

The Executive Summary of the independent review of files held by the Archbishop of Canterbury for the Southern Province under PCR2

Context

The files reviewed at Lambeth Palace date from the 1950's and cover a span of approximately 70 years. During this time there have been significant cultural changes in society, shaping the Church of England's priorities and procedures.

The Independent Reviewers recognised that from around 2013, there has been a noticeable improvement in safeguarding awareness and understanding within the files reviewed at Lambeth Palace and the wider Church of England. Survivor engagement, decision making, the management of risk, the management of cases and alleged perpetrators are some of the areas that have improved. Significant investment by the Church of England in recent years has clearly provided a solid platform for growth and development with the implementation of Diocese Safeguarding Teams, Advisers and the National Safeguarding Team.

Background

In 2007, the Church of England commissioned a Past Cases Review (PCR), which was a large-scale review of the handling by the Church of child protection cases over many years. It involved scrutiny of clergy and church officers' files to identify persons presenting ongoing risks to children but whose cases had not been acted upon appropriately.

In 2015, concerns were raised about how well the PCR had been conducted and an independent assessment was commissioned of the adequacy and effectiveness of the PCR.

Following this assessment, the Church of England commissioned a second review, known as PCR2.

The purpose of the PCR2 review was to identify both good and bad practice together with institutional failings in relation to how allegations of abuse have been handled, and to provide recommendations to the Church of England that will lead to improvements in its response to allegations of abuse and its overall safeguarding working practices. Specifically, its objectives were to:

- To identify all information within parishes and other church bodies, which may contain allegations of abuse or neglect where the alleged perpetrator is a clergy person or other church officer and ensure these cases have been independently reviewed.
- To ensure all allegations of abuse of children especially those that have been recorded since the original PCR, have been handled appropriately and proportionately to the level of risk identified and with the paramountcy principle 1 evidenced within the decision making.
- To ensure that recorded incidents or allegations of abuse of an adult (including domestic abuse) have been handled appropriately demonstrating the principle 2 of adult safeguarding.
- To ensure that the support needs of known survivors have been considered.
- To ensure that all safeguarding allegations have been referred to the Diocesan Safeguarding Advisers and are being / have been responded to in line with current safeguarding practice guidance.

- To ensure that cases meeting the relevant thresholds have been referred to statutory agencies.

The National Safeguarding Team (NST) PCR2 Reference Group, set up in 2020, provides an independent assessment of the measures in place to manage risk and provide feedback to the NST PCR2 Project Team and Director of Safeguarding Team. It reports to the National Safeguarding Steering Group. The reference group met every two months to provide oversight on the ongoing progress of the review. This group was chaired independently.

In December 2021, a comprehensive report was completed in relation to the files reviewed at Lambeth Palace and a total of 27 thematic recommendations were subsequently accepted by the PCR2 Reference Group. These recommendations are included within this executive summary below.

All 27 recommendations were accepted by Lambeth Palace and an action plan was implemented to review and monitor their progress. Each recommendation has a specific owner and is being progressed, some of which through the implementation of revised policy and guidance projects, such as the CDM Implementation Group and the National Case Management System.

Governance of all PCR2 recommendations is provided by the National Safeguarding Steering Group (NSSG).

The specification for the independent reviewers is outlined in the document 'Background and overview to the Past Cases Review 2019 (PCR2)'. It states that reviewers should:

- Be manifestly independent of the diocese i.e., not a diocesan church officer or closely involved in the diocese.
- Be suitably experienced in safeguarding investigative work within a relevant profession such as social work, police, law, probation, psychology.
- Be experienced in reviewing cases preferably at IMR/SCR/DHR/CSPR level.
- Be experienced and competent in risk assessment.
- Have a good understanding of the process for handling allegations of abuse made in relation to those working with children and vulnerable adults and the associated law and statutory guidance.
- Possess the interpersonal skills and experience to engage sensitively with victims and survivors.

Three independent reviewers were recruited who met these criteria.

All three had extensive experience in safeguarding, being two ex-police officers and one registered social worker. They were based at Lambeth Palace and reported to the then Provincial Safeguarding Adviser, who was accountable to and provided regular feedback to the PCR2 Reference Group.

Lambeth Palace, the London home and administrative base of the Archbishop of Canterbury, is often seen by the general public as the heart of the Church of England and church members and others contact the Archbishop for advice and guidance in a vast array of subjects such as complaints, requests for assistance, discipline, matters of procedure or general concerns. The Archbishop also acts as a supervisor, advisor and

confidant of bishops as well as performing a statutory role such as the Clergy Discipline Measure (CDM)¹.

The Archbishop of Canterbury has particular responsibility for the Southern Province, which consists of 30 dioceses covering about two thirds of England and includes parts of Wales, the Channel Islands and Europe. Up until September 2021, it also included the Falkland Islands and military chaplains.

The role of Lambeth Palace is reflected within the files it holds and maintains. Case work is not carried out by Lambeth Palace staff. Lambeth Palace do not investigate cases; investigations are undertaken by the NST or by a member of the Diocesan Safeguarding Team at the relevant diocese. Consequently, Lambeth Palace do not hold or create safeguarding files or parish returns. Instead, it is a central point of contact and a place where people seek advice. The files are not a reflection of case management.

At the time of the PCR2 review, there were seven main categories of paper files held at Lambeth Palace, which included clergy personnel files (Military Chaplain/Provincial Bishops) and Clergy Discipline files.

The reviewers were asked to review all categories in line with the PCR2 guidance with the exception of deceased clergy.

All the files reviewed, in excess of 2,700, were paper based and dated from the 1950's to current day. As Lambeth Palace do not investigate allegations, they do not hold 'Live Cases.'

Summary of Findings

All public correspondence and communication received into Lambeth Palace via the Contact address is recorded onto the Lambeth Palace database by the Correspondence Team.

Not all safeguarding correspondence received by Lambeth Palace is triaged through the Correspondence Team. Some correspondence including clergy complaints is and has historically been sent directly to other departments within Lambeth Palace, such as the Office to the Bishop at Lambeth, now the Office for the Bishop to the Archbishops of Canterbury and York. It is important therefore, that any safeguarding concern identified in such correspondence, is flagged as such to enable appropriate safeguarding action. It was evident during the PCR2 process, that a review of internal procedures was already in hand to address this issue.

A small number of loose documents identified for review, were located in offices at Lambeth Palace. The potential for personal data being lost or accessed by an unauthorised third party was problematic. The reinforcement of a Clear Desk policy would go some way to prevent potential breaches in data protection and/or a loss of documentation/correspondence.

Historically, the lack of consistency, integrity and security of files was a recurring theme during the PCR2 review. The reviewers did note recent improvements in file management by Lambeth Palace staff, including file security, an increased awareness of data protection legislation and risks represented by poor information management, driven by Records Office staff.

¹ See Appendix 1

The security of files currently stored at Lambeth Palace was found to be good. Files were located securely in appropriate locations within Lambeth Palace, accessed by authorised personnel.

In relation to record keeping and standardisation of file content, it was noted that there was inconsistency in the type of information available within the majority of the files reviewed. The depth of the information varied considerably and there was found to be much duplication and repetition. The reviewers noted that (with the exception of the most recent personnel files) there was a lack of consistency within the clergy personnel files regarding evidence of safeguarding training, such as certificates and courses attended or completed. Evidence of current safeguarding training being located within clergy personnel files, is an important part of the Clergy Current Status transfer process, as it is the personnel file that follows a member of clergy when he or she moves to another diocese. These records enable bishops to exercise their ministry of oversight and pastoral care as well as their canonical responsibilities, especially that of commending someone for any particular ministry. It is vital that the personnel files of clergy accurately reflect what safeguarding training he or she has undertaken, to what level and whether refresher training is required, as this will enable senior clergy to make informed decisions regarding completion of the Current Clergy Status Letter (CCSL)² and better assess risk. Such action will also adhere to the House of Bishops updated policy (June 2021)³ in relation to clergy personnel files. The more recent files demonstrate a positive change. Clergy personnel files are noticeably more relevant in terms of content with a move towards standardisation. There is evidence of Disclosure and Barring Service (DBS) checks, safeguarding training and CCSL's. These files are now more likely to contain HR material, such as assessments and appraisals.

A central theme running through the review was the lack of cohesion, coordination and liaison nationally between the dioceses, regarding the recording and sharing of information in relation to clergy who were/are the subject of safeguarding concerns. It would be extremely beneficial for the Church of England to have one secure national database. Such a database could identify potential perpetrators at the earliest opportunity, protect vulnerable members of the public, plug necessary intelligence gaps and significantly reduce reputational risk for the Church.

The reviewers found some historical examples of cases whereby members of clergy had been moved around from diocese to diocese, following an allegation or disclosure of a safeguarding concern without meaningful or positive action being taken against them. In recent years, however, there is clear evidence within the files reviewed that positive action is being taken against alleged perpetrators, for example, through the Clergy Discipline Measure (CDM), the practice of formal risk assessments and use of core groups. There is also a noticeable significant increase within the recent files of statutory agency referrals, and the sharing of information between dioceses and some overseas locations.

Organisational culture is pivotal to safeguarding. It is often described as the personality of that organisation as it encompasses the underlying values, beliefs and codes of practice that make the organisation what it is. It can be seen through behaviour, language, customs, rule, group interaction and habits.

There are many examples from the files reviewed, which illustrate, historically, a poor safeguarding culture within the Church of England. Personal and disparaging

² See Appendix 1

³ Personal Files Relating to Clergy – House of Bishops updated Policy (June 2021) [DRAFT \(churchofengland.org\)](https://www.churchofengland.org)

remarks were often recorded within reports contained within the older files. Documents, particularly within the older files, demonstrated the use of antiquated attitudes and vocabulary. This is less apparent in more recent files. However, evidence of bullying of clergy and by clergy was apparent within some of the more recent complaint files reviewed. These did not however, relate to Lambeth Palace and did not involve Lambeth Palace staff.

More recent files demonstrate a welcome move towards standardisation, particularly around DBS, the identification of safeguarding concerns and early intervention to mitigate risk, with a noticeable positive change in safeguarding understanding and awareness. Survivors were seen to be better supported, their concerns acknowledged, addressed and relevant referrals were made to statutory agencies.

There is little recording of domestic abuse within the files held at Lambeth Palace. Where it was alluded to within divorce proceedings, it was not always recorded on the details within the Archbishops' List⁴. There was also very little evidence to suggest that external agencies had been informed, this was particularly true of files up to the 2000's.

Older files illustrate a lack of support and understanding of the causes of poor mental health. The reviewers found examples within these files of clergy being referred to as 'troublesome' or 'difficult' when high workloads and poor mental health were evident. Some of the more recent files did, however, demonstrate a clearer understanding and sign posting of mental health and adult abuse cases and were appropriately referred to statutory and support agencies. These findings were not consistent throughout the review and better training and awareness in identifying and understanding poor mental health may go some way to alleviate these issues. Support mechanisms need to be considered to manage these issues at the earliest opportunity, to prevent them worsening and reduce the perceived stigma associated with poor mental health. Such intervention would support the individual in the short term and could in the longer term, mitigate sickness and litigation for the Church.

It was evident that some files had not been available for the PCR1 review. Those files missed under PCR1 were reviewed under PCR2. The reviewers did not encounter any files in this category where safeguarding opportunities were missed.

The detail behind safeguarding decisions and actions documented were largely recorded on files held by the local diocese. A direct consequence of this resulted in a number of enquiries being highlighted to the Provincial Safeguarding Adviser and followed up. The independent reviewers were satisfied that those enquiries raised for further information were shown to have been dealt with by the relevant diocese at the time, subsequently or are currently in hand.

Maintaining consistency in procedure and processes provides clarity of what is expected, it creates accountability and establishes reputation. Inconsistency in procedure was apparent in some files relating to the disclosure of overseas convictions and others, who were convicted of sexual offences, but not registered on the Archbishops' List.

There was a lack of consistency regarding the description of the disciplinary behaviour included within the Archbishops' List and it would appear that in some cases the offending behaviour had been minimised. The reviewers noted that in cases of sexual assault on a child, the age of the child was not included within the description; in adultery/extra marital relationship cases, or divorce on grounds of unreasonable behaviour, the fact that domestic

⁴ See Appendix 1

abuse might be a factor was not included. Detail such as these might better inform and signpost any current or future safeguarding risk.

Providing good pastoral care and support for survivors and those reporting abuse, is integral to the role of the Church in maintaining public confidence and its reputation. The reviewers noted a number of historic cases where decision making sought to protect the reputation of the Church often to the detriment of the survivor and their welfare. However, in more recent files, it was clear that with the introduction of Diocesan Safeguarding Teams and Diocesan Safeguarding Advisers, together with the implementation of the National Safeguarding Team, survivor care, survivor engagement, referrals and support mechanisms provided, has improved significantly.

A recurring theme which emerged during the review of files was the bureaucratic and complex nature of the Clergy Discipline Measure (CDM) process. It was felt that the system was onerous, that insufficient explanations were provided to survivors/complainants regarding the process, which included the administration involved, the court process (giving evidence and being cross examined) and that complainants expectations could be better managed. The result of this included incorrectly completed forms, applications that were out of time, or were dismissed owing to a lack of evidence and/or a lack of understanding of the CDM process.

Conclusions

The files reviewed cover a span of approximately 70 years and it is recognised that during this period there have been cultural changes in society, which in turn has impacted on the Church of England's priorities and practices. In particular, opinions and attitudes towards human sexuality, safeguarding and the role of women have been transformed during this time and these changes have been reflected in legislation and procedure.

It is clear from the files reviewed that from around 2013 there have been noticeable improvements in safeguarding awareness and understanding at Lambeth Palace and the wider Church of England. These improvements relate to record keeping, decision making, risk management, management of cases, engagement with survivors and the management of alleged perpetrators, underpinned by the significant investment by the Church of England, which has resulted in the implementation of Diocese Safeguarding Teams, Advisers and the National Safeguarding Team.

The fact that the Church of England has listened to the criticism aimed at the PCR1, is a reflection that the Church wants to 'get it right' and although the reviewers have made many recommendations, there is evidence of progress and a visible a shift in the Church of England's culture.

The following recommendations, made by the Southern Provincial Independent Reviewers, form part of the National PCR2 report.

R 1. Whilst it is inevitable that some safeguarding communications will go directly to the office for the Bishop to the Archbishops of Canterbury and York, it is important that these communications are logged into the Lambeth Palace database system. This will ensure that all safeguarding communications and documents are dealt with and filed appropriately in a timely manner.

R 2. To ensure the safe storage of confidential and sensitive documentation, files should be stored in one large secure records repository either within the Palace, at Lambeth Palace Library or relocated to a Central Records Centre. When trying to reduce the risk of security

breaches, parts of original files should not be removed without a clear record on the file of who took what and when. Duplication of files or parts thereof should be kept to a minimum and avoided where possible. If required, duplicate files or parts thereof, should be stored securely and returned to the original file or destroyed when no longer required.

R 3. The enforcement of a clear desk policy will go some way to prevent such breaches. It is important that everyone in the organisation, including senior leaders follow good record keeping practice. This requires putting the policy in writing, reminding staff of the policy and conducting spot checks to ensure the policy is being followed. It is crucial to let all staff know how to follow the policy, its importance, and the consequences of disregarding the policy. Any 'working files' must be kept securely and archived in accordance with the record keeping policy, once the work is complete.

R 4. The Records Office department should be sufficiently resourced with appropriately skilled staff, supported by a centralised records system to reduce the risk of records being misplaced, unassessed, and retained for longer than necessary without being recorded on electronic databases.

R 5. Adherence to the House of Bishops policy (June 2021) in relation to clergy personnel files and circulation to relevant Church of England staff and clergy to raise awareness of the updated policy.

R 6. Those files required for retention under GDPR, to be converted into a digital format.

R 7. Ensure that the GDPR process undertaken during the PCR2 is followed up and implemented.

R 8. A review of the CDM file management process is required to ensure that all CDM's are logged and recorded appropriately and are securely stored in one location.

R 9. To prevent a breach in data protection and the loss of files in transit, adherence to a clear and robust policy that can withstand scrutiny needs to be implemented.

R 10. There needs to be a regular review of file content to prevent inappropriate or irrelevant material being held within the files at Lambeth Palace.

R 11. The creation of a National Database for Clergy.

R 12. Bullying. Awareness and understanding needs to be raised regarding this issue and the impact it has upon the individual. Support needs to be given at an earlier stage and throughout any complaint process.

R 13. Consideration for early intervention, a focus on wellbeing, and the internal grievance procedure to support complainants and / or survivors and seek to conciliate and mitigate issues before they escalate to disciplinary measures under the CDM process.

R 14. Awareness of domestic abuse and its impact on children and families should be raised within the Church of England, as lack of recording suggests that it is an area that needs more consideration.

R 15. Assurance that Church of England legal advisors and relevant legal department staff receive safeguarding training to a level that enables them to effectively manage and advise on safeguarding matters.

R 16. Assurance that clergy receive regular safeguarding training at an appropriate level to enable them to fulfil their ministerial duties effectively. Such training should form part of their

Ministerial Development Reviews to reinforce understanding and awareness of the issues surrounding safeguarding.

R 17. A greater understanding through training of Mental Health awareness to ensure that clergy members are supported sufficiently and not left vulnerable. Consideration should be given to such training forming part of the Ministerial Development Reviews process to reinforce understanding and awareness of the issues surrounding poor mental health.

R 18. The regular review of files is required to ensure that GDPR legislation is adhered to.

R 19. The Church should ensure that Information Sharing procedures are robust and cover the movement of clergy nationally and internationally within the Church of England and externally covering movement to other Churches and Religious Faiths.

R 20. A standardised approach should be adopted when considering the sanctions imposed in relation to adultery and other disciplinary conduct cases. This will ensure fairness to clergy members, whilst providing clarity and accountability in the process.

R 21. Ensure there is a system in place that identifies and captures clergy members, who pose a risk but do not meet the criteria for entry on the Archbishops' List.

R 22. Ensure there is a system/register in place that identifies and captures non-clergy who pose a risk, in order that necessary safeguarding measures may be implemented to protect vulnerable individuals.

R 23. Ensure that there are robust processes in place to enable the disclosure of clergy, convicted of offending overseas.

R 24. To avoid confusion the description of disciplinary behaviour requires more detailed information to better inform and signpost any current or future safeguarding risk.

R 25. More support is required for the NST to ensure that timely responses are provided to survivors to prevent further trauma being caused to complainants or survivors of abuse.

R 26. Improve the communication of the CDM process to ensure sufficient support and understanding is provided to survivors, complainants and respondents.

R 27. Enable the CDM process to be more 'user friendly' for victims and completed within a time frame that supports both complainants and respondents.

APPENDIX 1

The Archbishops' List

The Archbishops' List enables a record to be kept of all clergy who have received a penalty following disciplinary action. It would also include those who have relinquished their holy orders, resigned following the making of a complaint under the CDM, whose names are included on a barred list, together with those who, in the opinion of the Archbishops, have acted in a manner not amounting to misconduct but which might affect their suitability for engaging in active ministry.

Current Clergy Status Letter (CCSL)

Where a priest or deacon is being considered for an appointment or permission to officiate in the receiving bishop's diocese, and the sending bishop receives a request from the receiving bishop for an Episcopal Reference and Clergy Current Status Letter ('**CCSL**'), the sending bishop will share with the receiving bishop such personal information about that priest or deacon as is necessary to provide a full and accurate response.

The primary function of the CCSL is to ensure that there are no safeguarding concerns associated with the relevant cleric.

The Clergy Discipline Measure

The Clergy Discipline Measure 2003 (CDM) provides a legal process for dealing with formal complaints of serious misconduct against members of the clergy. The CDM applies to all deacons, priests and bishops in the Church of England, even if they are not in active ministry.

House of Bishops updated Policy (June 2021)

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