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Diocese of Paisley Independent Safeguarding Audit August 2022





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- identifying and sharing knowledge about what works and what's new
- supporting people who plan, commission, deliver and use services to put that knowledge into practice
- informing, influencing and inspiring the direction of future practice and policy.

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1 INTRODUCTION

1.1 THE AUDIT

- 1.1.1 The Social Care Institute for Excellence (SCIE) has been commissioned to undertake an audit of the safeguarding arrangements of the Roman Catholic Diocese of Paisley. Audits for the Dioceses of Galloway, Motherwell, Dunkeld, Argyll and the Isles and Aberdeen, and the Archdioceses of St Andrews & Edinburgh and Glasgow have already been completed.
- 1.1.2 The aim of the audit is to work with the diocese to support safeguarding improvements by identifying how well safeguarding is working, identifying where there might be weaknesses and exploring the rationale for both strengths and weaknesses found.
- 1.1.3 The audit has used SCIE's established methodology Learning Together, which has been used through a three-year programme of Church of England diocesan audits. While some of the areas to be explored differ slightly, the methodology remains the same. The audit was completed by Jane Bee and Jane Scott in June 2022 with quality assurance provided by SCIE through Sheila Fish, Senior Research Analyst.
- 1.1.4 The audit process involved interviews, written contributions, a survey and documentary analysis. This included seven conversations with key clergy and lay staff involved in safeguarding within the diocese, two contributions from multi-agency partners, 95 survey returns from parishes, a documentary analysis of eight case files, policies and procedures for safeguarding and minutes of meetings. Those who contributed are described as 'participants' throughout the report. Details of the process are provided in the appendix.
- 1.1.5 As part of the audit process, the Diocese of Paisley sought to involve survivors of abuse who had received a service from the diocese. Auditors spoke to three survivors whose views are included as 'contributors' within the report.
- 1.1.6 The audit was designed to be proportionate. Auditors aimed to cover enough breadth and depth to gain an insight into safeguarding within the diocese, recognising that within the timescales available this was not wholly comprehensive.
- 1.1.7 Input from parishes was via a survey rather than the traditional focus groups due to distance and continuing Covid-19 pandemic concerns. There were no other known limitations to this audit.

1.2 THE DIOCESE

- 1.2.1 The Diocese of Paisley is geographically the smallest in Scotland covering 224 square miles and comprises the local government areas of Inverclyde, Renfrewshire and East Renfrewshire. By Catholic population, it is the fourth largest of the dioceses in Scotland with an estimated Catholic population of 90,060 in a general population of 347,000; 27% spread across 33 parishes in

three deaneries. The diocese comes under the Ecclesiastic Province of Glasgow, led by the Metropolitan Archbishop William Nolan. The Diocese of Paisley is led by Bishop John Keenan.

1.3 DESCRIPTION OF THE SAFEGUARDING STRUCTURE

- 1.3.1 The Bishop takes ultimate responsibility for safeguarding within the Diocese of Paisley. Supporting him in this task is a team comprising the Vicar General, who is Vicar Episcopal for safeguarding, to whom safeguarding is delegated by the Bishop, the Diocesan Safeguarding Advisor (DSA), who is a volunteer, the Safeguarding Administrator and Head of Administration, and the Safeguarding Administrator. The DSA meets quarterly with the Diocesan Senior Management Group (SMG) for safeguarding, which consists of the Bishop, Vicar General, the Treasurer and the Chancellor. The SMG meets to take forward the strategic safeguarding development plans. The Vicar General also line manages the Diocesan Safeguarding Administrator, who is a part-time paid employee.
- 1.3.2 The Diocesan Safeguarding Advisory Group (DSAG) is chaired independently and supports, informs and oversees the work of the safeguarding team. Members represent the main lay organisations whose work involves them with children or adults at risk. The DSAG is organised and attended by the DSA and the Vicar General.
- 1.3.3 Where there is an allegation or safeguarding concern raised, the DSA convenes a Diocesan Risk Assessment Management Team (DRAMT) meeting to assess risk and make recommendations to the Bishop, who is not a member of the DRAMT. The DRAMT's membership include those with professional qualifications and experience relevant to safeguarding.
- 1.3.4 In local parishes, priests are responsible for ensuring safeguarding standards are met. Each parish has at least one safeguarding coordinator whose role is to support the parish priest with the management of safeguarding at parish level. The diocese has a total of 877 volunteers undertaking regulated work, all of whom have been recruited and trained using the safe recruitment standard set out in the Church's safeguarding manual, *IG/v2*).

1.4 STRUCTURE OF THE REPORT

- 1.4.1 This report is divided into:
 - introduction
 - the findings that the audit, presented by theme
 - questions for the diocese to consider, listed where relevant at the end of each finding
 - conclusions of the auditors' findings: what is working well and areas where future development might be considered.
- 1.4.2 An appendix sets out the audit process and any limitations to the audit. Each substantive section begins with a generic introduction. This is followed by a description of what the auditors learnt about arrangements and practice in the diocese followed by their analysis of the strengths and systemic vulnerabilities

identified. The description is value neutral. In the analysis the auditors make assessments of the safeguarding arrangements and practice they learnt about.

SCIE methodology does not conclude findings with recommendations. Instead, for each theme, the report provides the diocese with questions to consider in relation to the findings. This approach is part of the SCIE Learning Together methodology and requires those with local knowledge and responsibility for progressing improvement work to have a key role in deciding what to do in order to address the findings and to be responsible for their decisions. This methodology also helps to encourage local ownership of the work required in order to improve safeguarding.

2 FINDINGS

2.1 SAFEGUARDING LEADERSHIP AND MANAGEMENT

2.1.1 Safeguarding leadership within the Diocese falls ultimately to the Bishop of Paisley who is responsible for leadership on all aspects of life within the diocese. Safeguarding leadership takes various forms with different people or groups taking different roles. The key areas considered by the audit were aspects of leadership including spiritual/theological, strategic and operational leadership, and how these were defined and understood. How these roles are understood and how they fit together can determine how well led the safeguarding function is across the diocese.

SPIRITUAL/THEOLOGICAL LEADERSHIP FOR SAFEGUARDING

Introduction

2.1.2 McLellan (2015) wrote of the need for 'a clear account of the theological principles which underpin safeguarding' (p.215, para 3.24). The Commission emphasised the importance and the urgency of the task in setting out a compelling and coherent theology of safeguarding for the Catholic Church in Scotland. Recommendation 3.110 addressed this specifically: 'The relative absence of theological insight in the "Awareness and Safety" manual must be replaced with a clear explanation of the task of safeguarding as a Christian privilege with a firm theological foundation' (para. 3.78).

2.1.3 It is for the Bishop, Vicar General, Vicars Episcopal, Chancellor and deans to help parish priests, congregations and others around the diocese to understand that safeguarding is intrinsic to the Catholic faith and therefore a priority. This aspect of the leadership role is the foundation for the culture of the Church and is critical in terms of making it a safer place for children and vulnerable adults.

Description

2.1.4 The Bishop of Paisley described safeguarding as having been in place across the diocese prior to the publication of *In God's Image*. The previous Bishop had been the national lead for safeguarding for the Bishops' Conference of Scotland (BCOS) and appointed a lead locally for safeguarding before this was a requirement. The current Bishop feels therefore that safeguarding is well embedded and has become part of how the diocese works in general.

2.1.5 The Bishop was able to articulate his own thoughts and feelings that safeguarding is core to the Catholic faith and intrinsic to the teaching of the Gospel. He explained that safeguarding is not a new and separate branch of theology, but described it as a 'living' theology with linked ethics and ethos, the former being the principles or approach the Church should undertake and the latter being a belief that something is right for the Church's attitudes and values. The Bishop described safeguarding as active listening and having the courage to speak out, and for the Church to have the humility to say, 'we got it wrong'.

2.1.6 The Diocese of Paisley has a statement of intent for safeguarding which is in

three parts:

- Everyone in the Church is valued
- All have the same value
- Everyone is responsible.

The Bishop described systems in place to ensure the ethos of safeguarding works throughout the diocese and gave examples such as the Assembly of Clergy feedback and an annual announcement on the website which invites feedback.

- 2.1.7 The diocesan website provides clear information about the Bishop's ministry and how this links to safeguarding. The Bishop provides monthly thoughts, which up until the pandemic, were published in the regular bulletins and available to everyone at Mass. These will begin again after the summer. The Bishop provides a safeguarding message to all parish priests via a formal pastoral visit to each parish, and annual visits to the parish clusters surrounding all 34 Catholic primary schools and eight secondary schools within the diocese, with a Mass offered to each.
- 2.1.8 All safeguarding training is set within a theological framework with prayer at the beginning and end of each training session. Support for parishes (see Section 2.17) is also linked to safeguarding, including through Safeguarding Sunday which is a day to highlight and celebrate safeguarding work, thank volunteers and encourage everyone involved in Church life to help ensure a safe Church for all, the Parish Bulletins and via regular communications.
- 2.1.9 The Vicar General described safeguarding as integral to being a parish priest and said that this was already the case when he was ordained over 20 years ago. He thought parish priests understand its importance and also the importance of parish safeguarding coordinators (PSCs). The Vicar General advised that there are no parishes without a PSC and that this was a credit to the parish priests' understanding of the importance of embedding safeguarding within the day-to-day working of parishes.
- 2.1.10 Participants also described small actions or ways of working which spoke to the embedding of the theology of safeguarding throughout practice. For example, calling vulnerable learners who are part of Special Religious Educational Development (SPRED) 'friends' because of the teachings of the Gospel.

Analysis

- 2.1.11 The theological leadership within the Diocese of Paisley is strong. The Bishop articulated his understanding of the theological aspect to safeguarding and his commitment to prioritising this. While not complacent, he felt that the message that safeguarding is core to the Catholic mission is well embedded across the diocese and regularly reinforced to parish priests, PSCs and volunteers. Of survey responses (n=95), 80% stated that the Bishop's communication regarding

safeguarding was good, while 19% felt it was average; 85% of respondents to the survey felt that the Bishop was visible within their parish.

2.1.12 The Bishop plays an important part in setting the context and tone for the work of safeguarding within the diocese. It is difficult to measure how well understood safeguarding is across the diocese and the parishes, but the auditors heard consistent messages from the Bishop and his team. In addition, safeguarding is widely discussed by parish priests at the Assembly of Clergy where a bespoke session on trauma was delivered via the Grief to Grace programme. Following this, parish priests were provided with a second session led by the DSA in the Archdiocese of Glasgow which brought to life the aspects of trauma which might be raised by or through the parish priests within their role, tying it with the theology of safeguarding. There is a clear expectation for parish priests to attend the Assembly of Clergy in order to receive updates and information on safeguarding.

2.1.13 Contributors to the audit gave examples of where they had been able to contact the Bishop directly when required and how they had been able, on occasion, to input their thoughts and provide learning points which the safeguarding team had acted upon. There was an acknowledgement from the Bishop, however, that they still have aspects to learn. The annual safeguarding announcement for this year, read out as part of a Sunday service, was cited as an example where the diocese received negative feedback from those who had suffered abuse and also from those who had not. This feedback was mainly due to the length of the announcement and that it was difficult material to listen to.

2.1.14 The Bishop also articulated that he felt a sense of hope across the diocese that the Church was beginning to shift its thinking and that the importance a safe Church for all was much better understood. The parish audits now provide much room for reflective thinking which has been positive and the new Scottish Catholic Safeguarding Standards Agency (SCSSA) provides hope as it gives people a sense of greater transparency and robustness in terms of safeguarding.

Questions for the diocese to consider

- How might the diocese better balance the safeguarding announcements across the diocese to ensure the message is clear without causing negative thoughts and feelings?
- How could the Bishop's message that safeguarding is part of the Catholic mission and life be more overtly articulated across the deaneries and parishes?
- How can the diocese be assured that it has a robust understanding of the extent of a consistent safeguarding message across all parishes?

STRATEGIC LEADERSHIP FOR SAFEGUARDING

Introduction

2.1.15 Strategic and operational leadership are commonly considered essential aspects of the leadership and governance of organisations. Strategic leadership develops the vision and mission, strategies, systems and structures for achieving that vision and overall accountability. Operational leadership delivers that vision and mission on a day-to-day basis. Roles and forums for strategic leadership and governance exist in dioceses to cover a range of areas and activities, for example Bishop's/Archbishop's Councils. It is useful therefore to consider how strategic leadership is provided for safeguarding in the context of these fora.

2.1.16 *IGlv2* reaffirms the Bishop's role in terms of local safeguarding arrangements and at 6.2.1 continues:

The bishop is ultimately responsible for ensuring that the safeguarding arrangements within his diocese are properly embedded within a culture of care. Above all, in his manner of reaching out and responding to survivors, the bishop must provide a powerful example of humility, Christian love and compassion. In appointing competent, qualified, and experienced individuals to key safeguarding posts, he will ensure that the strategic planning and organisation of safeguarding are secure and well regulated.

(Bishops' Conference of Scotland 2018, p.68)

2.1.17 Furthermore, *IGlv2* now speaks to 'Church leaders showing personal commitment to, and strategic planning of, safeguarding' (p.74). It is easier for organisations to be clear about progress and improvements if the objectives to be set and actions to take are set out in a strategic plan. For the diocese, a work plan would set out how the safeguarding service will be developed and who will lead on the different aspects of achieving the plan. Although not outlined *IGlv2*, governance of the delivery of this plan would logically sit within the local governance arrangements of each diocese. Setting out the goals of the service and tracking progress against them enhances accountability and should assist operational leadership by identifying barriers to development that need to be addressed.

Description

2.1.18 Paisley is a small diocese where the Bishop has one Vicar General to whom the task of safeguarding is delegated. The diocese had reviewed all published SCIE audits to date and identified relevant learning points for Paisley including development of both a strategic plan and the Safeguarding Action Plan. The strategic plan is approved by the Curial and overseen by the diocesan SMG. The Curial meets monthly and consists of the Bishop, Vicar General, Chancellor and Treasurer all of whom are trustees with the exception of the Chancellor. The

Curial then meets quarterly with DSA as the SMG.

- 2.1.19 The DSAG oversees the operational Safeguarding Action Plan which stems from the parish audits. The DSA attends and minutes the DSAG meetings and provides a safeguarding input, but the DSAG does not approve actions from the strategic plan, although the plan is discussed at each meeting. This is further discussed in Section 2.14.
- 2.1.20 Links between trustees and the DSA are strong due to the quarterly SMG meetings and the link between the SMG and DSAG is also in place, due to attendance of the Vicar General and the DSA at both meetings. The Vicar General and the DSA also meet at least monthly.
- 2.1.21 The Bishop is supported by the Council of Priests, which acts as an advisory body for the Bishop, and meets twice per year. Parish priests also meet together as an Assembly of Clergy an additional twice per year for in-service training which always covers safeguarding, including information from the DSA.
- 2.1.22 The DSA and the Bishop also meet regularly and sit in close proximity to the Vicar General who together form a close-knit team with advice from the independent chair of the DSAG.
- 2.1.23 The DRAMT shares an independent chair with the DSAG and makes recommendations to the Bishop regarding risk. The Bishop is not a member of the DRAMT.

Analysis

- 2.1.24 Strategic links between the trustees and the DSA is through the Curial group which quarterly becomes the safeguarding SMG with the addition of the DSA. It is a strength for strategic leadership that these links are in place with the trustees.
- 2.1.25 It is less clear, however, where the accountability for safeguarding lies. The DSAG does see the strategic plan and has sight of the actions, but does not approve the plan which is instead the responsibility of the SMG. Auditors reflected that the DSAG therefore has less strategic oversight of the plan than it might, and it is unclear whether the DRAMT is accountable to the DSAG, the Curial group or the SMG.
- 2.1.26 The strategic plan is useful and is beginning to identify required actions from the SMG, however it has not yet developed into an overarching strategic plan. Some elements of a strategic plan are in place, but it would be helpful to see a clearer articulation of the strategic vision of the diocese for safeguarding, identified priorities and intended outcomes, including some measure of impact. This would help the current plan to become more forward-looking and give a sense of where the diocese would like to be in five years. There is much planning in progress for safeguarding and auditors felt that these plans could be linked into clearly defined priorities.
- 2.1.27 In addition, it might be useful, in terms of strategic leadership, to link the strategic plan with the operational Safeguarding Action Plan. The two plans are currently overseen by two different groups and the auditors reflected that an amalgamated

plan approved by the DSAG, progressed by the SMG and reported on to the Curial would provide a broader strategic oversight across the diocese, better links between the DSAG and SMG and a quality assurance loop between the SMG, DSAG and Curial. Linking the two plans would also assist continuity of knowledge between the DSAG and the DRAMT as both have the same independent chair. This means that learning from themes raised at the DRAMT could be discussed at the DSAG and absorbed into the strategic plan.

2.1.28 The Assembly of Clergy gives a good base for discussing safeguarding with all parishes and developing greater consistency in approaches and practice locally. Safeguarding at strategic level is discussed at each meeting with regular input from the DSA and external speakers.

Questions for the diocese to consider

- How can the strategic plan be broadened to include clear priorities, outcomes and impacts from which to measure progress and provide a clear vision of where the diocese would like to be in the future?
- How might oversight and ownership of the strategic plan be better brought into effect?
- How might the diocese strengthen strategic oversight of safeguarding, specifically the provision of clear lines of accountability between the SMG, DSAG and the DRAMT?
- Is there an appetite for amalgamating the more operational plan and the strategic plan to broaden priorities and themes and to draw in the expertise of the DSAG and DRAMT?

OPERATIONAL LEADERSHIP OF SAFEGUARDING

Introduction

2.1.29 Senior clergy leadership and management of the operational work of safeguarding is needed to provide oversight of safeguarding in a diocese, including identifying any barriers to implementation that need tackling. It is also needed for accountability purposes, particularly when the safeguarding service is delivered through collaboration between clerics, staff and laity. Operational leadership and management by the clergy can be seen as providing a strong link to the strategic leadership of senior clergy and ultimately the Bishop. It is distinct from an operational decision-making responsibility.

2.1.30 There are inherent challenges to clergy, as non-specialists in safeguarding, fulfilling the operational leadership and oversight of safeguarding, given it is a specialist function. However, leaving the centralised operations of safeguarding in a diocese without any clergy-led governance and oversight would also weaken

the safety of safeguarding arrangements

Description

- 2.1.31 Daily operational leadership for safeguarding remains formally with the Bishop, but in practice is delegated to the Vicar General, who works closely with the Bishop and the DSA. The Bishop is clearly part of safeguarding decision-making and there is a close collegiate approach to safeguarding work. Between SMG and DSAG meetings, the DSA, Vicar General and the Bishop meet or speak regularly regarding safeguarding.
- 2.1.32 The DSA is highly respected by those with whom they have had contact or worked with. Of those who contributed to the survey, 89.6% (n=95) stated that the safeguarding support they received from the diocesan office was good and there was a high level of confidence in the DSA and diocesan team's ability to provide assistance.
- 2.1.33 Operational arrangements for disagreement between the recommendations from the DRAMT and the Bishop are currently being discussed. While the Bishop has never disagreed with such recommendations, he was clear that this might become an issue in the future and therefore should be addressed. Auditors heard of the Standing Panel in England and Wales which the Bishop felt would be a way forward in such a situation. The Bishop referred to the development in the Catholic Church in England and Wales in which a commission, independent of dioceses, is being established to examine and adjudicate on particular allegations referred to it. The Bishop wondered if this commission might be open to acting as a review board in any case where a Scottish Bishop and his DRAMT could not reach agreement.
- 2.1.34 Issues of operational safeguarding are delineated from complaints such as conduct issues or bullying behaviour which require addressing but do not necessarily meet the criteria of safeguarding. Auditors saw evidence of a flow chart used to ensure that where this is raised as a safeguarding issue, but later is found to be a conduct issue, this is carefully considered and refocused via disciplinary or complaints processes which are managed by the Vicar General.

Analysis

- 2.1.35 Operational leadership within the Diocese of Paisley is a strength, in particular the recognition of the possibility for disagreement and proactive planning for how to manage this, and the demarcation of what is safeguarding and what is not. Decisions and the process of decision-making are clearly recorded. As with strategic leadership, however, the links between operational and strategic planning could be made stronger through the linking of plans and a broader strategic oversight through the DSAG drawing in learning from the DRAMT.
- 2.1.36 The DSA is clear about the operational role. She is well known, visible and proactive at every level, taking operational duties seriously. The survey showed a clear respect for the DSA's work and included comments such as, 'Safeguarding is taken very seriously in our parish and Diocese', 'There are rigorous procedures

in place as regards safeguarding' and 'we are continuously informed of any training we require in our roles in church and in the diocese'.

2.1.37 Links operationally between the DRAMT and DSAG are in place via the same independent chair and through attendance at both by the DSA, but currently the thematic learning from operational discussions at the DRAMT does not effectively inform the strategic plan via the DSAG because, as previously discussed, the strategic plan is overseen in the main by the SMG.

2.1.38 Currently the SMG meets formally only quarterly. Auditors reflected that operational leadership could be strengthened with more regular and formal meetings between the Bishop, DSA and Vicar General who are the core SMT. The quarterly SMG meetings work well, but act as a reporting mechanism to trustees and might not provide the opportunity for assessing the effectiveness of safeguarding generally at every level across the diocese. While this core group of leaders do meet regularly, it could be better utilised to formally tie all aspects of safeguarding together.

Questions for the diocese to consider

- How might thematic operational learning from cases presented at the DRAMT be better captured in strategic planning?
- What might be gained from a more regular and formal meeting of the core safeguarding management team to tie together all levels of safeguarding across the diocese?

2.2 DIOCESAN SAFEGUARDING ADVISER

Introduction

2.2.1 The DSA, along with the DSAG and DRAMT remain key to the infrastructure as set out in *IG/v2*, to advise and assist the Bishop to fulfil safeguarding responsibilities.

2.2.2 The role is summarised at 6.2.2 in *IG/v2*:

The role of the diocesan Safeguarding Adviser (DSA) is to advise and assist the bishop in meeting his safeguarding responsibilities. These include endeavouring to protect children and vulnerable adults in their contact with Church personnel, in Church activities, and on Church property.

2.2.3 *IG/v2* (6.2.2) continues to explain that the DSA is responsible for:

- coordinating efforts to raise awareness of safeguarding within parish communities, including the training of PSCs, the recruiting of diocesan safeguarding trainers and the safeguarding training of

diocesan clergy

- advise the bishop on good practice in responding to safeguarding concerns and allegations of abuse
- collaborating closely, not only within their diocesan teams, but with safeguarding colleagues across the country, as well as with the statutory authorities; and
- as the main link between the diocese and the Scottish Catholic Safeguarding Standards Agency, the DSA is responsible for promoting national safeguarding standards and demonstrating compliance with them.

2.2.4 Membership of the DSAG must include the DSA (6.2.3) and, in relation to the DRAMT (6.2.7) in the absence of any allegations for any significant period of time, the DSA should support the DRAMT by providing some scenarios of the types of allegations that might arise. In this way the DRAMT will be able to practise its skills and develop its understanding of the complex situations that might arise at any time.

2.2.5 It is recommended that the DSA role should be undertaken by an appropriately qualified and experienced layperson.

Description

RESOURCING AND RELATIVE ROLES

2.2.6 The DSA in Paisley has been in post for six years. The post itself is paid, but currently the DSA is a volunteer, working when required. The DSA describes the role as requiring a range of knowledge and more than one skill set. This includes knowledge such as the law and practice in relation to child and adult protection, and attributes such as empathy, being able to listen to and talk with survivors, and skills in communication and teamwork to cover both the operational and strategic safeguarding work.

2.2.7 The role of the DSA is well supported by the Bishop, the Vicar General and the Safeguarding Administrator and Head of Administration. The DSA attends the DSAG and provides minutes for each meeting. All allegations made within the Diocese of Paisley are referred directly to the DSA in line with *IG/v2*. If appropriate, the DSA convenes a DRAMT meeting, chaired independently, where cases are discussed and actions agreed. The DSA carries out casework and reports progress and broad concerns to the Curial (SMG) meeting quarterly.

2.2.8 The DSA, assisted by the Safeguarding Administrator, deals with all queries in relation to safeguarding and regularly links with PSCs for training and when safeguarding issues are raised locally.

2.2.9 The DSA has been instrumental in setting up a network of all the DSAs across Scotland to discuss national policies, procedures and tools. Auditors heard that this is useful and has become a valuable network, particularly during the absence

of a national safeguarding group while the new SCSSA is set up and embeds.

RESOURCES

2.2.10 The DSA has a base in the diocesan office and is provided with the required office resources for the role. However, some of the work is done remotely.

2.2.11 The DSA has administrative support through the Safeguarding Administrator who oversees the Protection of Vulnerable Groups checks (PVGs) and training records, as well as safe recruitment qualifications.

2.2.12 The DSA is a lawyer and has extensive legal experience.

CONFLICTS OF INTEREST

2.2.13 There are no known conflicts of interest for the DSA in this role.

LINE MANAGEMENT AND SUPERVISION ARRANGEMENTS

2.2.14 The DSA receives supervision from the Vicar General which works well. Currently there is no professional reflective supervision in place for the role, but the DSA feels well supported by the DSA network, the SMG and the DRAMT. More formal professional supervision is being considered and the diocese is hopeful that this might be offered by the new SCSSA.

Analysis

2.2.15 The DSA brings a high level of expertise to the role. She has a legal background which she has found useful in terms of being able to challenge. A knowledge of the law, outside Canon Law, provides an understanding of civil and criminal liability and confidence in expressing the importance of apologising when individuals who have experienced abuse come forward. The DSA is widely known and respected by parishes and external partners.

2.2.16 The DSA works closely with the Bishop, Vicar General and the independent chair of both the DSAG and DRAMT. Auditors saw a communicative culture where any individuals wanting to contact the diocese regarding safeguarding, including survivors of abuse, are made welcome and provided with time to talk. Links with PSCs and safeguarding trainers were evident and 82% of survey participants (n=95) felt that communication between the diocese and parishes regarding safeguarding was good.

2.2.17 Following the introduction of *IGIv2* and as the SCSSA gets underway, it might be a useful time to reflect on the role of the DSA to ensure it remains manageable, particularly where caseloads are high. The role set out in *In God's Image* was originally focused on operational work, but it now has a greater developmental aspect, which may increase the role. Professional reflective supervision would

also assist in recognising where this might become an issue.

Questions for the diocese to consider

- What is required to ensure that the role of the DSA does not become untenable due to an increase in duties?
- How might the diocese better provide professional supervision for the DSA role with formal links to line management?

2.3 DIOCESAN SAFEGUARDING GROUP

Introduction

2.3.1 The DSAG along with the DRAMT and the DSA is a core part of the safeguarding infrastructure, whose function it is to support the Bishop in his responsibilities for safeguarding.

2.3.2 In *IG/v2*, the role and membership of the DSAG is set out at 6.2.3:

The Diocesan Safeguarding Advisory Group (DSAG) should consist of people with relevant experience and skills, appointed by the bishop to support the DSA and to ensure diocesan-wide adherence to the safeguarding standards to which the bishop is co-signatory. Their responsibilities should also include analysis of the annual safeguarding audits, the formulation of the diocesan safeguarding action plan and the planning of relevant safeguarding training for clergy, religious, PSCs and volunteers. Membership of DSAG must include the DSA. Its work may be enhanced by the involvement of representatives of relevant diocesan groups – e.g., Pilgrimage leaders, SPREd, Youth Office, and religious congregations – for whom safeguarding is particularly significant.

(*IG/v2* 2021, p.68)

2.3.3 Sections 8.3.1–8.3.3 in *IG/v2* set out the DSAG monitoring role and consider the implications of results of the parish audit for training, support and further improvements. This analysis and reflection, together with any recommendations emerging from any independent reviews of safeguarding practice, should enable the DSAG to prepare a safeguarding action plan that will address some areas of improvement required within the diocese over the subsequent year. The actions planned should be measurable and achievable, and be sharply focused on the intended outcomes of each action.

Description

2.3.4 In line with *IG/v2*, the Diocese of Paisley has a DSAG. The DSAG is

independently chaired by a volunteer who is a qualified social worker currently working for the local authority. The group is attended by the DSA with representation from a wide remit of attendees drawn from relevant professional backgrounds including social work, police and Canon Law as well as lay groups across the diocese.

- 2.3.5 The DSAG discusses a wide range of topics related to safeguarding and all are minuted. The Strategic Safeguarding Plan, overseen by the SMG, is examined at every meeting as is the operational Safeguarding Action Plan, which is updated and overseen by the DSAG and includes information and actions from the annual parish audits.
- 2.3.6 The DSAG has a wide range of professionals from which to draw. There is a balance of genders represented on the DSAG but the chair reflected that a younger demographic and representatives from some of the broader communities within the Paisley diocese might also add a different dynamic.
- 2.3.7 Auditors met with the independent chair and one other member of the DSAG. Both felt that the DSAG works well and is a useful forum, in particular for sharing information and good practice.

Analysis

- 2.3.8 The current chair has been a member of the DSAG for 15 years and became the independent chair in 2016. The chair has a background in children and families and criminal justice social work. The chair is aware of the impact of abuse on families and has worked in the management of sex offenders, so bringing a varied background and experience in social work to the role.
- 2.3.9 As discussed earlier, the DSAG has sight of, but is not responsible for the Strategic Safeguarding Plan. Instead, the DSAG's oversight and drive is for the operational Safeguarding Action Plan. Currently the DSAG acts more as an exchange of information which, while extremely useful, could be better utilised to drive the safeguarding strategy and provide strategic oversight across the diocese. For example, other dioceses have allocated a strand from *IG/v2* to individual members on which to lead. This help to develop a wider ownership of the strategy and links the Strategic Safeguarding Plan with the operational Safeguarding Action Plan, enabling the DSAG to act more strategically. The work of the Paisley DSAG remains mainly operational and currently lacks a strategic remit. Instead, the link between the DSAG and the Curial group of the trustees and Treasurer is unusually strong and adds an additional layer of strategic oversight. In making the DSAG more strategic, the diocese should not lose links with trustees.

Questions for the diocese to consider

- How might the current remit of the DSAG be re-established to give a more strategic remit?
- How can the Strategic Safeguarding Plan better link with the operational Safeguarding Action Plan and be further developed, spanning a longer length of time?
- How might the DSAG become more diverse in nature?

2.4 DIOCESAN RISK ASSESSMENT MANAGEMENT TEAM

Introduction

2.4.1 *In God's Image* sets out that the DRAMT along with the DSAG and the DSA is a core part of the safeguarding infrastructure, whose function it is to support the Bishop in his responsibilities for safeguarding.

2.4.2 *IG/v2* 6.2.4 states that:

Members of the diocesan Risk Assessment Management Team (DRAMT) are appointed by the bishop to assist him, within the strict limits of the law, in the management of individual cases where allegations have been made against a diocesan cleric, employee or volunteer. This team's advice and recommendations should assist the bishop to come to decisions about how to proceed, in accordance with both civil and canon law, in response to reported allegations and concerns. The DRAMT should comprise a small number of individuals with relevant expertise, including those with experience of working in the legal profession, in canon law, in healthcare, social work and the police. Its composition should be mixed, in numbers of ordained and lay members, and in their gender.

2.4.3 The detail of the DRAMT outlined in *IG/v2* does not address the previous identified potential conflicts of interest. These hinge on the advisory nature of the DRAMT. The DRAMT gives advice and recommendations, but decision-making authority remains with the Bishop/Archbishop. This means he is making decisions about the clergy, employees or volunteers for whom he also has pastoral responsibilities. The relationship between a volunteer and Bishop may be more distant, but bishops appoint and ordain priests, make decisions about many aspects of their lives and have the responsibility for their pastoral care, including when they have safeguarding allegations made against them (see Standard 5). This makes it essential that there are clear processes for identifying and dealing with disagreements where they emerge between the DRAMT and Bishop/Archbishop so they can be resolved swiftly and transparently.

Description

- 2.4.4 The Diocese of Paisley has an active DRAMT consisting of the same independent chair as the DSAG, the DSA, Vicar General and representatives from education, police and health. The Bishop does not sit on the DRAMT, but receives a report of concerns with recommendations from the DRAMT. Meetings are called when required by the DSA to whom all allegations and potential safeguarding concerns are referred.
- 2.4.5 DRAMT members described being asked to consider blemished PVGs, assess their potential risk and provide recommendations to the Bishop. The DRAMT also consider assessing levels of risk in relation to Safe Worship Plans, which are reviewed by the DRAMT after six months. DRAMT members described that this process works well and, in most cases, the DSA has a discussion related to the possible risk with the parish priest following the DRAMT meeting.
- 2.4.6 Where an individual on a Safe Worship Plan does not comply or the plan is not working well, auditors heard that the Bishop is able to apply sanctions, however, the DRAMT felt it better to keep an individual worshipping in a known church. The auditors heard that the DRAMT had been successful in managing plans in such circumstances.
- 2.4.7 Where an allegation of concern is received which engages the Church's mandatory reporting policy, the DSA makes an immediate report to the police Public Protection Unit (PPU) contact, copying in the Bishop and Vicar General. The DRAMT is then convened as quickly as possible following this. Advice is taken from the police to inform the DRAMT's risk assessment.
- 2.4.8 All allegations against parish priests are referred to the DRAMT and meetings are always held between 24 hours and seven days of the concerns being raised, depending on the urgency of the presenting issues and availability of DRAMT members, although all members make their attendance a priority. DRAMT meetings are usually held face-to-face.
- 2.4.9 The DRAMT has a formal terms of reference and one new member described being impressed with the information provided to her on induction.
- 2.4.10 The DRAMT has in place a clear process flow chart which is used in all cases. In addition, as discussed previously, the flow chart separates issues of safeguarding from those which are later felt to be more a conduct or disciplinary issue. The flow chart ensures that relevant actions are considered.
- 2.4.11 PVGs blemished with low level concerns such as driving offences which do not have a bearing on the role are not referred to the DRAMT. Protocols for such decision-making have been written, agreed and are working well. Auditors saw clear records regarding blemished PVGs in the form of a database recording decisions made and their rationale.
- 2.4.12 There are currently no arrangements in place should the Bishop disagree with recommendations made to him by the DRAMT, but as previously mentioned the Bishop and DRAMT understand that this could become an issue in the future and have already identified a Standing Panel in England which they could make use

of in such an eventuality.

Analysis

- 2.4.13 The DRAMT in Paisley is a strength. Thresholds for calling a DRAMT meeting are clear and well recorded by the DSA. Decision-making follows the terms of reference for the DRAMT and its flow chart. The diocese has thought carefully about the potential for disagreement arising from assessment of risk by the DRAMT and are making enquiries about where such disagreements may be escalated if required. The DSA and independent chair of the DRAMT have a good working relationship and backgrounds that prepare them well for challenge.
- 2.4.14 The remit of the DRAMT is clear to its members and has a secure role in diocesan decision-making. Membership and arrangements for the DRAMT are in place as are reviews of those on safeguarding agreements such as Welfare Monitoring Plans and Safe Worship Plans and the group has continued to meet regularly. There is a good level of induction for new members.
- 2.4.15 What was less clear, however, is how the DRAMT is held to account for its remit and who it reports to. The independent chair felt that any concerns would be reported into the DSAG via either the chair or the DSA who sit on both groups. This is not formally noted, however.
- 2.4.16 As with the DSAG, a reflection on any additional skills required for the DRAMT would be useful. Auditors heard that currently there is no one on the DRAMT with a mental health background which some felt would be a useful addition, particularly post pandemic.

Questions for the diocese to consider

- How might the diocese formally broaden the pool of expertise from which it can draw DRAMT membership?
- How can the diocese mitigate against any disagreement between the DRAMT members and the Bishop? What system and protocol needs to be put in place in order to use any external panel for escalation if required?

2.5 LINKS WITH THE SCOTTISH CATHOLIC SAFEGUARDING SERVICE

Introduction

- 2.5.1 In early 2021, the National Coordinator for the Scottish Catholic Safeguarding Service (SCSS) left their post and the BCOS took the opportunity to review the role of the national Safeguarding Service in line with the revisions to *IG/v2*.
- 2.5.2 The recent publication of *IG/v2* states that: 'At the time of publication, the

Bishops' Conference of Scotland have decided to replace SCSS with the Scottish Catholic Safeguarding Standards Agency (SCSSA) (p.73). The role of this new agency will be:

- to develop and promote the 'culture of care' that should be the hallmark of the Church's safeguarding efforts
- to be informed by those who have been harmed by abuse
- to provide strategic leadership and direction in safeguarding to all components of the Church in Scotland
- to promote and regulate consistent compliance with safeguarding standards through the provision of training, the development of common resources and other forms of support
- to develop the culture of an annual improvement cycle involving audits, analysis, planning, training and sharing of good practice
- to commission or undertake independent scrutiny of safeguarding practice in all jurisdictions
- to report on the outcomes of audits and reviews in transparent ways
- to coordinate a safeguarding complaints system that is transparent.

Analysis

2.5.3 The role of the new agency is set out in *IG/v2*. The appointment of board members has now been published. The agency is not yet fully in place with operational posts currently being advertised. Clarity is needed on the task and roles which will fall to the national agency and which are the responsibility of each diocese.

Questions for the diocese to consider

- How might the diocese take forward ideas for a different model and structure with the SCSSA and BCOS?

2.6 GUIDANCE, POLICIES AND PROCEDURES

Introduction

2.6.1 A working group of DSAs developed a set of templates for essential policies and procedures which should be in place within each diocese and archdiocese to each of the standards in *IG/v2*.

Description

- 2.6.2 The Diocese of Paisley has in place a range of comprehensive policies which are in line with those set out in *IG/v2*. The DSA and DSAG have favoured the production of policies alongside practical guidance for PSCs and there is now a full set of protocols for each requirement carried out within the diocese; for example, blemished PVG protocols, social media guidance and a live streaming protocol.
- 2.6.3 The Diocese of Paisley has a section of its website dedicated to safeguarding, including information for survivors of abuse (see Section 2.9). The website has links to the annual safeguarding statement read out in all parishes, national safeguarding newsletters, information regarding the new SCSSA, mandatory reporting and BCOS advice on safe social media.
- 2.6.4 The diocese has also produced a PSC induction pack incorporating the remit of the role, a welcome for new PSCs and a code of conduct (discussed further in Section 2.12) which outlines the key policies and procedures for those undertaking that role and where to seek further advice and support.

Analysis

- 2.6.5 The policies, procedures and protocols in place in Paisley are good. Materials are comprehensive and well written, covering every role and action related to safeguarding.
- 2.6.6 All policies have been reviewed and are written in line with *IG/v2*. The diocese has also developed a General Data Protection Regulation (GDPR) flow chart outlining how it processes personal information, which is excellent and is also published on the website.

Questions for the diocese to consider

- Where does the responsibility for oversight of diocesan policies lie and how might a rolling programme of review of policies be beneficial?

2.7 COMPLAINTS AND WHISTLEBLOWING

Introduction

- 2.7.1 A complaints process is required so that anyone who has contact with the diocese about safeguarding knows how to complain should they feel they need to. A strong policy is clear about who complaints should be made to, and how they can be escalated if necessary. Positive features include an independent element, and clarity that raising a safeguarding concern, and making a complaint about a safeguarding service, are two distinct things. The outcome of complaints enables an organisation to learn from those who have had to use their service,

enabling the organisation to make any necessary changes or improvements.

- 2.7.2 Whistleblowing and complaints procedures can be part of a general complaints procedure, but it is important that the process for making a complaint about the safeguarding response or service is clear and is different from sharing safeguarding concerns or allegations.
- 2.7.3 While 'complaints' or 'whistleblowing' did not feature within *In God's Image, IGlv2* now sets out at 8.6.4 (p. 89):

In collaboration with dioceses and religious institutes, the SCSSA will co-ordinate a national policy on a tiered process of responding to a complaint about how a safeguarding allegation has been handled in any jurisdiction. Anyone wishing to make such a complaint will be able to do so, either to the original diocese/religious institute which handled the allegation or directly to SCSSA. The process will include, as a final stage, a case review managed by an independent party.

Description

- 2.7.4 The Diocese of Paisley has a complaints policy in place which is in line with *IGlv2* and can be found on the diocesan website. The policy covers all types of complaint, including any regarding the safeguarding service.
- 2.7.5 There is also a clear and well written whistleblowing policy in place which outlines what the individual can expect in terms of how they will be treated, the process and timescales.

Analysis

- 2.7.6 The complaints policy is well written and provides real clarity between what might constitute a complaint and what should be channelled through safeguarding processes. This fits well with the DRAMT flow chart and clearly separates actions required; for example, the differences between a complaint about the behaviour of a parish priest which could constitute bullying or favouritism as opposed to an allegation of abuse.
- 2.7.7 The complaints policy is included on the diocesan website, but is not easy to find and could perhaps be referenced in the safeguarding pages. The whistleblowing policy is not included on the website. The auditors felt this would be a useful addition to the website and to reference both the safeguarding and complaints policies on the safeguarding pages.

Questions for the diocese to consider

- There were no questions for the diocese to consider.

2.8 CASEWORK

Introduction

- 2.8.1 In order to manage concerns well and respond to allegations there must be a system in place which clearly defines escalation for seeking advice regarding concerns and reports of abuse. There should be effective and clear recording of issues and incidents which are kept securely and are compliant with GDPR 2018. Integral to managing concerns well is the requirement to work jointly with statutory agencies and to debrief and reflect on any areas of weakness in order to improve practice.
- 2.8.2 The auditors looked at a range of casework material that was identified by the diocese as related to safeguarding. This included general enquiries dealt with by the DSA.
- 2.8.3 The auditors focused on recording systems, quality of response to allegations, information sharing, risk assessments and safeguarding agreements. For this section, description and analysis are presented together for each sub-section.

RECORDING SYSTEMS

Description

- 2.8.4 Case files in the Diocese of Paisley are electronic and all are held by the DSA. Each file is allocated a case number and includes a chronology and precis of the case, making it easy to follow. Outcomes are also recorded, making clear the rationale for closing the file.
- 2.8.5 Paisley has a relatively high number of cases. The auditors viewed eight case files showing a range of safeguarding allegations and concerns managed by the diocese. Case files showed supportive and sensitive handling with pastoral support. Responses to those raising concerns were extremely rapid, and on several occasions on the same day.

Analysis

- 2.8.6 Safeguarding case files were very well presented and well organised with a comprehensive chronology. There was good communication between the DSA and the Bishop and evidence of referral to other agencies such as Police Scotland. Consideration for those accused was also evident in case files as well as challenge to other agencies where support or a timely response was not forthcoming. Feedback from partner agencies related to casework was positive.

Questions for the diocese to consider

- There were no questions for the diocese to consider.

QUALITY OF RESPONSE TO CONCERNS AND ALLEGATIONS AND INFORMATION SHARING

Description

- 2.8.7 During the timescale of the audit, the Diocese of Paisley was able to provide examples of the management of allegations and how they are managed. From the case files, it was evident that concerns and allegations are addressed quickly and all are referred to the DSA, who then convenes a meeting of the DRAMT.
- 2.8.8 The Church's mandatory reporting policy means that disclosures of harm or abuse, past or present, are reported to Police Scotland in all cases regardless of whether or not the individual wishes to contact the police. Auditors saw evidence of discussion with Police Scotland regarding this and in all cases any investigation by the diocese did not take place until Police Scotland had confirmed no further action.
- 2.8.9 Mandatory reporting was instigated by the Catholic Church in Scotland to ensure the reporting of concerns and to provide transparency and clear process for those disclosing abuse. Auditors heard from some *contributors*, however, that a visit from uniformed police had caused real distress and was described by one *contributor* as 'the most traumatic part'. The diocese mitigate against this by ensuring the need for mandatory reporting is explained to those raising concerns prior to them continuing to disclose. The diocese felt that mandatory reporting was important to guard against previous practice where not all disclosures were actioned in the past.
- 2.8.10 Allegations are managed by the diocese through the DRAMT, which follows a robust process laid down in a flow chart which is used in each case. The DRAMT provides recommendations to the Bishop, who is not a member. In most cases, the DSA feeds back to the parish regarding the management of allegations. Disclosing abuse is not a single event for individuals who sometimes need significant support following disclosure, which changes over time. The need to provide support to both individuals disclosing and to clergy was recognised by the diocese.
- 2.8.11 Action is taken on all cases including those which may have been referred to the DRAMT as a safeguarding issue, but later transpired to be an issue in relation to workplace conduct or an individual's circumstances.
- 2.8.12 As previously mentioned, recently parish priests have attended a seminar called *Grief to Grace*, which was followed by a second seminar from the DSA in Glasgow which looked at how the principles of *Grief to Grace* has better equipped parish priests to deal with disclosures and allegations.
- 2.8.13 All those making allegations or raising concerns are provided with an offer of support and an opportunity to talk through what has happened with the Bishop. Auditors heard from *contributors* that the Bishop of Paisley is supportive and saw evidence of the Bishop meeting with individuals to hear and listen to their concerns. Case files show swift and sensitive handling with pastoral support

offered to those involved.

Analysis

2.8.14 There is good support from the Bishop and DSA to those making allegations. The referring of allegations and concerns to the DSA and through the DRAMT works well and means that all are considered through a clear process. Support and direction for parish priests who might struggle to support individuals is in place and is regularly discussed.

2.8.15 The diocese is aware of the concern from some *contributors* about mandatory reporting and has mitigated against this by being clear about when this is required before the point of an individual disclosing more. Adult survivors often need time to reflect on the issues they have raised and to speak with family and friends and this is recognised in Paisley. Auditors judged this to be good practice although reflected that it might prompt further discussion through the BCOS around mandatory reporting.

2.8.16 Auditors heard from one *contributor* who had disclosed several times over a long period of time and so was able to provide reflections about the change in response over time. This individual felt that the response from the diocese was now very different from past experience, and that support and care had been offered by the Bishop. The *contributor* also felt that parish priests more recently had been very supportive in their pastoral care.

Questions for the diocese to consider

- What support could be provided for parish priests on a more individual basis to assist in supporting others and implementing the principles of Grief to Grace?
- Who would need to be part of discussions about how the diocese can best respect the wishes of adults who come forward to disclose abuse but do not wish to give consent in the context of the Church's mandatory reporting?

RISK ASSESSMENTS AND SAFEGUARDING AGREEMENTS

Introduction

2.8.17 *IG/v2* states that:

When a high risk offender expresses a wish to participate in one or more religious services in a parish, an assessment of potential risk of harm must be made by the statutory authorities. Police Scotland has agreed an Information Sharing Protocol which is governed by the system known as the Multi Agency Public Protection Arrangements (MAPPA). The police service, prison service, health service, local authorities, and others are

statutorily obliged to operate on a multiagency basis, with the objective of protecting the public from the risks that may be posed by Serious Criminal Offenders, including sex offenders.

2.8.18 It further specifies that when a high risk offender wishes to attend a service in a Catholic church, the relevant personnel from Offender Management or Criminal Justice should contact the DSA (or religious equivalent) to discuss if it is possible to create a safe context for the individual to worship in a church following the implementation of a Safe Worship Plan. For those not subject to formal statutory supervision through MAPPA, but where there are concerns, restrictions or allegations that indicate a possible risk of harm, the DRAMT in liaison with the DSA, parish priest and PSC will develop and agree with the respondent the terms and conditions of the required Safe Worship Plan, including a review timetable and an agreement term. Plans should be reviewed within six months.

2.8.19 *IG/v2* has also expanded on the role of the support priest to the role of support person when a priest or religious is asked to respond to an allegation of abuse. As *IG/v2* states at 5.3.1:

Pending an investigation, the bishop/major religious superior must offer the support of a priest, religious or layperson who will monitor the conduct and welfare of the respondent through what will be a difficult process. The appointment of this support person must be made in discussion with the respondent and following advice from the DRAMT (or religious equivalent). The respondent is NOT obliged to accept the offer of a support person.

2.8.20 It continues at 5.3.2:

The person appointed to the role of Support Person should be reliable, trustworthy, discreet, honest and wise. She/he should possess good pastoral qualities and be able to respond to others with empathy, but must also be able to observe firm boundaries in interactions with others. She/he should understand how to identify risk-taking behaviours.

Sections 5.3.3 and 5.3.4 then set out what is within the remit and role of the support person and, importantly, what is not.

Description

2.8.21 Processes of assessment of risk have been developed via the DRAMT and consistent formats for assessing and identifying risk and recording recommendations are in place. The diocese is currently managing some Safe Worship Plans and has in place information on potential plans for the future where parishioners are currently serving prison sentences. Plans are reviewed

by the DRAMT every six months.

2.8.22 Auditors saw evidence of the management and monitoring of plans which include which Mass an individual should attend, who they contact on arrival and where they sit. There is also evidence of good engagement between the DSA, PSCs and parish priests as well as external agencies in the identification of concerns and the management of individuals.

2.8.23 Within *IG/v2*, the provision of support has changed from the support priest to a support person. The diocese currently has one support person in place for parish priests who have allegations of abuse made against them. Training was provided in October 2021 at a national training event run by the Archdiocese of Glasgow. Support person training had been identified by the DSAG as an urgent training need but further training for others will be offered nationally by the new Head of Training.

2.8.24 Currently there are no welfare monitoring plans in place arising from safeguarding issues. Auditors heard that should the need arise for such a plan, these would be overseen by the DRAMT. General clergy welfare and non-safeguarding disciplinary matters are managed by the Bishop and VG.

Analysis

2.8.25 DRAMT members are appropriately called upon to monitor Safe Worship Plans every six months. DRAMT meetings are called as required to assess and manage risk and to support any ongoing Welfare Monitoring Plans for those within the Church who have had allegations made against them. Where the parish has concerns, these are referred back to the DRAMT for further risk assessment although there are currently none in place.

2.8.26 Members of the DRAMT have a good knowledge of risk assessment and working with risk and there was evidence from the case files and minutes that members challenge when required. It would be timely for the DRAMT to discuss the type of training and advice members might require when dealing with offenders, who might be manipulative.

2.8.27 The diocese should also begin thinking about a pool of support persons to assist in the process of monitoring; what skills are required and what training can be offered to ensure such a skill set, and might they be drawn from a cross section of communities?

Questions for the diocese to consider

- What is needed to begin to identify support persons and what should be in place to support these individuals?
- How can the diocese ensure high quality support, including challenge when required, for those who have an allegation made against them?

2.9 SUPPORTING SURVIVORS

Introduction

2.9.1 Standard 4 of *IG/v2* relates to providing care and support for survivors:

We acknowledge, with 'sorrow and shame', that the Catholic Church's past response to those disclosing abuse was often characterised by denial and rejection. Those who wished to disclose experiences of abuse were often ignored at first and later marginalised. In recognising these past failures, the Church has committed to responding more compassionately and effectively to those who wish to disclose the pain of their experience.

(Bishops' Conference of Scotland 2021, p.45)

2.9.2 *IG/v2* continues:

... the Church must now show that:

- We are prepared to listen and to give credence to survivors.
- We wish to help survivors to feel welcome and trusted.
- Our first response is to ask survivors: "'What do you need us to do for you?'.
- We are committed to help survivors to re-build their lives.

(Bishops' conference of Scotland 2021, p.45)

2.9.3 An important part of the audit was to seek the views of survivors, as well as those working in the diocese.

Description

2.9.4 The DSA in Paisley has a clear remit to work with survivors of abuse and to offer services to support as early as possible. Auditors saw evidence throughout casework of good support for survivors which was well managed. The DSA and the Bishop understand that survivors are individuals and that their support and pastoral needs change over time.

2.9.5 Support for survivors of abuse takes the form of counselling offered via the Raphael Counselling Service, however the Bishop has offered alternative counselling and additional support when required, in discussion with individuals. The *contributors* advised that a 'one size fits all' approach to counselling for those who have been abused does not take account of their changing needs or the requirement for different types of counselling such as Cognitive Behavioural Therapy (CBT) when needed.

2.9.6 *Contributors* also raised the importance of spiritual support as part of their offer of support, particularly where in addition to the abuse itself there are other issues individuals need to address. Sometimes it is those original issues which made them more vulnerable to the abuse they have suffered. While the numbers of

contributors to this audit were small, this echoes comments and feedback from those who contributed to all previous audits.

- 2.9.7 Auditors also heard that the time-limited nature of such support undermines an individual's self-worth and is not helpful. The Bishop and DSA understood this and are keen to offer a broader range of services as well as a broader range of approaches including individual counselling and retreats which are able to examine the move from emotional and clinical support to more spiritual support. A range of approaches is currently being considered. Feedback from survivors with whom the diocese is in contact will be sought to inform decision-making on all aspects of the strategic action plan including future offers of support.
- 2.9.8 The Bishop maintains contact with survivors who wish it and takes time to talk and listen on a regular basis. Contributors were appreciative of this, but felt that their earlier disclosures had fallen short of what happens now and that this had increased their trauma, making it more difficult to be trusting of those who now wish to help.
- 2.9.9 The diocesan website has separate pages dedicated to those who have suffered abuse or to those supporting them. This includes information about alternative sources of support should an individual not wish to disclose to someone within the Church. In addition, the diocese provides a leaflet for survivors and has, in response to working with a survivor, provided posters signposting survivors to support.
- 2.9.10 Many contributors and participants expressed the need for an apology when they come forward and felt that the Church was discouraged from doing so as this would amount to an admission of liability for their abuse. As mentioned earlier, the DSA is clear that the diocese should be listening and making an apology. Paisley has included the wording of Archbishop Tartaglia's public apology to survivors on behalf of the Catholic Church of Scotland in full on the website. This allows individuals to access and read the statement as often as they need to. The Bishop felt this was an important part of being transparent and reinforcing the message of support to survivors of abuse. Despite this, the auditors heard that, for some, this was too late: 'someone on your side is really important. Not listening and later apologising isn't helpful'.
- 2.9.11 Some, but not all, contributors described compassion being at the heart of the diocese's response and in particular had received a compassionate initial response from the Bishop. Several had heard about the audit from their local parish and felt this reflected the willingness of those within the diocese now to become involved in safeguarding. They reflected on this being a real change to what they had found in the past.
- 2.9.12 As in other dioceses, some but not all contributors felt a strong desire to have access to others in their position in order to feel less isolated, possibly in a group setting for those who have suffered abuse within the Church and who live in the diocese.
- 2.9.13 Some contributors raised the damage abuse has caused to their religious belief and ability to attend Mass or receive Holy Communion. Some had moved away from their faith completely. One contributor spoke of being asked to assist the diocese in its offer to those who have suffered abuse and to help those who wish

to return to the Church. Auditors heard that this should, 'begin with meditative prayer in a place which isn't connected to the Church, led by survivors themselves'.

2.9.14 As heard elsewhere, the development of the approach to survivors needs to be taken forward operationally and strategically by individual dioceses and nationally through the BCOS. Some of these issues are broader than Paisley alone.

Analysis

2.9.15 Auditors judged that the approach to working with survivors in Paisley is good. There is an excellent understanding of the journey undertaken by a survivor from making a disclosure through to the need for individually tailored and flexible professional support, sometimes outwith the Catholic Church.

2.9.16 Paisley's offer of counselling sessions from Health in Mind is useful, but those working in safeguarding within Paisley understood that a more bespoke service might be required in discussion with the individual. The diocese has made a start on learning from survivors but consideration should now be given to how the diocese might reach out to survivors, to hear and learn from them about their experiences in order to better inform the work of the diocese.

2.9.17 The DSA has begun this work by thinking carefully about the support required nationally for survivors and has been instrumental in putting forward three possible options for the provision of a Survivor Advisory Panel in Scotland in a paper to the new SCSSA. The DSA will lead the work of the Survivor Advisory Panel sub-group and, as part of this, has already engaged with survivors, seeking their reflections on the proposed work of the national panel. Auditors judged this to be a significant step forward for the Church nationally and that such reflections could be replicated locally at diocesan level to assist those in parishes and deaneries.

2.9.18 Currently there is no survivor group offered within the diocese, but the Bishop has begun to seek survivors' views about how support might be taken forward and what form this would take. Developments should include a strategic overview of support for survivors, which can be taken forward operationally, with input from survivors themselves, for individuals who might wish to be involved.

2.9.19 Until this time, there are details of various support mechanisms on the diocesan website which provide options for support other than from the diocese should individuals prefer. Auditors judged it especially good to include the wording of the Archbishop's public apology to those who had suffered abuse within the Catholic

Church in Scotland on the website.

Questions for the diocese to consider

- What needs to be in place to assist survivors who wish to, in coming back to the Church?
- How might the diocese support the need for survivors to speak to and support each other?
- How might the diocese, perhaps through theological leadership and dissemination of this through the deaneries and parishes, more proactively reach out to survivors who have not yet come forward as well as those who continue to suffer?
What needs to be in place to continue to ensure offers of support for survivors of abuse are flexible to the changing needs of individuals and do not feel in some way time-limited?

2.10 SAFE RECRUITMENT OF CLERGY, LAY OFFICERS AND VOLUNTEERS

Introduction

2.10.1 The mandatory safe recruitment process in the Catholic Church in Scotland is central to ensuring that everyone, including volunteers, is safe to work with children and vulnerable adults. *IG/v2* specifies the DSAG as having an operational function around the organisation of PVG applications and monitoring of ongoing membership of the scheme across the dioceses.

2.10.2 Standard 2 of *IG/v2* states at 2.1: 'We require all Church personnel and volunteers to be safely recruited to their roles, following the relevant statutory and Church requirements' (p.15) and continues at 2.1.1:

Our mandatory safe recruitment process is central to ensuring that everyone – when working in, or training for, ministry as an ordained or religious, or working as a Church employee or volunteer – has passed through appropriate checks and assessments of their suitability to work with children or vulnerable adults.

(Bishops' Conference of Scotland 2021, p.24)

Description

2.10.3 The management of safer recruitment processes in Paisley falls to the Diocesan Safeguarding Administrator overseen by the DSA. The Safeguarding

Administrator has worked for the diocese for 21 years and in her current post since 2016. The post is part time and covers evenings which has proved useful when there is a requirement to contact PSCs.

- 2.10.4 Auditors heard that there is a well established process in place for safer recruitment. Those wishing to volunteer contact their PSC and complete an online PVG with identification documents checked in person. At diocese level, the Safeguarding Administrator processes the PVG forms electronically and also offers paper forms if volunteers are uncomfortable with completing their details online.
- 2.10.5 References are sought and safeguarding training is booked for each volunteer through the diocesan safeguarding trainers. It is only when the PVG form and references are received, and safeguarding training has been completed that an approval letter from the diocese is issued signed on the Bishop's behalf by the Safeguarding Administrator.
- 2.10.6 Blemished PVG forms are referred to the Diocesan Safeguarding Administrator in all cases and the diocese has a protocol for handling the confidential letters containing such blemishes. In most cases, blemished PVGs are referred to the DRAMT for a formal assessment of risk. In minor cases such as a driving offence where the role does not involve driving, the decision regarding volunteering is made by the DSA and carefully recorded in a PVG log.
- 2.10.7 In Paisley, a tracker is maintained by the Safeguarding Administrator to ensure that all 877 volunteers have completed their training prior to starting their role. Parish priests and PSCs are regularly informed of those who require their Part 2 training which aims to be within 18 months of their initial safeguarding training. The Safeguarding Administrator could say with certainty that there are no volunteers working without having received initial safeguarding training.
- 2.10.8 Safe recruitment records, including PVGs, are recorded on the diocesan recruitment database which is in line with that used in other dioceses and developed within Dumfries and Galloway. The database can be interrogated to extract data in a number of ways and is also used to record training. It is also used to ensure that PVGs are updated every five years.
- 2.10.9 Visiting priests are asked to complete PVG forms and bring a testimonial letter from their bishop, however, PVG checks only cover time spent in the UK and do not inform the diocese of any concerns or crimes committed abroad.

Analysis

- 2.10.10 Auditors judged that safer recruitment in Paisley is robust. All new volunteers are trained in safeguarding, have references and a PVG prior to starting in their role. All volunteers are issued with a letter from the diocese to detail when they have been cleared to work and are able to start. Record-keeping is excellent and provides confidence in the safeguarding system.
- 2.10.11 The tracking system held by the Diocesan Safeguarding Administrator is comprehensive and well kept. This means that parishes receive regular

reminders about who requires Part 2 safeguarding training and PVG updates, and the Diocese is confident that all volunteers have been checked and trained.

2.10.12 The Diocese has a protocol for blemished PVGs which is robust and works well. The blemished PVG log shows good decision-making supported by clear rationale. Links between the Safeguarding Administrator and parishes is good. The Safeguarding Administrator takes time to offer support to the PSCs, keeping them up to date and holding them, along with individual volunteers, to account for safeguarding timescales.

2.10.13 Visiting priests are not vetted for their time outside of the UK, but they do provide a letter from their current bishop. Currently no overseas vetting checks are carried out for visiting priests and the diocese might wish to consider requesting certificates of good conduct (or equivalent) from their country of origin. Auditors heard that this may become a moot point because visiting priests can no longer apply for short-term visas and, therefore, the diocese is only able to bring visiting priests into Scotland on long-term visas. The Bishop and Vicar General felt that it might now be prohibitive to bring in a visiting priest for the summer only, which is current practice.

Questions for the diocese to consider

- If visiting priests continue to arrive in Paisley for the summer, how might the diocese better be satisfied that they have been vetted in their country of origin? Might this be raised at a national level at the SCSSA?

2.11 TRAINING

Introduction

2.11.1 Prior to the introduction of *In God's Image*, training was not mandatory before volunteering or taking up a role within the parish. *In God's Image* clarified the importance of training and *IGIv2* continues that mandatory safeguarding training is required by the Church to enable those involved in working with children and vulnerable adults to be well equipped to understand, manage and reduce risk, and to create safe environments. There is a basic level of expertise that all those involved in this work must first acquire, and this must be supplemented by participation in further training, within agreed timeframes, to deepen expertise, skills and knowledge specific to roles. This training must be provided within a framework of nationally agreed safeguarding training established by the SCSSA in collaboration with key stakeholders.

2.11.2 Safeguarding Induction Training Part 1 must be completed by all who will be

working in a regulated role prior to assuming any role in the Church involving children or vulnerable adults and applies to seminary applicants, those accepted for the propaedeutic period, and those entering any formation programme provided by religious institutes. Within 18 months, each person must also complete Safeguarding Induction Training Part 2. Further training opportunities should be offered to clergy, religious, Church employees, and volunteers in the context of support or update meetings, courses and conferences. These training opportunities should be shaped in response to needs identified through the processes of evaluation and audit.

- 2.11.3 In addition to the training provided locally, *IGlv2* also sets out that a Safeguarding Training Advisory Group will be established by the SCSSA. In collaboration with key stakeholders, this group will be expected to support the development of a framework of nationally agreed safeguarding training to meet specific training needs identified by various groups – bishops, clergy, religious, employees and volunteers.

Description

- 2.11.4 The Diocese of Paisley has a team of three trainers in addition to the DSA. All training is completed face to face because the diocese has found this works well with volunteers. Part 1 safeguarding training was introduced in May 2016 and met with a small amount of resistance at first. The diocese made it mandatory, however, and evaluations showed that participants reflected they understood better the benefit of training. This helped establish a culture of safeguarding training and the introduction of Part 2 has been met with little resistance, the main focus of which is prevention.
- 2.11.5 In addition to safeguarding training, diocesan safeguarding trainers meet with the DSA twice a year. Auditors heard that trainers analysed the 2021 parish audits responses to the questions on training needs and responded to the identified needs.
- 2.11.6 Training for parish priests is undertaken by the DSA. Priests complete Parts 1 and 2 of the safeguarding training in addition to their two clergy assemblies. Some parish priests also attend the training sessions with their parishioners/volunteers in order to hear the discussion and questions, which the trainers reflected was good practice.
- 2.11.7 Training is quality assured through the evaluations and through the parish safeguarding audits where answers can identify a training need. Trainers advised that parish priests take safeguarding seriously and that there is a culture of safeguarding which includes the requirement for training. Training dates are disseminated via parish newsletters and on the website. Enthusiasm for training was demonstrated at one face-to-face course where 157 people arrived for the session. Since this time, trainers have put in place a booking system which caps the numbers at 50.
- 2.11.8 All volunteers in Paisley have completed Part 1 training including those in role prior to the safeguarding training being a requirement. Over 600 volunteers have

also completed Part 2 training. Completed training is recorded by the Diocesan Safeguarding Administrator who holds a database which is regularly updated. The safeguarding survey carried out as part of this audit recorded that 100% of participants (n=95) felt that safeguarding training was good or average (90% answered that the training was good).

- 2.11.9 Trainers advised that going forward they would like to embed the existing job descriptors for each volunteer role. These are available on the website but in practice are not always provided to volunteers at a parish level. Trainers felt that the descriptors provide insight into the level of safeguarding involvement within each role and therefore help to reinforce the requirement for safeguarding training.
- 2.11.10 Parish priests and PSCs are regularly reminded by the DSA of the safer recruitment and training process including that no member of a parish should be volunteering until they receive their approval letter from the diocese. Diocesan safeguarding staff and trainers were not aware of any cases where this had happened and all felt that parish priests had a clear understanding of the importance of safeguarding and safer recruitment processes including training.

Analysis

- 2.11.11 Safeguarding training in the Diocese of Paisley is well established, of good quality and timely. Training records are meticulous and provide good evidence of training need, which is communicated to parishes regularly. Records include training for new volunteers and for those who have been in role prior to the training becoming mandatory. With such a high number of volunteers (877), this is commendable.
- 2.11.12 Safeguarding training is delivered flexibly, in face-to-face groups in a number of parishes spread across the three deaneries. In addition to the annual training programme, where trainers are advised that a recruitment drive has created a demand for training, additional courses are offered. On occasion, trainers will also provide one-to-one training in order to ensure no one is waiting.
- 2.11.13 In addition to Parts 1 and 2 safeguarding training, the Diocese of Paisley has ensured bespoke training for parish priests in areas such as: trauma and the impact on survivors; risk assessments; the new diocesan complaints procedure; the new SCSSA; changes to the PVG system and the new safe recruitment protocol; and BCOS guidance on the safe use of social media. Additional training is an area of continuous planned development for the diocese.
- 2.11.14 Participants mentioned that joint training for parish priests and PSCs together within the deaneries might be a useful addition to the suite of training offered. They felt that this would assist in each understanding the role of the other in safeguarding and be useful in addressing pitfalls and any local difficulties at parish level.

Questions for the diocese to consider

- Is there an appetite for joint training at deanery level and how might the diocese facilitate this, measuring impact for the Strategic Safeguarding Plan?

2.12 HOW THE DIOCESE PROVIDES SAFEGUARDING SUPPORT TO PARISHES

Introduction

2.12.1 In a centralised diocesan structure of safeguarding, support from the diocese to parishes is key to safe and reliable safeguarding. Diocesan safeguarding is, in significant ways, only as good as its weakest parish.

Description

2.12.2 The Bishop, DSA, Vicar General and Safeguarding Administrator provide safeguarding support to the parishes through visits and by telephone. Each PSC is provided with a comprehensive induction manual including policies, practical information and contacts. The DSA meets regularly with the PSCs and survey results showed that 90% of respondents (n=95) felt support for parishes from the diocese is good.

2.12.3 Prior to each audit, the DSA offers support to PSCs within the parishes on completion of the audit. This acts as a clear reminder of the importance of the parish audits while also answering practical questions. There is a section on the diocesan website regarding the parish audit with a button to press for assistance.

2.12.4 Additional training for parish priests is in place and has been augmented by training sessions from outside the diocese, including responding to disclosures. Discussions are now ongoing within the diocese about whether parish representatives could come together more often to discuss safeguarding issues. Auditors heard suggestions that this might happen via deaneries for both PSCs and parish priests in some form of facilitated discussion.

Analysis

2.12.5 There is a good support network across parishes from the diocesan safeguarding team. Regular updates in newsletters and on the website, communication regarding training and safer recruitment, training and the provision of an induction manual for PSCs mean that support for parishes is strong. The DSA's additional links with parish priests through the Clergy Assemblies has added to this. Feedback from parishes suggests that they recognise and welcome this

support.

2.12.6 Were joint training to be provided for parish priests and PSCs together, this would provide a level of support for parishes which has not yet been considered and its impact would be a useful question for parishes to consider.

Questions for the diocese to consider

- There were no questions for the diocese to consider.

2.13 QUALITY ASSURANCE

Introduction

2.13.1 A safe organisation needs constant feedback loops about what is going well and where there are difficulties in relation to safeguarding, and this should drive ongoing cycles of learning and improvement. Robust quality assurance enables an organisation to understand its strengths and weaknesses. Potential sources of data are numerous, including independent scrutiny. Quality assurance needs to be strategic and systematic to support accountability and shed light on how well things are working and where there are gaps or concerns.

2.13.2 There are a range of mechanisms that can support this:

- professional supervision of the DSA (see DSA section)
- scrutiny by the DSAG (see DSAG section)
- routine benchmarking of the diocese against other dioceses within and outwith Scotland
- identifying lessons learnt from other dioceses and feeding these into planning the work of the diocese
- abuse survivor 'customer' feedback
- routine PSC 'customer' feedback
- safeguarding training evaluations
- complaints procedure about the safeguarding service (see complaints section)
- independent 'lessons learnt' reviews of cases where things seem to have gone wrong or there are concerns.

2.13.3 Standard 8 of *IG/v2* sets out an expectation that each diocese will oversee effective planning processes to monitor, review, self-evaluate and report on local safeguarding practices. The SCSSA will be tasked with arranging for independent reviews of the compliance of all jurisdictions with safeguarding standards.

Description

- 2.13.4 The BCOS requests that parishes in each diocese and archdiocese complete the annual safeguarding audit. All parishes in the Diocese of Paisley have completed the audits for several years. Themes or concerns are fed back to the diocese and discussed by the DSAG, forming part of the Operational Safeguarding Action Plan. Information from the DSAG is shared with parish priests and PSCs to provide a quality assurance loop. Training requirements from the parish audits are shared with the safeguarding trainers and incorporated into training sessions.
- 2.13.5 The DSA joins the Curial meetings on a quarterly basis when it becomes the SMG and provides a report to each meeting which allows for quality assurance. The Chancellor is part of this group and the only member who is not a trustee, meaning there is also a level of challenge to trustees if required. The DSA also attends the DSAG and DRAMT meetings as does the Vicar General, so there is a level of overlap at each meeting.
- 2.13.6 Anecdotal feedback comes from volunteers, parish priests and survivors and there is a level of quality assurance through the Assembly of Priests.
- 2.13.7 The DSA has also sought advice from external agencies such as the police in order to assess the quality of current casework, where a multi-agency approach has been required. This has been useful in establishing future ways of working and is good practice.

Analysis

- 2.13.8 Quality assurance loops are in place in Paisley and work well but are not yet brought together in any way. Auditors reflected that quality assurance might be a good priority area for the Strategic Safeguarding Plan.
- 2.13.9 To increase quality assurance the diocese could start to think about the development of strategic quality assurance loops in order to assess practice and ensure professional challenge. Bringing in a peer review, hearing feedback from survivors, regularly reviewing a selection of case files and more developed strategic oversight of safeguarding from the DSAG and linking in with the Curial meeting would also assist.

Questions for the diocese to consider

- How could the Strategic Safeguarding Plan be progressed to include a quality assurance framework to better inform the operational work of the diocese?

2.14 CULTURE

Introduction

- 2.14.1 The most critical aspect of safeguarding relates to the culture within any organisation. In a diocesan context, that can mean, for example, the extent to which priority is placed on safeguarding individuals as opposed to the reputation of the Church, or the ability of all members of the Church to think the unthinkable about friends and colleagues. Any diocese should strive for an open, learning culture where safeguarding is 'everybody's business' and a shared responsibility, albeit supported by experts, and which encourages people to highlight any concerns about how things are working in order that they can be addressed.
- 2.14.2 An open learning culture starts from the assumption that maintaining adequate vigilance is difficult and proactively seeks feedback on how safeguarding is operating and encourages people to highlight any concerns about how things are working in order that they can be addressed.
- 2.14.3 Culture within a diocese is crucial to effective safeguarding as is the priority given to safeguarding children and vulnerable adults over the protection of the reputation of the Church. A safe culture also relies on the knowledge and understanding of all within the diocese to react to allegations and disclosures of abuse even when these might be about those they know and admire. Crucially, a safe culture requires trust in the organisation's leadership and in fair and transparent systems and processes.

Description

- 2.14.4 The safeguarding culture of Paisley is led by the Bishop both theologically and strategically. The Bishop is visible across parishes and provides the clear message of the importance of safeguarding. Parish priests are engaged in safeguarding at parish level and audit returns are 100%. There are no PSC vacancies and the take-up of training is excellent. Auditors heard that this is possible because the parish priests understand the importance of safeguarding and take this seriously. All participants talked of a safeguarding culture which is well embedded. This was supported by the high number of survey responses.
- 2.14.5 Communication regarding safeguarding is frequent and helps to promote and increase understanding and confidence locally in the practice of safeguarding. This is supported by an open culture of approachability across the diocesan safeguarding team, where visitors are welcome.
- 2.14.6 The diocesan message that safeguarding is of high importance is reflected in the safeguarding pages of the website, including the apology to those abused. Operationally, safeguarding is led by the DSAG and forms a regular part of discussion with all parish priests and PSCs.

Analysis

- 2.14.7 Safeguarding feels to be core to the work of the Diocese of Paisley and therefore a well embedded part of culture across the diocese. There is a team of dedicated

volunteers who provide safeguarding knowledge and promote training, supported by robust recruitment processes. This has also meant that there is a confidence in the diocesan safeguarding team, which is supported by the survey responses.

2.14.8 Support for survivors of abuse is in place and there is a flexible offer of support which the diocese hopes to develop further. There is recognition of the need to reach out to survivors who have not yet come forward in addition to supporting those who have.

2.14.9 Training, safer recruitment and record keeping are in place and form part of the safeguarding culture across the whole diocese embedded at all levels. This provides a consistent approach which helps to challenge inconsistencies.

2.14.10 Despite the separation of strategic and operational safeguarding and their oversight by differing groups, Paisley's culture of safeguarding is strong and well established. Parishes are supported where they require support, views are heard and challenged where required. While the diocese recognises that there is still work to be done and is not complacent, there appears a genuine commitment to learn and improve.

Questions for the diocese to consider

- How might the diocese identify any areas where safeguarding culture is less well embedded and spread good practice where it is?
- How might culture be better included in diocesan strategic planning so that the operational messages heard within the DSAG are included?

3 CONCLUSION

- 3.1.1 The Bishop, Vicar General and DSA provide a strong leadership for safeguarding which has been recognised by the parishes. Challenge and quality assurance loops are in place.
- 3.1.2 The DSAG is in place and has good membership and an independent chair. The DSAG's strategic oversight across the diocese could be strengthened. The DRAMT is strong and works well. There is a clear referral process and discussions are in progress regarding the management of disagreements or conflicts of interest, including escalation where the conflict cannot be resolved.
- 3.1.3 The DSA has brought much to the role and worked hard to promote safeguarding and provide access to good quality advice supported by clear processes, policies and procedures. Volunteers who take up roles such as trainers, PSCs and other parish volunteer roles are valued and supported. All have completed safeguarding training which is recorded and tracked.
- 3.1.4 There are three areas that would benefit from further development. First, the Strategic Safeguarding Plan is in place but is not yet as comprehensive as it might be. It requires a clearly articulated vision, identified priorities, outcomes and some measure of impact, but is a good foundation for strategic thinking. It is not overseen by the DSAG and therefore there are few links between the Strategic Safeguarding Plan and the operational Safeguarding Action Plan. The development and oversight of one comprehensive plan and would sit well within the current DSAG framework, which might have implications for its future membership.
- 3.1.5 Second, the diocese has an openness towards individuals coming forward and provides good support for survivors. Further development is needed in terms of the range of counselling services which is not time-limited and recognises that an individual's needs can change over time. Different approaches are needed which might include groups for survivors or individual support to help those who wish to come back to church. A more proactive response is needed to reach out to those who have been harmed, informed by the views of those who have experienced abuse. Their views are core to how the Church can provide a more bespoke support for individuals and to ensure their voices are heard within policy and strategic planning. The work of the new SCSSA will assist with this.
- 3.1.6 Third, quality assurance loops are in place but could also be included in the impact section of the Strategic Safeguarding Plan. This would provide information regarding any pockets of practice which fall below that expected and help to inform any training needs analysis.
- 3.1.7 Paisley has a well embedded culture of safeguarding which is apparent theologically, strategically and operationally. Linking strategic and operational planning might assist in measuring impact on culture.

4 APPENDIX: REVIEW PROCESS

4.1 DATA COLLECTION AND LIMITATIONS OF AUDIT

DATA COLLECTION

Information provided to auditors

In advance of and during the site visit, the Diocese of Paisley provided auditors with the following:

- diocesan complaints procedure, October 2021
- diocesan whistleblowing policy, 2021
- safe recruitment protocol, last updated May 2022
- RSO mass attendance protocol, October 2021
- blemished PVG protocol, February 2022
- checklist for handling safeguarding allegations, 16 October 2021
- responding to concerns/allegations flow chart, 2019
- media enquiries protocol, 2019
- social media guidance, June 2021
- live streaming protocol and parish notice, December 2020
- listing and barring protocol flow chart (clergy), 2019
- listing and barring protocol flowchart (volunteer), 2019
- DoP referrals policy, May 2019
- DoP secure handling policy, May 2019
- regulated work with protected adults (checklist to see if role qualifies for a PVG), January 2022
- regulated work with children (checklist to see if role qualifies for a PVG), January 2022
- list of templates attached to IG/v2, May 2022
- agreement on safe use of premises, May 2022
- guidance on supervision ratios, May 2022
- Initial referral form, May 2022
- live streaming parish notice, May 2022

- permission form, child photo/video, May 2022 (amendment pending)
- letter of full approval, May 2022
- letter of restricted approval, May 2022
- safeguarding contact poster, May 2022
- 'what to do' poster, May 2022
- DoP SG risk assessment guidance notes, February 2022
- risk assessment for children's catechism class, February 2022
- risk assessment for children's liturgy, February 2022
- risk assessment for taking Communion to the sick housebound, February 2022
- SG risk assessment information, February 2022
- police disclosure request form (for completion by police requesting diocesan data), 2021
- RSO mass attendance contract (Safe Worship Plan), October 2021
- counselling agreement, 2020
- notification to CIS form, February 2022
- survivor poster, 2017
- Raphael Service leaflet, 2020
- survivor information leaflet, February 2022
- DoP safeguarding GDPR long notice, 2021
- DoP safeguarding GDPR summary leaflet, 2021
- information leaflet for those accused of abuse, February 2022
- survivor support services information for website, 2021
- annual *Diocesan SG Report*, 2018
- annual *Diocesan SG Report*, 2019
- annual *Diocesan SG Report*, 2020
- annual *Diocesan SG Report*, 2021
- bulletin notice, 2020
- *Safeguarding Matters* newsletter, September 2021
- *Safeguarding Matters* newsletter, November 2021
- *Safeguarding Matters* newsletter, December 2021
- *Safeguarding Matters* newsletter, January 2022
- *Safeguarding Matters* newsletter, March 2022

- *Safeguarding Matters* newsletter, April 2022.

Participation of members of the diocese

Between 14 and 16 June 2022 the auditors conducted an onsite visit to the Diocese and had conversations with:

- the Bishop of Paisley
- the Vicar General
- the DSA
- the independent chair of DSAG and DRAMT
- the Diocesan Chancellor
- the Diocesan Administrator
- two members of DRAMT
- representatives from the parishes (via the survey)
- three contributors.

The audit: records and files

Auditors looked at:

- eight selected case files
- examples of enquiries handled within the diocese from 2018.

LIMITATIONS OF AUDIT

It is possible that some survivors of abuse who have no further contact with the Church and who have not approached survivor support organisations would not have been made aware of the audit. We also recognise that those with strongly negative or positive views are more likely to come forward than those with broadly neutral views.

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