal lessons learnt exercise. All tasks related to the contract management have been included as part of the project plan and monitored appropriately.
- 7.39 The Scheme's design was initially due to have been delivered by December 2024 with conclusion of the legislative process to follow, however, following the publication of the Makin report in November 2024, the completion of the project was delayed. The Redress

Project Board (RPB) took a unanimous decision to review the scope and eligibility criteria with corresponding impact on the agreed timeline by at least six months and possibly more because of the General Synod timetable.

- 7.40 In July 2025, the General Synod approved the underpinning legislation for the Redress scheme. A crucial feature and commitment of the scheme is the assurance that any payments received by a survivor through the Church's ISS will not negatively impact or be deducted from the final financial amount awarded under the new National Redress Scheme.

### **Interim Support Scheme (ISS)**

- 7.41 The ISS was initially set up to support victims and survivors who required immediate help and support to those whose life circumstances were significantly affected by the abuse suffered, and the subsequent response to the reported abuse. Applications to the scheme are processed by a dedicated team, and considered by a panel, which includes victim and survivor representation. Quarterly panel member meetings exist, whereby updates are shared, good practice and feedback are assessed. Some panel members reflected that this served as more of a briefing function, rather than supervisory.
- 7.42 At the time of Audit, data reported by the NST showed that in the last 12 months the scheme helped 70 individuals, and out of 134 applications made 129 were successful in receipt of financial support. Indeed, the Audit has viewed positive feedback from applicants on their experiences and heard from one applicant who felt as though the support provided saved their life at a time of critical need.
- 7.43 The ISS is fundamentally valued by its users, with survey findings and direct engagement showing a clear consensus that it is a "lifeline", and many believe it would be "very difficult" to access required support without it. The therapeutic support provided through the scheme was generally rated as "helpful". A key operational strength of the ISS is its

relational approach, which ensures returning applicants have a known point of contact. However, the process itself creates significant anxiety. Victims and survivors report that the nature of repeatedly revisiting their experience and returning to the scheme heightens their anxiety, especially during the wait to hear if their support needs will be met.

7.44 The Audit recognises concerns about a potential ‘cliff edge’ that may occur once short-term support ends. This concern, raised by both staff and victims/survivors, is particularly pertinent given the ongoing uncertainty surrounding the official start date of the National Redress Scheme. Furthermore, not all individuals receiving ISS will ultimately be eligible to apply for the Redress Scheme. The Audit has been assured that the extension of ISS provision will continue beyond the launch of the Redress Scheme and until applicants are able to go through this process or avail of the development of a new survivor support fund. That said, throughout the Audit process, the Team has seen evidence of heightened levels of anxiety among current ISS recipients regarding uncertainty of support ending and the need to re-apply for support.

**Recommendation 56:** The NST should consider (within the limits of charity regulations) the extension of the current ISS support for returning applicants with urgent, ongoing needs, allowing them to continue receiving support without re-application for the duration of the Scheme unless the applicant advises a change in their circumstances.

7.45 Concerns and queries have been raised about the consistency and fairness of outcomes issued by ISS panels, particularly around whether variations in support packages exist for survivors in similar situations. An internal audit of the scheme was carried out in 2023 and published in 2024, however did not examine consistency of panel outcomes. A systematic, independent review would improve transparency in decision-making and help promote confidence among stakeholders.

**Recommendation 57:** The NST should commission a systematic, independent review of ISS panel decisions to ensure transparency, consistency, and fairness, reinforcing confidence among victims and survivors in the scheme.

7.46 Concerns have been raised in response to outcomes of applications made to the scheme by victims of abuse perpetrated by a spouse who is a member of the clergy. The Audit has been informed that these complex situations are labelled as ‘domestic situations’. When categorised as domestic, the Audit was informed that this would result in an unsuccessful ISS claim with the claim being signposted to other services. The Audit believes this may result in the complexity of some situations being lost. Reflecting the need for equal treatment, the Safeguarding E-manual mandates: ‘Clergy and clergy spouses/partners are entitled to at least the same level of treatment and support as any other person disclosing abuse, given the often-public nature of their relationship’<sup>26</sup>. Victims, including spouses and partners, are instead signposted to independent support organisations such as the Clergy Support Trust (CST) and Broken Rites.

**Recommendation 58:** The NST should review the policy relating to clergy spouses who find themselves in complex situations labelled as ‘domestic situations’ and clarify whether this currently disadvantages them.

## Safe Spaces

7.47 Safe Spaces is an independent advocacy and support service commissioned by Safe Spaces England and Wales (SSEW), currently operated by First Light. SSEW is a registered charity, independent of the NST. It was set up in 2020 by the Archbishops’ Council and the Catholic Trust for England and Wales. SSEW commissions independent

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<sup>26</sup> <sup>26</sup> <https://www.churchofengland.org/safeguarding/safeguarding-e-manual/safeguarding-children-young-people-and-vulnerable-adults/section-3-domestic-abuse>

support for victims and survivors of church-related abuse for both Churches. It provides a confidential, personal and safe space for anyone who has been abused by someone in the Church or because of their relationship with the Church of England, the Catholic Church in England and Wales or the Church in Wales.

- 7.48 This is a national service, provided through the Safe Spaces helpline, email and online referral system. The service is trauma informed and run by specialist advocates trained in trauma informed practice. The service is survivor led, and service users are given choices regarding their options and support decisions. The Board of SSEW maintains operational monitoring of the service and is also subject to independent evaluation through a third party. The Board receives aggregated data on monthly referrals. The Audit was informed that the service also uses survivor feedback about services to continuously improve. Feedback surveys are embedded as routine in service delivery, focusing on different points in the client journey rather than their experiences on leaving the service. To be clear, this Audit is not in a position to comment on the service or its outcomes.

### **Enhancing the effectiveness of Victim and Survivor Participation and Engagement**

- 7.49 Given the depth and breadth of work that the Audit has examined, it is clear that this priority area has the potential to benefit from the proposed structural changes outlined in the Leadership section of this report. To support improvement in this area the Audit makes the following recommendation.
- 7.50 Auditors identified structural and leadership gaps within the current approach to victim and survivor participation and engagement. These issues limit the consistency, influence, and visibility of the work. Although the function is now a dedicated service, the supporting leadership structures and operating model have not changed to reflect this. This misalignment results in individual roles carrying disproportionate expectations.

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- 7.51 Feedback also highlighted a requirement for a more diverse range of survivor voices. There is a concurrent need for clearer mechanisms to manage a small number of potentially vexatious complaints within the participation framework. Without these, practice remains variable and survivor-informed decision-making is less effective.
- 7.52 The lack of a cohesive strategic approach and clear oversight has hindered coordination across the organisation. A more structured framework with strengthened leadership would ensure consistent delivery and help to mitigate risks. This would allow the service to achieve the full potential of its new status.

## 8 Learning, Supervision and Support

### Introduction

- 8.1 The learning and development function within the National Safeguarding Team is delivered by a small, highly committed team who demonstrate a genuine desire to strengthen safeguarding capability across the Church. Despite significant capacity pressures, they have developed and embedded a core safeguarding curriculum which is now used routinely by dioceses and cathedrals.
- 8.2 Evidence gathered during the Audit highlights examples of where engagement with dioceses has improved through purposeful relationship building. This has included meeting with and listening to frontline staff to better understand contextual safeguarding needs relevant to their location and role.
- 8.3 Notwithstanding capacity challenges they have faced, they have developed a Training Portal and Virtual Safeguarding Library which provide access to a variety of learning opportunities and resources. This has demonstrated an ability to design and deliver new courses, that said, the current model is assessed as being under-resourced. In the opinion of the Audit, it lacks the capacity to deliver the national function relied upon to underpin safeguarding practice across all Church bodies.
- 8.4 To address this vulnerability and capitalise on the opportunity the current foundation presents, the NST Learning and Development approach should evolve into a Virtual Church of England Safeguarding College in keeping with the recommendation in Leadership and Capacity section of this report. Whilst the majority of its outreach would be virtual it would include face-to-face and residential elements, hosted in regional campuses. In many respects, this would mirror the model used by other bodies including the College of Policing. The Virtual Church of England Safeguarding College would be responsible for

developing and maintaining national standards, competency frameworks, evidence-based practice, and professional development pathways, as well as access to appropriate, relevant courses developed by other similar bodies. This approach would support the expansion of their learning offer and ensure that policy, training and practice is informed by research, lived experience and emerging themes from casework and audits.

- 8.5 The Audit acknowledges that this will require further investment. However, this should be seen as a necessary step for a Church demonstrating national leadership with the potential to become a global exemplar. A strengthened central structure would provide the foundation upon which to build a new delivery model. The virtual and regional campuses should develop specialisms aligned with particular policies. For example, risk assessments and safety planning. It would also create pathways to more effectively engage with and support theological education institutions.

**Recommendation 59:** The NST should strengthen its learning and development function by creating a Virtual Church of England Safeguarding College as recommended in the Leadership and Capacity section of this report. This should include consideration of the following:

- a) Establishing a Service with a senior lead accountable for national safeguarding learning.
- b) Increase staffing to ensure that responsibility for content development, quality assurance and review cycles is not held by single individuals.
- c) Define clear roles, responsibilities and workflows within the team to support consistency and reduce siloed working.
- d) Introduce shared oversight mechanisms to ensure continuity and protect organisational memory.
- e) Ensure implementation plans align with wider NST and NCIs strategy, including digital development, research activity and operational learning.

Align with and support the portfolio approach utilising RSLs and regional safeguarding representative to ensure the construction, review and revision of policies are developed collaboratively.

**Recommendation 60:** The Virtual Church of England Safeguarding College should include:

- a) A single, recognisable entry point where all safeguarding learning resources, standards and pathways are located to provide clarity for dioceses, cathedrals and other Church bodies.
- b) A standardised professional development framework that sets out clear expectations for those who hold safeguarding responsibilities, including clergy, DBF staff and volunteers.
- c) A centralised approach to curriculum design that draws on research, lived experience, learning from casework and audit findings.
- d) A programme of quality assurance that monitors delivery, evaluates impact and ensures alignment with national standards.
- e) A digital infrastructure that reduces duplication across Church bodies by embedding approved course content and learning resources for all.

## Review Cycles and Responsiveness to Feedback

8.6 The NST's Learning and Development Framework is reviewed every three years. Staff describe ongoing conversations with DSOs, CSOs and trainers in relation to how this works across their settings, and there is evidence of informal channels used to gather views. While these efforts reflect good intention, the overwhelming feedback from diocesan safeguarding professionals suggests that these mechanisms are experienced as inconsistent and at times ineffective, less than a quarter of Diocesan and Cathedral respondents to the Audit survey believed that feedback on national safeguarding training is routinely collected and acted upon to improve quality and relevance.

- 8.7 While NST staff maintain that no individual should take the same course twice within that three-year cycle, feedback from previous Diocese and Cathedral audits to date indicates that this can and does occur in practice. This repetition does not support ongoing development, limits opportunities to strengthen knowledge and can reduce engagement.
- 8.8 Additionally, a significant number report submitting feedback with no response, little visibility of how it is used, or are unsure if it informs revisions. This has impacted confidence and contributed to perceptions of disconnect between national development and local delivery.
- 8.9 This appears to be less a matter of unwillingness and more a reflection of limited capacity and the weight of national expectations on a very small team. Nonetheless, the gap between process and perception is significant. A clear example is the recent domestic abuse pathway, which despite undergoing some consultation, did not sufficiently mitigate concerns prior to release and required recall (the issues have since been rectified and the revised pathway is now available).

**Recommendation 61:** To enhance the Learning and Development Framework's currency and effectiveness, the existing triennial review cycle should be formally replaced by a new annual review cycle.

This annual cycle lead by RSL Portfolio holders and regional representatives, should include the following processes:

- a) **Planned annual update timetable:** Set and publish key dates at consistent points each year so dioceses and cathedrals can plan for updates and implementation. This should provide clarity about when revisions will be consulted on, finalised and released.
- b) **Clear scope for the annual review:** Ensure the annual review explicitly considers new legislation, statutory guidance and national policy changes, emerging safeguarding risks and

themes, and areas where clearer definitions or expectations are needed to support good practice and compliance.

c) A transparent feedback loop: Introduce a clear method for capturing, reviewing and acting on feedback, with visibility about what has changed and why. This should address current perceptions that feedback is not routinely gathered or used.

d) Formal quality assurance prior to release: Introduce defined stages of scrutiny and a formal sign-off before publication, covering as a minimum:

- Instructional design, including clarity of objectives, logical structure and learner engagement.
- Content quality, including accuracy, currency and editorial standards.
- Technical functionality, including reliability across devices, ease of navigation and accurate assessments.
- Design and accessibility, including consistency and compliance with recognised accessibility standards, including WCAG.

e) Beyond the portfolio approach, ensure wider structured stakeholder engagement via embedding consultation between course development and launch, including engagement with the Training Network Group, relevant sub-groups, subject matter experts and practitioners.

Where courses are new or substantially revised, pilot them in a small number of dioceses or regions before national release to test usability and practical impact. Additionally, ensure the annual review cycle is informed by learning from audits, case reviews, MyConcern data, DARE research and relevant national policy updates. This should include scheduled cross-team discussions and documented decisions to demonstrate how operational and research learning has informed training revisions, rather than reliance on ad hoc or informal mechanisms.

## Course Content, Scenarios and Learning Tools

- 8.10 Discussions with stakeholders and review of course materials highlight areas of strength in the content development process. The integration of national and local case reviews, survivor voice, and emerging thematic learning is visible in several pathways. The work undertaken to embed learning from the Scolding Review, including plans for a new case study and survivor-informed materials, is positive and should continue.
- 8.11 However, trainers and DSOs described some materials as overly complex, confusing or inaccurate. Feedback about the use of the SOCIAL GRRRAACCEEESSS<sup>27</sup> model indicates that it is not well received in its current form. Many trainers report that it is difficult to recall, overly complicated and not an effective learning tool in this context. Having reviewed its application within the pathways, the Audit agrees that the mnemonic is not easy to remember and does not support consistent understanding or practical use. Consideration should be given to simplifying the approach or replacing it with a more accessible framework that supports reflection on identity, diversity and power dynamics in safeguarding practice.
- 8.12 The Leadership Pathway was reviewed during this Audit and includes a scenario case study to support learning. While it is positive that the intention is to support learning through a realistic case example, elements of the content and accompanying trainer notes do not always model the level of accuracy and clarity around safeguarding processes expected of national training materials. This demonstrates the need for an enhanced quality assurance process where material can be robustly interrogated and reviewed before being rolled out to the wider Church.

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<sup>27</sup> The SOCIAL GRRRAACCEEESSS model is a reflective tool originally developed within systemic practice to support consideration of how aspects of identity such as gender, geography, race, religion, age, ability, culture, class, ethnicity, education, employment, sexuality, sexual orientation and spirituality shape personal experience and professional interaction. It is intended to help practitioners recognise the influence of power, bias and context when working with individuals and families. Burnham, J. (1992). Approach–method–technique: Making distinctions and creating connections. *Human Systems*, 3(1), 3–27.

## Evaluation and Impact

- 8.13 The NST recognises that evaluation of learning remains underdeveloped nationally. Current measurement focuses on attendance and completion rather than impact on practice, behaviour or culture. Work has begun to introduce standardised evaluation questions and longer-term impact surveys, which is positive and should be prioritised. The absence of a consistent evaluation system has slowed improvement and contributed to the perception that feedback is not always acted upon. Trainers were clear that they would welcome a central mechanism to view, collate and respond to feedback on all NST developed courses.
- 8.14 There appears to be a stronger focus on leadership training, likely reflecting the higher safeguarding responsibilities of those undertaking this pathway. However, safeguarding training at all levels plays an essential role. All courses should carry the same expectations for quality, consistency and evaluation.
- 8.15 Each area currently manages feedback and evaluation independently, yet all face similar challenges when implementing feedback on nationally developed materials. A standardised approach would strengthen the learning cycle. For all courses, a short evaluation and feedback survey should be issued immediately after completion. Online modules could automate this and require completion before issuing a certificate. In person delivery could use paper surveys where appropriate or provide a link to a webpage for participants to complete digitally afterwards.
- 8.16 Trainers should continue to receive evaluation and feedback on their individual delivery. However, feedback relating to course content should be shared with the NST and diocesan or cathedral training teams. A clear system is needed to enable this, either through designated staff or an automated route. Regular collation of themes should inform revisions and support a more timely and transparent improvement process.

**Recommendation 62:** Establish a clear Evaluation Model for safeguarding learning. While the Audit recognises that a range of recognised evaluation models may be appropriate, the NST should set out a structured and comprehensive framework for assessing the effectiveness and impact of policy and training. This framework should support consistent measurement of outcomes, identification of learning themes, and alignment with national safeguarding standards and organisational objectives.

The NST should establish a coherent and proportionate approach to evaluating safeguarding learning, comprising the following three elements:

a) A clear evaluation model for learning, setting out a structured framework for assessing the effectiveness and impact of safeguarding training. While recognising that different evaluation models may be appropriate, the framework should enable consistent measurement of outcomes, identification of learning themes, and alignment with national safeguarding standards and organisational objectives.

b) Consistent capture and central consolidation of evaluation data, ensuring that feedback and evaluation from all training pathways, including locally delivered and face-to-face training, is gathered in a standardised way. This should support effective aggregation and analysis at a national level, whether through digital platforms or agreed local processes, and enable clearer oversight of learning quality and impact.

c) Meaningful measures of impact, ensuring evaluation goes beyond participant satisfaction to include changes in confidence, understanding, and the application of learning in practice.

Where proportionate, this should be supported by follow-up activity to understand longer-term impact and inform continuous improvement.

## **Integration of Learning from Data, Research and Operational Practice**

8.17 There is growing recognition within the NST of the need to improve the feedback loop between operational learning, research and policy development. Staff across learning and development, regional safeguarding and casework teams acknowledge that the integration of research insights, audit findings and case review learning is taking place, but it happens on more of an ad hoc basis. The work of the DARE unit presents a significant opportunity to strengthen this area, but there is not yet a consistent mechanism to ensure data informs training development in a systematic way. This has been addressed in an earlier recommendation regarding review cycles.

## **Thematic Gaps and the Need for Innovation**

8.18 Feedback across dioceses and cathedrals continues to highlight the need for safeguarding learning that is more clearly contextualised to both region and role. The Audit recognises that progress has been made to embed region specific examples, as well as role specific case studies. That said, clergy, churchwardens, cathedral staff, vergers and those involved in risk management consistently report that generic training does not always equip them with the depth or nuance needed for their responsibilities. This has been a recurring theme throughout INEQE's Audit Programme and was a recommendation in the Year One Annual Report. Given its national remit and access to specialist expertise, the NST is well placed to coordinate the development of contextualised learning in partnership with diocesan and cathedral teams, reducing duplication and ensuring greater relevance across diverse ministry contexts.

8.19 A further theme raised relates specifically to training on offender behaviour. Staff at parish, diocesan and national levels reported limited confidence in recognising the ways individuals who have sexually harmed others and who pose a risk may minimise, self-justify or manipulate within Church contexts. Although work has begun to address this knowledge gap, the Audit believe work should be prioritised in this area as non-specialist

safeguarding roles frequently intersect with these behaviours, and those responsible for safety plans, supervision agreements or ongoing engagement with individuals who may pose a risk require a stronger foundation in this area. See also the section Recognising, Assessing and Managing Risk in this report.

**Recommendation 63:** As part of the Virtual Church of England Safeguarding College approach, the NST should develop a national commissioning framework for new thematic training modules, guided by risk analysis, user need and the Church’s statutory responsibilities. This should include a review of thematic training already developed by individual dioceses and cathedrals to identify good practice, reduce duplication and inform a cohesive national offer. The framework should be supported by increased resource and dedicated development time within the learning and development team.

8.20 Feedback across dioceses and cathedrals continues to highlight the need for safeguarding learning that is more clearly contextualised to both region and role. While some progress has been made in embedding region specific examples, role specific content remains limited. Clergy, churchwardens, cathedral staff, vergers and those involved in risk management consistently report that generic training does not always equip them with the depth or nuance needed for their responsibilities. This has been a recurring theme throughout INEQE’s Audit Programme and was a recommendation in the Year One Annual Report. Given its national remit and access to specialist expertise, the NST is well placed to coordinate the development of contextualised learning in partnership with diocesan and cathedral teams, reducing duplication and ensuring greater relevance across diverse ministry contexts.

**Recommendation 64:** As part of the Virtual Church of England Safeguarding College approach, develop a programme of contextualised learning that includes role specific modules and regionally relevant examples. This should be created collaboratively with diocesan and cathedral safeguarding teams and supported by adequate capacity within the NST.

## Accessibility

8.21 The safeguarding learning portal provides multiple versions of core courses, including BSL and enhanced accessibility formats. This reflects good practice and a clear commitment to making learning available to all. User testing, however, indicates that some learners find the enhanced accessibility option difficult to navigate. Elements such as lengthier text than the standard version, layout and visual clarity may unintentionally create barriers for those the materials are designed to support. Further structured testing would help refine these versions and ensure they meet the needs of a wide range of users.

**Recommendation 65::** Strengthen assurance of accessibility across the safeguarding learning portal by adopting a range of proportionate methods to test and evaluate accessibility and inclusivity. This should include, but not be limited to, structured engagement with individuals who have lived experience of accessibility needs, alongside technical accessibility checks and review against recognised standards.

Findings should inform revisions to layout, language, navigation and interactive design across all learning pathways.

Consideration should also be given to how language accessibility is supported, including whether translation functionality is available within the e-learning platform or whether appropriate external translation tools could be used to widen access, while recognising the need to balance reach, quality and accuracy.

## Core Competencies

8.22 The NST must adopt a framework of core competencies that aligns with the specific requirements of the organisation. This framework should be applied consistently across all key safeguarding roles within the Church, including RSLs, DSOs, CSOs, caseworkers, and investigators.

8.23 This approach should mirror the standards set by external professional bodies, such as the police service, where investigators are mandated to complete Professionalising Investigation Programme (PIP) courses.

8.24 Once established, a critical component of this process will be ensuring that individuals recruited into these roles possess genuine, credible safeguarding experience, rather than merely having been employed by an organisation that performs safeguarding functions. For instance, having served as a police officer does not automatically qualify an individual as a safeguarding professional; the specific roles and duties they performed are the true markers of their expertise.

**Recommendation 66: Safeguarding Professional Standards Framework (SPSF).**

**1. Tiered Competency Mapping:** The NST should map every role (RSL, DSO, CSO, etc.) against a specific competency tier. Just as the police use PIP 1, 2, and 3, the Church should define what ‘Level 1 Safeguarding’ looks like versus ‘Specialist Casework’.

**2. The Role-Specific Recruitment Audit:** Shift the recruitment focus from organisational background to functional history. Redesign job descriptions to require evidence of ‘Direct Case Management’ or ‘Risk Assessment Oversight’ rather than general ‘Experience in a statutory agency’. Use a Competency Matrix during the interview stage to score candidates on technical safeguarding tasks (e.g., managing disclosure, multi-agency working) rather than broad professional experience.

**3. Mandatory Accreditation Path:** Establish a Licence to Practice within the Church. If a new hire lacks a specific technical qualification (like the PIP equivalent), their probation should be contingent on completing an accredited internal or external safeguarding module within the first six months.

## 9 Conclusion

- 9.1 The Independent Safeguarding Audit of the NST reveals an organisation in a state of significant, professional transition. Since its inception, the NST has evolved from a single part-time position into a multi-million-pound department capable of managing complex, high-profile casework and driving national standards. The overarching narrative is one of commitment, professionalisation, and a genuine appetite for systemic improvement across the Church of England.
- 9.2 Internal staff sentiment stands as a primary strength of the organisation. An overwhelming majority of personnel describe a supportive, collaborative environment where professional skills are genuinely valued. This internal confidence is further evidenced by most employees stating they feel safe raising concerns, which provides a stable foundation for the demanding and sensitive nature of national safeguarding work.
- 9.3 The National Director of Safeguarding brings vital credibility from statutory social care, having operated at both frontline and senior management levels. He is supported by a senior leadership team with a credible blend of experience across policing, probation, victim and survivor advocacy, and project management. Under this leadership, the NST has demonstrated a proactive attitude towards independent scrutiny, evidenced by its active engagement with recommendations from major reviews such as Makin and Scolding. This leadership credibility places the NST in a strong position to support the next stage of safeguarding reform across the Church.
- 9.4 The NST has successfully redefined the Church's safeguarding landscape by embedding accountability through the National Safeguarding Standards, approved in 2023. These are frequently cited as the single most impactful catalyst for driving consistent, professional, and lasting cultural improvement. Furthermore, the establishment of the Data Analysis,

Research and Evaluation (DARE) Unit marks a vital shift towards an intelligence-led approach, enabling the NST to identify trends and measure impact through evidence-based metrics. Together, these developments signal the NST's transition from policy formation to system-wide stewardship and assurance.

9.5 The Audit highlights several high-impact initiatives demonstrating the NST's value to the wider Church. The RSL model has shown the potential to successfully bridge the gap between national policy and local implementation, reducing professional isolation and increasing practitioner confidence. In parallel, survivor engagement has grown significantly, underpinned by the launch of the Survivor Participation Framework in February 2025, which ensures lived experience informs core policy. Additionally, support mechanisms such as the Interim Support Scheme (ISS) are fundamentally valued, with survey findings confirming the scheme acts as a lifeline for those in critical need.

9.6 While the NST has demonstrated remarkable growth, the Audit identifies a need for structural refinement to ensure long-term sustainability. The team currently navigates significant challenges inherent in the Church's decentralised arrangements, which often rely on influence and persuasion rather than direct authority. To address this, the Audit recommends absolute operational independence, supported by a definitive statement acknowledging the NDS as the final authority on all operational safeguarding matters. Addressing these constraints is essential if the NST is to operate with the clarity, authority, and consistency expected of a national safeguarding body.

9.7 The proposed transition of the learning and development function into a Virtual Church of England Safeguarding College represents a logical evolution, shifting the focus towards professional development pathways and research-led curricula. When combined with the recommendation for a Safeguarding Secretariat to manage high-level workflows and compliance, the recommendations in this report will provide the necessary infrastructure

for the NST's next iteration. By refining its governance, clarifying lines of authority, and continuing to prioritise survivor-led insights, the NST will be well-positioned to command both internal and external confidence.

9.8 Finally, wider safeguarding reform will be most effective where the NST is fully integrated and clearly positioned within it, and where the findings and recommendations of this Audit are actively considered and embedded. Given the NST's statutory expertise, survivor engagement, and national oversight role, any reform programme that does not fully take account of the Audit's conclusions and recommendations or limits the NST's involvement in shaping system-wide change, risks weakening coherence, accountability, and the overall credibility of future safeguarding arrangements.

## 10 Appendix 1 – Recommendations

**Recommendation 1:** To resolve ambiguity regarding the National Director of Safeguarding and the NST's authority when critical local safeguarding issues arise, the Archbishops' Council should agree and define specific circumstances when the National Director of Safeguarding can launch investigations into such safeguarding concerns or adjudicate upon cases escalated from individual dioceses.

**Recommendation 2:** The NSSG should mandate the immediate establishment of a single, non-negotiable electronic submission portal or dedicated secure mailbox for all LLRs (Lessons Learned Reviews) and SPRs (Safeguarding Practice Reviews) commissioned by any diocesan or cathedral body.

**Recommendation 3:** The NST must immediately review and revise the Safeguarding Practice Review (SPR) Code of Practice and associated guidance. Specifically, the ambiguous language in the "Who needs copies" section of the SPR code of practice (e.g., the use of "may need to be provided") must be replaced with clear, directive phrasing that reinforces the non-negotiable requirement to send copies to the NST.

**Recommendation 4:** The NST, in collaboration with the Audit and Information Technology departments, should immediately commission and establish a Centralised Safeguarding Learning Repository for all completed Lessons Learned Reviews (LLRs) and Safeguarding Practice Reviews (SPRs). This repository should:

- a) Be designed on the principles of the NSPCC Case Review Repository, focusing on the collation and thematic indexing of key learning points and systemic failures.

b) Implement a mandatory, standardised process for professional anonymisation before publishing, ensuring no personal identifying information remains while retaining the critical context required for learning.

**Recommendation 5:** To assist in strengthening the NST’s inclusive professional environment the NST should implement a two-phased approach focused on cultural integration and impact measurement:

**Phase One:** Actively educate the wider team on the specific functions of every role to ensure each contribution is understood and respected. Create deliberate opportunities for cross-functional engagement, ensuring that the diverse expertise of every member is both utilised and visibly valued.

**Phase Two:** To ensure these interventions are effective, the NST should re-issue the Healthy Cultures survey at an appropriate interval. This follow-up iteration will provide a data-driven benchmark to measure the impact of the changes implemented and identify any remaining areas for cultural development.

**Recommendation 6:** The National Safeguarding Team (NST) should administer an annual diocesan and cathedral safeguarding support survey to measure satisfaction with NST support, including communication, the quality of professional advice, and timeliness.

**Recommendation 7:** The NST should proactively supply mandatory, clear, and consistent communication materials (FAQs, explanatory briefing notes, and short narratives) to accompany all new guidance or policy changes.

**Recommendation 8:** The title of Lead Safeguarding Bishop and associated deputy roles should be abolished. Bishops dedicated to these roles should henceforth be designated as portfolio holders: Lead Bishop Advocate for Safeguarding; Lead Bishop Advocate for

Safeguarding Accountability and Learning; and Lead Bishop Advocate for Survivor Engagement and Support.

Given the central safeguarding influence of Archdeacons, the Church should also consider appointing a Lead Archdeacon Advocate for safeguarding.

**Recommendation 9: A Charter of Operational Independence.** The Archbishops' Council should issue a definitive Charter explicitly mandating that the NDS/Chief Safeguarding Officer holds final authority on all operational matters. This requires:

- a) Realigning the Chief Safeguarding Officer's job description to include 'final operational signatory' status, ensuring they are not subject to secondary approval or a requirement to seek clergy agreement on any safeguarding matter including specific casework.
- b) Formally defining the boundary between the NST (Operational) and the Archbishops' Council (Governance) to prevent encroachment on operational decision-making.
- c) Seeking agreement from every diocese to adopt this position, ensuring a uniform hierarchy of authority across the Church.

The NDS should be the authoritative independent public face on safeguarding matters related to the Church.

### **Recommendation 10: Restructuring.**

#### **The Safeguarding Secretariat**

To ensure maximum efficacy, a dedicated Secretariat, should be created. This unit should manage high-level workflows and act as a strategic gatekeeper, allowing the NDS to focus on core priorities.

The Secretariat will be overseen by a Chief of Staff, reporting directly to the NDS. This role is pivotal in maintaining organisational coherence and discipline. By managing high-level workflows, the Chief of Staff ensures that leadership remains focused on core safeguarding

priorities while the Secretariat manages the complexities to support the organisation and ensure compliance.

**The Secretariat should include:**

- A Compliance Unit. This will oversee regulatory standards and Charity Commission requirements such as annual reporting and Serious Incident Reporting.
- An agile programme/project management function that is scalable when needed. This will avoid over-resourcing after relevant programmes are concluded.
- Dedicated Legal Support. A specialist safeguarding legal advisor to navigate the Church's complex safeguarding landscape. Whilst this person may be linked to a larger legal team, their primary function and expertise must be grounded in safeguarding. Their role will be to ensure that the NDS is given advice, independent of the Church and fundamentally focused on safeguarding and associated legal frameworks.
- A Dedicated Communications Officer independent of the wider Church, fundamentally focused on safeguarding and related matters. Ensuring sensitive and strategically aligned messaging.
- Research Function (the Data Analysis, Research and Evaluation (DARE) Unit). A funded arm for evidence-based policy development. This team should continue to oversee the consolidated organisational action plan they have constructed.
- A Specialist HR Advisor with the skills and abilities to differentiate between conduct, HR and safeguarding issues. This role would provide advice to all regions ensuring conduct issues are clearly separated from safeguarding processes.

**Service Area Framework**

The following provides a high-level strategic repositioning and, where appropriate, a prioritisation of the work undertaken by the current directorates. The specific details should remain subject to the influence and consideration of the NST. These recommendations should be read in conjunction with the findings and narrative provided throughout the report.

In the opinion of the Audit, the existing business areas and activities, excluding project and programme management, which should be situated within the Safeguarding Secretariat, should be reconfigured into three separate service areas each led by a Head of Service, who by default, would be a member of the Senior Management Team:

**Learning & Development:** The current approach should evolve into a Virtual Church of England Safeguarding College. This would incorporate regional campuses across the eight regions, each with a specialist theme aligned to specific portfolio areas. See Learning, Supervision and Support section of this report.

**Operational Support:** This area should continue to focus on the provision of support via NST Regional Leads, as well as casework, specialist risk assessment and, when required, investigations. Moving forward, all roles should be competence-based, with competencies agreed with the Learning and Development Service area. A professional accreditation process should be established for Investigators to ensure consistent, high-quality investigations and risk assessments.

**Victim and Survivor Participation and Engagement:** To elevate this key priority area and ensure a singular focus, this dedicated Service Area will consolidate all engagement and advocacy initiatives. It should be led by a Head of Service with subject matter expertise, be supported by a Victim and Survivors Advisory Panel with a mandate to critique policy and practice and ensure the integration of survivor engagement principles into the core competencies and mandatory training for all staff.

**Recommendation 11:** In light of the Audit's findings of the IICSA 1 & 8 Regional Model Implementation, it is evident that some issues remain unresolved. Consequently, this Audit report recommends that the NST takes immediate steps to rectify the inconsistencies in the model's delivery. Furthermore, the NST should commit to an ongoing review process, or the

publication of an annual report, to monitor the quality of supervision and ensure regional consistency, as highlighted in the original evaluation findings.

**Recommendation 12:** For all future recruitment cycles, the National Safeguarding Team should update the person specification for the RSL role. The 'desirable requirements' should include demonstrable experience of safeguarding within a church context, alongside prior experience as a Diocesan Safeguarding Officer or Cathedral Safeguarding Officer.

**Recommendation 13:** The National Safeguarding Team (NST) should rename the Regional Safeguarding Lead role to NST Regional Lead to explicitly align post-holders with the NST. By adopting this title, the role will function primarily as a strategic liaison and ambassador, bridging the gap between national policy and local implementation. In this capacity, leads will be responsible for promoting the NST's strategic objectives at a regional level, while simultaneously challenging the national centre to ensure it remains responsive to local operational requirements. As part of this approach, NST Regional Leads should brief local teams including Bishops, Deans, Archdeacons, Diocesan Secretary and COOs on the work of the NST, updating them on policy development, and national plans that may impact local delivery.

**Recommendation 14:** The 'supervision agreement' between the RSL/NST, the DSO, and the DSO's line manager should be updated to include formal mechanisms for direct reporting. Specifically, the agreement should be amended to grant the RSL both the right and the obligation to report any concerns regarding the DSO's professional competence directly to the relevant individual or body. Should any party to this agreement inhibit a RSL from escalating a legitimate concern regarding the application of policy in practice, a formal written letter from the National Director of Safeguarding should be sent to the body concerned (DBF or Chapter) and copied to the NSSG and Archbishops' Council highlighting and formally recording the issues.

Furthermore, if such good practice is resisted and the concerns relate to any matter that could undermine any safeguarding practice, a Serious Incident Report to the Charity Commission should be considered.

In any case where a DSO or CSO fails to enter into an agreement which facilitates quality assurance, a formal record should be noted and provided to the appropriate governing body, e.g. the DBF or Chapter.

**Recommendation 15:** Establish a formal 'Policy-to-Practice Feedback Loop'. While the RSLs lead the portfolios, the inclusion of DSOs should be framed as a statutory consultative step rather than an optional invite. This ensures that policy is not only "informed from the ground up" but also carries the mandate of those responsible for its local implementation. Furthermore, this portfolio model should be integrated into the Virtual College's digital repository, creating a single "Source of Truth" to eliminate the risk of parishes receiving information ahead of regional officers.

**Recommendation 16:** As an interim measure, the NSSG should be chaired by an appropriately qualified Independent Safeguarding Professional. The membership of the group must be reviewed and refreshed to ensure that independent individuals and safeguarding experts constitute the majority of its membership. Under this model, any Church Officers or clergy participating in the forum would do so 'in attendance'. Their role would be to provide advice on the specific ecclesiastical context and, where relevant, the requirements of Canon Law, rather than holding primary voting or decision-making power.

Until the proposed new national structures are fully implemented, this reconfigured NSSG should serve as the formal interim oversight body for safeguarding. This shift ensures that, even

during this transitional phase, the Church facilitates an independent, more objective, professionalised approach to its safeguarding responsibilities.

**Recommendation 17:** Moving forward, safeguarding activity across the Church of England should be governed and overseen by an independent charity. This entity should be directed by an appropriately constituted independent board, chaired by a credible and experienced safeguarding professional. In developing this approach, the Archbishops' Council and the Safeguarding Structures Programme team should evaluate the most effective commissioning and construction methods, ensuring this body maintains its independence and integrity.

The primary function of this new governance body must be to hold those operationally responsible for the delivery of safeguarding to account. It should be the ultimate reporting line for the most senior safeguarding professional within the Church of England, currently the National Director of Safeguarding.

**Recommendation 18:** Moving forward, the Church of England, the Safeguarding Structures Programme, and other relevant stakeholders should consider the establishment of a Church Ombudsperson's Office. This office would be entirely external to the Church, providing a robust mechanism through which complaints can be independently assessed, actions directed, and formal findings made.

**Recommendation 19:** The NST should designate contacts who are suitably qualified within the team. These individuals will be responsible for providing safeguarding advice, undertaking risk assessments, and making final decisions in respect of disclosures returned via confidential declarations or DBS checks.

**Recommendation 20:** The NST should review their understanding of the application of DBS eligibility criteria within all available statutory guidance. Following this review, a reassessment

should be systematically applied to all roles within the organisation to ensure their correct compliance with the established criteria.

**Recommendation 21:** The NST should take action to address the misunderstanding that safer recruitment applies only to roles requiring a DBS check. To achieve this, the NST must ensure that everyone involved clearly understands that safer recruitment is a comprehensive and essential set of safeguarding principles. These principles must be embedded into every single stage of the hiring process, starting from the initial job advertisement right through to the successful candidate's induction. This requirement remains vital regardless of whether the specific position necessitates a DBS check.

**Recommendation 22:** The NST should establish a specialist HR capacity to provide expert advice tailored specifically to the CofE context (see Recommendation regarding the establishment of a Safeguarding Secretariat). This provision would offer comprehensive guidance on internal conduct and the crucial differentiation between HR and safeguarding matters. This specialist function would be a resource for all key stakeholders, including the Archbishops' Council, NCIs, dioceses, and cathedrals. A function of this resource could be, for example, to lead the development of a national framework or decision-making tool on classifying a concern as either safeguarding or HR, thereby ensuring essential consistency across the entire Church of England.

**Recommendation 23:** The NST should permanently expand the resource within the DARE Unit to meet the growing need for evidence-based safeguarding, performance monitoring, and quality assurance across the Church of England. It should produce a publicly available Annual Strategic Safeguarding Assessment identifying the progress made, and any persistent or emerging safeguarding trends, themes and patterns.

**Recommendation 24:** The NST should undertake a comprehensive review of the safeguarding webpages on its website. This should begin with an inventory of all existing safeguarding content and an analysis of user behaviour, leveraging website analytics to understand current usage. Following this, the sub-menus and overall content structure should be optimised based on both user feedback and the analytics data, ensuring the pages effectively meet the needs of all key stakeholders.

A vital part of this review will be the creation of a dedicated landing page for Victim and Survivor support and engagement, employing clear and relevant sub-menus. This is essential to ensure that crucial victim and survivor information is highly accessible and easy for users to navigate.

Crucially, every page identified in this process must be assessed for compliance with the WCAG 2.2 accessibility guidelines.

**Recommendation 25:** To build on the benefits that the safeguarding webpages provide to dioceses, cathedrals and parishes, the NST should develop a more extensive library of resources and templates. This could be through the creation of a Safeguarding Resource Library.

To achieve this, they could compile a comprehensive list of all relevant documents and resources to host on their website. These can be sourced from existing national materials and good practice examples from different dioceses and cathedrals. An internal team should then review these resources to ensure they are clear and consistent.

Given that many dioceses already have their own local resources and templates, the NST could adopt a collaborative approach by seeking input from dioceses and cathedrals. To streamline this, a process could be established where dioceses and cathedrals:

- a) Identify the resources they have.
- b) Align them with the corresponding national safeguarding standard.

- c) Agree to terms and conditions set by the NST. These terms would ensure the resources meet agreed-upon standards, such as verifying that the copyright of any images or material used is secure and that the resource has been appropriately quality-assured.

**Recommendation 26:** The NST should adjust its communication plan to include key safeguarding messages via its digital channels. This updated strategy should be explicitly role-specific, ensuring content is precisely targeted and relevant to the diverse stakeholders, be they staff, volunteers, or the general public. In order to enhance this engagement, it should:

- a) Tailor content to resonate with the specific interests and preferences of followers on each platform.
- b) Employ diverse communication strategies suited to each platform's unique features and user expectations. For example, short-form portrait video, polls and support local events with targeted location-specific information.
- c) Capitalise on relevant awareness days, campaigns, and events to amplify key messages and expand audience engagement.
- d) The plan must also incorporate a robust process for capturing and analysing performance data to provide vital insight that will continuously inform and improve all future communications efforts.

**Recommendation 27:** Given the depth and breadth of such engagement and to ensure a coherent and consistent approach, a member of the SLT or the Chief of Staff (if such a post is agreed) should review and ensure alignment with SLT business areas and responsibilities.

**Recommendation 28:** In recognition of the unique risks and complex safeguarding considerations inherent in children and youth-focussed ministries, it is recommended that Archbishops' Council, with the advice of the NST, and the Strategic Mission and Ministry Investment Board (SMMIB) undertake the following:

- a) Integrate Safeguarding into the application process: The SMMIB should mandate that all future funding applications for Children and Young People ministries include a comprehensive outline of safeguarding measures and delivery arrangements. Evidence of robust oversight must be a prerequisite for the approval of any Diocesan Investment Programme (DIP) or People and Partnerships Funding (PPF).
- b) Permit Proportional DIP Funding for Safeguarding Infrastructure: Current DIP funding stipulations should allow for a proportional allocation of grant monies to be directed towards safeguarding support services. This ensures that the expansion of youth ministry is accompanied by the necessary investment in Diocesan Safeguarding Teams and the professional infrastructure required to protect participants.

**Recommendation 29:** The NST and the wider Archbishops' Council should establish a national safeguarding strategy for Children and Youth Ministries. This strategy should adopt a collaborative, coordinated, and holistic approach, with part of the implementation and local data collection being driven locally in dioceses in support of the NST's national oversight role.

This national strategy could include, but not be limited to the following objectives:

- a) Mapping of Programme Types: Scope the extent and the types of children and youth activities taking place across the dioceses.
- b) Workforce Oversight and Data: To establish an ambition and work plan to support dioceses in identifying and maintaining oversight of all paid and volunteer children and youth workers, feeding this critical data into a national database.
- c) Stakeholder Participation: To ensure appropriate consultation and engagement with children, youth, and their leaders through specific participation activities.
- d) A Tailored Learning Programme: To develop and implement safeguarding training that is specific to children and youth ministry, ensuring it is effectively tailored to both the individual's role (e.g., volunteer leader, paid worker, clergy) and the regional context in which they serve.

**Recommendation 30:** A collaborative and coordinated approach should be adopted for further development of national safeguarding guidance within the context of children and youth ministries.

This should commence with a mapping exercise, conducted simultaneously with the identification of any existing gaps.

This approach should include robust quality assurance mechanisms and specialist safeguarding advice and input. The objective would be to establish a centralised, resource for the House of Bishops' Safeguarding Guidance (specifically as a 'due regard' or 'requirement to comply') and integrate it fully into the Church of England's Safeguarding e-manual.

**Recommendation 31:** Establish a specialist children and youth safeguarding function embedded within the existing NST structure. This dedicated capacity should provide expert advice, strengthen national oversight of youth-facing ministries and partnerships, and ensure the Church's ambitions for children and young people are delivered safely. Whilst this is a decision for the NST, the Audit believes this function should be hosted within the Operational Support Service area.

**Recommendation 32:** The NST should adopt a formal recording model by implementing a structured Safeguarding Contact Framework. This transition moves away from a reliance on anecdotal evidence and creates a data-driven approach similar to a Multi-Agency Safeguarding Hub (MASH), ensuring full compliance with UK data protection standards.

The NST should replace informal, memory-based systems with a formal, auditable registry. A standardised 'Initial Contact' protocol should be integrated into the existing Case Management System to ensure every contact is recorded, including those that do not meet the threshold for

immediate intervention. This provides a single source of information for managers to analyse trends, identify recurring patterns of concern, and allocate resources accurately.

The NST is required to update its Privacy Notice to satisfy the UK GDPR principles of lawfulness, fairness, and transparency. This update must inform individuals that data is recorded for audit and trend analysis under the legal basis of substantial public interest. Explicitly documenting that this data helps identify cumulative risk over time provides a defence against potential challenges from the Information Commissioner's Office (ICO) regarding the necessity of storing records where no action was taken.

A tiered retention and anonymisation strategy should be introduced to address the principle of data minimisation. A two-stage system is recommended where contacts that do not result in a referral are kept in a searchable format for a set period (based on existing protocols) for example two years or more if permissible, to monitor for repeat patterns. After this window, personal identifiers should be removed, leaving only the data required for long-term strategic planning.

Regular managerial audits should be established to compare the volume of initial contacts against successful referrals. These audits will provide a clear picture of the impact of early support and ensure the NST operates within a professional, auditable, and legally sound environment rather than relying on fallible memories.

**Recommendation 33:** To strengthen practice on casework, the NST should:

- a) Review current caseloads and case allocations to ensure equitable distribution and that those carrying additional cases, including managers, have the necessary support and whether additional resource is needed.
- b) Introduce formal naming conventions for different event/document types and mandate their use.
- c) Cease the practice of uploading draft documentation unless it is clearly marked with proper

version control and a consistent naming convention. All such drafts should be hidden/deleted upon completion of the final record.

- d) Explore the potential for the 'Files' section of the NSCMS to identify document dates, as opposed to simply recording their upload date.

**Recommendation 34:** The NST should develop and issue comprehensive national guidance to refine the use of the NSCMS across diocesan teams. This policy should move beyond basic functionality to establish clear, standardised principles for professional recording. Specifically, the guidance should address the following areas:

- Clarity on the specific types and thresholds of safeguarding concerns that require formal entry into the system. This should include a clear protocol for recording 'advice-only' interactions, such as when a diocesan team provides guidance to a parish, to ensure such interventions are captured consistently.
- Provide a framework for the decisions safeguarding teams make when allocating risk levels. This should include the specific criteria to be used when determining a risk rating, ensuring that risk is assessed and recorded uniformly across the Church.
- To improve the quality of casework oversight, the use of chronologies within the system should be reviewed. Recording should shift from a simple index of all administrative activity toward a practice-led approach that highlights 'significant events,' providing a more meaningful narrative of the safeguarding journey.
- A requirement that a clear and comprehensive rationale is recorded for all decisions. Documentation should explicitly detail the justification for both the commencement of specific actions and crucially, the decision-making criteria applied when a standard intervention is deemed unnecessary or is intentionally omitted.
- Introduce and enforce formal naming conventions for all file types to ensure data remains organised, searchable, and consistent across different dioceses.

**Recommendation 35:** Given the reluctance of the current provider to adapt the software to meet the specific needs of the church, the NST should undertake a contingency planning exercise to identify a potential replacement to the current NSCMS.

**Recommendation 36:** Consideration should be given to designing and implementing a ‘threshold tool’ to be used alongside the Managing Safeguarding Concerns and Allegations Code. This tool should provide a framework and matrix of case examples that can help differentiate the different pathways particular cases should follow.

**Recommendation 37:** More rigorous oversight must be applied when commissioning or directing risk assessments of senior clergy. This is necessary to prevent (perceived or actual) conflicts of interest and to uphold the impartiality and independence essential to a credible safeguarding process.

**Recommendation 38:** The NST should develop a national framework for addressing the issue of risk assessments and safety plans.

This framework must encompass, but not be limited to, developing a national risk assessment matrix for safeguarding individuals who pose a risk in church settings, context-specific training provisions, including the creation of comprehensive, structured national guidance materials. Crucially, this framework should be designed to directly assist the Diocesan Safeguarding Teams (DSTs) in their work establishing and supporting Reference Groups.

This national resource bundle should include several key elements: detailed Guidance Material for Reference Group Members, which clearly articulates the core purpose and implementation process of a Safety Plan; a defined Role Description providing a national template for the duties, responsibilities, and required personal qualities of Reference Group members; and a formal, mandatory Statement of Confidentiality for anyone with knowledge of a Safety Plan.

The bundle should also include robust operational training materials, offering context-specific practical resources and techniques for applying the Safety Plan within specific parish scenarios and evaluating potential risks; for monitoring individuals, including techniques for conducting necessary conversations.

**Recommendation 39:**

The NST, in collaboration with national ecumenical bodies, should seek to facilitate the development of a formalised National Information Sharing Model. This framework should be designed to mirror the efficacy of the INI (Interpreting National Intelligence) systems used by UK Police forces, ensuring that when a respondent moves between different denominational jurisdictions, the associated risk and oversight requirements move with them.

This framework should codify the "Bilateral Responsibility" for risk disclosure:

The Respondent's Obligation: To ensure full transparency, the framework should mandate that any individual currently subject to a Church Safety Plan (CSP) has a formal requirement to disclose their status to the leadership of any new church or denomination they join.

The Diocesan Board of Finance (DBF) in the "exporting" diocese must have a formalised duty to notify their counterparts in the "importing" body. This must include the transfer of the most recent risk assessments, active CSPs, and Reference Group minutes.

**Recommendation 40:** The NST should review and consider options for how the NSCMS can be adapted to best meet the reporting and record-keeping needs associated with inactive or formally ended safety plans. This review should prioritise the introduction of a clear, auditable status field/flag (e.g., 'Inactive' or 'Ended') that allows users to retain the full plan record while accurately removing it from the count of active plans measured by the 'Profile Flag' mechanism.

**Recommendation 41:** The NST should consult its in-house expertise to produce formal, comprehensive guidance on how those in a position to do so can give a robust, authentic, and trauma-informed apology. This guidance should complement Section 7: *‘The issuing of apologies by Church Bodies’* in *‘Responding Well to Victims and Survivors of Abuse’*.

**Recommendation 42:** Establish a formally constituted and strategically mandated Victim and Survivor Reference Panel (SRP), composed of diverse survivors, close supporters, and specialist professionals/NGO representatives, tasked with providing high-level, collective advisory input on all major policy, strategic, and communication decisions, thereby embedding survivor expertise at the core of institutional governance and operational effectiveness.

All policies relating to or impacting on victims and survivors should be signed off by the Head of the re-purposed Victim and Survivor Participation and Engagement service.

**Recommendation 43:** The Audit recommends the NST seek to ensure more advanced training on understanding the impact of trauma takes place as soon as possible, especially for those directly engaging with victims and survivors.

**Recommendation 44:** Following the adoption of ‘Responding Well’ as a formal Code of Practice, the NST must ensure its effective rollout and mandate that all dioceses and cathedrals prioritise its promotion and compliance.

**Recommendation 45:** The NST should consider the central advertisement of all participation opportunities on the Survivor Participation webpage.

**Recommendation 46:** In line with the Survivor Participation Framework, the NST should review and strengthen how they:

- a) Clearly and consistently communicate the purpose and expectations of each participation role and activity.
- b) Ensure there is clarity about what each participation role and activity involves.
- c) Offer alternative ways for survivors to contribute to projects they have expressed interest in.
- d) Provide supportive messaging that non-selection reflects participation role, activity and context of participation. Messaging should be clear that non selection does not reflect personal shortcomings, to build trust and demonstrate the value of all contributions.

**Recommendation 47:** A budget should be allocated for victim and survivor-led projects focused on safeguarding improvements nationally.

**Recommendation 48:** The NST should ensure that the existing participation tracking system is accurately and consistently applied to all victim and survivor engagement.

**Recommendation 49:** The NST should initiate a formal mechanism whereby the Survivor Participation Lead works with local dioceses to provide local opportunities.

**Recommendation 50:** The NST should lead by example by creating clear opportunities for victims and survivors to propose initiatives and activities, ensuring their voices directly shape projects and decision-making.

**Recommendation 51:** The NST should establish mechanisms for victims and survivors to receive support while engaging in project work and participation activities. This should be discussed and agreed with victims and survivors, in line with the Survivor Participation Framework.

**Recommendation 52:** The NST should implement professional supervision for all staff engaging with victims and survivors on project work, with a particular emphasis on ensuring mandatory, regular supervision for all project leaders.

**Recommendation 53:** The NST should consider implementing training for staff involved in victim and survivor participation activities.

**Recommendation 54:** The NST should:

- a) Ensure central oversight of the participation log within the Victim and Survivor Participation and Engagement Service to maintain accountability and monitor all honorarium processes.
- b) Phase out the manual honorarium claims process and replace it with a streamlined system integrated into the central participation log.
- c) Designate operational responsibility for processing payments to the engagement officer (or a delegated team member), while the Service maintains overall oversight.

**Recommendation 55:** Victims and survivors participating in the project work should receive regular, timely updates on the progress of the work, information detailing how their contributions have been used, and access to final project outputs.

**Recommendation 56:** The NST should consider (within the limits of charity regulations) the extension of the current ISS support for returning applicants with urgent, ongoing needs, allowing them to continue receiving support without re-application for the duration of the Scheme unless the applicant advises a change in their circumstances.

**Recommendation 57:** The NST should commission a systematic, independent review of ISS panel decisions to ensure transparency, consistency, and fairness, reinforcing confidence among victims and survivors in the scheme.

**Recommendation 58:** The NST should review the policy relating to clergy spouses who find themselves in complex situations labelled as ‘domestic situations’ and clarify whether this currently disadvantages them.

**Recommendation 59:** The NST should strengthen its learning and development function by creating a Virtual Church of England Safeguarding College as recommended in the Leadership and Capacity section of this report. This should include consideration of the following:

- a) Establishing a Service with a senior lead accountable for national safeguarding learning.
- b) Increase staffing to ensure that responsibility for content development, quality assurance and review cycles is not held by single individuals.
- c) Define clear roles, responsibilities and workflows within the team to support consistency and reduce siloed working.
- d) Introduce shared oversight mechanisms to ensure continuity and protect organisational memory.
- e) Ensure implementation plans align with wider NST and NCIs strategy, including digital development, research activity and operational learning.

Align with and support the portfolio approach utilising RSLs and regional safeguarding representative to ensure the construction, review and revision of policies are developed collaboratively.

**Recommendation 60:** The Virtual Church of England Safeguarding College should include:

- a) A single, recognisable entry point where all safeguarding learning resources, standards and pathways are located to provide clarity for dioceses, cathedrals and other Church bodies.

- b) A standardised professional development framework that sets out clear expectations for those who hold safeguarding responsibilities, including clergy, DBF staff and volunteers.
- c) A centralised approach to curriculum design that draws on research, lived experience, learning from casework and audit findings.
- d) A programme of quality assurance that monitors delivery, evaluates impact and ensures alignment with national standards.
- e) A digital infrastructure that reduces duplication across Church bodies by embedding approved course content and learning resources for all.

**Recommendation 61:** To enhance the Learning and Development Framework's currency and effectiveness, the existing triennial review cycle should be formally replaced by a new annual review cycle.

This annual cycle lead by RSL Portfolio holders and regional representatives, should include the following processes:

- a) Planned annual update timetable: Set and publish key dates at consistent points each year so dioceses and cathedrals can plan for updates and implementation. This should provide clarity about when revisions will be consulted on, finalised and released.
- b) Clear scope for the annual review: Ensure the annual review explicitly considers new legislation, statutory guidance and national policy changes, emerging safeguarding risks and themes, and areas where clearer definitions or expectations are needed to support good practice and compliance.
- c) A transparent feedback loop: Introduce a clear method for capturing, reviewing and acting on feedback, with visibility about what has changed and why. This should address current perceptions that feedback is not routinely gathered or used.
- d) Formal quality assurance prior to release: Introduce defined stages of scrutiny and a formal sign-off before publication, covering as a minimum:

- Instructional design, including clarity of objectives, logical structure and learner engagement.
- Content quality, including accuracy, currency and editorial standards.
- Technical functionality, including reliability across devices, ease of navigation and accurate assessments.
- Design and accessibility, including consistency and compliance with recognised accessibility standards, including WCAG.

e) Beyond the portfolio approach, ensure wider structured stakeholder engagement via embedding consultation between course development and launch, including engagement with the Training Network Group, relevant sub-groups, subject matter experts and practitioners. Where courses are new or substantially revised, pilot them in a small number of dioceses or regions before national release to test usability and practical impact. Additionally, ensure the annual review cycle is informed by learning from audits, case reviews, MyConcern data, DARE research and relevant national policy updates. This should include scheduled cross-team discussions and documented decisions to demonstrate how operational and research learning has informed training revisions, rather than reliance on ad hoc or informal mechanisms.

**Recommendation 62:** Establish a clear Evaluation Model for safeguarding learning. While the Audit recognises that a range of recognised evaluation models may be appropriate, the NST should set out a structured and comprehensive framework for assessing the effectiveness and impact of policy and training. This framework should support consistent measurement of outcomes, identification of learning themes, and alignment with national safeguarding standards and organisational objectives.

The NST should establish a coherent and proportionate approach to evaluating safeguarding learning, comprising the following three elements:

- a) A clear evaluation model for learning, setting out a structured framework for assessing the effectiveness and impact of safeguarding training. While recognising that different evaluation models may be appropriate, the framework should enable consistent measurement of outcomes, identification of learning themes, and alignment with national safeguarding standards and organisational objectives.
- b) Consistent capture and central consolidation of evaluation data, ensuring that feedback and evaluation from all training pathways, including locally delivered and face-to-face training, is gathered in a standardised way. This should support effective aggregation and analysis at a national level, whether through digital platforms or agreed local processes, and enable clearer oversight of learning quality and impact.
- c) Meaningful measures of impact, ensuring evaluation goes beyond participant satisfaction to include changes in confidence, understanding, and the application of learning in practice. Where proportionate, this should be supported by follow-up activity to understand longer-term impact and inform continuous improvement.

**Recommendation 63:** As part of the Virtual Church of England Safeguarding College approach, the NST should develop a national commissioning framework for new thematic training modules, guided by risk analysis, user need and the Church’s statutory responsibilities. This should include a review of thematic training already developed by individual dioceses and cathedrals to identify good practice, reduce duplication and inform a cohesive national offer. The framework should be supported by increased resource and dedicated development time within the learning and development team.

**Recommendation 64:** As part of the Virtual Church of England Safeguarding College approach, develop a programme of contextualised learning that includes role specific modules and regionally relevant examples. This should be created collaboratively with diocesan and cathedral safeguarding teams and supported by adequate capacity within the NST.

**Recommendation 65:** Strengthen assurance of accessibility across the safeguarding learning portal by adopting a range of proportionate methods to test and evaluate accessibility and inclusivity. This should include, but not be limited to, structured engagement with individuals who have lived experience of accessibility needs, alongside technical accessibility checks and review against recognised standards.

Findings should inform revisions to layout, language, navigation and interactive design across all learning pathways. Consideration should also be given to how language accessibility is supported, including whether translation functionality is available within the e-learning platform or whether appropriate external translation tools could be used to widen access, while recognising the need to balance reach, quality and accuracy.

**Recommendation 66: Safeguarding Professional Standards Framework (SPSF).**

**1. Tiered Competency Mapping:** The NST should map every role (RSL, DSO, CSO, etc.) against a specific competency tier. Just as the police use PIP 1, 2, and 3, the Church should define what ‘Level 1 Safeguarding’ looks like versus ‘Specialist Casework’.

**2. The Role-Specific Recruitment Audit:** Shift the recruitment focus from organisational background to functional history. Redesign job descriptions to require evidence of ‘Direct Case Management’ or ‘Risk Assessment Oversight’ rather than general ‘Experience in a statutory agency’. Use a Competency Matrix during the interview stage to score candidates on technical safeguarding tasks (e.g., managing disclosure, multi-agency working) rather than broad professional experience.

**3. Mandatory Accreditation Path:** Establish a Licence to Practice within the Church. If a new hire lacks a specific technical qualification (like the PIP equivalent), their probation should be contingent on completing an accredited internal or external safeguarding module within the first six months.

## 11 Appendix 2 – Glossary of Abbreviations

ARC	Audit and Risk Committee
BMO	Bishops' Mission Order
CENS	Church of England National Services
ChECS	Church of England Central Services
CofE	Church of England
CPD	Continuing Professional Development
CSO	Cathedral Safeguarding Officer
DARE	Data Analysis, Research and Evaluation (Unit)
DBF	Diocesan Board of Finance
DBS	Disclosure and Barring Service
DIP	Diocesan Investment Programme
DSA	Diocesan Safeguarding Advisor
DSAP	Diocesan Safeguarding Advisory Panel
DSO	Diocesan Safeguarding Officer
DST	Diocesan Safeguarding Team
GDPR	General Data Protection Regulation
IICSA	Independent Inquiry into Child Sexual Abuse
IOPC	Independent Office for Police Conduct
ISAP	Independent Safeguarding Audit Programme
ISB	Independent Safeguarding Board
ISS	Interim Support Scheme
LLR	Lessons Learned Review
MASH	Multi-Agency Safeguarding Hub
NCI	National Church Institution
NDS	National Director of Safeguarding
NSCMS	National Safeguarding Casework Management System

NSS	National Safeguarding Standards
NSSG	National Safeguarding Steering Group
NST	National Safeguarding Team
PCC	Parochial Church Council
PCR2	Past Cases Review 2
PIP	Professionalising Investigation Programme
PPF	People and Partnerships Funding
PSO	Parish Safeguarding Officer
QA	Quality Assurance
RSL	Regional Safeguarding Lead
SCMG	Safeguarding Case Management Group
SEND	Special Educational Needs and Disabilities
SIR	Serious Incident Report
SLT	Senior Leadership Team
SMMIB	Strategic Mission and Ministry Investment Board
SPR	Safeguarding Practice Review
SRPM	Safer Recruitment and People Management
SSEW	Safe Spaces England and Wales
WCAG	Web Content Accessibility Guidelines



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