

Lambeth Palace SCIE Audit Action Plan

Introduction

The Social Care Institute for Excellence (SCIE) conducted a review of the safeguarding arrangements at Lambeth Palace and their report was published in February 2023.

Lambeth Palace takes seriously the findings made by SCIE and aims to become an exemplar of Safeguarding and a place of safety for all residents, staff and guests, a place where individuals are confident to report wrong-doing and make disclosures in the knowledge that they can do so safely and with the full support of senior leaders.

This Action Plan demonstrates our ongoing commitment to addressing the findings made by SCIE through our response to the questions posed. To reinforce this commitment, we will continually review our progress and provide regular annual reports and updates which will be published on the Lambeth Palace website.

Regular Lambeth Palace Safeguarding Reference Group meetings will enable us to monitor and review the implementation of the recommendations, drive progress and measure success.

Governance within the Church of England

The governing structure of the Church is constitutionally decentralized, with 42 dioceses. Each of the 42 dioceses is overseen by a diocesan bishop. There are 115 bishops in total. Each of the diocesan bishops along with their leadership teams are responsible for the care of parishes and clergy in that diocese. Each diocese is a charity in its own right with its own financial and safeguarding responsibilities.

The dioceses are grouped into two provinces – Canterbury, in the South of England, comprising 30 dioceses covering roughly two-thirds of England, parts of Wales, and the Channel Islands, with the remainder comprising continental Europe (under the jurisdiction of the Diocese in Europe) and York, in the North, comprising 12 dioceses which cover the northern third of England and the Isle of Man. The provinces are administrative entities and have limited functions which are distinct from the dioceses, including in relation to safeguarding. Each province has a head or primate - the Archbishops of Canterbury and York, respectively. The Archbishop of Canterbury is the most senior cleric.

The Archbishop of Canterbury is the Primate of All England. The Archbishop is also primus inter pares – ‘first among equals’ – among the Primates of the 42 Provinces of the worldwide Anglican Communion. The Archbishop is one of the four Instruments of Communion and a Focus of Unity for the Communion. Approximately 25-30% of his role relates to his Anglican Communion responsibilities. He is the



Metropolitan for the Province of Canterbury, encompassing 30 dioceses in the southern two-thirds of England with one in Europe, and the diocesan bishop of the Diocese of Canterbury. He is a Privy Councillor, sits in the House of Lords and plays a central part in national ceremonies such as the funeral of a monarch and the coronation of a new monarch. The current Archbishop, Justin Welby, was installed at Canterbury Cathedral on 21 March 2013.

The Archbishop of Canterbury and the Archbishop of York share leadership responsibility at a national level as joint presidents of the Archbishops' Council (one of the seven NCIs, and a registered charity) and General Synod, which is the legislative body of the Church. The archbishops are two of the eight members of the House of Bishops' Standing Committee, which sets the agendas for the House of Bishops meetings. The House of Bishops is one of the three houses of the General Synod.

The Archbishop of Canterbury has metropolitan authority (a supervisory authority for defined purposes) in relation to all bishops and clergy in the 30 dioceses in southern England; the Archbishop of York has equivalent authority over the 12 dioceses in the Province of York. Given the very high profile of the roles, both archbishops are commonly assumed to be in a hierarchical relationship with the dioceses, and to have management oversight of bishops, deans and diocesan matters in general. Due to the constitutionally devolved nature of the Church, this is not the case, except in specific areas, such as clergy discipline involving senior clergy (mainly bishops).

The National Safeguarding Structure

The Archbishop of Canterbury holds ultimate accountability for the safeguarding arrangements at Lambeth Palace. In the Palace, the Archbishop is supported in this task by numerous others, who operate across the national church or have their focus entirely within the Palace.

The Archbishops' role is to:

- Provide leadership and direction in promoting a Safer Church;
- Appoint a bishop with lead responsibility for safeguarding children and adults;
- Appoint the members of the National Safeguarding Steering Group;
- Ensure that diocesan bishops engage in safeguarding induction and training;
- Direct the archbishop of another province or a bishop to undergo a risk assessment.

The Church of England has commissioned a review into the Independent Safeguarding Board (ISB) phase 1. It has also commissioned a review into the future of safeguarding within the Church of England. Any recommendations identified from these reviews will be reflected within our action plan and will inform our future practice.

See Appendix 1 below for further information regarding church bodies and roles mentioned throughout this document.

See Appendix 2 below for information regarding the Clergy Discipline Measure and Tribunal outcomes.

Summary of questions to consider and Lambeth Palace Action Plan

1. How will concerns about the security contract and operational procedures be addressed and when will this happen?

Progress Since Audit:

The provision of security to Lambeth Palace is due to be considered as a larger review of governance across the National Church Institutions (NCIs), in addition to this we have reviewed security operational procedures, addressing failures by working closely with the management of the security contractor.

Completion Date: Ongoing

2. How will consistency of security practices once in the buildings and grounds be improved?

Progress Since Audit:

In addition to the review of the NCIs, our review of the operational procedures has required staff wear security badges, be properly deployed at events, use correct communication methods, and challenge those who are not wearing ID.

Completion Date: This work is ongoing and regularly reviewed and is crucial to the safety and wellbeing of those that live and work at Lambeth Palace.

3. What needs to be done to ensure that all residents, staff, contractors and visitors comply with safety arrangements and are familiar with procedures for responding to emergencies?

Progress Since Audit:

Signage is in the process of being enhanced and Introductory training and inductions for staff has been extended.

Completion Date: Ongoing

4. How can clarity and sign-up to safe working practice for all staff and clergy based at Lambeth Palace best be achieved? Who should be involved in the development of local practice guidance, or other approaches to embedding good practice?

Progress Since Audit:

The National Church Institutions have a comprehensive set of policies for staff which set out safe working practices and procedures. The responsibility for monitoring the implementation of these policies rests with all managers and with staff. The Chief of Staff is responsible for ensuring safe working practices are adhered to at Lambeth Palace.

Completion Date: Ongoing

5. How can some targeted awareness raising be progressed to consider safe working practices and social media use in the context of Lambeth Palace, addressing relationships and communication between residents and staff, particularly the security staff?

Progress Since Audit:

The Lambeth Palace Safeguarding Manager (LPSM) conducts in person safeguarding inductions with all new staff joining Lambeth Palace. These inductions extend to security staff and Community of St Anselm (CoSA) members. This induction includes how to maintain safe working practices, use of social media, recognising abuse and managing risk, as well as how to deal with safeguarding concerns.

Online Safeguarding Training is mandatory for all staff, CoSA members, and security staff. The LPSM also maintains records and ensures all staff, security,

residents and religious communities at the Palace have completed the relevant safeguarding training.

A training needs analysis has been undertaken to assess the level of safeguarding training required for staff, Security, CoSA and Spiritual Companions.

Completion Date: Autumn 2023

6. How can the palace satisfy itself that safeguarding procedures for events involving outside visitors are consistently complied with?

Progress Since Audit:

In light of the SCIE audit recommendations, a review has been undertaken of the existing procedures for events held at Lambeth Palace. Names of visitors and vehicles continue to be provided to the security team prior to events, and bag searches are conducted where appropriate. Briefings are held with relevant staff prior to events taking place and debriefs conducted to identify best practice and learning. Incident logs are used to record issues raised. Safeguarding signage and information is now displayed in public areas and toilets. Advice is sought regularly by the Hospitality team from the LPSM in relation to forthcoming events. During outside events there is now a radio link to security and security channels are consistently monitored.

Completion Date: Ongoing

7. How can feedback from staff be routinely sought regarding how safe they feel at the palace?

Progress Since Audit:

The Palace is currently seeking to develop a Lambeth Palace Communities Survey to routinely monitor the safety of staff and residents and how safe these communities feel. A working group will be created to assess and address issues raised. This will be added as an agenda item at the regular Safeguarding Reference Group meetings which will commence in November 2023. This will ensure a robust and well embedded quality assurance process is in place which will build into staff and residents wellbeing, safety and security.

Completion Date: December 2023

8. How can CoSA apply the principles set out in *Promoting a Safer Church and Responding Well to Victims and Survivors (2022)*, and demonstrate that it is doing so consistently?

Progress Since Audit:

Each new cohort of CoSA receives an in person safeguarding induction with the LPSM. This induction includes how to maintain safe working practices, use of social media, recognising abuse and managing risk, as well as how to deal with safeguarding concerns. Whilst the principles set out in 'Promoting a Safer Church' and 'Responding Well to Victims and Survivors of Abuse' are adopted and applied by CoSA with the support of the LPSM, it was recognised that more could be done. Following a review of CoSA staff recruitment and onboarding, the LPSM is now involved in the formal interviewing of new CoSA staff, ensuring that successful applicants are recruited safely.

A training needs analysis has been undertaken to assess the level of training required by CoSA leads and Spiritual Companions. The result of which is being progressed by the LPSM.

All further in person safeguarding inductions will now take place together with the CoSA staff, its members and spiritual companions. This will ensure consistency in the delivery of training and safeguarding principles.

Completion Date: This will be subject to an ongoing review, however the training needs analysis for CoSA leads and Spiritual Companions is now complete.

9. What arrangements are needed to provide assurance that safeguarding and information sharing processes are working consistently well in CoSA?

Progress Since Audit:

The LPSM has created a CoSA Safeguarding Protocol which provides guidance to CoSA staff, members and spiritual companions on how to manage a disclosure and the responsibility to meet the spiritual, pastoral and welfare needs of victims and survivors afterwards. Regular monthly meetings take place between the LPSM and the Chaplain to the Archbishop of Canterbury, which affords an opportunity to discuss and address any issues raised. The disclosure process, which includes confidentiality, sharing and recording is discussed with CoSA staff and its members during the in-person induction training with the LPSM. As stated previously, further inductions that take place will include Spiritual Companions.

Completion Date: This will be subject to ongoing review.

10. What additional, specialised support and training is needed for 'spiritual companions?'

Progress Since Audit:

This is covered in actions 8 and 9 above.

Completion Date: The training needs analysis for CoSA leads and Spiritual Companions is now complete.

11. How can the skills and safeguarding understanding of decisionmakers who gatekeep correspondence, including correspondence related to Church officers, be better developed to support them in their roles?

Progress Since Audit:

The Correspondence Team at Lambeth Palace do not gatekeep but instead manage all the correspondence received through their Inbox.

All Correspondence Team staff have completed relevant safeguarding training and have undertaken an in-person safeguarding induction with the LPSM. The LPSM and Correspondence Team have weekly meetings to discuss issues and themes. The Correspondence Team now undertake bespoke external safeguarding training relevant to their role.

The Episcopal Secretary, LPSM and Executive Legal Officer now have regular meetings to identify safeguarding concerns that come through their office. The Episcopal Secretary and Executive Legal Officer have undertaken relevant safeguarding training in line with their role and record, maintain and review cases of a safeguarding nature and these are RAG rated in order of priority within their office team log. The LPSM is always consulted in safeguarding cases.

The Records Officer contributes to best practice conducting an in-person records management induction for all new members of staff, providing training on file management for safeguarding or disciplinary related records.

General Data Protection Regulation (GDPR) training is mandatory and staff are regularly reminded of National Church Institutions Information Management policies, Data Protection legislation and regulations.

Completion Date: This is subject to ongoing review.

12. Who has responsibility for addressing the continuing issues related to safeguarding correspondence received and sent prior to 2019?

Progress Since Audit:

Since the SCIE audit, the Records Team continue to collaborate with the LPSM, Episcopal Secretary, Executive Legal Officer and Correspondence Team in the retrieval, review, recording and retention of correspondence held within the Lambeth Palace database and filing processes. By doing so, these teams have been able to identify and escalate to senior staff the issues caused by previous poor record management.

Since the SCIE audit, Lambeth Palace has worked closely with the central IT department to resolve issues related to the research of safeguarding correspondence pre-2019. Collaboration between the Information Governance Officer, Information Technology Team, Records Office, the LPSM, Bishop to the Archbishops of Canterbury and York (BACY) Team, the Correspondence Team and Lambeth Palace Library archivists ensure that all repositories and obsolete mailboxes are searched and remain searchable.

The process of identifying digital safeguarding correspondence pre-2019 is ongoing and continues to be addressed. The Palace is currently recruiting a records and legacy assistant on a fulltime basis to assist in this task.

Completion Date: Ongoing. To be reviewed Spring 2024.

13. What is the best way routinely to seek feedback from people who have made contact with Lambeth Palace about safeguarding issues?

Progress Since Audit:

Lambeth Palace is keen to improve the response it provides to those who contact the Palace regarding safeguarding issues. At the time of the SCIE audit, the role of the Lambeth Palace Safeguarding Officer was part time with a short-term contract. The Palace recognised the need for a dedicated full time safeguarding professional. Following a business needs assessment by the new Chief of Staff, the LPSM was made a permanent full-time member of staff, employed by and dedicated solely to Lambeth Palace. The LPSM responds to safeguarding correspondence received by the Palace, and engages with survivors, victims and complainants in line with the principles of Promoting a Safer Church and Responding Well to Victims and Survivors of Abuse policies and guidance.

The LPSM is working closely with the National Safeguarding Team (NST) and Survivor Engagement lead to identify and develop appropriate ways of seeking

feedback from those who have received responses and assistance from the LPSM. This may include feedback surveys, the results of which can be brought to the regular Lambeth Palace Safeguarding Reference Group to identify learning and best practice.

Completion Date: Spring 2024

14. What are the timescales for agreeing safe processes for identifying and responding to correspondence to Lambeth Palace via social media?

Progress Since Audit:

There is an agreed and embedded process in place with the NST for handling safeguarding-related messages received via Lambeth Palace's social media channels. The protocol document was reviewed recently with the Communications Leads and the LPSM. Lambeth Palace is also researching systems that we can implement to provide additional support for monitoring our social media channels on evenings and weekends.

Completion Date: December 2023

15. How can victims and survivors be brought in to support the OABCY with identifying good practice in responding to different kinds of safeguarding correspondence?

Progress Since Audit:

Both Lambeth Palace and the Episcopal Secretary are exploring ways to better engage with and improve responses to victim and survivors by seeking feedback to help shape, develop and improve the experience of those involved.

Lambeth Palace is also currently reviewing complaints and mediation procedures to ascertain ways to further improve the complaints process and service provided.

Completion Date: Spring 2024

16. What are the long-term plans for support to the correspondence team and correspondence with victims and survivors, given the temporary nature of the LPSO currently?

Progress Since Audit:

The Lambeth Palace Safeguarding Manager is now full time and a permanent member of staff and leads on all correspondence with victims and survivors.

Completion Date: February 2023

17. How can the Palace assure itself that safeguarding concerns are now being consistently identified and dealt with, in line with the principles set out in *Responding Well to Victims and Survivors of Abuse* (2022)?

Progress Since Audit:

The Lambeth Palace Safeguarding Manager (LPSM) has been in post since November 2021 at which time the vast majority of safeguarding correspondence was received by and triaged through the Correspondence Team to the LPSM inbox. Since that time there has been a noticeable decline of safeguarding correspondence received in this way and an increase in such correspondence being received directly by the LPSM via the safeguarding inbox, in part likely owing to the length of time the LPSM has now been in post.

All safeguarding correspondence received by the LPSM is dealt with as soon as practicable. Safeguarding concerns are identified, prioritised and actioned in line with the principles set out in *Responding Well to Victims and Survivors of Abuse* and the Parish Safeguarding Officers Handbook.

Completion Date: Ongoing.

18. How can the principles set out in *Responding Well to Victims and Survivors of Abuse (2022)* be used to ensure that individuals raising safeguarding concerns with Lambeth Palace are responded to consistently well?

Progress Since Audit:

As stated in Recommendation 13 above, the LPSM is now a permanent full-time member of staff, employed by and dedicated solely to Lambeth Palace.

The LPSM responds to safeguarding correspondence received by the Palace, and engages with survivors, victims and complainants in line with the principles of Promoting a Safer Church and Responding Well to Victims and Survivors of Abuse policies and guidance.

The LPSM is working closely with the National Safeguarding Team (NST) and Survivor Engagement lead to identify and develop appropriate ways of seeking feedback from those who have received responses and assistance from the LPSM. This may include feedback surveys, the results of which can be brought to the regular Lambeth Palace Safeguarding Reference Group to identify and shape learning and best practice.

Completion Date: Spring 2024

19. How can an independent audit of Lambeth Palace CDMs related to safeguarding or containing safeguarding elements, be achieved?

Progress Since Audit:

Access to CDM files under the current statutory Code of Practice issued by the Clergy Discipline Commission under section 3 of the CDM restricts access to these files (and other relevant CDM papers) as follows:

- *“306. Allegations of misconduct under the CDM are private and confidential. This is to ensure that matters are dealt with fairly and that the process is not prejudiced. It extends to complainants, respondents and witnesses.*
- *307. All matters should be kept strictly private and confidential. This includes written documents and material which, save for legal representatives, should not be shared with third parties....”.*

The Preliminary Scrutiny Report for any allegation under the Clergy Discipline Measure (CDM) is prepared by the Provincial Registrar, a lawyer who has undertaken Senior Leadership Safeguarding training.

All information with regard to safeguarding allegations and complaints brought under the CDM, including decisions made, processes implemented, actions taken, are stored within the clergy Personal File, as set out in the House of Bishops' policy – Personal Files relating to Clergy (June 2021).

All Clergy Personal files held at Lambeth Palace were reviewed under PCR2 and findings from this review were set out in the Lambeth Palace PCR2 Executive Summary in 2022.

Where a (new) CDM file held by the Palace relates to safeguarding, the LPSM is always consulted. The LPSM will follow up and take any action as necessary.

The Clergy Personal files can be audited independently at any time, however access to CDM files is limited owing to their confidential nature.

Completion Date: Recommendation Complete

20. How can an independent audit of how the outcomes of CDMs, conducted by Lambeth Palace, which are related to safeguarding or containing safeguarding elements, are logged on the Archbishops' list be achieved?

Progress Since Audit:

A recent review has ensured that the rules on access to the Archbishop's List are being followed. Under Rule 74, access is limited because of the confidentiality of the information stored.

Section 38 of the Clergy Discipline Measure 2003 and Part 12, Rule 74 – Rule 80 (The Archbishops' List) of the Clergy Discipline Rules 2005 specify how penalties must be recorded on the Archbishops' List. The reasons are specified in Section 38(1) of the CDM and the Code of Practice 2021, and all entries on the List include a description of the activity that led to the penalty, some of which may be safeguarding related.

Completion Date: Not applicable

21. How can an independent audit of decisions by the Archbishop to reinstate PTO once a person's period of Limited Prohibition ends following CDMs related to safeguarding or containing safeguarding elements, as well as the option for the Archbishop to comment or give a view in relation to equivalent decision making by diocesan bishops, be achieved?

Progress Since Audit:

The decision regarding a return to ministry (including the reinstatement of PtO) remains solely with the diocesan bishop.

There is already a team of qualified assessors in place who are appointed to make an assessment regarding a return to ministry, which currently goes to the Archbishop for comment.

The Palace has recently reviewed its working practices in this area and has safely recruited and carried out training of a renewed panel of Clergy Discipline Measure (CDM) Assessors. As a result of the new Code of Practice recently approved by the House of Bishops, in future the diocese will take a more active role in directing all assessments and the Archbishop will no longer be sent a copy of the assessors report for comment.

(See Appendix 2 below for further information).

Completion Date: To be reviewed Spring 2024

22. How will the Archbishop and senior clergy and staff at Lambeth Palace improve their responses to those involved in CDM and related safeguarding processes, pending the future introduction of a new clergy conduct measure?

Progress Since Audit:

Lambeth Palace and the Episcopal Secretary are exploring ways to better engage with victim and survivors and improve responses by seeking feedback to help shape, develop and improve the experience of those involved.

Lambeth Palace is also currently reviewing the way complaints and mediation procedures are handled to ascertain ways to further improve the process and service provided, pending the introduction of the new Clergy Conduct Measure.

Completion Date: Spring 2024

23. Within the limitations of the CDM, and pending the outcome of the current review, what steps can the Archbishop take to address complaints and criticisms by survivors of the way in which the CDM has been handled at Lambeth Palace and correct perceived injustices?

Progress Since Audit:

All decisions taken by the Archbishop in respect of CDM decisions are made following a full and thorough review by the Provincial Registrar of the written particulars and evidence provided by the complainant. When the decision is made to dismiss the allegations made under the CDM, it may result in disappointment for the complainant. When a complaint is dismissed under the CDM, the complainant has a right to request the President of Tribunals to review the dismissal. All complainants are informed about this process when they receive the Decision Letter from the Archbishop.

Lambeth Palace takes seriously any complaint and criticism made to them in relation to the CDM process and seeks to continually learn from and improve its response to both complainants and respondents.

(See Appendix 2 for further information on CDM and Tribunal outcomes).

Completion Date: Ongoing

24. How might the Archbishop and senior clergy and staff at Lambeth Palace improve their responses to those who wish to make a complaint about the outcome of diocesan safeguarding processes, pending the future introduction of a new clergy conduct measure?

Progress Since Audit:

As stated above, Lambeth Palace and the Episcopal Secretary are exploring ways to better engage with victim and survivors and improve responses by seeking feedback to help shape, develop and improve the experience of those involved.

Lambeth Palace is also currently reviewing the way complaints and mediation procedures are handled to ascertain ways to further improve the process and service provided, pending the introduction of the new Clergy Conduct Measure.

Pastoral support is offered to every complainant and respondent in complaints received by Lambeth Palace. Work is currently underway to revamp the way

pastoral support is offered to those involved in a Clergy Discipline Measure (CDM) process.

Safeguarding concerns, as related to either respondent or complainant are reported to the Lambeth Palace Safeguarding Manager.

The Episcopal Secretary and Executive Legal Officer seek to ensure that differently abled complainants in the CDM process are offered assistance. Any complainant who needs support with making an allegation under the CDM is referred to Safe Spaces for the appropriate assistance.

Completion Date: Ongoing

25. How will the Church address the problem of there being no means of complaining about the actions taken within its dioceses, and what is the role of the Archbishop and his senior staff in achieving a solution?

Progress Since Audit:

The Archbishop has no jurisdiction in relation to dioceses. Each diocese is its own legal entity. (See Governance and role of Diocesan Bishop in introduction above and Appendix 1 below).

Often when the Episcopal Secretary and Executive Legal Officer are passed correspondence about a local matter, it is the case that it is outside the Archbishop's powers to intervene.

In these cases, sometimes regret at the situation is expressed but it is explained that, due to the constitutionally decentralised nature of the Church of England, the Archbishop is unable to become involved.

In other cases, where possible, enquiries are made with the diocese by the Episcopal Secretary or Executive Legal Officer before responding appropriately to the correspondent.

Completion Date: No further action

26. How confident is the Palace that bullying is being consistently recognised as a safeguarding issue and what more might be done to respond well to those experiencing bullying, to address those whose behaviour causes distress, and to promote awareness and understanding of the impact on the individual and the wider Church?

Progress Since Audit:

The Palace will be addressing bullying as part of staff wellbeing and through the staff survey, which is under development. The National Church Institutions (NCI) Dignity at Work Policy is already in place to deal with such matters. This will also be raised during staff monthly meetings.

Any disclosures or allegations of bullying of or by staff at Lambeth Palace will be brought to the attention of the LPSM to ensure that necessary and appropriate advice and support is provided and relevant policy is adhered to.

The issue of wider bullying within the Church can be raised through bodies such as the National Safeguarding Panel, National Safeguarding Steering Group, National Safeguarding Team, General Synod and College of Bishops to ensure the extent of the issue is sufficiently understood and themes are identified and addressed.

(See Appendix 1 for further information on the church bodies listed).

Completion Date: Ongoing

27. What more can clergy and senior staff do to promote a safe culture in which all staff and volunteers feel able to make a complaint or use the whistleblowing procedure with confidence?

Progress Since Audit:

The aim of the Church of England is to promote open, healthy, safe and compassionate cultures, which facilitate disclosures. A culture where senior leaders set the highest standards and lead by example, ensuring that they create environments that help to ensure that abuse is responded to well. Where complainants, victims, survivors and those against whom allegations are made are consistently dealt with with care, compassion and sensitivity.

The Whistleblowing and complaints policies help to promote and embed healthy cultures. These policies form part of the LPSM in-person safeguarding induction

with staff, to ensure that individuals know where to find the policies and how the process works. A recent all staff Whistleblowing presentation during Whistleblowing week, facilitated by HR remains accessible on NCI Gateway (via webinar) for staff to view. Staff are reminded of this policy during all-staff meetings and the webinar will be circulated to staff at regular intervals. It will also be shown during the next Palace Safeguarding Seminar to continue to raise awareness in this important area.

Completion Date: Ongoing reviews will take place.

28. Who is best placed to develop a local safeguarding policy for Lambeth Palace and when will this be put into place?

Progress Since Audit:

The current National Church Institution (NCI) and Church of England safeguarding policies and guidelines consist of: The Code of Safer Working Practice (2021); The Church of England Safeguarding Policy statement 'Promoting a Safer Church'; Responding Well to Victims and Survivors of Abuse as well as the Parish Safeguarding Officers Handbook. All of which cover safeguarding practices at Lambeth Palace.

Local Palace safeguarding protocols and guidelines have been created in partnership with relevant departments within the Palace, and these protocols and guidelines are subject to regular review.

Completion Date: Ongoing reviews will take place of the local protocols and guidance currently in place.

29. How will the Palace satisfy itself that the current safeguarding-related policies and procedures are fit for purpose, known about, understood, consistently applied, and kept up to date?

Progress Since Audit:

The NST Learning and Development Team and Human Resources (HR) Department are responsible for the regular review and updating of all current NCI safeguarding policies to ensure they remain relevant and fit for purpose.

Updates and changes in existing policies are disseminated during regular all staff meetings and digitally via email.

Local safeguarding protocols and guidance are subject to regular reviews.

The Palace will use staff surveys, and open-door policies as a way of securing qualitative feedback.

Completion Date: Subject to ongoing reviews.

30. Who is best placed to develop a training plan based on the national Safeguarding *Learning and Development Framework*?

Progress Since Audit:

This is being addressed by the LPSM who is conducting a training needs analysis of the roles of Lambeth Palace staff.

Completion Date: Autumn 2023

31. What would be the most effective way of monitoring and reporting take up, quality and impact of safeguarding and related training and how may this be achieved?

Progress Since Audit:

Safeguarding training is delivered or facilitated through the Learning and Development Team (LDT) within the NST. Feedback/evaluation is collated by the LDT and reviewed to identify areas for improvement.

Locally, the Line Managers Checklist form ensures role specific training is undertaken and complied with.

The LPSM notifies staff of new and upcoming safeguarding and related training sessions.

The LPSM maintains a local record of all relevant training undertaken and is currently completing a training needs analysis for all Lambeth Palace staff roles to ensure that the training is at the appropriate level for the role.

Completion Date: Autumn 2023

32. Where does leadership and accountability for delivering on these training issues lie in the Palace?

Progress Since Audit:

Leadership and accountability for delivery sits with line managers and the LPSM to ensure take up. This is reinforced and driven by senior Palace leads during all staff meetings, and staff appraisals through Personal Development Reviews with line managers.

This will also be a fixed agenda item at the Safeguarding Reference Group meetings, which will recommence in November 2023.

Completion Date: Subject to ongoing review

33. How will the Palace address shortfalls in the safeguarding training of its managers?

Progress Since Audit:

All managers must complete Leadership or Senior Leadership training, in line with their role description, together with Safer Recruitment and People Management training where their role includes the recruitment of relevant staff. This needs to be included, adhered to and followed up by the line manager within the Line Manager Checklist.

Completion Date: Subject to ongoing review

34. What is the role of Lambeth Palace in ensuring that the *Safer Recruitment and People Management Guidance* becomes the minimum standard for all recruitments, including appointments made by clergy and others to whom it does not yet apply, and which manager should be responsible for ensuring this happens?

Progress Since Audit:

Lambeth Palace and its senior leaders recognise the importance of safe recruitment of staff. Regular notifications are sent to staff regarding the *Safer Recruitment and People Management Guidance*. Completion of the online Safer Recruitment and People Management training is mandatory for all who are involved in the recruitment of relevant staff. The LPSM maintains records locally

of all training undertaken, albeit this is also recorded on the NST Safeguarding training portal.

Exceptional events such as our late Queen Elizabeth's funeral and Coronation of King Charles has enabled the Palace to secure a cohort of Palace staff who now hold Disclosure and Barring Service (DBS) certificates.

Enhanced DBS checks are conducted for some clergy and lay roles held at the Palace, where eligible.

Completion Date: Completed May 2023

35. What safeguarding knowledge and experience is necessary for those posts which are essential to safeguarding oversight and delivery, and how confident is the Palace that these requirements are reflected in the job profiles for the posts?

Progress Since Audit:

The LPSM will is currently undertaking an assessment of the safeguarding training needs for each role at Lambeth Palace and we shall ensure these needs are reflected in the job description for each post.

Completion Date: Winter 2023

36. Which managers have responsibility for recruitment and how will their training needs be addressed?

Progress Since Audit:

The Lambeth Palace Safeguarding Manager is currently undertaking a training needs analysis of roles at the Palace to ensure that all staff who are involved in the recruitment of staff are aware of the Safer Recruitment and People Management policy and guidance and have completed the mandatory training.

The LPSM maintains the training spreadsheet where this information is recorded and reviewed. This information is also recorded digitally within the NST Safeguarding training Portal.

Completion Date: Winter 2023

37. How will the Palace address the backlog of historical records to ensure all safeguarding concerns have been identified and properly dealt with?

Progress Since Audit:

The recommendations from the Past Case Review 2 (PCR2) review and the Social Care Institute for Excellence (SCIE) audit are taken seriously by the Archbishop and Senior Leadership team and much work has and continues to take place since the conclusion of both processes.

The Records Team, Episcopal Secretary and Executive Legal Officer assisted by the LPSM, have been reviewing the backlog of historic records and correspondence to identify safeguarding concerns. The LPSM has ensured that any safeguarding concerns have been addressed or are in hand. The Records Team ensures all records and correspondence are appropriately logged within the Lambeth Palace database.

The Palace has recognised this is a resource intensive and time-consuming process and is currently recruiting a records and legacy administrator to expediate this area of work.

Completion Date: December 2023

38. What are the present and future needs of the Palace for professional operational safeguarding support and how will these be met, resourced, managed and supported?

Progress Since Audit:

The Palace is now supported by the LPSM on a full time and permanent basis. This provides the necessary resilience for operational safeguarding support at the Palace. The role holder reports to the Chief of Staff who has overall safeguarding responsibility at the Palace.

Completion Date: February 2023

39. What is the desired scope of the moral leadership role of the Archbishop regarding safeguarding and the Church's response to victims and survivors of abuse by clergy and those in Church-related roles, given the present constitutional realities of the Church of England?

Progress Since Audit:

The Archbishop of Canterbury has influence across the National Church Institutions and provides moral leadership by emphasising the importance of safeguarding, leading by example and setting the tone, culture and safeguarding priorities for the Church.

The National Church Institutions are undertaking a governance review and this will include a review of the different NCIs. The Bishop with safeguarding responsibility will take responsibility for working with the Archbishops' to ensure that safeguarding continues to remain a high priority for the Church of England.

Completion Date: Ongoing

40. How can more openness be achieved about perceived tensions and dilemmas in exerting moral and theological leadership publicly versus behind the scenes?

Progress Since Audit:

The National Safeguarding Team (NST), the National Safeguarding Steering Group (NSSG), the lead Bishop for Safeguarding, Archbishops' Council and General Synod provide challenge, supervision and advice.

(See Appendix 1 for further details and remit of church bodies listed).

In addition to this, the Archbishop of Canterbury has agreed to the supervision of his safeguarding practice. The Chief of Staff has identified a suitable individual who will provide the professional independent supervision, challenge and advice.

Completion Date: Completed

41. What safeguarding expertise do Lambeth Palace and the joint office require to provide moral and theological leadership in this domain?

Progress Since Audit:

The Safeguarding manager will conduct an audit of the safeguarding needs for each role at Lambeth Palace and we shall ensure these needs are reflected in the job description for that post, and that staff are given the training they require in line with their role.

We are committed to ensuring that this training provides the necessary theological and moral leadership required.

The Archbishop and staff at the Palace follow the NCI policy of Responding Well to Survivors and Victims. The Palace seeks regular advice and guidance from the Survivor Engagement Team. The Palace currently awaits the result of the Survivor Strategy being developed by the National Safeguarding Team (NST). The Archbishop and the Palace are also guided by the joint Palaces Apology Protocol.

The standards around support for survivors are set out in the Responding Well policy and the NST is currently also developing a set of national standards that will be used in the quality assurance of safeguarding work, including in respect of support for, and engagement with, victims and survivors.

The National Safeguarding Standards are a set of five Standards (Prevention, Culture, Risk, Victim and Survivors, Learning) created to enable dioceses, cathedrals and other church bodies to know how well it is performing in its safeguarding practice and to drive its future planning and development in this area. Within each Standard are a set of 'what good looks like' indicators, which are there to help evidence or specify how well a Standard is being met.

The Palace will be using these five standards within our safeguarding work, once development in this area is complete.

Lambeth Palace continues to reflect on the relevant aspects of the 'Responding Well' policy in which the Archbishop can take a leadership role, such as the promotion of healthy cultures. We are also waiting for the Survivor Engagement Framework and the National Safeguarding Standards, and we will be reflecting on how these might apply to the direct work of the Palace.

Safeguarding is now a standing item on the agenda at all staff team meetings. Safeguarding Reference group meetings will recommence in November this year.

Completion Date: Spring 2024

42. How will the Archbishop use his position of moral and theological leadership to enable the Church to address the legacy of past failures, by serving and former bishops, to put first the safety and wellbeing of victims and survivors of abuse by church officers, and enable their abusers to continue in ministry?

Progress Since Audit:

The Archbishop will continue to take seriously his role as moral and theological leader and will seek to use his position and office to ensure that victims and survivors remain at the front and centre of any process which involves them. He is committed to their continued safety and wellbeing, which is of paramount importance in order to build up the necessary trust and confidence in the Church, which has been lost through past failures.

The Archbishop recognises the need to remain impartial during criminal and disciplinary cases. There are well embedded internal processes in place to support, manage risk and prevent harm at a national and diocesan level.

The National Safeguarding Steering Group, the National Safeguarding Team, the National Safeguarding Panel together with General Synod, provide vital oversight, challenge and insight helping to inform and shape the Archbishop's moral and theological leadership.

(See Appendix 1 for further information on church bodies listed and remit).

Progress is being made to develop the Redress Scheme which aims to replace the Interim Support Scheme to help further support victims and survivors of church related abuse.

Completion Date: Ongoing

43. How can the Archbishop challenge the Church to address past failings, while being clear about the limits of his own direct authority to act?

Progress Since Audit:

See 42 above.

Completion Date: Ongoing

44. In what circumstances should the Archbishop's role as a moral leader lead him to speak out about what he considers to be a safeguarding failure within the Church, or a failure to promote the interests of victims and survivors?

Progress Since Audit:

Further to the response under 42 above, regular meetings are held between both Archbishops, senior safeguarding colleagues, the lead bishop for safeguarding and other national church institution leaders. This affords the Archbishop an opportunity to question, challenge and reflect on the effectiveness of the church's safeguarding work, whilst maintaining impartiality for ongoing criminal and disciplinary cases.

Where appropriate this could involve a joint response with the diocese.

Completion Date: Ongoing

45. What further steps are needed to clarify the scope and limits of the strategic safeguarding leadership roles of both archbishops, and how might they be held accountable for their effectiveness?

Progress Since Audit:

Bodies such as the General Synod, Archbishops Council, the College of Bishops, the National Safeguarding Panel, the National Safeguarding Steering Group and the National Safeguarding Team all play their part in challenging and holding the Church of England and both Archbishops to account for ensuring effective safeguarding practices are maintained within the Church.

It is right that we listen and act upon these challenges and insight to improve strategic safeguarding leadership across the Church and that we continue to review and revisit areas that are not working as well.

(See Appendix 1)

Completion Date: Ongoing

46. What can the Archbishop and Chief of Staff do to demonstrate to NCIs and Church trustee bodies the importance of complying fully with the spirit and letter of the Church's safeguarding policy and put victims and survivors at the heart of a transparent and just system?

Progress Since Audit:

Lambeth Palace will publish this action plan and provide an annual report about the progress of safeguarding practice at Lambeth Palace.

It is hoped that this may go some way to demonstrate accountability, transparency and the progress made by Lambeth Palace to address the recommendations within the Social Care Institute for Excellence (SCIE) safeguarding audit report.

Completion Date: September 2023

47. What further opportunities are there for the Archbishop to use his authority in the various leadership and decision-making fora to promote a safer church?

Progress Since Audit:

The Archbishop continues to ensure that safeguarding is implemented and adhered to across the Church of England and within the NCIs.

As stated in 45 above, bodies such as the General Synod, the College of Bishops, Archbishops Council, the National Safeguarding Panel, the National Safeguarding Steering Group and the National Safeguarding Team all play their part in challenging and holding the Church of England and both Archbishops to account for ensuring effective safeguarding practices are maintained within the Church. (See Appendix 1).

Regular meetings take place between senior safeguarding colleagues, the lead bishop for safeguarding and other National Church Institution leads. This affords the Archbishop the opportunity to question, challenge, reflect and improve upon the effectiveness of the church's safeguarding work.

Completion Date: Ongoing

48. How can the Archbishop exert strategic leadership regarding the need for a duty of candour on bishops about failures and alleged failures to respond to disclosures of abuse or sharing of concerns about unsafe practice or people and demonstration of accountability through recognition of the harm and evidence of learning for the future?

Progress Since Audit:

The Archbishop understands and recognises the need for a duty of candour from bishops to respond both timely and appropriately to disclosures of abuse or unsafe practice.

As stated previously, bodies such as General Synod, Archbishop's Council, College of Bishops, the National Safeguarding Panel, the National Safeguarding Steering Group (NSSG) and the National Safeguarding Team enable a platform for scrutiny, challenge, reflection and learning, whilst demonstrating accountability for the Church and both Archbishops.

Much work has been and is currently being developed by the National Safeguarding Learning and Development Team in terms of recognising harm, unsafe practices and promoting a healthy culture within the Church. Healthy cultures is cited in a suite of training which includes Spiritual abuse, Leadership and Senior leadership (SLSP).

Underpinning all training and safeguarding practice will be the safeguarding standards (pending NSSG approval), which outlines the need for leaders to ensure healthy cultures.

The National Learning and Development Team have co-produced a Survivors Brief Symposium which was delivered in May and June 2023.

The Brief Symposium looks at the cultural richness of survivors and reflects how individuals with lived experience of abuse have been providing an integral contribution to the development of an inclusive and healthy culture across the church body. It also reflects our commitment, and continuous journey of collaboration and change with victims and survivors. (See 56 below).

Completion Date: Ongoing

49. What role does the Archbishop have in ensuring that bishops appointed to the NSSG do not include any individual who has failed to take sound safeguarding actions or has not dealt transparently and compassionately with any past mistakes or alleged failures?

Progress Since Audit:

The Archbishop is committed to providing a safe environment and culture across all Church bodies, one which inspires trust and attracts the best possible individuals to all roles through inclusive, fair, consistent and transparent processes. That also identifies and rejects individuals who are unsuitable by following a proportionate but thorough selection process.

To that end, and as there is now a new Chair in place, we are in the process of reviewing the Terms of Reference for the National Safeguarding Steering Group (NSSG). This will include a review of the current appointment process to ensure that it complies with the Safer Recruitment and People Management and Promoting a Safer Church policies and guidance.

Completion Date: Spring 2024

50. Will the joint office of the archbishops have a strategic plan for safeguarding and how could this be co-produced with relevant stakeholders, and made public?

Progress Since Audit:

Lambeth Palace will publish their Social Care Institute for Excellence (SCIE) Action Plan. This will be regularly monitored and reviewed as the recommendations are progressed.

Completion Date: Ongoing

51. What formal access to independent strategic, informed safeguarding advice is needed by the Archbishop, the BACY and senior colleagues and how might this be secured?

Progress Since Audit:

In the autumn of 2022, a decision was made that the Bishop to the Archbishops of Canterbury and York (BACY) would no longer be involved in any aspect of safeguarding work. Capacity at Lambeth Palace has been increased by augmenting the role of the Safeguarding Manager, who is now permanent and full-time. All safeguarding matters are reported to, dealt with or addressed by the LPSM, under the responsibility of the Chief of Staff. Access to appropriate independent safeguarding advice is now in place.

Completion Date: Complete

52. How can the SRG be developed further to lead and support operational safeguarding practice within the Palace?

Progress Since Audit:

Regular Safeguarding Reference Group meetings will recommence in November 2023. This group involves leaders from relevant business areas and is an opportunity to discuss best practice, share learning, identify and address safeguarding concerns and areas of vulnerability to quality assure whilst developing further a strong and healthy safeguarding culture at the Palace.

Completion Date: Ongoing

53. What might the advantages and disadvantages be to having some survivor representation on the SRG at Lambeth Palace?

Progress Since Audit:

Lambeth Palace is currently liaising with the national Survivor Engagement Lead to discuss this recommendation.

The Palace awaits the completion of the Survivor Engagement Strategy, following which, the plan will be to include training for staff and engagement from survivors.

Completion Date: Ongoing

54. What opportunities are there to develop the SRG to provide assurance that Palace safeguarding arrangements are effective, and how might this be achieved?

Progress Since Audit:

Regular Safeguarding Reference Group meetings will recommence in November 2023. This group involves leaders from relevant business areas and is an opportunity to discuss best practice, share learning, identify and address safeguarding concerns and areas of vulnerability, to quality assure whilst developing further a strong and healthy safeguarding culture at the Palace.

Completion Date: Ongoing

55. How can the potential quality assurance contributions and oversight roles of the Archbishop and Lambeth Palace in relation to safeguarding across the Church be clarified?

Progress Since Audit:

Regular Safeguarding Reference Group meetings will recommence in November 2023. This group involves leaders from relevant business areas and is an opportunity to discuss best practice, share learning, identify and address safeguarding concerns and areas of vulnerability to quality assure, maintain a strong and healthy safeguarding culture at the Palace. Lessons learnt from this group will be published in an annual report and shared in this way across the Church.

Completion Date: Ongoing

56. What else might the Palace do to promote the healthy culture described in *Responding Well to Victims and Survivors of Abuse* (2022) both within Lambeth Palace and across the wider church?

Progress Since Audit:

The Palace has created a joint Palaces Apology protocol, in line with the Responding Well to Victims and Survivors Guidance.

A regular joint Palaces meeting takes place to discuss safeguarding themes, best practice and learning as well as areas of concern and vulnerability.

There is further work to do in terms of promoting a healthy culture and we will continue to learn and develop in this area in line with the Responding Well guidance.

Healthy cultures are cited in a suite of training that has been developed by the national Learning and Development Team, which includes Spiritual abuse, Leadership and Senior leadership (SLSP).

Underpinning all training and safeguarding practice will be the safeguarding standards (pending NSSG approval), which outlines the need for leaders to ensure healthy cultures.

The National Learning and Development Team have co-produced a Survivors Brief Symposium being delivered in May and June 2023.

The Brief Symposium looks at the cultural richness of survivors and reflects how individuals with lived experience of abuse have been providing an integral contribution to the development of an inclusive and healthy culture across the church body. It also reflects our commitment, and continuous journey of collaboration and change with victims and survivors.

It has the following learning outcomes and objectives:

Aims

- Reflect a fuller range of the survivor voices across the Church;
- Create environments across the church where the experience and learning from being a survivor are valued whether shared publicly or not;
- Recognise the strength and value that survivors contribute to the Church.

Outcomes

At the end of the event, participants should feel this learning has helped them:

- Contribute to the development of a healthier culture where survivors are valued across the Church;
- Honour the voices of those discerning themselves as individuals with lived experience;
- Contribute to our shared efforts to remove/reduce the shame and stigma of disclosing as a survivor and bring their voice and experience to the learning of the Church.

It has been developed in a way to healthily and productively integrate survivor profiles and involvement as inclusive contributions in the development of an inclusive and healthy culture across the Church.

The LPSM ensures that the suite of 'Healthy Cultures' training is being undertaken by relevant staff at the Palace and that the 'Survivors Brief Symposium' training will be disseminated to the 'Community of Communities at Lambeth Palace to enable our contribution to the development of a healthier culture where survivors are valued across the Church and their voices are honoured.

Completion Date: Ongoing

57. How might the Palace identify areas where safeguarding culture is less well embedded and spread good practice where it is?

Progress Since Audit:

Regular safeguarding briefings take place with the Archbishop, Chief of Staff, LPSM, the Lead Safeguarding Bishop and Director of the National Safeguarding Team where safeguarding cases are discussed.

As mentioned above, other meetings take place such as the Joint Palaces, staff meetings, the Safeguarding Reference Group, Palace Security meetings. All of which provide opportunities to identify best practice, learning, areas of vulnerability whilst embedding a healthy and safe safeguarding culture.

(See Appendix 1 for more information on church bodies listed and remit).

Completion Date: Summer 2025

58. How can progress in the development of a safe culture form part of Palace strategic planning and be quality assured, and how will the Palace be confident that things are improving?

Progress Since Audit:

The Palace has published our Action Plan, which demonstrates our ongoing commitment to addressing the findings made by SCIE through our response to the questions posed. To reinforce this commitment, we will continually review our progress through our Safeguarding Reference Group meetings and provide regular annual reports and updates, which will be published on the Lambeth Palace website.

This will form part of our commitment to continued quality assurance from which we can learn, develop and improve.

In August 2023, INEQE Safeguarding Group was appointed by the Archbishops' Council to carry out the next round of independent external audits of the Church of England dioceses, cathedrals and Lambeth and Bishophorpe Palaces. This independent Audit programme will run for 5 years from 2023 to 2028, with Audits commencing in January 2024. INEQE were appointed after a full and open tender process, which included survivor representation.

Lambeth Palace will be audited by INEQE in November 2027.

Also see 57 above.

Completion Date: Ongoing

59. In what ways could survivors of abuse be invited to support the development of safeguarding culture at the Palace?

Progress Since Audit:

The Palace is working closely with the Survivor Engagement Team at the National Safeguarding Team (NST).

We will use the Survivor Engagement newsletter to invite victims and survivors to work with us. We will adhere to practice in line with the development and implementation of the Survivor Engagement Framework that is currently taking place at national level.

We will take forward and seriously the views and the experiences of survivors as expressed in the national Survivor Engagement survey.

Completion Date: Ongoing

60. Where should Lambeth Palace seek guidance and support in understanding the basics of good practice in engaging with victims and survivors of abuse by clergy and people in church related roles, as well as other kinds of abuse?

Progress Since Audit:

The Palace follows the National Church Institutions (NCI) policy of Responding Well to Survivors and Victims and seeks regular advice and guidance from the national Survivor Engagement Team and the Learning and Development Team.

The Palace currently awaits the result of the Survivor Strategy being developed by the NST.

The Palace continues to work with relevant experts and organisations that have developed work on specific kinds of abuse, such as domestic abuse and spiritual abuse in a church context.

Lambeth Palace remains committed to improve our practice around survivor engagement and ensure that survivors' voices are embedded into our daily work.

We continue to learn from any guidance, training and advice released by the National Safeguarding Team in this space, and we work closely with the NST Partnerships and National Safeguarding Lead to gain bespoke advice as we grow this aspect of our work.

The LPSM will be working collaboratively with the national Survivor Engagement Lead to develop a bespoke survivor strategy to implement the responding well to survivors' guidance.

Completion Date: Spring 2024

61. What is the role of the Archbishop and Lambeth Palace in leading and supporting the implementation of the *Responding Well to Victims and Survivors of Abuse (2022)* guidance and how might its framework and principles be used in addressing the legacy of historic abuse in the church?

Progress Since Audit:

Good safeguarding starts with the development of healthy cultures, in which abuse is not tolerated and is prevented. A healthy culture within the Church also means that, when abuse takes place, victims and survivors feel that they can come forward to disclose their experiences and receive good care and support.

The Archbishop recognises his role in paving the way in the development of healthy cultures across the Church. Modelling positive behaviours at the highest level of an organisation and setting expectations regarding healthy behaviours across the Church ensures that our Church becomes a safer space for all.

The national Learning and Development Team have, as mentioned in 56 above, co-produced a Survivors Brief Symposium, which looks at the cultural richness of survivors and reflects how individuals with lived experience of abuse have been providing an integral contribution to the development of an inclusive and healthy culture across the church body.

Completion Date: Ongoing

62. What should the roles of the Archbishop and Lambeth Palace be in relation to victims and survivors, and how will this be negotiated, agreed and communicated? Would a 'Responding Well' plan assist with thinking through the practical implications?

Progress Since Audit:

A joint Palaces Apology protocol has already been created in line with the Responding Well guidance.

The LPSM will be working collaboratively with the national Survivor Engagement team to develop a survivor strategy to implement the responding well to survivors' guidance, this will form part of a 'Responding Well' plan.

The Palace is considering the value of appointing a survivor engagement lead.

Completion Date: Spring 2024

63. What should be the role of the Archbishop in setting new standards for engagement with and responses to survivors of abuse within the Church?

Progress Since Audit:

The Archbishop and the Palace follow the NCI policy of Responding Well to Survivors and Victims. The Palace seeks regular advice and guidance from the Survivor Engagement Team. The Palace currently awaits the result of the Survivor Strategy being developed by the NST. The Archbishop and the Palace are also guided by the joint Palaces Apology Protocol.

The standards around support for survivors are set out in the Responding Well policy and the NST is currently also developing a set of national standards that will be used in the quality assurance of safeguarding work, including in respect of support for, and engagement with, victims and survivors.

The National Safeguarding Standards are a set of five Standards (Prevention, Culture, Risk, Victim and Survivors, Learning) created to enable dioceses, cathedrals and other church bodies to know how well it is performing in its safeguarding practice and to drive its future planning and development in this

area. Within each Standard are a set of 'what good looks like' indicators, which are there to help evidence or specify how well a Standard is being met.

The Palace will be utilising these five standards within our safeguarding work, once development in this area is complete.

Lambeth Palace continues to reflect on the relevant aspects of the 'Responding Well' policy in which the Archbishop can take a leadership role, such as the promotion of healthy cultures. We are also waiting for the Survivor Engagement Framework and the National Safeguarding Standards, and we will be reflecting on how these might apply to the direct work of the Palace.

Completion Date: Ongoing

64. How proactive should the Archbishop be in seeking out survivors who feel they have been let down by the Church and rectifying past failings?

Progress Since Audit:

The Archbishop of Canterbury understands the importance of speaking out on a range of moral and theological issues, including safeguarding.

Whilst the Archbishop and the Palace recognise the importance of being proactive in this regard, a balance must be struck and care should be taken to minimise the risk of victims and survivors being re-traumatised or caused further harm by doing so.

Completion Date: Ongoing

65. How will Lambeth and Bishopthorpe Palaces together respond to the needs and views of the victims and survivors of non-recent abuse, who still feel that their experiences and concerns have not been listened to, understood and addressed?

Progress Since Audit:

The regular Joint Palaces meetings, leadership from Archbishop's Council, ongoing survivor engagement, the Interim Support Scheme and the Redress Scheme are used and will continue to be used to ensure that the Palaces listen

to, understand and address the concerns and experiences of the victims and survivors.

The Future Safeguarding Programme will also provide further opportunities to listen to, understand and address the concerns and experiences of the victims and survivors.

Completion Date: Ongoing

Appendix 1

The House of Bishops

The House of Bishops role is to:

- Provide leadership and direction in promoting a Safer Church;
- Develop, approve and implement safeguarding policy and practice guidance to ensure consistency in best practice across the Church;
- Make regulations in relation to safeguarding;
- Ratify the appointment of a lead safeguarding bishop;
- Ensure that a National Safeguarding Adviser, Deputy Safeguarding Adviser and National Safeguarding Team are appointed with a clear line of accountability and a right to submit reports to the House of Bishops on safeguarding matters;
- Support the appointment of a National Safeguarding Steering Group to advise the House of Bishops on safeguarding matters, as required;
- Ensure minimum standards of safeguarding training for clergy;
- Review the implementation of the 'Promoting a Safer Church' business plan annually.

National Lead Safeguarding Bishop

The Lead Safeguarding Bishop's role is to:

- Provide leadership and direction in promoting a Safer Church;
- Communicate key safeguarding messages both inside and outside the Church;
- Support the House of Bishops and General Synod in their responsibilities for developing strategy, policy and practice guidance in the area of safeguarding;
- Engage in key policy and practice developments with the national and deputy safeguarding adviser and the national safeguarding team;
- Chair (with deputies) key safeguarding advisory/working groups (as required);
- Work closely with the Methodist Church and other ecumenical partners;
- Be informed of, and when required, involved in the resolution of safeguarding matters which might arise through diocesan safeguarding audits or investigations of complaints
- Appoint one or more Deputy Lead Bishop(s), as required.

The Archbishops' Council

The Archbishops' Council's role is to:

- Ensure that adequate resourcing and arrangements are available to support the work of the National Safeguarding Team;
- Hold to account the Secretary General, other senior staff and the National Safeguarding Team on their development and implementation of the 'Promoting a Safer Church' business plan;
- Receive regular reports on safeguarding finances, operations and risk management and offer comment and guidance as appropriate;
- Support the work of the National Safeguarding Steering Group.
- Support the work of the National Safeguarding Steering Group.

Church Commissioners

The Church Commissioners role is to:

- Fund bishops' legal costs for litigation relating to safeguarding cases;
- Fund the legal costs relating to the Independent Inquiry into Child Sexual Abuse (IICSA);
- Emphasise that this financial support is contingent on dioceses proving that they have been operating in line with House of Bishops' safeguarding policies and practice guidance;
- Ensure that Diocesan Boards of Finance are providing sufficient funds for safeguarding operational and legal costs in order to meet the expectations set by the House of Bishops' policies and practice guidance.

General Synod

The General Synod's role is to:

- Approve new and amended church safeguarding legislation, including regulations;
- Where necessary, consider and express their opinion on any public policy issues regarding safeguarding as part of their function.

National Safeguarding Steering Group

The National Safeguarding Steering Group's (NSSG) role is to:

- Offer strategic oversight of national safeguarding activity, including recommendations on the strategic development to the Archbishops, the House of Bishops and the National Church Institutions;
- Offer oversight of the work of the National Safeguarding Team;
- Receive and consider the recommendations and advice of the National Safeguarding Panel;
- Oversee the work of the IICSA6 Steering Group;
- Review information from quality assurance processes, including lessons learnt case reviews and support implementation of learning and any recommendations across the Church;
- Scrutinise and comment on draft safeguarding policy and practice guidance. The House of Bishops' members of the group can approve House of Bishops' safeguarding policy and guidance under delegated powers from the House.

The National Safeguarding Team

The National Safeguarding Team (NST) is a part of the Church of England that is responsible for promoting a safer environment and culture, safely recruiting and supporting all those with any responsibility related to children and vulnerable adults within the Church, and responding promptly to every safeguarding concern or allegation. The NST provides professional safeguarding advice to the Church of England on matters of national policy as part of its wider transformation plan, which includes the development and implementation of national training, quality assurance and audit, and work with survivors of abuse.

The National Safeguarding Team's role is:

- Develop and implement a 'Promoting a Safer Church' business plan that outlines the actions towards promoting a safer culture throughout the Church of England;
- Provide expert advice, guidance and support to dioceses, cathedrals, National Church Institutions and other Church bodies in respect of safeguarding policy, training, casework and communications;
- Highlighting areas of concern in relation to safeguarding arrangements and practice and facilitating and supporting the necessary improvements;
- Undertake provincial and national case work;
- Promote key safeguarding messages;
- Commission national lessons learnt case reviews, as required;
- Develop and implement national survivors engagement and support work;

- Develop a consistent approach to the support and oversight of offenders and those that may pose a risk within dioceses and other Church bodies. This includes holding a list of approved risk assessors, on behalf of the Archbishops' Council, to be used by all church bodies who are undertaking independent risk assessments;
- Develop and support the implementation of House of Bishops' safeguarding policy and practice guidance;
- Develop and support the roll out of a national Training and Development Framework;
- Work to strengthen safeguarding networks and professional support for key safeguarding officers, such as diocesan safeguarding advisers and chairs of Diocesan Safeguarding Advisory Panels;
- Develop and implement quality assurance processes, to measure progress and compliance including ensuring that lessons learnt from case reviews inform and improve practice;
- Review progress annually.

National Safeguarding Panel

The National Safeguarding Panel's role is to;

- Offer external expertise and recommendations and advice to the Church of England's leadership, including the NSSG, on the development of safeguarding arrangements to ensure these arrangements meet accepted best practice in the UK;
- Offer external expertise and engage a range of perspectives within the statutory, voluntary and faith sectors and survivors in the development of the Church's safeguarding arrangements;
- Provide a reference to, and scrutiny of, the Church's safeguarding priorities, approach, development and effectiveness of the implementation of national policy, practice guidance and other national initiatives;
- Review progress annually.

The Role of Diocesan Bishop

The diocesan bishop is ultimately responsible for ensuring good safeguarding arrangements and practice in the diocese in line with the House of Bishops' safeguarding policy and guidance. In certain circumstances, the bishop may delegate these functions. Delegation may be to a suffragan bishop and/or assistant bishop. In addition, the diocesan bishop may ask someone to carry out safeguarding

tasks on his/her behalf e.g. an archdeacon. The ultimate responsibility, however, will always rest with the diocesan bishop.

The Diocesan Bishop's role is to:

- Provide leadership and direction in promoting a Safer Church;
- Attend national training and any local training, as required;
- With the bishop's staff, Diocesan Synod, Diocesan Board of Finance (DBF), ensure the adequate resourcing of safeguarding in the diocese;
- Seek to ensure that there is a structure to manage safeguarding in the diocese with clear lines of accountability between diocesan groups and bodies. In addition to ensure that there are clear arrangements in place with cathedrals and any other relevant Church bodies e.g. religious communities, TEIs;
- Ensure that safeguarding is a regular item on bishops' staff team agenda and that the DSA is able to attend meetings, as required;
- Ensure that the diocese adopts and implements House of Bishops' safeguarding policy and practice guidance;
- Ensure that the diocese has a Diocesan Safeguarding Advisory Panel (DSAP). The group should have clear terms of reference and be directly accountable to and regularly report to the diocesan bishop and other diocesan bodies;
- Appoint a suitably qualified independent chair to the Diocesan Safeguarding Advisory Panel and work with Chair and the DSA on the choice of members.
- Appoint a suitably qualified and experienced Diocesan Safeguarding Adviser/s (DSA/s) following consultation with the National Safeguarding Team;
- Ensure that the DSA/s are provided with the appropriate financial, organisational and management support and that they meet with the bishop regularly. That they have full access to all records including clergy personal files. This includes ensuring that the DSA/s receives supervision that is appropriate for the role and that they have sufficient time to undertake continuing professional development;
- Ensure that the diocese develops a diocesan safeguarding strategy that is informed by the national 'Promoting a Safer Church' Business Plan;
- Ensure that the diocese has arrangements in place to monitor and support safeguarding arrangements in parishes. This should include monitoring as part of the Archdeacons' responsibilities and visitations;
- Ensure that a diocesan central record of clergy, licenced lay ministers and other church officers that have a role with children, young people and vulnerable adults is kept that will enable a prompt response to enquiries and enable tracking of DBS compliance, renewals and safeguarding training. This record should include start and finish dates, all posts held and next post when known, DBS information and training

attended. Where there have been safeguarding concerns, these should be clearly indicated and cross referenced to clergy/personnel files in accordance with data protection principles¹² and House of Bishops' guidance;

- Ensure that a complaints and whistleblowing procedure is in place which can be used for those who wish to complain about the handling of safeguarding issues;
- Ensure that arrangements are in place to share relevant information (after having received advice from the DSA and Registrar) about individuals with other dioceses, other Church bodies, other denominations and organisations or the national Church as appropriate;
- Ensure that the diocese provides arrangements to support survivors of abuse;
- Ensure that adequate safeguarding training is available and that all clergy, licensed readers, lay workers and other church officers who have relevant contact with children young people and vulnerable adults, participate accordingly;
- Discharging his/her legal duties to have regard for safeguarding in the authorisations of ministers and the exercise of discipline. This would include: Where satisfied, directing a priest or deacon who has authority to officiate in the diocese, to undergo a risk assessment; Considering the suspension of any priest or deacon holding any preferment in the diocese, if, on the basis of information provided by the local authority or police, the relevant individual presents a significant risk of harm; In cases involving a churchwarden, a PCC member, a member of a district church council or synod, a secretary or treasurer of a PCC a licensed reader or lay worker, considering suspension where the individual involved has been arrested on suspicion of committing an offence mentioned in Schedule 1 of the Children and Young Persons Act 1933 (or charged without having been arrested) or if the bishop is satisfied that an individual represents a safeguarding risk on information provided by the police or local authority.
- Ensure that the diocese reviews progress annually.

The Role of Diocese Safeguarding Adviser

The Diocesan Safeguarding Adviser (DSA) is a member of the Diocesan Safeguarding Team (DST) and they manage and coordinate the day-to-day operational mechanisms for safeguarding practice across the Diocese. This is achieved by the provision of advice on safeguarding concerns, support for parishes in managing concerns, overseeing safeguarding training and monitoring safeguarding issues in parishes.

Safeguarding at Lambeth Palace

The Chief of Staff and Strategy is the most senior employee at the Palace. She has the role of safeguarding lead for the Palace. She chairs the Palace Safeguarding Reference Group (SRG) and oversees the work of the Lambeth Palace Safeguarding Manager.

The Lambeth Palace Safeguarding Manager, (LPSM) is responsible for promoting and maintaining a strong safeguarding culture across the various communities at Lambeth Palace. To support, advise and assist the Archbishop and Senior Leadership Team at Lambeth Palace on safeguarding matters. The LPSM also takes on strategic oversight together with day-to-day professional triage of correspondence, including assessment of risk, and co-ordination of response, referring to National Safeguarding Team caseworkers and Diocesan Safeguarding Advisors as appropriate.

The Independent Safeguarding Board

The Archbishops' Council is committed to developing fully independent scrutiny of safeguarding within the Church of England, to ensure the Church is a safer place for all. This principle was agreed in the run-up to the publication of the report of the Independent Inquiry into Child Sexual Abuse (IICSA) into the Anglican Church in England Wales in 2020.

The Archbishops Council has announced that a leading public law barrister is to head an independent review into the first phase of the Church of England's Independent Safeguarding Board (ISB).

Appendix 2

The Clergy Discipline Process

The Measure, Rules and Code set out structures and a formal process, which apply to all disciplinary cases, in place of the previous (often informal) arrangements. All clergy are subject to this disciplinary regime (not only those who hold 'freehold' office), and no informal disciplinary procedures are now permitted.

Structures

There is a national Clergy Discipline Commission, with 12 members (Measure, s.3), which gives general guidance and oversees the working of the new regime. In those cases which have to be referred to a tribunal, the President of Tribunals (Dame Sarah Asplin) will appoint a chair, for the relevant tribunal (Measure, s.22(1)(a)).

The bishop's role is central (Measure, s.1); he or she determines how cases should be dealt with in the light of the Registrar's report and may be invited to advise the tribunal as to suitable censure. However, they must take care to observe appropriate boundaries due to their judicial role (Code, paras 17, 90-102). The "bishop's disciplinary tribunal" (Measure, s.2) hears serious cases; it does not include any members drawn from the relevant diocese, in order to avoid prejudice or undue influence (Measure, s.22(1)(b) and (c)).

Steps to be taken

Complaints must be:

- Brought normally within twelve months of the occurrence of the alleged misconduct, save in the case of abuse of children or vulnerable adults (Measure, s.9)
- Brought by someone who has a 'proper interest' in doing so (Measure, s.10(1); Code paras 30-35)
- Laid before the bishop (Measure, s.10(2); Rule 4; Code paras 48-51); and
- Supported by written particulars and written evidence (Measure, s.10(3); Code paras 40- 47)
- See generally, Rules 4-8, and Form 1a (at end of Rules)

If there are other criminal, matrimonial or capability proceedings under way, the usual period of one year is extended until 28 days after the outcome of these

proceedings is made known (Rule 19). At this preliminary stage, the respondent (the person against whom the complaint has been made) does not need to submit any formal answer (Rule 10(1)(c); Code, para 74). The diocesan registrar is to investigate in the first instance, and report to the bishop within 28 days (as to the status of the complainant and as to the substance of the complaint) (Measure, s.11(2); Rules 11-14; Code, paras 77-89). Within 28 days of receiving the registrar's report, the bishop may dismiss the complaint, subject to appeal by the complainant to the President of Tribunals (Measure, s.11(3) and (4); Rule 15; Code paras 103-106). If he or she does not dismiss the complaint, the bishop requires the respondent to submit an answer to the complaint, within 21 days (Rule 17(1)(d), using Form 2; Code paras 110-112) The bishop then has a series of possible ways forward. See Rules 20-28; Code paras 113-162.

He or she may:

- Take no further action (subject to appeal by complainant)
- Direct conditional deferment
- Direct a conciliation process
- Impose a penalty by consent
- Direct formal investigation

If the respondent decides to resign, a 7-day 'cooling-off' period is imposed before the resignation takes effect (Measure, s.16(2); Rule 27(5); Code para 158).

The bishop may suspend the respondent from some or all rights and functions of office (Measure, s.36; Rules 60-66; Forms 12,13; Code paras 216-230). Any formal investigation is undertaken by the "Designated Officer" a member of the central legal team at Church House, Westminster; he submits his report to the President of Tribunals (Measure, s.17(1); Rules 28, 29; Code paras 176-185).

If the President considers the matter should be brought before a disciplinary tribunal, the Designated Officer prosecutes the case, and there is a right of appeal to the Court of Arches (Measure, s.20(1); Code 233-235). Hearings will normally be held in private; but may be in public, if the respondent requests or the interests of justice require (Measure, s.18(3); Rule 40; Code paras 196,197). The standard of proof is 'civil' (balance of probabilities) not 'criminal' (beyond reasonable doubt), but the more serious the complaint, the more weighty the evidence that will be needed to prove the case (Measure, s.18(3)).

Penalties that may be imposed comprise (Measure, s.24(1)):

- Prohibition for life (Code, para 204)

- Limited prohibition (Code, para 205)
- Removal from office (Code, para 206)
- Revocation of licence (Code, para 207)
- Injunction (Code, para 208)
- Rebuke (Code, para 209)
- Conditional Discharge (Code, para 210)

Misconduct

The Measure does not define misconduct except in the most general terms (Measure, s.8):

- Acts or defaults
- Neglect or inefficiency
- Conduct unbecoming or inappropriate The Code of Practice (paras 22-29) gives some explanation and raises the possibility that the same issues may give rise to 'capability' proceedings (under the Clergy Terms of Service proposals). This is one of the areas in which the Convocations' Guidelines has particular relevance.

Archbishops' List

S.38 provides for a statutory register to be compiled, listing:

- Those on whom statutory penalties have been imposed under the present or previous legislation;
- Those who have resigned following a formal complaint;
- Those whose name is included in a barred list;
- Those who "in the opinion of the Archbishops have acted in a manner (not amounting to misconduct) which might affect their suitability for holding preferment";
- Those who have relinquished their Orders as Anglican clergy

Before any name is included on the List, the individual is given the opportunity to make representations. The Archbishops are required to review the Register after a name has been included for five years (Measure, s.38; Rules 74- 80)



Removing effects of prohibition for life and deposition In line with theological understandings of the 'indelibility of orders', lifetime prohibition, and deposition (under the old regime) is reversible (Measure, ss.26, 27; Rules 97-100; Code paras 246-252).