

RESEARCH ARTICLE

‘There Isn’t One!’ Church of England Safeguarding Policy

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Abstract

Policy and professionalism go hand in hand. When safeguarding policy is all but absent as it is in the Church of England, it leaves clergy and others ill equipped to diagnose or to respond to concerns over abuse. Complex issues such as conflict of interest, evaluation based on verifiable objectives linked to safeguarding priorities, setting a balance between confidentiality and disclosure, safe recruitment and implementing the recommendations of safeguarding reviews are in effect left dangling. Expertise and professional judgement are needed both to develop policy and to apply it in real-world cases of prospective and actual abuse. Statistics about safeguarding cases covering associated resources, expenditure and outcomes are not readily available. Safeguarding reviews, mostly about particular cases, are difficult to generalise and ‘lessons learned’ are typically left at that without evidence of how safeguarding has changed as a result. The focus of safeguarding should be on the welfare of the people concerned, including survivors and perpetrators as well as congregations and church workers. Confrontational and legalistic approaches are all too common and do more harm than good. The objective should be to restore broken relationships, not necessarily between the survivor and the perpetrator, but between everyone involved in the case and the church.

Keywords: abuse; Anglican; confidentiality; independence; safeguarding; transparency

Introduction

At an interview for a part-time safeguarding job in the Church of England in December 2019, I was asked about possible conflicts of interest arising from other employment. This wasn’t an issue, but I noted that I had been unable to find anything about conflict of interest policy on the Church’s safeguarding website. ‘There isn’t one!’, said David Worlock, then Deputy Director of the National Safeguarding Team (NST) for development.

Since then, a conflict of interest policy was allegedly put into place but applying only to case management groups, following a public uproar over how two complainants were appointed to the group handling the Martyn Percy case.

The Church is technically bound by sections 175–181 of the Companies Act 2006, but this has not been transposed to its own conflict of interest policy. Instead, conflict of interest is ‘baked in everywhere’¹, while the Church has struggled with the notion of independent review.

Worlock’s response is indicative of a more general absence of Church of England policies in the safeguarding area. Yes, the Church has various bodies such as the NST, the National Safeguarding Steering Group with strategic oversight over safeguarding, the National Safeguarding Panel, an advisory group, and a successor to the disbanded Independent Safeguarding Board may be appointed. These bodies have produced various findings and reports, but not safeguarding policies guiding the actions of the Church.

Other countries such as Canada and Australia have well-developed safeguarding policies. However, the policy cupboard of the Church of England is nearly empty.

Safeguarding in the Church of England

The Church is a highly diverse institution comprised of a great number of separate legal entities and autonomous dioceses and parishes, plus educational bodies such as theological colleges and Gladstone’s Library. This means that responsibility for safeguarding can be difficult to pin down. Church workers rely on diocesan safeguarding staff and volunteers in parishes. Yes, safeguarding staff will have specialised knowledge and experience, but they are not in the front line of ministry and may lack understanding of the context in which abuse cases arise. And there is no unifying practical approach to safeguarding nationally.

General Synod has repeatedly challenged the Church’s suppression of discussion on safeguarding, including keeping questions about shortcomings of the NST, failures of bishops and the lack of implementation of ‘lessons learned’ from reviews off the floor of Synod. According to Bishop Pete Broadbent², the standing orders of General Synod ‘do not provide an adequate forum within which to scrutinise these concerns’, however noting that ‘They won’t go away’.

However, a series of ecclesiastical abuse scandals emerging into the public domain has forced the Church to realise that it has been complicit and ‘has bloody hands’³.

Disputes and legalism dominate thinking about safeguarding within the Church. Emphasis is placed on formal processes and child protection, when it is a person’s vulnerability rather than age that most matters. It is prudent to be prepared for the escalation of abuse-related conflict, but alternatives to formal intervention can be simpler, more effective and far less costly in terms of both time and money.

Law does not prevent crime, just as formulaic punishment of children for breaching rules does not succeed in dealing with most childish misbehaviour. Indeed, this can be counterproductive. Nor is legalism helpful for resolving offences by adults except when strictly necessary. It should never be a first response – or a default approach.

¹Martyn Percy, personal communication, 13.4.2024.

²Pete Broadbent, ‘Reflections on the Workings of General Synod’, *Ecclesiastical Law Society Journal* 25.1 (2003), 19–31.

³Fergus J. King and Isaac Poobalan, ‘The Bronze Serpent: Abuse, Trauma and the Lifted Healer in the Wilderness’, *Journal of Anglican Studies* 22.1 (2024), 176–196.

For the people affected by abuse, whether survivors, perpetrators, congregations or people in various Church roles, a pastoral approach that deals directly with abuse-related interpersonal problems is far more effective and less traumatising than formal responses. It is important for church officials to be trained and to attend to their own experiences of abuse in order to better help others⁴.

Safeguarding ought to be about restoring relationships, not necessarily between the survivor and the perpetrator, but between the survivor, the perpetrator and the Church community. This is not easily achieved through legalistic processes.

The Church of England has a web page on ‘Safeguarding Principles’ with a commitment to ‘the safeguarding, care and nurture of everyone within our community’. These principles cover prompt response and pastoral care for victims/survivors and others concerned or affected by abuse, safe recruitment, risk management and promoting a safe culture. However, nowhere are consequences of safeguarding failures or specific responsibilities of church workers laid out. The Church prides itself on being about love, compassion and kindness but no one gets love from an institution⁵.

Safeguarding staff are not employed to support survivors or perpetrators of abuse beyond initial discussions following disclosure, although some take it upon themselves to provide more enduring support. Neither do safeguarding staff supervise ministers or other church workers who look after members of congregations with children and vulnerable adults. They write reports.

As one highly experienced safeguarding professional in England put it, lengthy documents attempting to impose detailed procedures covering all eventualities are ‘overly complex and completely useless’.

The Church does provide training (see below), which focuses more on formal processes and procedures than on addressing personal and social responsibility and preventative intervention. Education about the causes of and responses to abuse is relatively neglected.

Core groups, also called case management groups⁶ typically involve archdeacons, safeguarding advisors, lawyers, reputation managers and sometimes insurers. Survivors are not normally told if a case management group has been appointed, let alone who is on the group, when it meets, what is on the agenda or given the minutes of meetings. According to Harper and Wilson, core groups are typically haphazard in their membership and conduct. They recommend that casework be done by permanent multidisciplinary professional teams including survivors’ representatives, social workers, pastors, lawyers and forensic specialists.

The Independent Inquiry into Child Sexual Abuse (IICSA) hearings on the Church of England⁷, most of which I attended, drew attention to realities of safeguarding that many bishops were unaware of. These hearings were a real wake-up call, particularly the evidence given by survivors.

⁴Fiona Gardner, *Sex, Power, Control: Responding to Abuse in the Institutional Church* (Cambridge, The Lutterworth Press, 2021), 121.

⁵*Ibid.*, 153.

⁶Rosie Harper and Alan Wilson, *To Heal and Not to Hurt: A fresh approach to safeguarding in Church* (London: Darton, Longman and Todd, 2019).

⁷Alexis Jay, Malcolm Evans, Ivor Frank and Drusilla Sharpling, *The Report of the Independent Inquiry into Child Sexual Abuse* (Independent Inquiry into Child Sexual Abuse, 2022), 142.

The website houseofsurvivors.org⁸, compiled by two independent survivors, is a comprehensive source of information, opinion, news and key references such as books, articles and videos covering examples of Church-based abuse and responses to it. However, safeguarding issues and practice are under-researched by independent scholars.

Prevention

Rules can help to deter abuse but cannot prevent it any more than law can prevent crime.

A statutory definition of grooming can trigger the sorts of formal processes that can risk damaging everyone concerned. It is far better to learn how to recognise potentially abusive behaviour.

If safeguarding is to be truly preventative, actions are needed *before* abuse occurs. The first step is to notice the vulnerabilities of people who might be abused, and of people who might get drawn into abusing others.

The vulnerabilities of potential victims can be addressed by using one of the Church of England's most powerful tools: the cup of tea! The vulnerable can also be invited to join church activities and projects. Overcoming loneliness is a most powerful preventive action. It is also straightforward to explain to vulnerable people how to recognise potential problems and how to avoid them. 'What to do if.' brochures with contact information for those willing to help should empower the vulnerable and give them greater self-confidence.

Potential abusers typically have distinctive personality traits that are evident to people who have the relevant psychological knowledge. Once identified, the potential abuser needs to know that they are being watched, and that transgressions will lead to intervention.

This preventative approach is neither complicated nor expensive and is far more sensible than waiting until abuse occurs leading to clear evidence that would 'stand up in court'. Formal proceedings should be avoided as they damage those who are targeted and exacerbate the perpetrators' behavioural problems. Ways to handle (or not to handle) perpetrators are outlined by Daugherty⁹.

Responding to abuse

No matter how attentive and proactive a church may be with preventative interventions, abuse can still take place.

A prompt response to an abuse crisis by a bishop can be very helpful, in which he or she can meet with the congregation, answer questions and explain how the situation will be dealt with¹⁰.

⁸House of Survivors – Stronger Informed, Stronger Together, www.houseofsurvivors.org, accessed 18.5.2024.

⁹Dyron B. Daugherty, *A Worldly Christian: The Life and Times of Stephen Neill* (Cambridge: Lutterworth Press, 2021).

¹⁰Chilton Knudsen, 'Understanding Congregational Dynamics', In Myer Hopkins and Mark Laaser, Eds., *Restoring the Soul of a Church: Healing congregations wounded by clergy sexual misconduct* (Minnesota: The Liturgical Press, 1995), 75–101.

It is very important to articulate the purpose of interventions following abuse, and the desired outcomes of these interventions.

Awareness of IICSA, the United Nations Convention on the Rights of the Child and the Online Safety Act 2023 is important, but externalising responsibility for enforcement to the police and the courts without providing pastoral support is avoidance behaviour.

Mandatory reporting might appear to be a helpful tool, but the devil here is in the detail. To whom? Only if the abused is a child, for whom there are clear legal implications? Who would actually benefit?

The Church needs to take responsibility for safeguarding everyone, whatever their age. However, institutional responses tend to focus on self-protection and reputational management and may neglect the responsibilities of Church leaders as well as professional expertise in safeguarding – whilst also neglecting the needs of the people involved.

A pastoral response to the abused is recognised as important – but what happens in practice? This is very difficult to establish in the absence of systematic research and is probably a very mixed bag. Survivors may avoid reliance on official Church pastoral care, organising (and paying for) their own. As for perpetrators, care is rarely mentioned. Controls may be imposed, such as avoiding children and those who had been abused, but without addressing the root causes the impact may be limited and even counterproductive. Abusive behaviour can be taken on and if done in cooperation with the perpetrator, can lead to self-control backed up by support to improve safety.

When major cases arise, such as the Maids Moreton abuse and murder by churchwarden Benjamin Field in 2020, the Church in Buckinghamshire appointed a priest to minister to members of the affected congregations for 6 months. The unrepentant church warden was jailed for life.

In most cases, clerical perpetrators can be confronted pastorally by archdeacons or bishops and the consequences of their behaviour explained. They can be supported with a temporary assignment, spiritual direction and professional supervision, and encouraged to accept a new post.

In serious cases, circles of accountability and support can address the needs of perpetrators if they accept that they have abused others and agree to refrain from doing this in future. This can remain in place for as long as it takes to restore their confidence and avoidance of further abuse.

In the USA, specially qualified ministers ('afterpastors') can be appointed to work in traumatised churches for a few years until congregations have recovered enough to return to ordinary ministry.

Confidentiality and Information Sharing

Survivors may be subject to lengthy, complex and inconsistent processes, while being passed from pillar to post by an ever-changing array of case officers. They may discover that their cases are discussed without their knowledge or consent.

It can be extremely difficult to prove that confidentiality has been broken, especially when information has been passed on orally. But it is not necessarily

difficult to tell if this has happened. Survivors can spot when people know things that they could only have learned from people they had briefed.

Survivors normally accept that information does need to be shared if anyone is in danger, including with the police. But in general, policy on confidentiality needs to be carefully formulated, communicated and subject to the consent of the survivor. Guidelines should be made explicit or negotiated with those who disclose abuse. For example, routine information sharing with subordinates and other colleagues could be agreed with the survivor, with confidentiality extended to them.

Clarity on confidentiality would be an important contributor to the 'policy cupboard' which would protect survivors and their associates as well as improve confidence in how the Church responds to allegations of abuse.

Training

Clergy generally find safeguarding training time consuming but mostly worthwhile – the first time. After that, they complain that they are already familiar with most of the material. As professionals, clergy can be expected to go online to update themselves, especially if a safeguarding issue comes up in their parish or diocese. Diocesan safeguarding advisors can be consulted on specific questions.

Requirements to undergo training for each new role taken up by a member of the clergy could easily be boiled down into reviewing a short paper or online post relevant to that particular role.

Training opportunities could easily be covered in the course of regular discussions between clergy and archdeacons.

Safeguarding Monitoring and Reviews

The Church's record on monitoring and reviewing safeguarding is mixed, although it has improved over time.

The Church sponsored a *Past Cases Review* (PCR) in 2007–2009 intended to draw together widespread experiences of safeguarding across the Church. However, according to a report by Sir Roger Singleton, the PCR report was deeply flawed, with seven dioceses needing to do it all over again. The Church responded to the extent of reported cases of abuse by revising definitions to drastically reduce the numbers: 13 in England as compared to 2500 in the much smaller Methodist Church and 1500 in the even smaller United Reformed Church¹¹.

In one diocese, a more recent project was undertaken to review the safeguarding activities of all parishes, with the goal of awarding 'green lights' to those who scrupulously followed the protocols. Each parish was responsible for self-reporting without any checks. It was easy to build up an impressive-looking report filled with green lights, but it was unlikely to reflect the realities on the ground.

Basic data, such as the number of current and recently closed safeguarding cases and their outcomes, are not readily available. And systematic overviews of abuse cases, if done, are not published.

¹¹Harper and Wilson, *Op. Cit.*, 153–154.

I am not aware of reports on actions taken by the Church to prevent abuse (apart from training), nor reviews of feedback from survivors on how their cases were handled.

Reviews of abuse cases are commissioned by the Church from experienced professionals, and these can highlight issues of general relevance. Their recommendations are typically 'accepted in full', but there is no routine assessment of resulting changes in safeguarding practice.

In most cases, safeguarding reviews' terms of reference protect the institution and Church officers involved from criticism or consequences of failures. One notable example is the 'independent' review commissioned by London Diocese into the case of Malcolm Sargeant's 'brain dump', which contained damaging and often untrue allegations about 42 clergy in the Diocese. One of the priests concerned took his own life. The review was to identify 'lessons learned' from this case, but the terms of reference specified that no blame was to be attributed¹². It is not clear what has changed in the Church as a result of these 'lessons learned'.

Alexis Jay's comprehensive review of safeguarding in the Church of England was exceptional¹³. She drew up her own terms of reference and came to a powerful overall conclusion: that responsibility for the oversight of safeguarding needs to be entrusted to a fully independent body with enforcement powers. This would enable the suspension or dismissal of church officers for safeguarding failures subject to a right of appeal to an employment tribunal along with instructing the Church to award damages to abuse victims and requiring apologies.

Safeguarding needs to be regulated, much as healthcare and utilities are regulated, and this need not be restricted to a single church denomination. Safeguarding regulation could apply across all sectors, including those whose main activities are already regulated.

International Comparison

It is instructive to look at how other countries approach safeguarding. Australia and Canada have well-developed policies and guidelines that can serve as models for England.

Australia

Australia has a clear layout of its aims, structures, purposes and types of professional resources for safeguarding online¹⁴. Under a banner labelled 'Safer Ministry', preventing and responding to abuse each contain three elements. 'Preventing' covers identifying standards of behaviour, training and recruiting clergy and church workers; 'Responding' covers caring for the abused, handling complaints and

¹²Tim Wyatt, 'In the Shadow of St Paul's', *The Fence* (2024).

¹³Alexis Jay, *Report into the future of safeguarding in the Church of England* (Future of Church Safeguarding, 2024).

¹⁴Anglican Church of Australia, *Safe Ministry*, [Anglican.org.au/our-work/professional standards commission](https://www.anglican.org.au/our-work/professional-standards-commission), accessed 18.5.2024.

‘responding to persons of concern’. There follows extensive detail on applying criteria, checklists and other tools.

In 2013, Australia appointed a *Royal Commission into Institutional Responses to Child Sexual Abuse* which conducted a large-scale review of safeguarding. Research into numerous issues and case studies was undertaken, along with a review of all child sex abuse complaints, documentation, policies, protocols and practices operating in the 23 dioceses. Their final report was published in 2017¹⁵.

Shortly before this, the General Synod passed the Safe Ministry to Children Canon 2017 which set national standards in areas of church worker screening, selection and training, adoption of a consistent code of conduct and risk management strategies for persons of concern.

The Royal Commission worked with other denominations to facilitate a consistent response in areas such as redress and civil litigation.

Australia have outsourced the management of professional standards to a specialist organisation called Kooyoora¹⁶.

Research on child sexual abuse in the Anglican Church of Australia and England¹⁷ analysed ethical issues related to justice in providing redress to victims.

Canada

Canada has adopted the Anglican Communion’s approach to safeguarding, commending its guidelines to Anglican dioceses, churches and other bodies in Canada¹⁸. Canada focuses on ethics¹⁹ and theologically informed pastoral care for both complainants and respondents. Canada promotes professional supervision, professional development and performance appraisal.

Canada recommends that each Province or Diocese provide a trained support person for the complainant and for the respondent throughout the process and beyond.

Training is not confined to policies and documents. It covers the importance of listening to complainants and respondents with empathy, patience and compassion.

An independent Canadian organisation published a valuable report in 2022²⁰ with advice for those who have been abused.

What is so striking about both the Australian and Canadian examples is the extent to which professional safeguarding expertise and experience are applied to the responsibilities of church officers. Their recommendations are flexible enough to be adapted to circumstances, encouraging church officers to learn and empowering them to use their professional judgement.

¹⁵Australian Royal Commission into Institutional Responses to Child Sexual Abuse, *Final Report*, Anglican.org.au/our-work/professional standards commission, (2017).

¹⁶Kooyoora, (<https://www.kooyoora.org.au/>) accessed 18.5.2024.

¹⁷Virginia Miller and Seumas Miller ‘Child Sexual Abuse, Integrity Systems and the Anglican Church: Truth, Justice and Love’, *Journal of Anglican Studies* 19.2 (2021), 193–212.

¹⁸Garth Blake, ‘Enhancing the Safety of All Persons within the Anglican Communion: Initiatives of the Instruments of Communion’, *Journal of Anglican Studies* 9.2 (2021), 134–150.

¹⁹Anglican Church of Canada, ‘Clergy Codes of Ethics’, www.anglican.ca/faith/focus/ethics/codes-ethics, accessed 19.5.2024.

²⁰ACCtoo, Anglican Church of Canada, *Before You Report*, 6.1 (2022).

The Church of England, in contrast, publishes a set of principles but without putting policies in place on the responsibilities of ministers and other church workers to prevent or to respond to abuse.

In all three of these Anglican churches, there is no policy on the consequences of abusing the vulnerable beyond the possibility of clergy being deposed for ‘conduct unbecoming’. Perpetrators who are lay church officers or members of congregations may be restricted, for example in their access to children, but guidance on imposing penalties is generally left to external authorities such as the police and the courts in serious cases.

Leadership by example may be at least as influential as referrals and reports in promoting constructive responses to safeguarding failures. And churches can do far more than posting notices and laying out safeguarding leaflets by providing opportunities for presentations and discussions. Dioceses can promote Safeguarding Sunday, and there are projects such as Newcastle Diocese’s ‘If I told you, what would you do?’²¹

Events organised by a local church are a good way of raising awareness about issues.

Evaluation

There is no systematic approach to evaluation of safeguarding in the Church of England. When the word ‘evaluation’ is used, it is not generally evidence-based and goes no further than informal opinion.

The Church does audit safeguarding procedures. But this is not equivalent to a full evaluation and as it is paper-based will have limited relevance.

The Audit Committee of the Archbishops’ Council is consistently blocked from seeing risk registers, conducting performative evaluation related to expenditure and receiving meaningful responses to questions²².

For evaluation to be effective, there need to be clear policies in place and sufficient data to determine how well safeguarding objectives are met. What matters most is how safeguarding is actually delivered and the outcomes for those affected by abuse.

Professional evaluation applies a rigorous methodology that first establishes a set of verifiable indicators. Fully independent evaluation is needed to assess the effectiveness of safeguarding policies benchmarked against objectives, resources and budgets.

Evaluation need not be a costly exercise that is comprehensive in its coverage of parishes, dioceses, cathedrals and other church bodies. Dioceses are vastly different from one another in size and complexity, and evaluations need to reflect the local realities. The design of an evaluation needs to be based on consultation with bishops, diocesan safeguarding advisory panels and staff, survivors and scholars.

Church authorities need to recognise the value of professional evaluation both to support and to legitimise the management of safeguarding.

²¹Newcastle Diocese, *If I told you, what would you do?* <https://newcastle.anglican.org/safeguarding/>, accessed 18.5.2024.

²²Martyn Percy, personal communication, 30.4.2024.

Expenditure on Safeguarding

Safeguarding budgets may be the best indicators of the actual priorities of the Church. However, there is no transparency on ecclesiastical expenditure on safeguarding and neither is data available on the numbers of active safeguarding cases at either diocesan or national level.

It is common for Church bodies to claim that safeguarding is for the protection and care of vulnerable people and survivors. However, only about 1% of safeguarding expenditure reaches survivors.

According to an article in *Private Eye*²³, £5.3 million/year is spent by the Church on central safeguarding staff. Centralised support for church abuse survivors from the CoFE's Interim Support Scheme amounted to £711,000 awarded to 44 survivors in 2021, the following year dropping to £458,000 awarded to 42 survivors.

The cost of about two hundred safeguarding staff employed by the dioceses plus others doing safeguarding-related work such as administrators and archdeacons is considerably higher. Dioceses also contract trainers, lawyers, reviewers and consultants, as well as making awards to survivors. The overall cost to dioceses comes to an estimated £45 million/year.

At diocesan level, payments to survivors of £500 may be authorised by bishops on the advice of Ecclesiastical or other Church insurers, in order to forestall lawsuits that could lead to much higher damages being awarded. This amount is intended to pay for half a dozen counselling sessions. However, according to three people who provide this kind of counselling, survivors need 140 sessions on average.

Overall costs associated with engaging with the Church and healing from trauma can amount to hundreds of thousands of pounds. Many survivors have limited resources or income.

Clerics accused of abuse and suspended typically continue to receive stipends and to have their housing costs covered while cases are under investigation.

The cost of most safeguarding reviews runs into the hundreds of thousands of pounds, but the argument is made that it is too expensive to monitor the implementation of their recommendations. Spot checks, however, are not costly and can help to convey the importance of the findings of safeguarding reviews.

The prevailing approach to safeguarding in the Church of England externalises responsibility to a set of mainly legalistic, secular structures and documents. It has nothing to do with religion itself, nor with the people who are affected by abuse. It is worth recalling that the word 'religion' is constructed around the core letters of 'lig', which connote tying or binding together. This concept is entirely absent in a system based on formalised conflict.

Christianity ought to be core to responses to Church-based abuse and the causes of it. Abuse is a sin, and as such needs to be dealt with through confession, repentance, reconciliation and pastoral care. The people affected by abuse need to be put before institutional preoccupations with legalisms and reputational protection. And professional evaluation needs to be applied to assess the effectiveness and outcomes of safeguarding policies and activities. The involvement of Parliament and the

²³Private Eye, *Synod's omission*, PE No. 1620, (2024).

development of independent oversight, if not delegation to independent bodies with authority to manage Church safeguarding, could change the picture radically in future.

The Future of Safeguarding Policy

Whilst there is an extensive body of literature on ecclesiastical safeguarding, most of it is focused on case studies. It is difficult to draw overall conclusions based on piecemeal knowledge, and the Church refuses to monitor compliance with recommendations in safeguarding reports because ‘it costs too much’.

Reviews and reports with terms of reference drawn up by the Church have little impact on their ecclesiastical client. Recommendations are all too often ‘accepted’ but ignored in practice²⁴.

Arguing that there is need for a change in culture and behaviour within the Church (see Jay et al.²⁵, Oakley and Humphreys²⁶ and Sidebotham²⁷) without specifying what changes are needed and how to implement them (and by whom) is another form of avoidance. As IICSA and others have noted, recommendations that are not acted upon plague the Church.

The Church of England recognises that its safeguarding policies are underdeveloped. At the time of writing (May 2024), the Church was recruiting a National Safeguarding Policy and Development Lead, working with the NST and others in the National Church Institutions. The job requires co-production with victims and survivors of clergy and other Church-related abuse²⁸.

Most members of the NST are not identified online and despite many years of talk about co-production with survivors, it does not seem that this has taken place in any meaningful way. Discussion meetings with survivors occasionally take place, but survivors are typically left frustrated by the lack of outcomes. Survivors may have extensive specialist knowledge and professional experience and are occasionally asked to review draft reports. However, I am not aware of any cases in which survivors are commissioned by the Church to do research or to write reviews.

For co-production to be authentic, there needs to be parity. Church officers and survivors should be paid a comparable amount for the work they do. At the moment, Church officers draw a salary, expert consultants are paid, but survivors are expected to serve as volunteers. Projects need to be drawn up jointly between the Church, independent experts and survivors, and be properly resourced.

Another possibility would be to extend the role of the permanent case management group described above to incorporate co-production of safeguarding policy and practice guidance along with survivors.

²⁴Thirtyone:eight, ‘Together we can: A manifesto for a safer society for all’, (<https://thirtyoneeight.org>: 2024).

²⁵Alexis Jay, Malcolm Evans, Ivor Frank and Drusilla Sharpling, *Report of the Independent Inquiry into Child Sexual Abuse* (IICSA, 2022).

²⁶Lisa Oakley and Justin Humphreys, *Escaping the Maze of Spiritual Abuse: Creating healthy Christian cultures*, (London: Society for Promoting Christian Knowledge, 2019).

²⁷Peter Sidebotham, ‘Promoting a safer Church? A critical discourse analysis of the Church of England’s safeguarding policy document’, (*Theology*, 124.3, 2021), 190–199.

²⁸Charity Job, <https://charityjob.co.uk/jobs/church-of-england/national-safeguarding-policy-and-development-lead/955889>, accessed 8.4.2024.

Diagnosing threatening personality-based indicators is best left to professionals. However, ordinary people can be encouraged to recognise vulnerability and to look after those who might be targeted, as well as those who might succumb to abusing others. It is amazing what cups of tea and listening can accomplish to safeguard the Church before any abuse may take place.

Pastoral supervision for church workers, both ordained and lay, is an essential if neglected means to support individuals in their working lives.

Priority should be given to the needs of those affected by abuse and the promotion of constructive interpersonal relationships amongst everyone involved. Policies per se are not the most important part of safeguarding – it is only how they are applied and the impacts they have that count.

Conclusions

The main purpose of developing policies is to professionalise safeguarding in the Church of England, with staff internalising their responsibilities and ensuring that there are consequences of safeguarding failures as well as beneficial outcomes for those affected by abuse. There also need to be ways to challenge institutional failures to implement policies through independent oversight.

What policies need to go into the Church of England's nearly empty cupboard?

The top priority has to be *conflict of interest*. A short, straightforward definition needs little embellishment, although a set of guidelines would help to embed good practice. For example, at the first meeting of a committee, panel or working group, the first item on the agenda should be a tour de table for disclosures and/or questions.

The Church needs to develop *verifiable objectives associated with explicit safeguarding priorities*, regularly updated and published on the Church of England's website.

Basic safeguarding data, collated from all dioceses and at national level, needs to be reviewed by fully independent experts and published in annual reports. This should include statistics on active cases and forms of support offered to survivors, along with associated resources, expenditure and outcomes.

A policy on *confidentiality and information sharing* would help to protect survivors and their associates – and the Church.

Recruitment and employment policies need to incorporate safeguarding requirements and expectations of professional qualifications.

Finally, the Church of England needs to commit to *broad consultation, regular reviews and evaluations of safeguarding policy and practice* at all levels in the Church, explaining how practice will be monitored and improved as a result.

When formal responses to abuse are necessary, professional expertise is essential along with the commitment of bishops and others working in the Church to exercising their responsibilities.

Safeguarding is under-researched. Social work, psychology and counselling are all valuable disciplines. However, the most important elements of safeguarding are experience, judgement and recognition of dysfunctional interpersonal dynamics, plus research-based knowledge of helpful intervention strategies.

The Church of England can draw upon the experiences of other countries such as Australia and Canada, which have well-developed safeguarding policies.

Safeguarding priorities need to be articulated with far more care, and aggregated outcomes of safeguarding activities monitored, analysed and posted online. Alexis Jay's observation that governmental involvement is essential needs to be taken up by the Houses of Parliament, informed by independent experts and the civil service. The objective is to establish a fully independent external regulatory body with powers to enforce safeguarding regulation²⁹.

The Church has made a start with safeguarding policy development, although it remains to be seen how this takes shape and if there will be changes in practices and outcomes as a result. It would help to take stock of structural and governance features of the Church and to assess how safeguarding policymaking can draw upon both internal and external expertise.

It will take time, perhaps decades, before new policies, structures and public bodies with authority over safeguarding emerge. There is no reason why such a system should not cover safeguarding throughout the private and charitable sectors.

Meanwhile, it is time to develop binding safeguarding policies for the Church of England with which to stock its policy cupboard.

²⁹Martyn Percy, personal communication, 30.4.2024.