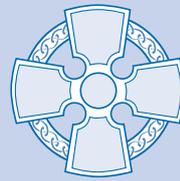


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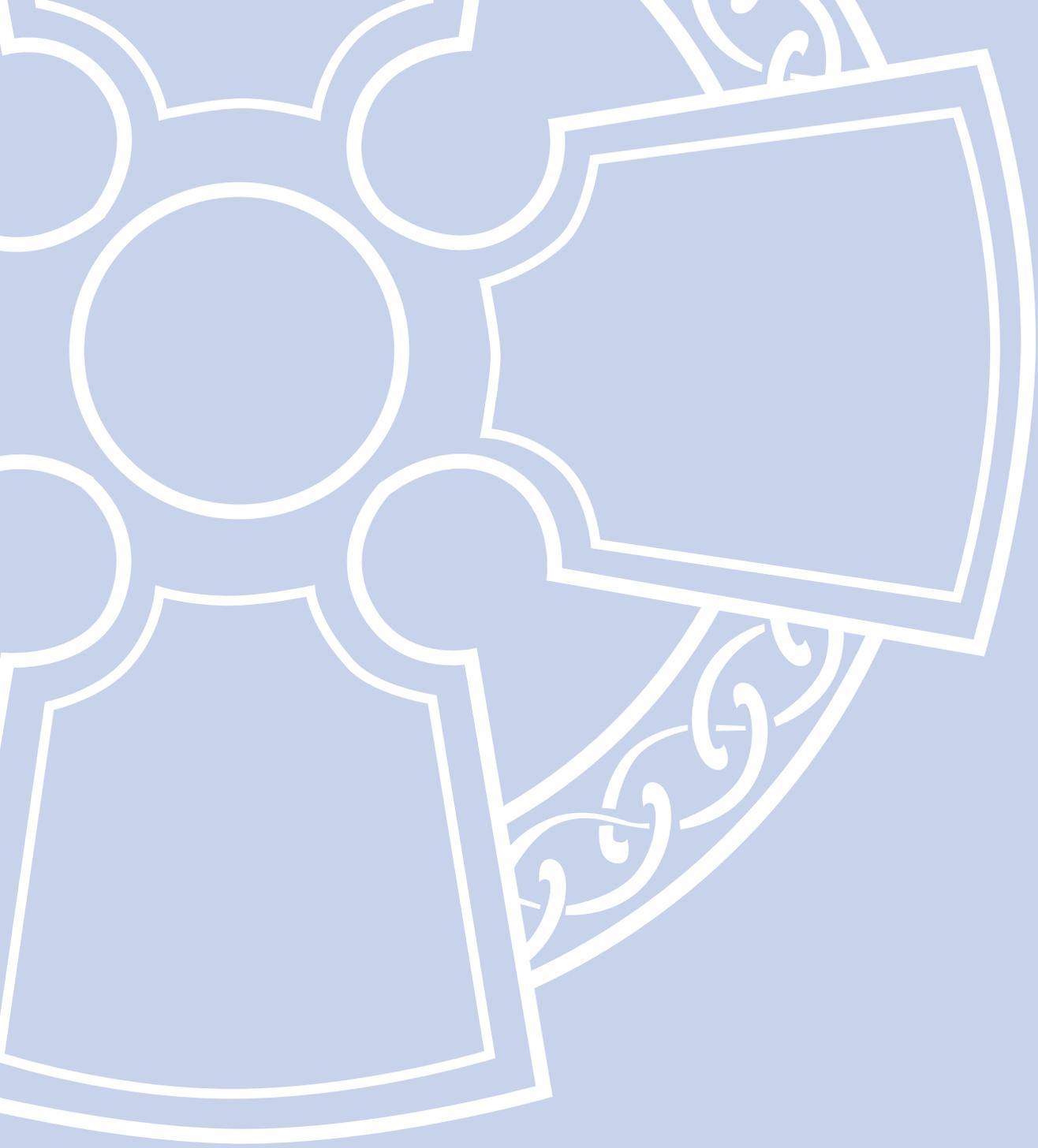
THE CHURCH  
IN WALES

# Working Together for a Safer Church

**The Response of the Church in Wales  
to the Recommendations in the  
Investigation Report (October 2020)  
of the Independent Inquiry into Child  
Sexual Abuse into Safeguarding in the  
Church of England and  
the Church in Wales**

**Prepared by the Standing Committee of the  
Governing Body of the Church in Wales**

**April 2021**





## FOREWORD BY THE ARCHBISHOP OF WALES

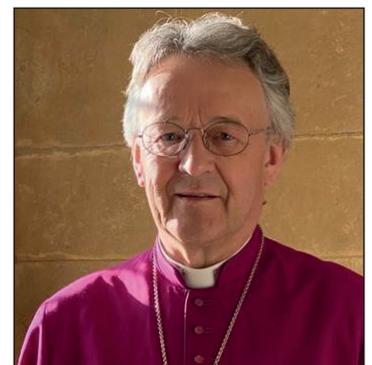
The work and resulting report of the Independent Inquiry into Child Sexual Abuse have been difficult and sobering for many organisations, the Church in Wales among them. The Inquiry heard evidence not only of instances of horrific abuse, but also of shockingly inadequate institutional responses which, by virtue of their very inadequacy, were of themselves abusive. Whilst I convey my thanks to the many individuals who assisted in the preparations for and submissions to the Inquiry, these thanks pale into insignificance when compared to the gratitude owed to all those individual victims and survivors who so bravely shared their harrowing accounts of abuse suffered in schools, care homes, custodial institutions, on the internet and in faith communities. They should not have had to do so, not only because the levels of both vigilance and response at the relevant times should have been better, but because such terrible events should never have happened in the first place. These victims and these survivors both deserve and have my profound thanks and admiration for their courage in speaking out. They also have my heartfelt sorrow for those instances where the Church in Wales has failed them.

I am under no illusions. Our Church remains on a journey aimed at ensuring that all its safeguarding practices are of the highest possible standard. We have already learned much and we are committed to continuing to learn. I am pleased with progress that we have made, including in relation to the recommendations made by the Inquiry in October 2020. But I am anxious that the pace is maintained and, indeed, accelerated, both as and after the Inquiry's work concludes. And I am clear that our ongoing work in this area is not undertaken because we are under public and governmental scrutiny, but because it is absolutely the right and responsible thing to do.

Much of our recent work as a church has focussed on making financial, organisational and strategic changes. But change must occur not only in our resourcing, policies and processes, but also in our culture. An inappropriate culture of deference to clergy, of deference to bishops, of a propensity to believe the adult in preference to the child, or of a disbelief that abuse could occur or may be occurring in our own congregations, cannot be fixed by resourcing and policy documents alone. It is with culture that much of our ongoing work lies, through the process of embedding the notion that safeguarding is everybody's responsibility, and that the Church in Wales must maintain, as our Safeguarding Policy says, an open and transparent organisational culture that reflects the importance of safeguarding children and adults at risk.

Finally, I must convey my thanks to the Inquiry team and the staff supporting their work. I have been struck by their commitment, professionalism, care and pastoral concern while working in this difficult and often traumatic area. They, and all whom the Inquiry has affected in any way, remain in my thoughts and prayers.

**The Most Reverend John D E Davies**  
**Archbishop of Wales**





## RESPONSES TO INDIVIDUAL RECOMMENDATIONS

### Recommendation 3<sup>1</sup>:

***The Church [in]<sup>2</sup> Wales should make clear that the operational advice of provincial safeguarding officers must be followed by all members of the clergy and other Church officers. It should be enshrined in policy that those who are volunteers and who do not follow the directions of provincial safeguarding officers should be removed from working with children.***

We agree that it is of the utmost importance that the operational advice of provincial safeguarding officers is followed by all church officers, including clergy. We will make this clear in upcoming revisions to our safeguarding policy and procedural documents, and in our training materials.

We further agree that there should be a process and consequences for failure or refusal to follow that advice. We believe that the practical implementation and enforcement of this is best achieved with the assistance of our Provincial Safeguarding Panel, which monitors every active case and is independent from the bishops, dioceses and central administrative structures of the Church in Wales.<sup>3</sup>

The jurisdiction of the Church's Disciplinary Tribunal (which, as the Report notes with approval at paragraph D 53, is wholly separate from the Dioceses) extends not only to clergy, but also to a wide range of lay persons including ordinands, churchwardens and licensed (and trainee) lay ministers<sup>4</sup>. As promised in our previous Inquiry submissions, we have introduced a new cause of action in the Disciplinary Tribunal of 'failure to follow the advice of the Provincial Safeguarding Panel without a reasonable excuse'.<sup>5</sup> Sanctions available to the Tribunal include removal and disqualification from holding any office or membership in the Church in Wales and inhibition from any particular function. There is also a power (again, exercisable independently of a bishop, if necessary) of suspension whilst investigation and/or disciplinary proceedings are ongoing.

Some volunteers, due to the roles they occupy, will not directly be subject to the jurisdiction of the Disciplinary Tribunal. We agree, as a point of policy, that it should be made clear that those who fail to follow the advice or direction of the provincial safeguarding officers should be removed from working with children. We already have means of enforcing this happening (for example by the Provincial Safeguarding Panel advising the Incumbent to remove that volunteer, and enforcing disciplinary proceedings against the Incumbent if that advice is not followed). However, we will revise our procedural guidelines to make explicitly clear the expectation that such volunteers should be removed from working with children. We intend to publish this guidance by autumn 2021.

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<sup>1</sup> Recommendations 1 and 2 relate solely to the Church of England.

<sup>2</sup> The Inquiry's Recommendation refers to the 'Church of Wales', a typographical error.

<sup>3</sup> The Provincial Safeguarding Panel reports to the Governing Body of the Church in Wales, through its Standing Committee.

<sup>4</sup> *Constitution of the Church in Wales*, Chapter IX, Section 9

<sup>5</sup> *The Safeguarding (Suspension And Disciplinary Tribunal) Canon 2020*, promulgated and brought into effect on 4 November 2020.



We believe that, by setting these enforcement provisions with reference to the Provincial Safeguarding Panel rather than the Provincial Safeguarding Officers, we are creating a more robust system, without a single point of failure if incorrect advice were given. Whilst in the vast majority of cases the Panel's advice will accord with the Officers' advice and recommendations, it gives opportunity for the advice to be checked by an independent group with expert knowledge before a church officer is subject to disciplinary proceedings for failure to follow that advice.

#### **Recommendation 4:**

***The Church in Wales should introduce record-keeping policies relating to safeguarding, complaints and whistleblowing. These should be implemented consistently across dioceses. The Church should develop policies and training on the information that must be recorded in files. The Church should provide its provincial safeguarding officers with the right to see personnel files of clergy, office holders, employees or others if concerns and complaints are raised about child protection or safeguarding.***

We agree entirely with this recommendation. The Church in Wales' national online safeguarding case management and record-keeping system (an adapted version of the MyConcern platform widely used across the educational, faith and sports sectors) was launched in January 2020 and serves as a single, searchable repository of all Church in Wales safeguarding, and safeguarding whistleblowing, case data. The information in the system is populated by the Provincial Safeguarding Officers, and the Provincial Safeguarding Officers have full and unrestricted access to the entirety of the system.

The model adopted and set out in the Church in Wales Safeguarding Policy<sup>6</sup> is that all concerns of a safeguarding nature are reported to a Provincial Safeguarding Officer, and that casework of a safeguarding nature is undertaken at a national level. This helps ensure consistent implementation of policy across dioceses.

We are currently developing procedural guidance documenting our practice regarding what information is held, and how information should be exchanged between the safeguarding case management systems and personnel records held at a diocesan local level. Relevant staff (including bishops, their PAs and the Safeguarding Officers) will be trained in accordance with this procedural guidance by the end of 2021.

Provincial Safeguarding Officers already have the right, enshrined in written policy, to view the personnel files of clergy.<sup>7</sup> We agree that our procedural guidance needs to make clear to the various employers of other church staff (including the Representative Body, Diocesan Boards of Finance and Parochial Church Councils) that the same applies to lay personnel. This guidance will be published as part of the supporting Safeguarding documentation by autumn 2021.

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<sup>6</sup> Published online at:

[https://www.churchinwales.org.uk/en/publications/administration-and-business/Safeguarding\\_Documents](https://www.churchinwales.org.uk/en/publications/administration-and-business/Safeguarding_Documents)

<sup>7</sup> Church in Wales Clergy Personal Files Policy (Feb 2020 edition).



### Recommendation 5:

***The Church of England and the Church in Wales should agree and implement a formal information-sharing protocol. This should include the sharing of information about clergy who move between the two Churches.***

We agree and enthusiastically support this recommendation. The Church in Wales has raised concern in the past about the absence of exchange of full and complete information exchange where clergy cross national boundaries, and we have raised this issue previously in our submissions to the Inquiry.

The Church in Wales has taken a number of steps to aid the introduction of such a protocol. We have already ensured that all relevant records are held by a single data controller (The Representative Body of the Church in Wales) so that only a single Welsh party is needed to enter into such a protocol. We have reviewed our record-keeping policies and retention schedules and standardised them wherever possible with the policies operated by the Church of England, to give confidence that records will be managed in a consistent way when passed between churches.

We believe, therefore, that all barriers to introducing an information-sharing protocol have been removed on the Welsh side, and this was communicated to the National Central Institutions of the Church of England in October 2020. We understand that there is a more complex series of internal agreements needed for the many dozens of Church of England data controllers to ensure that the Church of England is in a position to enter into a comprehensive protocol with the Church in Wales. A representative of the Church in Wales has been invited to recent meetings of the Church of England's safeguarding information sharing task group in February and March 2021, which has been appreciated. We remain ready to conclude these negotiations swiftly as soon as the Church of England is in a position to progress the agreement. We understand from our recent engagement with them that it should be possible to conclude these negotiations and issue updated policies and privacy notices in July 2021. It is our aim that these updated policies would result in the full sharing of personnel files when clergy move between England and Wales and *vice-versa*.

### Recommendation 6:

***The Church of England, the Church in Wales and statutory partners should ensure that information-sharing protocols are in place at a local level between dioceses and statutory partners.***

This is a joint recommendation for the Church of England and Church in Wales. Given, as outlined in detail elsewhere in the Church in Wales' evidence to the Inquiry, our casework is undertaken and managed at a national level rather than a diocesan level, we understand that the references to dioceses in this recommendation applies to the Church of England. We have interpreted it as referring to the Provincial Safeguarding Team in relation to the Church in Wales.

We entirely agree and accept this recommendation. Whilst, from our initial discussions with statutory partners, it seems likely that individual agreements will be required between the Church and each constituent body in a Regional Safeguarding Board, we believe it is vital



that such information sharing is not subject to a 'postcode lottery' in different regions of Wales, or England. We have therefore sought, initially, to take forward this recommendation on an England & Wales national basis with our colleagues in the Church of England. We have been involved in joint meetings with representatives of the National Police Chiefs' Council and the Church of England with a view to agreeing a national information sharing agreement, or (if that is not possible) a template sharing agreement with national guidance on how it should be rolled out across each church organisation and each police force. We had hoped that progress on this would have been quicker, but remain of the view that the best response to this recommendation is co-ordinated agreements (or template agreements) on a national level.

We continue in discussions with the Church of England about the best means of taking forward co-ordinated national (England & Wales) conversations with other statutory partners, which has resulted in a recent approach from the Church of England, on behalf of both churches, to the safeguarding lead at the Local Government Association. We also plan to commence parallel discussions with the six Welsh Regional Safeguarding Boards directly and (depending on those discussions) with the Welsh Local Government Association.

#### **Recommendation 7:**

***The Church of England and the Church in Wales should each introduce a Church-wide policy on the funding and provision of support to victims and survivors of child sexual abuse concerning clergy, Church officers or those with some connection to the Church. The policy should clearly set out the circumstances in which different types of support, including counselling, should be offered. It should make clear that support should always be offered as quickly as possible, taking into account the needs of the victim over time.***

***The policy should take account of the views of victims and survivors. It should be mandatory for the policy to be implemented across all dioceses.***

We agree with this recommendation.

The Church in Wales has now introduced, nationally, ISVA (Independent Sexual Violence Adviser) support for survivors via two different sources, both run independently of the Church and its Provincial safeguarding team. The first is 'Safe Spaces', operated by Victim Support (and forming part of their wider support for the Church of England, Church in Wales, and the Catholic Church in England & Wales). The second is specific to the Church in Wales and operated by New Pathways. New Pathways provides ISVA and counselling services, including a Children's Project that offers a dedicated counselling service for child victims and survivors.

The Church in Wales is committed to offering funding towards such counselling as may be recommended by the ISVA in the relevant case, where abuse was committed by Church in Wales clergy, or in a church context. This is arranged at a national level by the Representative Body of the Church in Wales to ensure consistent treatment across all six dioceses. The sufficiency of this provision will be reviewed regularly, in consultation with our Safeguarding Panel, Safeguarding Committee, and the providers of the ISVA service (through whom the views of victims and survivors will be sought).



### Recommendation 8:

***The Church in Wales should introduce independent external auditing of its safeguarding policies and procedures, as well as the effectiveness of safeguarding practice in dioceses, cathedrals and other Church organisations. Audits should be conducted regularly and reports should be published.***

We agree with this recommendation. We remain in the process of a significant overhaul of our procedural documentation and guidelines, which will be scrutinised externally as part of the revision process. During the course of 2021 we plan to undertake an audit of a random sample of safeguarding casework, and to agree a programme of both internal (under the oversight of the Provincial Safeguarding Committee, taking advice from the Provincial Safeguarding Panel) and external peer review and audit of 'on the ground' practice to take place in 2022 and 2023. It is our intention to publish the findings of these external audits, and our intention that they become a regular part of our landscape of quality-assurance.

## REPORT ON OTHER RECENT DEVELOPMENTS

In September 2020, the Standing Committee of the Governing Body of the Church in Wales appointed Mr Tony Young as the new independent chair of its Safeguarding Panel. Mr Young is a member of the Wales National Independent Safeguarding Board, and a former director of Social Services from Cardiff County Council. He is not a member of and has no personal connections with the Church in Wales. The role was made a remunerated role for the first time, as a recognition of the time commitment the role requires and to ensure the highest calibre of candidate would be attracted.

In February 2021, a reorganisation of Safeguarding Governance within the national church office began. The key change is that all safeguarding services (policy & procedure, casework, training) is to be united into one team under one leader. We are currently in the process of recruiting a Director of Safeguarding to lead the combined team, which is a new full-time senior role in the organisation, and in addition to the other additional roles previously reported to the Inquiry. Final interviews for this role are scheduled for 7-9 April 2021.

In March 2021 we launched a new DBS & Safeguarding Training Database. This provides a single, national database of clergy, church officers, and DBS-checked volunteers, together with details of their DBS status and safeguarding training accreditations. It also includes records of all attendees of Church in Wales safeguarding training, whether in-person or online. The system provides for automatic reminders and prompts for follow-up/enforcement when DBS checks or safeguarding training is due for renewal.