

NSPCC Consultancy Services

Overview Report: Safeguarding Review of Plymouth Diocese

February 2012

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Safeguarding review – Plymouth Diocese
Final Overview Report**

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1. INTRODUCTION

- 1.1. The Bishop of the Roman Catholic Diocese of Plymouth commissioned the National Society for the Prevention of Cruelty to Children (NSPCC) Consultancy Services (Child Protection Consultancy Division) to undertake an independent review of the Diocese's safeguarding practices. The intended outcome of this project is to promote improved safeguarding awareness and practises, to identify lessons to be learned within the Diocese of Plymouth, and to ensure that children and adults in need of safeguarding are safeguarded. This is part of a number of measures the Bishop has taken, in conjunction with his Diocesan Safeguarding Commission and Safeguarding Office, to ensure that a safe environment exists for all in the church.

- 1.2. This followed the knowledge that Mr Christopher Jarvis, who had been a fully qualified social worker employed (although not registered with the GSCC¹) as the Diocesan lead for safeguarding since 2002, had been accessing abusive images of children (category 4/5 – 5 is the highest level and constitutes the most serious offence) and distributing these. The Bishop immediately suspended Mr Jarvis and subsequently dismissed him from his position for gross misconduct, after Mr Jarvis admitted to the offences. From the outset the church fully co-operated with police to bring Mr Jarvis to justice, and he has since been convicted (October 2011) of these offences and is currently serving a 12 month custodial sentence.

- 1.3. The NSPCC safeguarding review was divided into two phases. Phase one involved reviewing all church case files (111) over the past three years which Mr Jarvis was involved with, to assess the extent to which policies/procedures have been complied with, and to ensure that any safeguarding concerns have been appropriately responded to, and if not, to ensure that action was taken to address this. Findings are represented in a separate report (dated September 2011) and this provides assurance that assessments of risk are considered to have been proportionate to the presenting concern and did not compromise the safety of children or adults in need of safeguarding. Recommendations have

¹ GSCC (General Social Care Council) – regulators of the social work profession and social work education in England

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been made about how to improve systems mainly relating to recording practices (and these can be found at appendix B.

1.4. Phase two has since been completed and findings/key themes are represented in this report. This part of the review had two objectives:

- (i) Review the diocesan safeguarding practice as an organisation to assess what works well and identify areas for improvement and make recommendations in order that children and adults in need of safeguarding are safeguarded.
- (ii) Examining the interface between the Diocese of Plymouth safeguarding practice as an organisation and the function of the Diocesan Safeguarding Commission², and the relationship with the National Catholic Safeguarding Commission (NCSC³) and Catholic Safeguarding Advisory Service (CSAS⁴). The purpose of this was to assess the effectiveness of the safeguarding function as a whole, focussing particularly on the assessment of practice and effectiveness of inspection/audit and governance as it applies to the Diocese of Plymouth.

This was achieved by examination of compliance with National safeguarding policies and procedures⁵, including the practice of recruitment, induction, supervision, support, training and appraisal as necessary, as well as other areas where practice could be strengthened particularly in respect of governance and accountability. Full details of the purpose, scope and methodology of the review are attached as appendix A.

1.5. We have made recommendations in this report only where we consider they will assist future practice development. Recommendations have been divided into those relating to compliance with existing National safeguarding procedures (in

² The Diocesan Safeguarding Commission is accountable to the Bishop and Trustees of the Diocese. The Commission has regulatory, advisory and supportive functions and exists to discharge these functions at a strategic level in all matters relating to safeguarding in the Diocese

³ The National Catholic Safeguarding Commission (NCSC) is responsible for setting the strategy direction of the Church's safeguarding policy and monitoring compliance. Mandated by the Conference of Bishops and Conference of Religious, it will ensure that standards are met and policies are implemented

⁴ The Catholic Safeguarding Advisory Service (CSAS) reports to and provides expert advice to the NCSC. CSAS are responsible for driving and supporting improvements in safeguarding practice, and is the Registered Body for CRB and Vetting and Barring

⁵ Catholic Safeguarding Advisory Service (CSAC) procedures (May 2011)

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effect these are the expected standards for the Catholic ‘One Church approach’⁶) with the expectation that these will be accepted to support compliance. Other recommendations are made where there is no current National standard but implementation would be beneficial in supporting the Diocese of Plymouth becoming a beacon of safeguarding good practice/excellence, and these are for consideration by the Bishop. It should be noted that recommendations relate not only to direct safeguarding practice but other ways of making the organisation a safer organisation, on the premise that ‘safer organisations equal safer children and adults’.

1.6. For the purpose of this report the following terms are used to mean:

- ‘Safeguarding’ – *“The process of protecting individuals from abuse or neglect, preventing impairment of their health and development, and ensuring they are living in circumstances consistent with the provision of safe and effective care that enables them to have optimum life chances”* (adapted from Working Together 2010⁷). This signifies the move from the narrow concept of ‘protection’ to the wider concept of ‘safeguarding’ and is also relevant to adults in need of safeguarding.
- ‘Children’ – includes all children and young people who have not yet reached their 18th birthday⁸.
- ‘An Adult in Need of Safeguarding’⁹ – *“Is a person who is/maybe, in need of community care services because of mental disability or other disability, age or illness, and who is/maybe unable to take care of themselves or unable to protect themselves against significant harm or exploitation”* (‘No Secrets’¹⁰).

1.7. While it is noted that the catalyst for this review came from the knowledge of one individual’s offending behaviour, it has also been used as a valuable

⁶ One Church approach means commitment to using the same policies, procedures and systems throughout the Church in England and Wales

⁷ Working Together to Safeguard Children – A guide to inter-agency working to safeguard and promote the welfare of children (Department for children, schools and families - now known as Department for Education) (2010, p.27)

⁸ As in the Children Acts 1989 and 2004 respectively

⁹ Adults in need of safeguarding is the current terminology and replaces the term ‘vulnerable adults’

¹⁰ No Secrets (Department of Health and the Home Office) (2000, Section 2)

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opportunity to strengthen safeguarding practice and build on an existing sound foundation. We wish to thank all those involved within the Diocese of Plymouth who have taken part in this review, particularly individuals from: the Safeguarding Office, representatives of the Clergy and Religious, parish Safeguarding Representatives, parishioners (including children and young people), and members of the Diocesan Safeguarding Commission (DSC), Trustees, and the Bishop. In addition, representatives of the Catholic Safeguarding Advisory Service (CSAS), and Buckfast Safeguarding Commission¹¹ have contributed. These individuals have demonstrated their commitment, enthusiasm, co-operation, assistance, support and guidance, without which phase two of this review could not have been completed. It is your contribution that has shaped the way forward and recommendations in this report.

2. METHODOLOGY (Phase two)

2.1. A reference group was established with representation from the diocese to ensure the expertise of those with knowledge and experience locally, which included representatives from: the Safeguarding Office; Clergy; Religious; Diocesan Safeguarding Commission; National Catholic Safeguarding Commission (this individual is also a Canon Lawyer and parish priest within the Diocese of Plymouth). The terms of reference for membership of this group involved four key functions:

- (i) To represent key personnel (across the range of functions) of the Diocese – to act in an advisory capacity to the NSPCC review team to inform the action plan for phase two.
- (ii) To assist in facilitating access to appropriate individuals and groups within the diocese and, for this purpose, to liaise with the project lead to confirm arrangements and support contribution of those involved.
- (iii) To comment on phase two instruments e.g. briefing, areas for discussion, questionnaires, to ensure they capture necessary information.
- (iv) To comment on the draft overview report compiled by the project lead at the end of the fieldwork to ensure it fulfils project objectives.

¹¹ Buckfast Religious Safeguarding Commission are separate to Plymouth Diocese

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2.2. **Table 1:** A list of phase two fieldwork activities and contributions received from across the three counties (Cornwall, Devon, and Dorset) served by the Diocese of Plymouth.

Fieldwork Activities	What/Whom & Number
Desk top review and comment	Review of the content of Diocese of Plymouth Safeguarding Resource Pack for consideration by Plymouth Diocese and the CSAS
Interview with Diocesan Safeguarding Office staff and access to relevant papers	All – 4 (Interim Safeguarding Co-ordinator, Safeguarding Officer, and Office Administrator, and former supervisor of the previous Safeguarding Co-ordinator)
Interview with some members of the Diocesan Safeguarding Commission	7 (this included the Independent Chair of the commission, representative of Police, Children’s Services, a specialist regarding sexual offending behaviour, and a member who was formerly the Diocesan Financial Secretary)
Observation of a Diocesan Safeguarding Commission meeting	Attended one meeting in December 2011
Interview with the Bishop and some key members of the diocese	6 (includes the Episcopal Vicar for Safeguarding, a member of the Religious, and representatives of the Vicariate of Formation)
Interview with Diocesan Trustees	2
Interview with Canon Lawyer ¹² and member of the National Catholic Safeguarding Commission (NCSC)	1
Interview with representatives of the Catholic Safeguarding Advisory Service (CSAS)	2 (the Director and a Learning and Development Advisor)
Interview with representatives of Buckfast Religious Safeguarding Commission	2 (the Religious Safeguarding Co-ordinator and Independent Chair of the Commission)
Children parishioners – completed questionnaires	143
Adult parishioners - completed questionnaires	801
Adult parishioners involved in active ministry – completed questionnaires	218
Focus groups (3) with parish Safeguarding Representatives ¹³	50 plus
Focus groups (3) with Clergy and Religious	31 (included 5 Deans, 1 University Chaplaincy, 6 Deacons, 1 Ordinariate Priest, 6 Religious, and 12 parish Priests)
TOTAL contributions	1267

¹² Canon Law is the juridical system of the Catholic Church

¹³ Local Safeguarding Representatives have responsibility for promoting good and safe practices in all activities involving children, and adults in need of safeguarding within the parish or congregation – they are the link between parish, Diocesan Safeguarding Office and the Diocesan Safeguarding Commission

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NB: It was outside the remit of this review to interview a wider sample of inter-agency professionals across the six local authorities covered by the Diocese of Plymouth. Interviews with inter-agency individuals who are also members of the Diocesan Safeguarding Commission have been undertaken.

3. SUMMARY OF KEY FINDINGS

Strengths:

- 3.1. It is important to acknowledge that over the past 20 years the Diocese of Plymouth has made significant strides along the safeguarding journey and the Bishop has played his part by championing safeguarding for the purpose of ensuring that all are safe, as far as possible, within the church environment.
- 3.2. Current structural arrangements within the Diocese of Plymouth have developed over the past 10 years as a result of national recommendations from the Nolan (2001) and Cumberlege (2007) reviews e.g. the establishment and functioning of the Diocesan Safeguarding Commission, the Safeguarding Office, and appointment of volunteer parish Safeguarding Representatives.
- 3.3. The majority of children who contributed to this review reported that they feel quite happy and safe at church and know who to speak to if they were not happy or wanted to make a complaint. They also said that they are listened to and treated with respect while involved with church activities.
- 3.4. The Diocesan Safeguarding Office has been operating for approximately 10 years and has evolved in response to local needs and national developments. The current staff group have the skills, knowledge, and experience to drive continued improvements forward and are well regarded by their colleagues across the diocese.
- 3.5. We consider the draft proposals to reallocate resources within the Diocesan Safeguarding Office, with minimal growth in establishment, for the purpose of improving the delineation between the management of safeguarding and service delivery as a necessary way forward, as this should provide greater flexibility

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and resilience within the office. This proposal is yet to be considered by the Bishop and Trustees.

- 3.6. Findings of this review evidence good working together (overall) and compliance with statutory agency processes and legislative requirements and also that existing arrangements are both appropriate and necessary in order to provide a safe environment for all involved with the Church.
- 3.7. The Diocese of Plymouth operates a well-established and effective Diocesan Safeguarding Commission. We found evidence of strong leadership and view the inter-agency membership and contribution to the group as a real strength in taking the safeguarding agenda forward.
- 3.8. There is evidence of well-established processes to support safer recruitment practice both via the Safeguarding Office and work of the parish Safeguarding Representatives.
- 3.9. There is a strong pool of volunteer parish Safeguarding Representatives across the diocese and these individuals are highly regarded for their good work.
- 3.10. Overall, there was a good level of understanding by the Clergy and Religious of their responsibilities for safeguarding within their parish/communities.
- 3.11. Parishioners engaged well with this review and this is considered to be indicative of the commitment and importance with which safeguarding is viewed, which is of itself a strength upon which to build.

Areas for improvement and development

- 3.12. The breach of professional and personal trust by the former Safeguarding Co-ordinator's offending behaviour has had a significant impact on many across the diocese and is a real setback for the Church which should not be minimised. It is also necessary to state that we are of the opinion that this individual would in all probability have offended whatever measures were in place by the Church and he must carry the responsibility for his behaviour and abuse of trust.

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- 3.13. With the benefit of hindsight and forethought there are lessons for the Diocese of Plymouth to learn from this experience and areas that can be further strengthened demonstrated by the 34 recommendations contained within this report.
- 3.14. Regarding the management, supervision, and support for Diocesan Safeguarding Office staff there are a number of areas which can be strengthened including: arrangements to sufficiently address the potential impact upon staff of this demanding area of work; the provision of supervision and recording of this needs to be in accordance with national standards, and there is a need for clearer lines of accountability; and commencement of annual appraisals for staff which set objectives for the forthcoming year against which progress can be measured.
- 3.15. Another way of strengthening existing practice is commencement of local case auditing through the management line in order to quality assure safeguarding practice and discuss findings within supervision of Diocesan Safeguarding Office staff on a monthly/bi-monthly basis. Furthermore, the Diocesan Safeguarding Commission should not rely on self-reports from the Safeguarding Office alone, and could also develop a process to annually review/audit the functioning of the Safeguarding Office. This would make the process of quality assurance more robust and compliment audit via the management line as well as new plans nationally to audit dioceses' on three yearly cycles.
- 3.16. There are a range of Human Resources policies which require review, tightening/development and promotion across the diocese, to ensure that all staff are fully informed about expectations and processes relating to the Sickness Absence, Whistleblowing, and Information Security Policies.
- 3.17. Communication has at times been fragmented and a number of formal measures could be established to improve this e.g. between the Bishop/Trustees and the Diocesan Safeguarding Commission and Safeguarding Office. For example, the Independent Chair of the Commission and/or Safeguarding Co-ordinator should attend a Trustees' meeting at least once a

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year to facilitate effective communication and an open channel between the safeguarding team and Trustees.

- 3.18. There is also a need for the appointment of a suitably experienced individual locally to develop of a communications strategy, including how to respond to media/communications across the diocese such as this recent safeguarding matter. The Independent Chair of the Commission and the Bishop's Personal Assistant had to deal with the media in this instance and did this commendably. However, while some support was received from The Catholic Communications Network (a national service) this does not detract from the need for a local communications person who could have been more 'hands on'.
- 3.19. While there are new national plans and standards for the training and development of the Clergy, Commission members, and others with safeguarding responsibilities within dioceses', there are many developments that could take place locally which would support individuals understanding of responsibility and accountability e.g. the development and joining up of induction/training strategy which integrates safeguarding into the mission of the church, which includes the five Deaneries, Vicariate of Formation, the Diocesan Safeguarding Office, and Special Needs Advisor. There is a need to respond to different types of learning needs for individuals in accordance with their role and responsibilities. In particular, there is a current identified need to provide training regarding adults in need of safeguarding for Local Safeguarding Representatives and members of the Clergy.
- 3.20. It is also an imperative identified by the Clergy/Religious about the need for a better understanding of different perspectives for the purpose of supporting a shared understanding of what good practice looks like when dealing with practical situations on the ground. Development opportunities and appropriate training would support this understanding and relationship building across the range of functions of the diocese.

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4. ORGANISATIONAL CONTEXT

- 4.1. It is important to acknowledge the journey, as the Diocese of Plymouth has been grappling with the challenges presented by safeguarding matters for approximately 20 years and during this time have made enormous positive strides along the safeguarding journey. For example the Bishop was the national lead for safeguarding for the Bishops' Conference, chairing a Church working group of professionals developing the 1994 Guidelines¹⁴ for the Catholic Church. A small working group within the Diocese of Plymouth was also established to consider how safeguarding was being dealt with locally, particularly in response to two cases in the 1990's involving members of the clergy.
- 4.2. In 2000 the Catholic Church nationally invited Lord Nolan to set a framework for best practice and prevention in order to assist the Church to respond fairly, properly and supportively to allegations of abuse. The Nolan Report¹⁵ was published in 2001 and sought to protect children from abuse by creating “a *culture of vigilance*” within the Catholic Church of England and Wales. The Organisational Structures Policy for Child Protection in the Catholic Church¹⁶ provided the foundation for implementing the recommendations (83) made in the Nolan Report – the last of which was that there should be a further review in five years. This subsequent review of progress culminated in the Cumberlege Commission Report¹⁷ published in 2007 which identified safeguarding as a fundamental part of the overall mission of the Church, highlighting the importance of working together to develop a One Church approach to safeguarding: “*Being loved and being kept safe go to the very core of the Church's ministry to children and vulnerable adults*” (Cumberlege Commission, 2007). A further 72 recommendations were made.

¹⁴ Child Abuse: Pastoral and Procedural Guidelines (2004)

¹⁵ The Nolan Report: ‘*A Programme for Action*’ (2001)

¹⁶ National Policy for Organisational Structures For Child Protection in The Catholic Community in England and Wales, COPCA (July 2003)

¹⁷ The Cumberlege Commission Report: ‘*Safeguarding with Confidence*’ – *Keeping Children and Vulnerable Adults Safe in the Catholic Church* (2007)

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- 4.3. Current arrangements within the Diocese of Plymouth are born out of these national recommendations, and much progress has been achieved as many relate to local arrangements e.g. appointment of parish Safeguarding Representatives, the functioning of the Diocesan Safeguarding Commission, and the Diocesan Safeguarding Office.
- 4.4. Recently work has progressed nationally to review the Diocesan Safeguarding Organisational Structures (2010)¹⁸, in order to establish a representative picture of current safeguarding in the Catholic Church of England and Wales. Another activity has been the National Learning Needs Analysis aimed at understanding what needs to be done in order to ensure the young and the vulnerable are safe from harm and a culture of safeguarding is promoted. Both initiatives are intended to *'help further a one church approach to safeguarding and contribute to the journey towards a culture of safeguarding'* (July 2011)¹⁹, and there are now new standards proposed aimed at raising awareness and understanding as well as consistent practice. Alongside this, a national programme of auditing practice is underway with plans to audit each diocese in three year cycles, which should assist the journey from implementation (of Nolan/Cumberlege recommendations) to compliance and quality assurance to assist practice improvements.

5. DIOCESE OF PLYMOUTH SAFEGUARDING OFFICE

- 5.1. The Diocese of Plymouth has a Diocesan Safeguarding Office established in 2002. Since then the composition of the team has changed/grown and practices evolved. Currently, there is an Interim Safeguarding Co-ordinator (part-time) appointed following the departure of the previous Safeguarding Co-ordinator (Mr Jarvis), a Safeguarding Officer (part-time), and Administrator (full-time). Individuals within this team are experienced and skilled professionals with a range of health, education, social care (previously) and police perspectives which is considered to be a positive complement of disciplines. Phase one findings evidenced effective practice at casework level e.g.

¹⁸ Safeguarding with Confidence – A Review of (Diocesan) Safeguarding Organisational Structures in the Catholic Dioceses in England and Wales, CSAS (March 2010)

¹⁹ Towards a Culture of Safeguarding – A Consultation Paper, NCSC (July 2011)

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examples of good practice which demonstrated action taken to ensure children and adults in need of safeguarding are safeguarded and protected, and the implementation of strategies proportionate to manage risk/potential risk.

5.2. It is important that staff feel valued particularly when they have continued to provide a professional service in the midst of challenging and painful circumstances over recent months. The breach of professional and personal trust by Mr Jarvis's offending behaviour has had a significant impact upon many, but particularly the individuals who worked alongside him. This should not be minimised.

5.3. With the benefit of hindsight there are lessons for the Diocese of Plymouth to learn from this experience and areas that could be strengthened, and these are divided into subheadings below.

5.4. **Roles:** There are job descriptions/person specifications for Diocesan Safeguarding Office staff regarding respective roles, but these have not been reviewed for some considerable time. A review of these would be timely to ensure that they are up to date and pertain to the current expectations and requirements of roles in accordance with national standards. It has also been raised that the terms and conditions of employment for staff would benefit from assessment, to ensure that these are commensurate with requirements of the role. Staff confirmed they understand that such an assessment could potentially lead to an uplift or reduction in salary.

5.5. **Recommendation 1**

The Bishop of the Diocese of Plymouth should ensure that Human Resources review the job description/person specification of Safeguarding Office staff to ensure they are fit for purpose and in accordance with national standards.

5.6. **Recommendation 2**

The Bishop of the Diocese of Plymouth should ensure that Human Resources progress an assessment of the terms and conditions of the

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employment of Diocesan Safeguarding Office staff to ensure that these are commensurate with requirements of the role.

- 5.7. **Counselling and support for staff:** Positively some staff received counselling/support following the impact of recent events, but this could have been offered much earlier. This has been privately arranged and resourced by the diocese. It has since transpired that the diocese does have a *Confidential Employee Counselling Service* which offers 24/7 telephone counselling up to six one hour sessions referred to in the staff handbook²⁰. However, no-one seemed to be aware of this and did not advise staff of this at the time concerns became known. As part of this review the counselling service was contacted and it has been confirmed that this service is available to staff across the Diocese of Plymouth.
- 5.8. There is a wider issue relating to the need to address the on-going impact on practitioners of this type of work (which involves managing risk and working with other people's distress and pain). Phase one of the review found that a significant proportion (more than a quarter) of cases involve work with alleged or convicted sex offenders and managing/monitoring risk/potential risk in this complex area can be demanding on staff. The impact of work is being explored by the Interim Safeguarding Co-ordinator with a view to considering the options e.g. staff being assessed by a psychologist on an interim basis (possibly 6 monthly), or face to face counselling being made available to staff when necessary, with the need for this to be monitored within the supervisory role. It would be beneficial to agree a way forward in this regard.
- 5.9. **Recommendation 3**
The Bishop of the Diocese of Plymouth should ensure that appropriate on-going arrangements are in place sufficient to address the potential impact upon staff of this demanding area of work.

²⁰ Plymouth Diocese Trust, page 15 (March 2010)

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5.10. **Management and supervision:** Arrangements were in place for the management of the previous Safeguarding Co-ordinator via the Diocese of Plymouth. He also received supervision from a suitably qualified practicing safeguarding professional provided on a volunteer basis, arranged via the Independent Chair of the Commission. Other staff in the office had been managed by the Safeguarding Co-ordinator and received supervision directly from him. There are some records of supervision available, but gaps are evident as the Safeguarding Co-ordinator had periods of sick leave and also during the preceding year before the concerns about his offending behaviour were known the frequency of supervision had been inconsistent. While there is no criticism of the quality of supervision relating to casework, there appears to be some confusion about the lines of accountability with no formal agreement in place clarifying this. The need for this to be explicit is even more important when an individual is line managed by one person and supervised by another, which was the case. A national standard is in place requiring that anyone appointed to provide professional supervision will do so under the terms of an agreement/contract between them and the relevant Commission. While it does not explicitly say this should be a written agreement/contract we consider that it should be. In this situation there was verbal agreement between the supervisor, safeguarding co-ordinator and the Diocesan Safeguarding Commission but no record clarifying the parameters of the role and lines of accountability in the event of any issues arising. To avoid confusion and to support clear lines of accountability moving forward we consider it would be beneficial to all parties for the Safeguarding Co-ordinator to be managed and supervised by the Bishop of the Diocese of Plymouth as he is ultimately accountable for safeguarding within the diocese. This would also support improved communication. Similarly, there should be clear arrangements for the supervision of all staff in the Diocesan Safeguarding Office so that the expectations of all parties are clear. Supervision is an important element of quality assurance and demonstration of organisational accountability through the management line. Lord Laming (2003, 2009)²¹ suggests that supervision should focus on the quality of decisions; good

²¹ Lord Laming - *The Victoria Climbié Inquiry: Report of an enquiry by Lord Laming* (2003) and *The Protection of Children in England: A Progress Report* (2009) London: The Stationery Office

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risk assessment and analysis; and improving outcomes for children (this also applies to adults in need of safeguarding).

5.11. Recommendation 4

The Bishop of the Diocese of Plymouth should ensure that any future arrangements for the management and supervision of any individual in the role of Safeguarding Co-ordinator is provided by him, and subject to a written agreement/contract clarifying the parameters, responsibilities, and lines of accountability.

5.12. Recommendation 5 (compliance)

The Bishop of the Diocese of Plymouth should satisfy himself that the on-going supervision of the Safeguarding Officer within the Diocesan Safeguarding Office is provided in accordance with National standards (i.e. subject to an agreement, agenda, frequency, record of discussion).

5.13. Recommendation 6

The Bishop of the Diocese of Plymouth should ensure that arrangements are in place for the supervision of the office Administrator (even though this is not covered by National standards) to assist the provision of support and to demonstrate accountability.

5.14. It is evident that Safeguarding Office staff had not received annual appraisals, which needs remedying in accordance with National standards. Appraisal is the process which compliments supervision providing an opportunity for acknowledging achievements and success as well as setting objectives for the forthcoming year and how the individual's needs for support, professional development, and training will be met. This will pro-actively assist measuring progress against agreed objectives and can be helpful in identifying any blocks and how to overcome them in a formal and focussed way.

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5.15. Recommendation 7 (compliance)

The Bishop of the Diocese of Plymouth should ensure that Diocesan Safeguarding Office staff, are appraised (annually) in their role for the safeguarding responsibilities which they carry out in accordance with National requirements.

5.16. Following the previous Safeguarding Officer's departure it became apparent that he had not continued his professional registration with GSCC (General Social Care Council). The Bishop has expressed a view that he has an expectation that individuals maintain registration with the professional body with which their professional qualification relates, but acknowledges that this was not, until now, made explicit to staff.

5.17. Recommendation 8

The Bishop of the Diocese of Plymouth should ensure that Diocesan Safeguarding Office staff maintain professional registration requirements (where applicable), and evidence of this should be reviewed on an annual basis.

5.18. Another way of strengthening existing practice would be by commencement of local case auditing through the management line in order to quality assure safeguarding practice on the ground. For example, the Safeguarding Co-ordinator could randomly select one/two of the Safeguarding Officer's cases for audit on a monthly basis, and the supervisor (Bishop) of the Safeguarding Co-ordinator could randomly audit one case on a bi-monthly basis, and then discuss findings in supervision. This auditing task could be delegated to someone else with relevant skills e.g. member of the Commission, and could then still be discussed in supervision between the Safeguarding Co-ordinator and their supervisor (the Bishop). Audit offers the opportunity to check what is being done and consider whether it could be done better (NSPCC, 2004)²². It is a method of checking against defined standards and assists with planning change and setting priorities (Munro, 2004)²³. If organisations can establish a culture whereby audit

²² *Safeguarding through audit: A guide to auditing case review recommendations* (NSPCC, 2004)

²³ *The impact of audit on Social Work Practice*. British Journal of Social Work, Vol 34, No 8. P1075-1095

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is about making best practice easy for everyone the process should become demystified and integral to practice (Fisch, 2009)²⁴. Self- assessment/auditing on the ground in many instances can be seen as a mechanism to empower staff in their commitment to on-going professional development while also assisting shared learning and standardisation where this is appropriate.

This will be further explored (at paragraphs 6.21. and 6.22. of this report) as audit could be incorporated through the diocesan safeguarding chain of accountability.

5.19. Recommendation 9

The Bishop of the Diocese of Plymouth should consider, in addition to existing quality assurance processes, the implementation of local auditing arrangements (e.g. case files) through the management line in order to quality assure practice on an on-going basis.

5.20. Issues were highlighted relating to regular sickness absence of the former Safeguarding Co-ordinator, and there is acknowledgement that this could have been managed better. It would be beneficial for the Sickness Absence Policy to be reviewed to better enable managers to maximise attendance standards while dealing with sickness absence sympathetically and consistently. For example in order to respond to potential problems as quickly as possible the diocese could set sickness absence levels (trigger points) which, once exceeded, may require management action²⁵. One example of applying a trigger points system could be: more than 7 days self-certified absence within a three month period; and more than fifteen days sickness absence within a year (with or without a doctor's certificate). There are other established models for setting trigger points and managing sickness absence such as the Bradford factor/index²⁶. Management action could involve having a structured face to face meeting, always necessary if: trigger points have been met; a pattern of frequent short

(Munro, E, 2004)

²⁴ C4EO, for the Sector from the Sector, Safeguarding Briefing 2, P4 (Fisch, S 2009)

²⁵ Absence: Sickness Absence Policy, NSPCC, March 2010

²⁶ The Bradford Factor originated as a method of measuring employee attendance. The factor gives a rating to each employee over time based on the number and length of their absences. Employees with many short leaves are penalised more than those with a small number of long term absences.

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absences is apparent; work related issues may have contributed to the sickness absence; there are other issues of concern to discuss, with a view to resolving this where possible. This may assist achieving a better balance between appropriately supporting staff during periods of ill health and ensuring the business needs of the diocese are adequately addressed. Of course, the value of using any model/tool remains reliant on good management practice for it to be effective.

5.21. Recommendation 10

The Bishop of the Diocese of Plymouth should ensure that Human Resources review the Diocesan Sickness Absence Policy, and strengthen it to include ‘trigger points’ to assist managers to respond to potential problems as quickly as possible.

5.22. The Interim Safeguarding Co-ordinator has developed a draft human resources plan²⁷ proposing the reallocation of resources with minimal growth in the establishment, although the Bishop has not yet seen this proposal and will need time to consider it fully. The Interim Safeguarding Co-ordinator suggests *‘there is a need to have a better delineation between the management of safeguarding and service delivery, to allow time to build the service in line with changing demands. To undertake appropriate management tasks around professional supervision of staff, staff development, budget management and responding to external drivers’*. This is supported by findings of this review which evidences some gaps in strategic direction, management oversight, and quality assurances processes.

5.23. The new plan includes: a Senior Co-ordinator role (reduced from full-time to three days a week) with an increased strategic/management focus; two Assistant Co-ordinator posts (three days a week) one with a focus on casework and support for parish representatives, and the other casework and leading training/development; and two administrative posts (three days a week), one

²⁷ Diocese of Plymouth Safeguarding Office: *Safeguarding in the Diocese of Plymouth Human Resources Plan* (September 2011)

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undertaking office management and CRB work as a backup, and the other leading on CRB work. The need for this administrative resource is in the context of the high number of CRB checks – approximately 660 annually (681 in 2010). We would support these proposals and agree that the spreading of resources provides greater flexibility and resilience within the office.

5.24. Recommendation 11

The Bishop of the Diocese of Plymouth should consider the proposed draft human resources plan, taking account of the National standard which states *‘Dioceses must ensure that their safeguarding functions are adequately resourced. The budget allocated is for local determination but has to be justified in terms of safe processes and minimisation of risk’.*

5.25. **‘Whistleblowing’:** With the benefit of hindsight, there were areas of previous concern about the former safeguarding Co-ordinator e.g. timekeeping and sickness absence. There is now a National Whistle Blowing Policy (contained within the National Procedures²⁸), which *‘aims to encourage individuals to feel confident in raising serious concerns and to question and act upon concerns about practice/conduct’.* However, this is not explicitly detailed in the Diocese of Plymouth Safeguarding Resource Pack²⁹ or the Diocesan Trust staff handbook³⁰, and would benefit from promotion across the diocese in order to ensure individuals know how to raise a concern and what the diocesan expectations are, and this could also form part of the induction process for staff and volunteers. It is acknowledged that the decision to report a concern about a work colleague can be a difficult one to make and individuals should be enabled if/when the need arises.

5.26. Recommendation 12 (compliance)

The Bishop of the Diocese of Plymouth should ensure that Human Resources promote understanding of the National Whistle Blowing Policy

²⁸ National Catholic Safeguarding Advisory Service (NCSC) procedures - paragraph 4.6. (May 2011)

²⁹ Diocese of Plymouth Safeguarding Office: Safeguarding Resource Pack – *Safeguarding children, young people and vulnerable adults within the church* (March 2009)

³⁰ Plymouth Diocese Trust (March 2010)

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so that individuals know how to raise a concern and also what the expectations are across the diocese.

5.27. One of the functions of the Safeguarding Office is to work closely with Local Safeguarding Children's Boards, Adult Safeguarding Boards, and other bodies that are located within the diocese who provide or support a safeguarding function. While there has long been recognition of the benefits of membership of such boards this presents a real challenge and resource issue. This is not least because the diocese serves six local authorities each of which will have arrangements for operating these functions. Achieving membership of such Boards would be a positive strategic move to improving inter-agency relationships in safeguarding children and adults in need of safeguarding. The current position is one of minimal or no engagement with Boards so any development would be a positive step. That said, it will be necessary to be pragmatic and creative about this and the Safeguarding Office are actively in discussions about how to progress this area of work. For example, one way forward would be in collaboration with cross denomination initiatives locally, as they are likely to have developed good links with organisations and places of worship throughout the United Kingdom (UK). Representation could be provided on Boards from varying faith organisations thereby sharing the resource implications and dispersing learning and knowledge gained via cross denomination initiatives.

5.28. **Recommendation 13 (compliance)**

The Bishop of the Diocese of Plymouth should ensure that the Safeguarding Office is supported to develop their working relationships with Local Safeguarding Children's Boards, Adult Safeguarding Boards, and other bodies located within the diocese who provide or support a safeguarding function, and this may include membership of/or contributions to some Boards. Progress in this regard should form part of the annual review of resources undertaken by the Diocesan Safeguarding Commission (see recommendation at 22 below).

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6. GOVERNANCE AND ACCOUNTABILITY

- 6.1. **The Bishop of the Diocese of Plymouth:** As outlined at section 3 (above) the Bishop has demonstrated a longstanding commitment to the safeguarding agenda for the purpose of providing a safe environment for children and adults in need of safeguarding when they participate in all the activities and services provided by the Church and its representatives. The commissioning of this review is further evidence of this. The Bishop was open in his thoughts about the struggle to get the right balance between what are the responsibilities of statutory agencies and the need for the church to work with and in these structures, while also having a professionally competent view on safeguarding within the church and processes to effectively support this. It is important to acknowledge this tension which is a very real dilemma. It will hopefully provide some reassurance that the findings of this review evidence good working together and compliance with statutory agency processes and legislative requirements. Existing arrangements within Plymouth Diocese are appropriate and a balance does exist which is necessary and can be further strengthened to enable the church to effectively respond to safeguarding and contribute to the overall mission of the Church.
- 6.2. The Bishop has a number of Episcopal Vicars, who have delegated responsibilities and take the lead in specific areas - essentially these individuals were described by the Bishop as his governance council (senior management team). There is an Episcopal Vicar for Safeguarding who has played a key role in the development of the Diocesan Safeguarding Office and contributed to the Diocesan Safeguarding Commission, also being the link person with members of the Clergy and Religious. The Bishop chairs the Board of Trustees whose role regarding safeguarding is to *‘ensure that any serious incidents (such as the offending behaviour of Mr Jarvis) which have a potentially detrimental effect to either the beneficiaries of the trust, the assets of the trust or the reputation of the trust are referred to the Charity Commission. Similarly, they have a responsibility to ensure that the terms of the Public Liability Insurance Policy are*

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complied with. This includes for example ensuring that National Safeguarding Procedures are fully operational within the Diocese³¹.

6.3. With a view to strengthening communication between relevant parties the Bishop accepts that increased face to face contact would be beneficial to all, and recommendations are made in this regard. He is also aware of a number of recommendations made in the recent *'Towards a Culture of Safeguarding'*³², and the plans to further develop a National standards approach (which is available to view on the NCAS website from 1 February 2012). A number of these are standards to ensure effective communication regarding accountability and governance (specified below), to enable the Diocesan Safeguarding Commissions and Trustees to adequately discharge their responsibilities.

6.4. **Recommendation 14 (new compliance standard)**

The Bishop of the Diocese of Plymouth will meet with the Safeguarding Commission at least once a year. This annual meeting will provide an opportunity to review the year's work and to consider plans for the forthcoming year.

6.5. **Recommendation 15**

The Bishop of the Diocese of Plymouth will meet with Safeguarding Office staff at least once a year, such as attendance at a team meeting.

6.6. **Recommendation 16 (new compliance standard)**

The Bishop of Plymouth will ensure that the Trustees request and receive quarterly update briefings from the Diocesan Safeguarding Commission, one of which will be the annual report.

6.7. **Recommendation 17 (new compliance standard)**

The Bishop of the Diocese of Plymouth should ensure that the Safeguarding Co-ordinator and/or Independent Chair of the Commission

³¹ Catholic Safeguarding Advisory Service (CSAC) procedures (May 2011)

³² Towards a Culture of Safeguarding, A Consultation Paper (NCSC, July 2011)

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attend a Trustees’ meeting at least once a year where they will be able to present their update briefing in person. The purpose is to facilitate effective communication and an open channel between the safeguarding team and Trustees.

6.8. **Trustees:** In addition to the above recommendations, it may also be beneficial to review the existing skills, knowledge and experience of the trustees to identify any potential gaps, and when recruiting future trustees endeavour to appoint individuals to fill any gaps e.g. safeguarding, as this is likely to assist in strengthening the safeguarding agenda.

6.9. **Recommendation 18**

The Bishop of the Diocese of Plymouth should review the existing skills, knowledge and experience of Trustees to ensure that any potential gaps are identified, and when appointing future Trustees endeavour to appoint individual/s to fill any gaps e.g. Trustee with skills, knowledge, and understanding of safeguarding.

6.10. There is the matter of the previous Safeguarding Co-ordinator using his work laptop to access sexually abusive images of children and distribute these. He had also previously ‘lost’ a laptop (three years earlier) and there appears to have been insufficient scrutiny of this at the time with the laptop being replaced. This raises questions about the level of monitoring being sufficient for its purpose, and staff being held accountable for loss of diocesan equipment. The staff handbook states:

‘The interception, recording and monitoring of communications is intended to protect the Trust’s legitimate business interests, including (without limitation) quality control, security of communications, protection of IT systems, protection of confidential information, compliance with this policy, record keeping, evidential requirements, detection and prevention of criminal activity or misconduct and compliance with relevant legal requirements’.

In discussing this matter with the Bishop he is aware of one suggested option being for staff to submit their laptop on an annual basis for a security check.

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However, he is also mindful that in so doing, this may also promote a culture of mistrust and is unsure if this measure is proportionate. We share his concern and consider it more appropriate for a full review of the options to mitigate risks should be explored prior to implementing additional security measures. It is however accepted that in circumstances where equipment goes missing a full enquiry into this should be undertaken to ensure that individuals are held to account and that any potential risks to the Trust are fully assessed and reasonable measures taken to minimise these.

6.11. Recommendation 19

The Bishop of the Diocese of Plymouth should ensure that a review is undertaken of arrangements for monitoring IT equipment to inform any decisions about increasing security measures, to ensure that any changes are sufficient as well as reasonable and proportionate to protect the Trust’s legitimate business interests.

6.12. Recommendation 20

The Bishop of the Diocese of Plymouth should ensure that a Policy is in place stating that in any event where there is a loss of Trust property/equipment a full enquiry is undertaken to ensure that individuals are appropriately held to account and that any potential risks to the Trust (e.g. loss of confidential information) are assessed and reasonable measures taken to mitigate any risks.

6.13. Diocesan (Plymouth) Safeguarding Commission: The Diocese of Plymouth operates a well-established and effective Diocesan Safeguarding Commission which in summary provides: support, governance, and independent challenge and scrutiny of safeguarding practice within the diocese. It is chaired by an independent person, and other members include representatives from statutory and voluntary bodies including Devon and Cornwall Police, Devon and Cornwall Probation Service, Plymouth Adult and Children’s Services, and two lay individuals, (one is a specialist regarding sexual offending behaviour, and the other was until recently also the Diocesan Financial Secretary). Pastoral input

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is provided by church representatives to ensure that faith issues are an integrated part of the Diocesan Safeguarding Commission approach, one of whom is the Episcopal Vicar for Safeguarding and the other who is a member of the Religious. Members of the Diocesan Safeguarding Office attend Diocesan Safeguarding Commission meetings but are not members of it. There is good evidence of strong leadership and the inter-agency membership and contribution to the functioning of the group is a real strength in moving safeguarding practice in the right direction. It should also be remembered that many members are also unpaid volunteers, and the professional handling (by the independent Chair of the Commission) of the media regarding recent events is commendable. However this was largely due to the diligence of this individual and the Bishop's personal assistant, with some support from The Catholic Communications Network (a national service), and limited support provided from within the Diocese of Plymouth. The Bishop is aware that this is an area which could be strengthened and we have made a recommendation about this. There is also much good work happening on a national basis, such as the development of new standards (mentioned at 3.19. and 4.4. above). Recommendations to further strengthen the Diocesan Safeguarding Commission position include:

6.14. **Recommendation 21**

The Bishop of the Diocese of Plymouth should ensure the appointment of a suitably qualified/experienced individual to develop a communications strategy, which includes how to respond to media/communications across the diocese i.e. safeguarding matters (as and when the need arises) and this individual to attend Diocesan Safeguarding Commission meetings as necessary.

6.15. **Recommendation 22 (new compliance standard)**

The Bishop of the Diocese of Plymouth should ensure that the Diocesan Safeguarding Commission undertakes a needs assessment annually to ensure those accountable for budget allocation in the Diocese have

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sufficient information so that the safeguarding budget is adequate to ensure safe process and minimisation of risk.

6.16. Recommendation 23

The Bishop of the Diocese of Plymouth should ensure the implementation of the new national standards for the recruitment and succession planning for Diocesan Safeguarding Commission members, for the purpose of ensuring clarity and transparency, and helping to support a one church approach to promote high standards of safeguarding practice into the future.

6.17. Recommendation 24

The Bishop of Plymouth should consider making it ‘essential’ to have a Parish Safeguarding Representative as a member of the Diocesan Safeguarding Commission (this is more than ‘desirable’ as recommended by the new National standards).

6.18. Recommendation 25

The Bishop of the Diocese of Plymouth should ensure that the minutes (non-confidential aspects) of Diocesan Safeguarding Commission meetings and local policies (as well as a link to national policies) are published on the Diocesan of Plymouth website to demonstrate openness and transparency.

6.19. One member of the Diocese Safeguarding Commission is also a member of the Buckfast Religious Safeguarding Commission and although this was not by design, the experience is viewed positively regarding communication and shared learning. It is recognised that communication could be further strengthened by commencement of planned meetings between both Independent Chairs of the Commissions and respective Safeguarding Co-ordinators.

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6.20. **Recommendation 26**

The Bishop of the Diocese of Plymouth should support arrangements for formal meetings to take place annually (as a minimum) between the Independent Chairs of the Commissions and respective Safeguarding Co-ordinators to open lines of communication and share learning.

6.21. Furthermore, the Diocesan Safeguarding Commission should not rely on self-reports from the Diocesan Safeguarding Office alone, but that a process should be developed to annually review/audit the functioning of the Safeguarding Office e.g. accessing completed audits of casework through the management line, sampling a small number of additional cases, accessing records of supervision to satisfy yourselves of the quality of supervision and that there are records to evidence this. This would make the process of quality assurance more robust and compliment audit via the management line (occurring on a monthly/bi-monthly basis) and planned national auditing (three year cycles).

6.22. **Recommendation 27**

The Bishop of the Diocese of Plymouth should ensure that the Diocesan Safeguarding Commission develop and implement a process for auditing the practice of the Diocesan Safeguarding Office, for the purpose of increasing the robustness of quality assurance processes as well as complimenting other auditing arrangements.

7. PARISH (LOCAL) SAFEGUARDING REPRESENTATIVES

7.1. Parish Safeguarding Representatives are at the frontline of safer recruitment practice and are also sometimes the person contacted if someone has a concern. It is significant that the number of Safeguarding Representatives has increased from approximately 60 (four years ago) to 120 (currently) with 6 in the process of recruitment. The number and turnover of Safeguarding Representatives has resource implications regarding the induction, support and training required to increase/maintain their understanding and confidence in their safeguarding role. More than 50 Parish Safeguarding Representatives

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(nearly half) contributed to this review providing valuable insights into their experiences. We were impressed by their commitment and energy in what can be a challenging voluntary role.

7.2. They were clear about expectations of them as safeguarding representatives and how they achieve this e.g. *“the main focus has to be about the protection of children and vulnerable individuals”* and to this end are *“persistent”*. Below are other examples of comments.

7.3. **What works well:**

- (i) Spoke positively about the Safeguarding Office - *“they are the font of all knowledge”* and are the *“feedback loop for communication”*. The *“friendly and empathetic approach”* received is appreciated.
- (ii) *“Safeguarding support group in Devon has worked well – such support groups could be replicated across the diocese”*.
- (iii) *“Parishes with two safeguarding representatives work well as support can be offered to each other and this also provides cover during periods of leave”*.
- (iv) *“Networking, such as the first annual conference this year”* – plans for next year’s conference are underway.
- (v) *“Examples of managing offenders in parishes”*.
- (vi) *“Training that they have received”*.
- (vii) *“Annual self-auditing returns, which is a well-established process”*.

7.4. **What could be better:**

- (i) *“Making parish members aware of what ‘safeguarding’ means and what the safeguarding role involves”*.
- (ii) *“Clarification of role and safeguarding responsibilities”*.
- (iii) *“Safe storage of information”*.
- (iv) Relationships with individual priests *“positive and works well in some areas”* and is *“challenging in other areas with some priests thinking safeguarding has nothing to do with them”*.

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- (v) *“CRB ‘overload’ – while important and the process works, CRB’s are just one part of taking steps to ensure children and vulnerable adults are safeguarded”.*
- (vi) *“Communication e.g. online resources accessible to safeguarding representatives. This could include a list of safeguarding representatives training, knowledge, and experience with a view to sharing learning/information”* NB: Development of a new IT system was a recommendation at phase one of this review, which once implemented will include access for Safeguarding Representatives to an intranet to ease the sharing of information.
- (vii) *“Training – need more of it (particularly regarding vulnerable adults” - adults in need of safeguarding).*
- (viii) *“Who checks the checkers?”* This is a relevant question particularly in the context of the reason for this review.
- 7.5. Recommendations are made regarding findings from key themes, which we consider should be given attention/action as follows:
- 7.6. **Recommendation 28 (compliance)**
The Bishop of Plymouth should satisfy himself that confidential information is stored appropriately within parishes across the Diocese in accordance with data protection legislation³³.
- 7.7. **Recommendation 29 (compliance)**
The Bishop of Plymouth should ensure that resources allow for the provision of an annual conference for Safeguarding Representatives year on year.
- 7.8. **Recommendation 30 (compliance)**
The Bishop of Plymouth should satisfy himself that all members of the Clergy are aware of their safeguarding responsibilities and appropriately

³³ Data Protection Act (1998)

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support their Parish Safeguarding Representative/s to fulfil their role effectively, as Priests are accountable for safeguarding within their parish.

8. CLERGY AND RELIGIOUS

8.1. The Clergy and the Religious are key individuals in positions of power, influence and trust serving their parish communities. Towards A Culture of Safeguarding 2011³⁴ suggests there is a need to *'identify fundamental values, beliefs and attitudes that are at the core of the gospel message, viewing safeguarding practice as an essential part of authentic ministry and mission'* and not as an 'add on' to the mission of the Church. A significant proportion (more than a third) representing a good cross section of Clergy and some Religious contributed to this review via focus groups providing a richness of information about their experiences and we are grateful for their openness. Overall, there was a good level of understanding that the Clergy and Religious are responsible for safeguarding within their parishes/communities, but that some responsibility to undertake tasks is delegated to Safeguarding Representatives. Below are some examples of comments expressed.

8.2. Challenges:

- (i) *"Recent events have been a major setback as the offending behaviour of Chris Jarvis serves to undermine the good safeguarding work of all involved with the Church".*
- (ii) *"Finding suitable volunteers capable, willing, and with the time to undertake the Safeguarding Representative role which is a big job".*
- (iii) *"Priests feelings of vulnerability and anxiety about false allegations and how this can unduly affect pastoral relationships – not all changes are positive".*
- (iv) *"Recognition of the need to guard against complacency".*
- (v) *"The balance between appropriate care and protection and paranoia".*
- (vi) *"Getting people to agree to be CRB checked – some parishioners do not understand the need for this and decline taking on a role in ministry because of this requirement".*

³⁴ Towards a Culture of Safeguarding – A Consultation Paper, NCSC, July 2011

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- (vii) *“Problems with take up of safeguarding training”.*
- (viii) *“The need for advice and guidance to be reasonable and proportionate – while it is important to minimise risk we do have to live with some element of risk and this is not any easy balance to get right”.*

8.3. What works well:

- (i) *“Recognition of the positive strides regarding safeguarding practice within the diocese over the past ten years in particular”.*
- (ii) *“Overall, the Safeguarding Office are responsive, supportive and helpful – only a telephone call away”.*
- (iii) *“Parish Safeguarding Representatives do a great job recruiting and processing CRB checks”.*
- (iv) *“Works very well in parishes where there are two safeguarding representatives who share tasks”.*
- (v) *“Importance of leading by example and the existence of clear boundaries”*
- (vi) *“Improved safeguarding practices within the parish and increased awareness and understanding of the benefits e.g. permission to take children’s photographs and not identifying children by name on the picture”.*
- (vii) *“Examples of Covenants of Care to manage risk working well”.*
- (viii) *“Portability of CRB’s within the diocese”.*
- (ix) *“Partaking in this focus group – feel affirmed by the experience”.*

8.4. What could be better:

- (i) *“Having a written list of the Safeguarding Representative role and responsibilities and clarity about the training and support they should receive”.*
- (ii) *“Others’ sensitivity and understanding regarding the pastoral role of the Clergy/Religious”.*
- (iii) *“Safeguarding Office staff being more pro-active – want them to be one step ahead of us”.*

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- (iv) “Improved understanding of when and why CRB’s are necessary – and not placing an over reliance on CRB clearance”.*
- (v) “Mechanisms to bring Clergy/Religious and others with a safeguarding role together to assist the sharing of knowledge and experience, developing understanding of different roles/disciplines, and for mutual support e.g. conference for safeguarding representatives viewed positively and Clergy would welcome attending events such as this”.*
- (vi) “Appropriate range of safeguarding training for Clergy and Religious – some had not undertaken any training for 10 years”.*
- (vii) “Need for training, guidance, and support regarding safeguarding vulnerable adults” (adults in need of safeguarding).*

8.5. A consistent message from Clergy/Religious is about the need for a better understanding of different perspectives for the purpose of supporting a shared understanding of what good practice looks like when dealing with practical situations on the ground, and a need for development opportunities and appropriate training to assist this developing understanding. This will be commented on at section 10 of this report.

9. PARISHIONERS

9.1. As part of this review there was a shared understanding of the importance of parishioners having the opportunity to express their views about safeguarding. To this end, versions of safeguarding questionnaires were developed, one for completion by children, one for completion by individuals involved in active ministry, and a general one for parishioners. In total, 4000 questionnaires were sent out to parishes across the diocese. We have been impressed by the degree of engagement in this review having received more than 25 per cent return which is extremely good compared to general expectations (from experience of return levels for this kind of exercise) being about 10 per cent – this good return allows for some valuable learning to be extracted . This could be indicative of the commitment and importance with which safeguarding is viewed within parish communities, which is of itself a strength upon which to build. Key themes from completed questionnaires are detailed below.

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9.2. **Children:** 143 completed questionnaires were received from children who responded to the following questions:

(i) **Do you like the things you do when involved with church activities:** 70.9% (100) said yes, 28.4% (40) said sometimes, one said no, and two skipped the question.

(ii) **Do you know who to speak to if you weren't happy and wanted to make a complaint:** 83.9% (120) said yes, 11.9% (17) said don't know, and 4.2% (6) said no.

(iii) **Do you know that if anyone at church became concerned about your safety or care they would need to do something about it to make sure you were safe:** 81.8% (117) said yes, 14.7% (21) said don't know, and 3.5% (5) said no.

(v) **Do people treat you with respect and listen to you at church:** 86% (123) said yes, 13.3% (19) said sometimes, and one said no.

(vi) **Is there anything that would make you feel happier or safer when involved with church activities:** two thirds responded that they felt quite happy and safe at church, of the remaining children they did not comment in response to this question. Below are some examples of comments expressed.

- *"I feel safe with all my other friends at church"*
- *"I am happy and safe"*
- *"I am happy about all the church activities that I am involved in – I am especially happy about children's liturgy and holy mass"*
- *"Everything is well organised"*
- *"It would make me happier if there were more adults helping with activities – I'm fine with everything else thanks"*
- *"Thank you for all the children's activities"*
- *"This question is embarrassing"*

9.3. Findings are positive showing a sound level of awareness of safeguarding amongst respondent children. The areas that could be strengthened are making it explicit to all children involved with the church that if there were any

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concerns about their safety or care that someone would need to do something about it to make sure they are safe, and also being clear who they could speak to if they were unhappy and wanted to make a complaint.

- 9.4. **Parishioners involved in active ministry** e.g. catechists, children's liturgy, youth group workers: 218 adults involved in active ministry completed questionnaires. There are a wide range of activities provided within parishes e.g. faith and religion, children's liturgy, and parish activities. Key findings are:
- (i) The majority are aware (with the exception of two) who the Parish Safeguarding Representative is, and that a safeguarding policy/procedure exists (although 31 stated that this was not known).
 - (ii) Just under half of those who were aware of the policy stated they had read it and found it easy to digest, of the remaining respondents they indicated that while they had not read it they knew where to find it should they need to access it.
 - (iii) The majority (94%) are aware of expectations of behaviour for individuals involved with the Church.
 - (iv) They are also aware of the need for employment checks of those involved in active ministry.
 - (v) Nearly two thirds of the respondents indicated that they were very confident/confident in safeguarding concerns being identified within the parish, and 24% (52) stated that they had never had to deal with it, 6.6% (14) were not confident and the remaining respondents skipped the question.
 - (vi) One third stated the need for members of the church to know more about safeguarding practice, one third were unsure about this, and a third considered that no more information was necessary.
 - (vii) Regarding key individuals within the parish having received safeguarding training in the past three years, responses were mixed with training having been provided in some areas and not in others.
 - (viii) Overall, there was a reasonable level of confidence in dealing with safeguarding concerns effectively, with just under a third of respondents saying that they had never had to deal with this but felt reasonably confident that people would know what to do should the need arise.

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(ix) The response was similar regarding dealing with adults who potentially pose a risk to other parishioners.

(x) The majority of respondents indicated that in the event of dealing with safeguarding matters the support provided to those involved was appropriate, with only some exceptions (8).

9.5. **Other adult parishioners:** 801 other parishioners completed questionnaires and findings are:

(i) There was good awareness (96.5% / 765 respondents) of the church's responsibilities for safeguarding, with only 3.5% (28) being unaware.

(ii) Similarly, there was reasonable knowledge of the expectations of behaviour within church (79% / 619) and who the Safeguarding Representative is in the event of any concerns arising (89% / 706).

(iii) More than half of the respondents indicated that they were very confident/confident in safeguarding concerns being identified within the parish, and 32% (256) stated that they had never had to deal with it, 6% (46) were not confident and the remaining respondents skipped the question.

(iv) More than one third considered members of the church needed to know more about safeguarding practice, one third were unsure about this, and less than one third considered that no more information was necessary.

(v) Regarding key individuals within the parish having received safeguarding training in the past three years, responses were mixed with training having been provided in some areas and not in others.

(vi) Over half of the respondents were confident that safeguarding concerns are dealt with effectively, with just over a third of respondents saying that they had never had to deal with this, and a minority were not confident (7% / 52).

(vii) The response was similar regarding dealing with adults who potentially pose a risk to other parishioners.

(viii) The majority of respondents indicated that in the event of dealing with safeguarding matters the support provided to those involved was appropriate, with only a few some exceptions (2.5% / 16).

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10. INDUCTION, TRAINING AND DEVELOPMENT

- 10.1. While there are arrangements in place, there is recognition within the Diocese of Plymouth that improvements could be made in respect of induction, training and development at every layer of safeguarding practice e.g. Bishop, Trustees, Safeguarding Office, Diocesan Safeguarding Commission, Safeguarding Representatives, Catechists, Clergy and Religious and others involved in active ministry. This mirrors the national picture with many other dioceses', hence the implementation of national safeguarding standards for training clergy, induction/training standards for commission members, training standards for safeguarding representatives, description of the legal responsibilities of Trustees in relation to safeguarding, role and function specification for Safeguarding Co-ordinators and Safeguarding Lead Clergy/Religious³⁵. In recognition there is a need to develop and provide a range of different induction, training and development products to meet the varying needs of relevant individuals – some of this will be nationally led, but local products to respond robustly to local need could also be provided.
- 10.2. For example, Diocesan Trustees and Diocesan Safeguarding Commission members may benefit from bespoke workshops on the legal responsibilities in relation to safeguarding, and effectiveness and change management when implementing and monitoring safeguarding processes e.g. identification of risk factors and positive outcomes; overview of safeguarding and child protection system; how do you know if the safeguarding system is effective; and local actions/next steps.
- 10.3. Diocesan Safeguarding Office staff require an assessment of their individual training and development needs which should be incorporated to their annual appraisal (see recommendation 7 above).

³⁵ Towards a Culture of Safeguarding – A Consultation Paper, NCSAS (July 2011)

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10.4. Further exploration would be beneficial of how to incorporate safeguarding into the regular training/meeting events that the Deaneries already provide to the Clergy/Religious, as well as considering how to integrate safeguarding training/learning into faith teachings via the Vicariate of Formation. There are e-learning safeguarding products such as NSPCC Educare which provide good basic safeguarding training.

10.5. **Recommendation 31**

The Bishop of the Diocese of Plymouth should ensure the implementation of the new national standards for induction and training of all individuals with responsibilities for safeguarding children and adults in need of safeguarding within the church (including Clergy).

10.6. **Recommendation 32**

The Bishop of the Diocese of Plymouth should ensure that Diocesan Safeguarding Office administrative staff receive a good induction to their role, in the absence of national standards for them in this regard.

10.7. **Recommendation 33**

The Bishop of the Diocese of Plymouth should ensure that a joined up induction/training strategy is developed across the Diocese (between the Deans, Vicariate of Formation, the Safeguarding Office, and Special Needs Advisor) which integrates safeguarding into the mission of the church, and includes responding to different types of learning needs for individuals in accordance with their role and responsibilities.

10.8. **Recommendation 34**

The Bishop of the Diocese of Plymouth should ensure that the Safeguarding Office prioritises training for Safeguarding Representatives and the Clergy/Religious, particularly regarding the adults in need of safeguarding as this is an identified learning need.

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11. LIST OF RECOMMENDATIONS

A full list of recommendations from phase one and phase two can be found in a list at appendix B, which is intended to ease development by the Diocese of an action plan in response to recommendations.

Wendy Noctor

NSPCC Senior Consultant

Finalised 2 February 2012

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APPENDIX A

PURPOSE AND SCOPE

Project task (intended outcome of this review):

To promote improved safeguarding awareness and practices, and to identify lessons to be learned within Plymouth Diocese, for the purpose of ensuring children and vulnerable adults are safeguarded.

Project objectives (intended objectives):

- 1) Review church case files where CJ has had involvement (previous 3 year period) to assess, the extent to which policies/procedures have been complied with, and to ensure that any safeguarding concerns have been appropriately responded to, and if not, to ensure that action is taken to address this.
- 2) Review the Diocesan safeguarding practice as an organisation to assess what works well and identify areas for improvement and make any recommendations in order that children and vulnerable adults are safeguarded.
- 3) Examine the interface between Plymouth Diocesan organisational safeguarding practice and the Plymouth Independent Safeguarding Commission and their relationship with the national safeguarding organisation of the Roman Catholic Church, to assess the effectiveness of the safeguarding function as a whole. This will focus on assessing the effectiveness of inspection, audit and governance as it applies to Plymouth Diocese.

In order to achieve these three objectives the NSPCC consultancy services are proposing a phased approach:

Phase One: this involves consultancy to review approximately 130 church case files to assess the quality of safeguarding practice (in accordance with relevant policies and procedures), identify any outstanding concerns, and ensure that action is taken to address them (if any are apparent).

Phase Two: this includes assessing the quality of Diocesan organisational safeguarding practice including the interface with inspection, audit and governance, and the wider Roman Catholic Church, as relevant to Plymouth Diocese safeguarding practice, to ensure that children and vulnerable adults are safeguarded in future practice as far as possible.

Phases will follow numerically (phase one is priority in terms of needing to complete this in a timely manner), and phase two will follow and have partly been informed by findings from phase one.

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Project scope and methodology for Phase One:

This phase involves NSPCC reviewing practice of CJ for the preceding 3 years via accessing church files in matters he has had involvement.

This will involve NSPCC Consultants in the following activities:

- Accessing and familiarising themselves with the **Catholic Safeguarding Advisory (CSAS) procedures** for safeguarding children and vulnerable adults;
- Developing an **audit tool** for the purpose of gleaning relevant information – this will be completed for each file reviewed. This audit tool will *need to be agreed with the Diocese* prior to review commencing. The tool will provide an audit trail of work undertaken and provide data for analysis and reporting (*agreed 19 July 2011*);
- Writing a **protocol** for working together, sharing information, and reporting any concerns during the course of work. This will *need to be agreed/signed* across agencies (NSPCC, Diocese, Local Authority, and Police) prior to review commencing. This protocol will apply to both *phase one* and *phase two* (*signed off 19 July 2011*);
- Convening a **professionals meeting** between relevant agencies for the purpose of making introductions, sharing information, and agreeing parameters prior to review commencing (*held 19 July 2011*);
- Making themselves (two or three consultants) available to **access and review church files** at a suitable Plymouth Diocese venue (*from 20 July onwards, with a view to concluding this part of the work by end of July 2011 if feasible*). Advice and support relating to vulnerable adults will be obtained (as considered necessary) through a linked Consultant contracted by the NSPCC. The NSPCC consultants will focus upon safeguards for children and young people as our expertise does not extend to adult protection services, although the values and principles underpinning both areas of practice are shared (*completed by end of July 2011*);
- **Communication strategy** - agreeing the wording of any media statement by Plymouth Diocese which makes reference to NSPCC involvement in this matter, following liaison and agreement with NSPCC media team (*signed off August 2011*);
- **Briefing NSPCC National Helpline staff** to the involvement of the NSPCC in this review in readiness for them to respond to any relevant calls from the public and refer out to appropriate agencies, alongside informing NSPCC Consultants (Wendy Noctor and/or Kevin Ball). Consultants will collate an overview of this information and report back to Plymouth Diocese appropriately, which is intended to support a joined up approach to safeguarding children and vulnerable adults (*arranged prior to audit commencing in July 2011*);

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NSPCC National Adult Helpline number is: 0808 800 5000

NSPCC ChildLine number is: 0800 1111

- Compiling a **summary report**, reporting key findings from the review of files, and share this with Plymouth Diocese, initially in draft for the purpose of checking for accuracy and fairness only, and subsequently finalising the report. It is expected that this report will become a public document (*September 2011*).

Project scope and methodology for Phase Two:

This phase involves examination of current arrangements within Plymouth Diocesan for safeguarding children and vulnerable adults. This will entail undertaking an independent review of the organisation's safeguarding policies, procedures, supporting guidance/resources, training/learning provision and safeguarding practices. Alongside, the interface between safeguarding practice, and inspection/audit, and governance arrangements (*October onwards*).

It should consist of the following:

- Establish a **reference group** with representation of key personnel from the Diocese to ensure the expertise of those with knowledge and experience locally (including where appropriate specialist vulnerable adult expertise) to inform an action plan for phase two and implementation thereafter;
- Senior consultant **desk top review** of the Diocese safeguarding policy and procedures, and allied policies/procedures that link to safeguarding in collaboration with the reference group, which is needed to ensure that policies and procedures are fit for purpose. Comment, suggested amendments and feedback will be provided electronically using Microsoft Word track changes facility. The aim will be to ensure that the policy and supporting resources are accessible for key stakeholders (and resonate with appropriate language and the context of the church community), reflect best practice, and are consistent with UK legislation and guidance;
- **Interviews** with key personnel including:
 - The Bishop
 - Chair of Independent Safeguarding Commission
 - Trustees (x 2)
 - Interim Safeguarding Co-ordinator
 - Safeguarding Officer
 - Administrator
 - Director of Catholic Safeguarding Advisory Service (CSAS)
 - Others considered necessary.

Support will be required from the Diocese in scheduling these interviews - telephone discussions are proposed in order to keep costs for travel to a minimum;

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- **Focus groups** x 3 (one in each of the three Counties) with:
 - Identified Diocesan senior staff
 - Identified members of the clergy and ministers
 - Others considered necessary (to be identified and agreed);
- A **survey/questionnaire** for completion by wider members of the Diocese e.g. parishioners;

NB: The interviews, focus groups, and survey results will provide the reviewers with information about the level of awareness and understanding, and learning and support needs, what works well and areas where change is needed, and issues relating to implementation and effectiveness;

- **Analysis and reporting** – analysis of review findings and compilation of an overview report identifying key themes about organisational safeguarding practice, including areas of strength, as well as areas where change is needed. Findings will not be attributed to individuals to ensure that the confidentiality of individuals is respected and protected. The only exception to this will be where concerns arise which require action to be taken to protect and child/vulnerable adult and where this is the case the child/vulnerable adult concerned will be the paramount consideration. This will be shared with Plymouth Diocese, initially in draft for the purpose of checking for accuracy and fairness only, and subsequently a final report will be provided.

The emphasis in this phase will be for the Senior Consultant to lead this discrete piece of work, together with support and guidance from the reference group.

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APPENDIX B

LIST OF RECOMMENDATIONS

PHASE ONE – recommendations from the review of cases report (this is a separate report signed off September 2011)

1. The Bishop of the Diocese of Plymouth should ensure the commissioning, review and implementation of an effective filing and recording system, ideally via an electronic database, which is fit for purpose, to assist easy retrieval of information, support staff/organisational accountability, in addition to supporting quality standardisation processes. This would include review/revision of standard recording templates.
2. The Bishop of the Diocese of Plymouth should ensure the Interim Safeguarding Co-ordinator of Plymouth Safeguarding Office puts a clear process in place for opening and closing cases to ensure that the parameters of responsibility and accountability for cases is clear and understood by staff.
3. The Bishop of the Diocese of Plymouth should ensure the Interim Safeguarding Co-ordinator of Plymouth Safeguarding Office implements a systematic process to plan forthcoming reviews on cases where potential risk is being managed/monitored to ensure timely and effective reviews are consistently undertaken (this could be included in the functionality of a new electronic database).
4. The Bishop of the Diocese of Plymouth should ensure, with immediate effect, that actions, decisions, and the rationale for decision making, is recorded on individual case files.

PHASE TWO - compliance recommendations

1. The Bishop of the Diocese of Plymouth should satisfy himself that the on-going supervision of the Safeguarding Officer within the Diocesan Safeguarding Office is provided in accordance with National standards (i.e. subject to an agreement, agenda, frequency, record of discussion).

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2. The Bishop of the Diocese of Plymouth should ensure that Safeguarding Office staff, are appraised (annually) in their role for the safeguarding responsibilities which they carry out in accordance with National requirements.
3. The Bishop of the Diocese of Plymouth should ensure that Human Resources promote understanding of the National Whistle Blowing Policy so that individuals know how to raise a concern and also what the expectations are across the diocese.
4. The Bishop of the Diocese of Plymouth should ensure that the Safeguarding Office is supported to develop their working relationships with Local Safeguarding Children's Boards, Adult Safeguarding Boards, and other bodies located within the diocese who provide or support a safeguarding function, and this may include membership of/or contributions to some Boards. Progress in this regard should form part of the annual review of resources undertaken by the Diocesan Safeguarding Commission.
5. The Bishop of the Diocese of Plymouth will meet with the Safeguarding Commission at least once a year. This annual meeting will provide an opportunity to review the year's work and to consider plans for the forthcoming year.
6. The Bishop of the Diocese of Plymouth will ensure that the Trustees request and receive quarterly update briefings from the Diocesan Safeguarding Commission, one of which will be the annual report.
7. The Bishop of the Diocese of Plymouth should ensure that the Safeguarding Co-ordinator and/or Independent Chair of the Commission attend a Trustees' meeting at least once a year where they will be able to present their update briefing in person. The purpose is to facilitate

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effective communication and an open channel between the safeguarding team and Trustees.

8. The Bishop of the Diocese of Plymouth should ensure that the Diocesan Safeguarding Commission undertakes a needs assessment annually to ensure those accountable for budget allocation in the Diocese have sufficient information so that the safeguarding budget is adequate to ensure safe process and minimisation of risk.
9. The Bishop of the Diocese of Plymouth should satisfy himself that confidential information is stored appropriately within parishes across the Diocese in accordance with data protection legislation.
10. The Bishop of the Diocese of Plymouth should ensure that resources allow for the provision of an annual conference for Safeguarding Representatives year on year.
11. The Bishop of the Diocese of Plymouth should satisfy himself that all members of the Clergy are aware of their safeguarding responsibilities and appropriately support their Parish Safeguarding Representative/s to fulfil their role effectively, as Priests are accountable for safeguarding in their parish.

PHASE TWO - other recommendations

12. The Bishop of the Diocese of Plymouth should ensure that Human Resources review the job description/person specification of Diocesan Safeguarding Office staff to ensure they are fit for purpose.
13. The Bishop of the Diocese of Plymouth should ensure that Human Resources progresses an assessment of the terms and conditions of the employment of the Diocesan Safeguarding Office staff to ensure that these are commensurate with requirements of the role.

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14. The Bishop of the Diocese of Plymouth should ensure that appropriate on-going arrangements are in place sufficient to address the potential impact upon staff of this demanding area of work.
15. The Bishop of the Diocese of Plymouth should ensure that any future arrangements for the supervision of any individual in the role of Safeguarding Co-ordinator is provided by him, subject to a written agreement/contract clarifying the parameters and lines of accountability.
16. The Bishop of the Diocese of Plymouth should ensure that arrangements are in place for the supervision of the office Administrator (even though this is not covered by National standards) to assist the provision of support and to demonstrate accountability.
17. The Bishop of the Diocese of Plymouth should ensure that Safeguarding Office staff maintain professional registration requirements (where applicable), and evidence of this should be reviewed on an annual basis.
18. The Bishop of the Diocese of Plymouth should consider, in addition to existing quality assurance processes, the implementation of local auditing arrangements (e.g. case files) through the management line in order to quality assure practice on an on-going basis.
19. The Bishop of the Diocese of Plymouth should ensure that Human Resources review the Diocesan Sickness Absence Policy, and strengthen it to include 'trigger points' to assist managers to respond to potential problems as quickly as possible.
20. The Bishop of the Diocese of Plymouth should consider the proposed human resources plan, taking account of the National standard which states *'Dioceses must ensure that their safeguarding functions are adequately resourced. The budget allocated is for local determination but has to be justified in terms of safe processes and minimisation of risk'*.

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21. The Bishop of the Diocese of Plymouth will meet with Safeguarding Office staff at least once a year, such as attendance at a team meeting.
22. The Bishop of the Diocese of Plymouth should review the existing skills, knowledge and experience of Trustees to ensure that any potential gaps are identified, and when appointing future Trustees endeavour to appoint individual/s to fill any gaps e.g. Trustee with skills, knowledge, and understanding of safeguarding.
23. The Bishop of the Diocese of Plymouth should ensure that a review is undertaken of arrangements for monitoring IT equipment to inform any decisions about increasing security measures, to ensure that any changes are sufficient as well as reasonable and proportionate to protect the Trust's legitimate business interests.
24. The Bishop of the Diocese of Plymouth should ensure that a Policy is in place stating that in any event where there is a loss of Trust property/equipment a full enquiry is undertaken to ensure that individuals are appropriately held to account and that any potential risks to the Trust (e.g. loss of confidential information) are assessed and reasonable measures taken to mitigate any risks.
25. The Bishop of the Diocese of Plymouth should ensure the appointment of a suitably qualified/experienced individual to develop a communications strategy, which includes how to respond to media/communications across the diocese i.e. safeguarding matters (as and when the need arises) and this individual to attend Diocesan Safeguarding Commission meetings as necessary.
26. The Bishop of the Diocese of Plymouth should ensure the implementation of the new National standards for the recruitment and succession planning for Diocesan Safeguarding Commission members, for the purpose of

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ensuring clarity and transparency, and helping to support a one church approach to promote high standards of safeguarding practice into the future.

27. The Bishop of the Diocese of Plymouth should consider making it 'essential' to have a Parish Safeguarding Representative as a member of the Diocesan Safeguarding Commission (this is more than 'desirable' as recommended by the new National standards).

28. The Bishop of the Diocese of Plymouth should ensure that the minutes (non-confidential aspects) of Diocesan Safeguarding Commission meetings and local policies (as well as a link to national policies) are published on the Diocese of Plymouth website to demonstrate openness and transparency.

29. The Bishop of the Diocese of Plymouth should support arrangements for formal meetings to take place annually (as a minimum) between the Independent Chairs of the Commissions and Safeguarding Co-ordinators to open lines of communication and share learning.

30. The Bishop of the Diocese of Plymouth should ensure that the Diocesan Safeguarding Commission develop and implement a process for auditing the practice of the Diocesan Safeguarding Office, for the purpose of increasing the robustness of quality assurance processes as well as complimenting other auditing arrangements.

31. The Bishop of the Diocese of Plymouth should ensure the implementation of the new national standards for induction and training of all individuals with responsibilities for safeguarding children and adults in need of safeguarding within the church (including Clergy).

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32. The Bishop of the Diocese of Plymouth should ensure that Diocesan Safeguarding Office administrative staff receive a full induction to their role, in the absence of national standards in this regard.
33. The Bishop of the Diocese of Plymouth should ensure that a joined up induction/training strategy is developed across the Diocese (between the Deaneries, Vicariate of Formation, and the Diocesan Safeguarding Office) which integrates safeguarding into the mission of the church, and includes responding to different types of learning needs for individuals in accordance with their role and responsibilities.
34. The Bishop of the Diocese of Plymouth should ensure that the Diocesan Safeguarding Office prioritises training for Safeguarding Representatives and the Clergy/Religious, particularly regarding adults in need of safeguarding as this is an identified learning need.