

Second Annual Report of the Independent Review Group (IRG) monitoring the implementation of the recommendations of the McLellan Report by the Roman Catholic Church in Scotland.

PREFACE BY THE CHAIR

Three years after the establishment of the IRG it is possible now to report evidence of improvement in how the Catholic Church in Scotland gives priority to the safeguarding of the most vulnerable members of our community. There are still challenges, and it is the job of the IRG to identify these and in reading the many appendices to this report, it will be clear how much work has gone in to identifying where those challenges are and possible routes forward.

We must never forget that survivors of abuse are at the heart of our work. We need to learn from them and through that put in place structures that safeguard the vulnerable. All of us have a part to play, not just clergy but laity too.

It must be made easier for those with complaints to feel safe and secure coming forward. There must be consistency in investigation, compassion in caring for those who are victims and first class professional help for those who need it. A constant striving to do better will lead to improved training and a willingness to learn from the best practice of others. This is a theme in this report. We are clear that the picture across Scotland is improving but patchy and promoting consistency is a key part of our strategy.

The publication by the Bishops' Conference of Scotland of "In God's Image" has been a significant and positive move forward in how the Church wishes to address these key issues. Together with the recommendations of the McLellan Commission, there is a sense of strategic direction. "In God's Image" will shortly come up for review, of significance will be how widespread has been the adoption of its guidelines.

When the IRG was established, one of our first tasks was to look in detail at the self administered audits of parishes and dioceses undertaken by BCOS. We were not impressed and made a series of recommendations many of which were acted upon. This year we reviewed the third audit since our establishment, now conducted on line. We have criticisms, as you will see in the body of the report, but the improvement has been marked, although again, not uniform across dioceses.

In a first for Scotland we asked BCOS to fund a professional audit of all dioceses conducted on the basis of two per year. The initial audits were undertaken by the Social Care Institute for Excellence. Audits such as these have been conducted across various denominations in England. We are grateful for the ready agreement of the Bishops.

There is reference to these audits in the body of the report and the detailed recommendations relating to the Archdiocese of St Andrews and Edinburgh and the Diocese of Galloway can be found on the respective diocesan websites and also on www.bcos.org.uk.

The process was not particularly easy, being first mover seldom is and the different social and legal structures in Scotland did slow the process down. To their credit, however, both Dioceses have accepted the conclusions of the audits and we are now working with them to help process the recommendations. We will report on progress towards those ends in the autumn.

Taking part in such a detailed examination of how any organisation conducts its business is often difficult, being subjected to such scrutiny in an environment that has never before been challenged takes courage and a willingness to learn, and so it proved. As we move forward to audit all 8 Dioceses we will do so with the benefit of the experience of these initial audits.

It is not the purpose of audits such as these to apportion either praise or blame, the intention is to have the benefit of the experience of others to determine what works and what needs improvement.

The next two Dioceses to be audited are Motherwell and Aberdeen. The preliminary work on these audits was due to start on the 21 April but the Covid 19 pandemic made that impossible. As diocesan offices are closed it is not possible to give a precise date when the audits will start but we hope to make progress before the end of the year.

We plan to have a seminar in the near future, probably on line, to look at lessons learned from the first audits.

The IRG is keen to look in detail at the work of Religious Congregations in relation to safeguarding and we are working with the Conference of Religious Congregations to plan this. As structures are not as uniform as for the rest of the Church, we need considerable guidance and we are grateful for the collaborative and enthusiastic support of the Conference.

The work of the IRG was never likely to be easy, but it has been made immeasurably more effective as a result of the helpful and committed involvement of Michael McGrath KSG, Assistant General Secretary of the Bishops' Conference. My colleagues and I wish to put on record our very sincere thanks.

I owe a personal debt to the members of the IRG, all of whom are distinguished professionals, all are volunteers, and the time commitment they have made is quite considerable. Members have been willing to visit dioceses far and near and to give up many hours to ensure that we do our very best for those who are the most vulnerable. They, and our administrator, Richard Riley, have my most sincere thanks.

In these difficult times, as we all deal with the reality of a global pandemic, the vulnerable suffer most and need our support and focus. Moreover there are challenges for all of us. Nevertheless the work of the Independent Review Group will go on, offering support, advice and scrutiny as best we can.

Helen Liddell
The Rt Hon the Baroness Liddell of Coatdyke.

Second Report of the IRG.

1 INTRODUCTION

1.1. When the Bishops' Conference of Scotland (BCOS) accepted in full the recommendations from the review into safeguarding chaired by Dr Andrew McLellan, they established an Independent Review Group (IRG) to monitor progress in implementing the recommendations.

1.2. This is the second annual progress report from the IRG. The remit of the IRG has been reviewed by BCOS and is included as Appendix 1 of this report.

1.3. The findings within this report are based on discussions between the BCOS and the IRG; the production of a Memorandum of Understanding (MoU) between the parties (see Appendix 2); the response of the BCOS to the recommendations from the first report (see Appendix 3) ; the process and outcome of the first 2 external audits of diocesan safeguarding practices and the outcome and analysis of the diocesan internal audits for 2019. Details of the IRG's membership and a summary of its main activities are in Appendix 4.

1.4. 2019 saw a deepening understanding of the respective roles and responsibilities for safeguarding delegated to the IRG by the BCOS. The introduction of entirely new and entirely independent scrutiny of all aspects of the implementation of safeguarding policy, procedures and practice within the Roman Catholic Church in Scotland was a courageous and decisive initiative by the BCOS. The agreement with the IRG was that two Dioceses in 2019 would be audited by the Social Care Institute for Excellence (SCIE) as part of a wider commitment by the Bishops to commission external audits of all eight Dioceses over a four year period. This showed a willingness to open all aspects of safeguarding to intense professional scrutiny and to learn lessons. Almost inevitably there were teething issues as commitments and shared values were teased out into effective behaviours and comprehensive relationships.

1.5 The BCOS delegated responsibility to the IRG to oversee the SCIE external audit of safeguarding in the archdiocese of Saint Andrews and Edinburgh and the diocese of Galloway to assist in facilitating the publication of the reports. It is much to the credit of the participating dioceses that this innovative process was concluded with the audits completed and recommendations accepted in full and published on bcos.org.uk. The process involved external auditors, independent dioceses, BCOS and the IRG and thus hardly surprisingly there were difficulties regarding timescales, accountability, reporting lines, communication, clarity regarding methodology and other matters pertaining to the structure of the final report. Given that the relationship between the BCOS and the IRG was in its infancy, the commendable features were the end products and the willingness on all sides to learn and improve. The process has been jointly reviewed by BCOS and the IRG to ensure improvements.

1.6. The Church has taken a number of important steps towards addressing the recommendations of the McLellan Report on safeguarding within the Roman

Catholic Church in Scotland published in August 2015. McLellan stated that “Safeguarding must be at the heart of the Church’s administration, its worship and its theology”. In particular the publication in March 2018 by the Roman Catholic Church of “In God’s Image” (IGI) as a policy and practice manual on safeguarding within the Roman Catholic Church in Scotland has provided a clear set of expectations and targets for implementation. This was approved by the Bishops for three years to begin with and carries the full authority of the Bishops’ Conference of Scotland (BCOS). It contains eight Standards against which each Diocese and Religious Organisation will be held accountable.

1.7 In addition, the Church has benefited from an evaluation of the progress made in meeting the McLellan Report recommendations contained within the first report of the Independent Review Group (IRG) published in June 2019.

1.8 The impact of the COVID-19 pandemic on all aspects of parish life has been considerable over the past 4 months. These are extremely demanding times. Safeguarding the vulnerable remains of crucial importance. Some Church staff have been furloughed but not those with a responsibility for safeguarding. Inevitably the delivery of training, support and critical friendship have been affected although good use is being made of online platforms and discussion networks. Regrettably the start of the next 2 external audits has been delayed as meaningful access would be problematic even with some initial digital contact. The process is under constant review and it is hoped that a revised timetable will be agreed in the not too distant future.

2. Progress in auditing, improvement planning and review

2.1. The first IRG report recommended that the Church should review the effectiveness and impact of IGI based on a fully collated analysis of the internally supervised Church audits. The report also stressed the importance of detailed analysis and review through both internal and external scrutiny to enable the Church to identify and share best practice as well as addressing areas requiring further improvement.

2.2. Progress is evident as a consequence of adopting a shared approach, for example, as set out in the Church’s safeguarding action plan agreed by the BCOS in 2019. In addition, improvements have been made to the structure and analysis of the annual Diocesan and Parish audits. The introduction of diocesan improvement plans builds on the changes to the audit process made in 2018. This is particularly evident through incorporating the eight standards of IGI within a restructured annual internal safeguarding audit process and a consistent focus on improvement. The Church’s annual internal audit is now completed on-line, facilitating greater analysis of the returns.

2.3. There is a growing awareness within most Dioceses and Parishes of the benefits of participating in discussion and analysis as part of the audit process. This approach is most effective when it demonstrates a willingness to reflect on how things might improve even where there are perceived strengths rather than seeing the process as being a negative one requiring a defensive response. Gradually there

is an understanding of a need for cultural change not least to embed safeguarding in all Church activities. The benefits of audits and independent support and advice are also being increasingly recognised.

2.4. The culture of audit across the Church is still at an early stage of development but there are signs of a growing willingness to engage in this process. In the best examples Diocesan audits identified some innovative approaches to promoting consistency through enhanced protocols, reviewing local training and, in a few examples, an increased focus on addressing the needs of survivors through wider engagement. While the revised audit structure has increased the focus on improvement, there remains an imbalance as too often the emphasis is on gathering numerical data producing quantitative rather than qualitative information. There is a need to get beyond compliance with a minimum approach to safeguarding to one where safety and inclusion are built in as founding principles.

2.5. The addition within the audit returns of an opportunity for the participating Dioceses to identify improvements as well as best practice is welcome. However, this should be seen as part of the same process of ongoing review. Future audits would benefit from a similar focus on identifying what impact, if any, previous improvement plans have had on the Dioceses and Parishes as part of a developing cycle of review. This is now possible as all Dioceses have produced action plans, many for the first time.

2.6. Diocesan audit returns continue to reveal important gaps in understanding and in ensuring consistency across Parishes and Dioceses. Often, significant omissions and challenges, where identified, are not sufficiently linked to action planning strategies to support a systematic approach to improvement. In some cases, minimum responses did not assist the Diocese or the BCOS to evaluate how ongoing areas of concern might be addressed.

2.7. The audit form has not built in a requirement for information on barriers to improvement against each section resulting in a lack of clarity where there is inconsistency. All too often gaps in information are left unexplained. Overall, where there are gaps or challenges there is often insufficient detail on the strategies being used to address these. In a few Diocesan response returns show that only some employees or other users have been informed of or are fully familiar with the Standards in IGI. In others this section has not been completed.

2.8 The external audits undertaken by SCIE were reviewed by both the IRG and BCOS and it was agreed that the contract with SCIE should be renewed to ensure consistency and concentration on lessons learned. To this end an MOU between IRG and SCIE has been formalised and there is clarity that SCIE reports to the IRG as authorised by BCOS.

2.9 The IRG has continued to seek opportunities to listen to the views of parishioners while recognising that it does not have a role in investigating individual concerns or complaints. There has been a pilot outreach meeting to give the IRG the opportunity to answer questions about its role and work plan. The emphasis is on meetings open to all and not targeted on any particular group of stakeholders. It is the intention to hold similar events in each diocese over the next 12 months.

Additionally, an IRG representative has met with each Diocesan Safeguarding Advisory Group (DSAG) with a view to understanding the role and function of this committee and offering advice regarding effectiveness.

2.10 In the initial phases of the work of the IRG the primary focus has been on the work in parishes and dioceses. There have been some discussions with Conference of Religious Scotland (CRSSC) and more are scheduled. There is certainly a need for careful consideration of safeguarding issues among Religious Organisations in order to support the implementation of the McLellan recommendations and to meet the standards of “In God’s Image”. This is a priority for the IRG.

3. Progress against each IGI Standard

3.1. The requirement that all members of the Church involved in safeguarding are fully familiar with the eight standards is an important aspect of the Church’s strategy to ensure that the objectives of **Standard 1: Creating and maintaining safe church environments** are achieved and equally importantly that the Church continues to systematically address the issues raised by the McLellan Report. There is increasing evidence of safeguarding awareness and effective practice but more could be achieved through a clearer connection among audit, improvement plan and the work of the DSAG conscious of the full range of parish activity that benefits from well-rehearsed and evidenced safeguarding practice in all Church environments.

3.2. Ensuring consistency in carrying out safeguarding checks is a vital part of applying **Standard 2: Vetting the appointment of clergy, religious, lay members and volunteers**. Often, where there were incomplete audit returns or specific issues such as vacancies in appointing Parish Safeguarding Coordinators (PSCs), or ensuring that key personnel have suitable Disclosure Scotland safeguarding checks there was insufficient information on why this was the case. In addition, some priests, including visiting clergy, are still not participating in safeguarding training. This remains a major issue for the Church.

3.3. Some plans did contain very helpful information while others lacked sufficient detail. There were examples within the audits of inconsistencies in ensuring that all groups who use Church facilities carry out annual safeguarding risk assessments and that all non-diocesan groups using Diocesan premises follow appropriate safeguarding policies. In contrast, some Dioceses provided helpful details of the approaches being used and the action being taken when there are issues.

3.4. A positive outcome has been the focus on ensuring that Parish and Diocesan records relating to safeguarding are now up-to-date. This is an important step towards achieving **Standard 3: Responding to safeguarding concerns or allegations**. There are some references in these audit returns indicating that monitoring systems are being revised and improved. However, the audit and action planning process is not yet focused sufficiently on evaluating the impact of Diocesan and Parish systems to ensure consistency and prompt responses to address issues of concern. The IRG recommendations regarding complaint handling and

whistleblowing require further immediate attention in order that support and reassurance is available and much needed credibility restored.

3.5. There remains insufficient focus in some Diocesan web-sites on providing information for survivors. This is a significant barrier to ensuring that **Standard 4: Providing care and support for survivors** is being addressed. While there are some references to consultation with and engagement of survivors in decision-making processes this remains particularly underdeveloped in the majority of Dioceses. The Church has consulted with some survivor groups and increasingly in a few Dioceses with individuals. This is not yet a consistent part of Church safeguarding protocols. Where this has taken place the impact on improving safeguarding arrangements has yet to be evaluated. It is recognised that further research is being undertaken by the BCOS regarding the most effective way of reaching out to survivors. There, however, remains a tendency to be tentative and defensive when considering allegations and to give issues of reputation management too much prominence. Always such a defensive approach is counter-productive.

3.6. The Church's ability to ensure full compliance with **Standard 5: Managing and providing care for those accused of abuse** is still developing. While there are growing signs of a greater focus in some Dioceses on reviewing and enhancing their approach to dealing with allegations of abuse, there is still a lack of clarity on how to balance the needs of the accuser as well as ensuring appropriate responses to those who are accused. In all matters relating to safeguarding investigations the expectation must remain that decisions are made in the interests of the vulnerable and on the basis of balance of probability. The Church would benefit from an evaluation of how it is ensuring consistency where there may be delays in the ability of the Police to fully investigate any concerns or where there are safeguarding matters which do not meet the threshold for ongoing police/statutory interventions i.e. beyond all reasonable doubt.

3.7. **Standard 6: Working together in safeguarding** is also at a developmental stage. The BCOS' commitment to engaging with the Irish National Safeguarding Office and participation through international collaboration on safeguarding are positive, if early, steps forward. Dioceses and Parishes are clearer about the need for enhanced collaboration with external agencies and in reporting any concerns quickly. There is also a growing realisation that collaboration across Parishes and Dioceses is beneficial in supporting effective and robust safeguarding arrangements, avoiding repetition and building on best practice. Further improvements in this regard will require greater evaluation of the impact of actions taken. Progress is still required particularly in working collaboratively with religious orders. In 2019 the IRG recommended full consideration of the Irish model. Part of the response from the BCOS was to query whether such an approach really created independence. The IRG do not accept this line of reasoning as properly constituted with clear delegated authority a strengthened National Office can evolve the authority to ensure accountability and provide the necessary quality assurance critical friendship irrespective of the provenance of the funding.

3.8. A revised programme of training has been introduced by the Scottish National Safeguarding Office as part of an ongoing commitment to achieving **Standard 7:**

Training and support for all involved in safeguarding. Many Dioceses and Parishes are more systematic in evaluating participants' responses to this programme. This is providing those responsible for the programme with helpful information on how best to deliver training and to avoid repetition. However, there remain inconsistencies in ensuring that all who require training are involved. The audit and review process has yet to inform future training through identifying and sharing best practice, including innovative approaches to ensuring safeguarding. Consideration should be given to training specifically designed for priests. There is certainly a need for urgent review of why so many priests have not taken up the opportunity for additional training. Furthermore, there are inconsistencies in how visiting priests are monitored.

3.9. A review of the role of the Scottish National Safeguarding Office in supporting Diocesan Scottish Catholic Safeguarding Services was undertaken in 2017 by the assistant secretary to the BCOS. As a consequence its remit has primarily focused on the provision of training. Consequently its role in the cycle of audit and review is not always clear and progress has become heavily dependent on the contribution of the assistant secretary to the BCOS. The internal audit returns will hopefully inform the nature and focus of future training based on best practice and areas of specific and measurable need. It is understood that the Scottish Catholic Safeguarding Service has produced an action plan. The IRG will wish to monitor the progress of this and discuss with the BCOS their view regarding shared services and provision of the challenge function following each year's audit.

4. Ensuring the quality of safeguarding

4.1. The Church has responded positively to the IRG report's recommendation that all Dioceses create an improvement plan as part of addressing **Standard 8: Quality assurance in safeguarding**. In the best examples, internal and external audit information, where appropriate, are informing local priorities. However, this approach is not yet consistent within and across Dioceses. Despite measurable improvements in raising awareness of the need for greater rigour and consistency across the Church, there is further work required to measure the impact of the actions taken.

4.2. The focus of designing safeguarding action plans is helping Dioceses and Parishes identify agreed priorities. However, improvement objectives are at a very early stage of development and almost all focus on restructuring Church procedures or processes. In the best examples, the action points identified have led to revised and enhanced membership of key Diocesan safeguarding groups, increased collaboration with external organisations and improved sharing of local best practice.

4.3. There remain examples of where Diocesan action plans do not reflect issues raised or gaps identified as a result of their internal audits. Often aspirational plans are insufficiently teased out to provide a structured and measurable approach to fulfilling agreed priorities. Some Dioceses are demonstrating enhanced understanding of the role of audit and review while others fail to provide evidence of this. The improvements made to collecting a more coherent overview at national

level is beginning to inform future developments but this is at an early stage of impacting on the longer-term strategic direction.

4.4. The strongest aspect of improvement planning is not surprisingly the focus being given to reviewing resources, membership of safeguarding teams and related protocols. At this stage timescales and specific measurable outcomes are still developing. This in part is the result of the Covid-19 pandemic as well as reflecting developing skills in improvement planning and review. In the best plans there are outcomes to help measure improvements but these are almost exclusively focused on provision and resources.

4.5. Diocesan safeguarding plans, as yet, do not contain sufficient focus on measuring improvements to services for vulnerable adults, young people and children. As skills in planning continue to develop this will be the most challenging aspect to ensure that the cycle of audit, planning and review is focused on meeting the needs of these groups. While there are examples of a more proactive approach in the Diocesan audits this is not systematically reflected in their action plans to support analysis of the impact or develop transferable practice.

4.6. As skills in self-evaluation and review also develop this can help the Church be more proactive in ensuring continuous improvement. This is particularly important in addressing the need to put survivors at the heart of this process so that justice can be both delivered and be seen to be delivered for those who have been affected by allegations of abuse within the Church. It is therefore essential that there is stronger emphasis on evaluating the response to each and every concern raised.

4.7. The Church is committed to reviewing the impact of IGI and the Bishops' own improvement objectives. While there is progress being made in aligning audit and review and in developing a culture of self-evaluation, there remains a need to evaluate the impact of the eight standards contained within IGI, particularly in putting the vulnerable at the heart of the work of the Church. There are developing examples of the growing use of independent counseling support such as The Raphael Counselling Service following the decision in 2016 that the full cost of supporting survivors would be met by the relevant diocese or religious order/congregation. Again, the Church would benefit from evaluating the impact of the approaches being taken.

5. Conclusion

5.1. The Church is increasingly responding to the recommendations contained within the IRG and SCIE reports. This has been enhanced through an MoU agreed with the IRG confirming an ongoing commitment by the Church to respond to external scrutiny and to continue with a programme of external Diocesan audits to support self-evaluation. The IRG look forward to continuing the constructive dialogue with BCOS on their actions in response to the recommendations of our first report, and to working with them to draw maximum benefit from the insights provided in the SCIE audit reports. Follow up to the first two audits is already underway with preliminary meetings to assist with taking forward the recommendations in the two

audits that have taken place so far, and meetings will take place by September to learn what actions are being implemented.

5.2. There remains a distinct need for a key strategic role at national level to sustain the positive impact that independent scrutiny and support, critical friendship, has begun to make to the quality and consistency of safeguarding across all parts of the Church in Scotland. The essential autonomy of each Bishop is recognised. Therefore the decisions of the Bishops to augment their authority by acting collectively e.g. full commitment to the McLellan recommendations and devising and implementing the 8 standards of “In God’s Image” , are commended. It is important that this shared commitment and one Church approach is underwritten by sustaining the work that has begun in providing detailed feedback and critical friendship to each diocese regarding their action plan and issues arising from their audit return. The IRG would wish to see a clear plan to ensure that a national challenge and support function is retained and reinforced. Moreover it is the view of the IRG that the Bishops should delegate authority to a more independent empowered national function to hold safeguarding in the Church in Scotland to account. Independence along the lines of the Irish model by establishing a charitable limited company would provide the opportunity to provide safeguarding strategic leadership, and expertise in planning without in any way contradicting the independence of the dioceses. To date the critical role that has been undertaken by the Assistant General Secretary to the BCOS is commended. This good work requires to be built on by ensuring that there is a national function that has the appropriate authority, credibility and expertise and moreover is resourced, fully informed, networked and accountable. While ongoing challenge and support continues to help the Church identify and address the issues raised by the McLellan Report, further work is required to fully meet the report’s recommendations. The challenge is to build on the recent improvements to ensure that there is a sustainable system for challenge and support, similar to the function of the Irish National Safeguarding Office. The IRG welcomes the work that has begun to look at how a more independent professional facility could be introduced in Scotland.

5.3. Challenges remain as the Church moves from the necessary focus on ensuring consistency in its operational arrangements towards a more challenging and reflective focus on evaluating the impact of its actions. Cultural change is still required to ensure that safeguarding is a core element of all aspects of the work of the Church. There remains a particular need to reflect on the role of survivors and their ability to contribute to and inform future provision. Furthermore, there is a need to develop a clear and coherent “whistleblowers“ policy

6. Recommendations

These recommendations continue to be set out against the McLellan recommendations in order that the IRG maintains its original focus on its remit.

6.1. Reviewing IGI

- We suggest that, when reviewing IGI in 2021, the BCOS should consider how the links between the 8 Standards and the principal recommendations of McLellan (see Appendix 5) may be made explicit

6.2. Support for survivors of abuse

- The policy statements in each diocese on access and support for survivors should be reviewed
- A learning network should be established among diocesan representatives with responsibility for providing advice and information to survivors and consideration given to creating shared national resources
- Diocesan improvement plans should include a survivor perspective

6.3. Policy and practice manual

- The process to fulfill the commitment to review “ In God’s Image” should be designed and the gaps in diocesan audits regarding awareness of “ In God’s Image “ explored

6.4. External scrutiny

- The dialogue of critical friend established following the 2019 audit should be developed further as a fundamental part of the annual cycle with clear national authority

6.5. Effectiveness and improvement

- Support should be available at national level which is credible, accepted and well-resourced in order that local progress can be created and sustained

6.6. A consistent approach to safeguarding

- Quality assurance should be promoted by a unified approach by the Bishops facilitating independent monitoring and support

6.7. Clarity regarding fairness and justice

- A further review should be undertaken regarding consideration of the balance of probability following an allegation ensuring the needs of the complainant are foremost while balancing the range of interests involved

6.8. Training and development

- Training deficits should be addressed and peer events introduced.

6.9. A theology of safeguarding

- There should be direct reference in audit and improvement plan to the importance of safeguarding to the fundamental work of the Church

Appendix 1

A revised remit for the IRG was published in January 2020 following discussions with the BCOS. It reads as follows:

Chair and membership

The chair of the Independent Review Group is appointed by the BCOS. The term will be 4 years with a possible review annually if requested by either party. A term may be repeated once.

Membership shall be drawn from those with professional experience in safeguarding, the law and organisational review. Others may be added or associated with the work of the IRG. Either BCOS or the Chair may nominate members and appointment shall require the agreement of both parties.

A term shall last four years but, in the first instance, some members may be asked to extend their term by two years to allow overlap of membership in subsequent iterations. A term may be repeated once.

Remit of the IRG

1. The IRG will review the results of the audits carried out annually in each diocese and religious congregation, and collated by the Scottish Catholic Safeguarding Service (SCSS), in order to monitor the implementation of 'In God's Image' as approved by the Bishops in March 2018.
2. Additionally the IRG will commission an external audit of progress in implementing 'In God's Image' in two dioceses per year (for four years) in order to identify strengths, good practice to be shared and areas needing further improvement.
3. All analysis, conduct and review of audits undertaken by the IRG will be under their authority and governed by a Memorandum of Understanding agreed between the IRG and BCOS. The Memorandum of Understanding establishes that the IRG may freely discuss with any member of SCSS matters arising from any audit and both SCSS and the BCOS General Secretariat will provide full cooperation with the IRG.
4. On the basis of their analysis of all audits the IRG will provide evaluative comment, advice and recommendations to BCOS on the progress which is being made, in the dioceses and in the work of the SCSS, in meeting the standards set out in the Church's Safeguarding policy document, 'In God's Image'.
5. Additionally the IRG will provide a report to BCOS, normally annually, on progress towards fulfilling each of the McLellan recommendations and, in so doing, contribute to the tri-annual review of 'In God's Image'.
6. The IRG will not examine individual allegations or cases and will refer any concerns which are brought to their attention to the relevant diocese, SCSS or BCOS as appropriate.
7. The IRG will be available to participate in discussions and correspondence to ensure its activities are transparent and fully understood.
8. The IRG will keep in regular contact with the BCOS General Secretariat to exchange information and updates on relevant developments.

Appendix 2

MEMORANDUM OF UNDERSTANDING governing the conduct of external audits of Diocesan Safeguarding practice¹

Context

The Bishops' Conference of Scotland (BCOS) is committed to supporting the ongoing development of safeguarding within the Catholic Church in Scotland. This includes both children and vulnerable adults. In 2017, as part of this commitment, the BCOS established an Independent Review Group (IRG) tasked with providing independent scrutiny of the Church's safeguarding practice in line with the McLellan Commission recommendations (see Appendix 5). The BCOS responded positively to a request by the IRG to initiate external audits of safeguarding in two of the eight Scottish Dioceses. These audits took place in 2019, carried out by the Social Care Institute for Excellence (SCIE) and Children in Scotland. As a result of the experience gained, the BCOS and the IRG agreed to establish a Memorandum of Understanding to facilitate the independent safeguarding audit programme involving the remaining six Dioceses. The purpose of the audit programme is to provide insights into the strengths and areas for improvement in safeguarding culture and practices. The results of each audit, which will be published by the IRG, will inform the wider work of the IRG, Dioceses and the BCOS.

Ethos and principles

The focus of the audit and review activities is on learning and improvement. It is not a vehicle for singling out individuals or groups for specific shortcomings. The process, however, must be rigorous, independent, consistent and evaluative of relevant evidence. The process should emphasise working with each Diocese to highlight areas of good safeguarding practice as well as identifying areas that require to be addressed. It is an essential component of these activities that courteous and professional regard, reflecting the highest standards, is maintained at all times.

Scope and Methodology

While the scope of the audit will focus on an evaluation of current diocesan safeguarding practice, this may include consideration of past responses to areas of safeguarding concern and to allegations. The auditors will require to access safeguarding documentation as well as agreeing a programme of interviews with the participating Diocese. This will include meetings with clergy, lay individuals or groups who work in the safeguarding system, victims of abuse and parishioners with an interest in safeguarding. Audit team members may ask for evidence of the action taken at Diocesan and Parish level from a number of relevant sources, including paper trails. Increasingly there will be an expectation that the Diocese is moving towards meeting the standards defined within the Church's safeguarding guidelines 'In God's Image'. A positive starting point for any audit will be discussions over any Diocesan safeguarding action plans being developed as a result of the information

¹ This is a statement of principle which will be supplemented by a detailed description of the methodology of the audit and by a Data Sharing agreement which will be shaped in the light of advice from the Information Commissioner's Office.

gathered from the annual internal Diocesan audit, as well as the roles and remits of safeguarding personnel and structures at Diocesan and Parish levels. The Audit team will set out clearly the methodology to be followed in the audit and review process. Prior to the audit field visits, a clear timeline will be agreed, setting out dates of meetings, target dates and deadlines for the provision of documents, draft reports and comments on these.

Data Sharing Agreement

Prior to the commencement of future Diocesan audits, the auditors will agree a Data Sharing Agreement with the IRG and the Dioceses being audited to ensure that it is legally compliant with GDPR and with the Church's own protocols while reinforcing the principles of independence, rigour and transparency. This agreement will acknowledge the right of individual confidentiality, particularly when working with survivors or other vulnerable groups, and the need to avoid the unnecessary sharing of sensitive personal data. It will also reflect the requirement of the audit process to respond to safeguarding issues and concerns raised by individuals or groups through a process of triangulation to check the accuracy and impact of these concerns.

Mediation, Arbitration and Agreement

The audit process should provide opportunities for discussion and resolving disagreements where there may be reasonable objections that the audit process has been imbalanced, unfair, inconsistent or outwith its remit. These discussions are solely about fairness and accuracy. It is essential that high quality and open communication is maintained between the audit team and Diocesan team to reduce duplication of effort, avoid misunderstandings and potential areas of disagreement. At all times the auditors should be in regular contact with the IRG, providing written updates on the progress being made. As the commissioning body, the IRG has the responsibility to act as an arbiter to try and resolve any areas of concern. Both the auditors and the participating Diocese must adhere to agreed timelines, engage openly and provide appropriate documentation.

In the event of an inability to agree the accuracy of the audit team's findings, aspects of the draft report or its conclusions, then a stepped mediation model will take place. If a matter of concern arises prior to or during the audit visit then the lead evaluator should endeavour to address these concerns. If this is not possible, the Bishop and the lead evaluator should try to resolve any issues to ensure an effective and robust audit and review process. This should involve the audit team and diocesan representatives reflecting on the evidence base to ensure the accuracy of the reported findings. At the draft stage, discussions should try to resolve any possible anomalies through agreeing a text which is accurate, evidence-based and evaluative. The Diocese and the IRG should receive the draft report at the same time and within an agreed timescale which will allow a meaningful discussion to help address any concerns. If issues remain, then the IRG will convene a meeting involving an IRG representative, the Bishop and the lead evaluator to review any remaining areas of concern and to establish a resolution. Recognising that the IRG is the independent commissioning authority, the IRG Chair will act as the final arbiter as to when the final report will be published.

Appendix 3

Bishops Conference of Scotland (BCOS) Action Plan submitted in November 2019 in response to the recommendations in the IRG's first report.

Updates of the target dates for action provided in May 2020 are shown in italics.

1. Support for survivors of abuse

2019 IRG Recommendations	BCOS Comment & Actions planned in response. Subsequent updates are shown in blue.
<p><i>1 Each diocese should have a clear policy statement on access and support for survivors.</i></p>	<p>We appreciate the report's clear focus on survivors of abuse and on how they can be better advised, supported and involved by the Church. We acknowledge that most Dioceses have experienced difficulty in learning from the experiences of survivors so that policy and practice can be shaped accordingly. We recognise the need for each Diocese to be explicit and consistent in their approaches to supporting Survivors with compassion and justice.</p> <p>Actions:</p> <p>1.1 In collaboration with SCSS and Diocesan Safeguarding Advisers, BCOS will form a working group to develop a policy statement on access and support for survivors, based on Standard 4 of 'In God's Image'. This policy will be adopted by each Diocese.</p> <p>Action to be taken by: BCOS working group Target date: March 2020 <i>Update: Resources Toolkit group is addressing this point</i></p> <p>1.2 In September 2019 BCOS reviewed the SCSS and Diocesan websites to assess the advice provided for survivors. In response to this review, all Dioceses and SCSS will ensure that advice for Survivors provided on their websites is easily accessible and clear.</p> <p>Action to be taken by: SCSS & DSAs Target date: December 2019 Update: improvements continue to be made</p>

<p><i>2 Each diocese should identify an independent person to whom survivors can turn for information and advice.</i></p>	<p>We require advice from the IRG as to the role/function of such an independent person and the information/ advice which (s)he would provide. We wonder if such advice is already available from other non- Church sources. The Church already funds Counselling support for survivors, provided by an independent agency (Health in Mind).</p> <p>Actions: 2.1 BCOS will seek advice from the IRG.</p> <p>Action to be taken by: BCOS Target date: November 2019</p> <p>Update: discussions & research ongoing</p>
<p><i>3 The annual safeguarding action plan in each diocese should respond to the evaluation of the effectiveness of services and support for survivors as described in the annual audit.</i></p>	<p>As the annual Safeguarding Audit is evolving in form and content, a greater focus is being placed on the importance of planning, especially at the Diocesan level. The 2019 Audit will show that each diocese, parish and religious congregation has a plan for improvement, based on its consideration of desirable improvements to Safeguarding practice. In the 2019 Audit there will be a specific focus on the support being provided for survivors, as required in Standard 4 of 'In God's Image'.</p> <p>Actions: 3.1 The 2019 Audit will request information about the support provided for Survivors.</p> <p>Action to be taken by: SAWG Target date: December 2019</p> <p>Update: information supplied and under consideration</p>

<p><i>4 Each diocese should consider how it can incorporate survivor perspectives and experiences into the development of its safeguarding work including survivor representation on decision making bodies.</i></p>	<p>We acknowledge that more needs to be done to learn from the experiences of survivors so that improvements are made to Safeguarding practice. However, we also acknowledge that every Diocese has experienced difficulties in engaging with Survivors, all of whose experiences, wishes and needs can vary greatly. We are committed to listening to, and learning from, survivors so that our Safeguarding practice improves. We are concerned to find ways of involving survivors that do not cause further harm through re-visiting the trauma of survivors' experiences. We do not think it appropriate to involve Survivor representatives on DRAMTs. We seek to benefit from the experience of other countries and other Churches in developing an appropriate forum on which the voices of survivors can be heard so that these can influence policy and practice in all Dioceses.</p> <p>Actions: 4.1 BCOS & SCSS will explore models of Survivor Advisory Panels in other jurisdictions (e.g., Catholic Bishops of England & Wales & Methodist Church).</p> <p>Action to be taken by: BCOS & SCSS Target date: September 2020 Update: SCSS is seeking support to explore options</p>
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2. The policy and practice manual to be completely revised and rewritten

2019 IRG Recommendation	BCOS Comment & Actions planned in response
<p>5) <i>The BCOS should review the effectiveness and impact of “In God’s Image” based on a fully collated analysis of the 2018 audit.</i></p>	<p>We view the publication of ‘In God’s Image’ in March 2018 as a major milestone in its radical revision of our safeguarding policy and procedures, as recommended by McLellan. We published it ‘ad experimentum’ for a period of 3 years, with the full expectation that it will be reviewed and updated at the end of that period. This is widely understood across Dioceses, Religious Institutes and Catholic organisations where time is needed to allow the new Safeguarding standards to be embedded in practice. This review will take account of comments received during the 3-year ‘ad experimentum’ period, as well as information gathered from the various audits which will have been analysed by that time. The review will also take account of any new guidance issued by the Holy See.</p> <p>Actions:</p> <p>5.1 Starting in March 2020, BCOS will take account of Audit data and also gather comments and take account of all relevant developments when revising ‘In God’s Image’ in time for publication in 2021.</p> <p>Action to be taken by: BCOS Target date: March 2021</p> <p><i>Update: Timeline will be affected by COVID-19 impact</i></p>

3. External independent scrutiny of the safeguarding policies and practices of the Church

IRG Recommendations	BCOS Comment & Actions planned in response
<p>6) <i>Audit arrangements should continue to be refined, building on the improvements introduced in 2018.</i></p>	<p>In 2018 we introduced a new form of Audit to reflect the eight Safeguarding standards of 'In God's Image'. We established a Safeguarding Action working group (SAWG) to develop this, to monitor its effectiveness and to continue its development. For the 2019 Audit, further refinements are being made with a view to promoting improved understanding of the Audit process as leading to improvements in Safeguarding practice.</p> <p>While we acknowledge that the IRG has commended the improvements made in the 2018 Audit, we intend to build on these by requiring the 2019 audit to be completed electronically, leading to more consistent analysis of audit results. We also wish to improve communications about the purpose of the audit process.</p> <p>Actions: 6.1 SAWG has published plans on 'Continuing to develop the Safeguarding Audit 2019', provided as Appendix B.</p> <p>Action taken by: SAWG Date completed: September 2019</p> <p>Update: achieved</p>

<p>7) <i>Each audit should lead to a revision of the existing action plan, the monitoring of which should be central to the following year's audit.</i></p>	<p>'In God's Image' requires those responsible for Safeguarding in parishes, dioceses, religious institutes and Catholic organisations to develop a plan for improving its Safeguarding practice. We recognise that, following the introduction of 'In God's Image' in March 2018, we would not see evidence of this planning by all parties until the 2019 Audit and beyond.</p> <p>Actions:</p> <p>7.1 In the 2019 Audit, SAWG will place an emphasis on improvement planning and providing training and support. Action to be taken by: SAWG & SCSS Target date: December 2019 Update: 2020 Audits completed online; diocesan Action Plans formed.</p> <p>7.2 SCSS will provide training and recourse to support improvement planning. Action to be taken by: SCSS Target date: December 2019 Update: support provided by dioceses & SCSS; BCOS leading conversations on Diocesan Action Plans</p>
<p>8) <i>If a scoring system is to be continued, then a methodology is required to ensure consistency and enable viable comparisons.</i></p>	<p>The use of a scoring system in the 2018 Audit was introduced to encourage easy steps towards self-evaluation at all levels. Its effectiveness will be reviewed by SAWG for subsequent Audits.</p> <p>Actions:</p> <p>8.1 SAWG has refined approaches to self-evaluation in the 2019 Audit which will not use a scoring system. Action taken by: SAWG Date completed: October 2019 Update: achieved with more open questions re: progress</p>

<p>9) <i>It is essential that there is independent scrutiny of each diocesan audit by the IRG in order that it is a valid step towards “repairing the damage, attaining justice and preventing, by all means possible, the recurrence” of abuse, reflecting the statement by Pope Francis on 22nd March 2014.</i></p>	<p>Clarification is required as to whether this recommendation refers to the annual Audit or to the independent Diocesan audits which were commissioned by the IRG. If the former, we refer to the fact that the IRG already have complete access to all the audit data and have the remit to comment and/or seek clarification on it. If the latter, discussions between the IRG and BCOS, leading to a Memorandum of Understanding, will determine the parameters of the independent audits and of their own role in that process.</p> <p>Actions:</p> <p>9.1 SAWG will clarify where responsibility lies for analysis of, and comment on, the data emerging from various annual Audits. Action taken by: SAWG Completion date: September 2019 Update: achieved</p> <p>9.2 BCOS & IRG will develop a Memorandum of Understanding to clarify the purposes and parameters of the independent Diocesan audits Action to be taken by: IRG & BCOS Target date: December 2019 Update: achieved</p>
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**4. Effectiveness and Improvement to be measured.
Recommendations**

IRG Recommendations	BCOS Comment & Actions planned in response
<p><i>10) The BCOS should give detailed and urgent consideration to the creation of a strengthened, resourced and independent SCSS with appropriate professional support as a crucial step to promote transparency and restore credibility.</i></p>	<p>Given that the IRG has not conducted any formal review of the functions of the Scottish Safeguarding Service, it is not clear on what basis it has chosen to make this recommendation. Nor is it yet clear how such a service, funded by the Church and staffed by professionals employed by the Church, can be “independent” of the Church. However, in the light of data emerging from the annual Audits, following consideration of the various independent Diocesan audits, and after reviewing the implementation of “in God’s Image’, BCOS will reflect on the remit, resourcing and governance of SCSS to ensure that it is fully fit for purpose. This will be incorporated into its considered response to Recommendation 12 (below).</p>
<p><i>11) A strengthened, revitalized, SCSS should also be commissioned to recommend a safe system for dealing with complaints and establishing a confidential method for the receipt of concerns.</i></p>	<p>We seek further clarification on this recommendation to determine if it points to the need for better systems of complaints handling/ ‘whistle-blowing’, although it is not clear what faults have been found in current Diocesan approaches. We are confident that the procedures for the safe and confidential handling of Safeguarding allegations are clearly established in ‘In God’s Image’, Standard 3. For some years now, the Church in Scotland has required mandatory reporting of all safeguarding allegations to the statutory authorities. These procedures will remain under review.</p>

5. A consistent approach to safeguarding

2019 IRG Recommendation	BCOS Comment & Actions planned in response
<p>12) <i>The BCOS should develop a governance arrangement for a national resource that underlines the independence of the monitoring arrangements through the reinforcement of shared autonomy and peer support within the BCOS.</i></p>	<p>We acknowledge that the IRG points to the Irish model of a national Safeguarding resource which can provide independent scrutiny of Safeguarding arrangements in Dioceses and Religious Institutes. We recognise that some appropriate arrangement will be required beyond the lifetime of the IRG itself. While we are sure that there are significant differences between the scale of Church structures and governance arrangements in Ireland and Scotland, we are keen to learn from the experiences of other jurisdictions.</p> <p>Actions: 12.1 BCOS will initiate discussions with Safeguarding personnel in Ireland in order to explore what governance arrangements might apply in Scotland at the end of the IRG's 4-year term.</p> <p>Action to be taken by: BCOS Target date: December 2020 Update: Timeline will be affected by COVID-19 impact</p>

6. Clarity regarding fairness and justice

2019 IRG Recommendation	BCOS Comment & Actions planned in response
<p>13) <i>The IRG requests an update on this area of work and current discussions to balance the range of interests involved when an allegation of abuse is made.</i></p>	<p>The IRG's concerns are not made clear in this recommendation which appears to refer to how safeguarding allegations are handled. Para 8.6 implies (without supporting evidence) that the reporting of allegations to statutory authorities is being obstructed or delayed by Canon Law. In our view, 'In God's Image' (cf Appendix 1) is unambivalent about the mandatory reporting of allegations.</p> <p>In May 2019 Pope Francis promulgated 'Vos Estis Lux Mundi' which established new procedural norms to combat sexual abuse and to ensure that bishops and religious superiors are held accountable for their actions. 'In God's Image' already covers some of these norms.</p> <p>Actions: 13.1 BCOS will review relevant sections of 'In God's Image', following the publication of 'Vos Estis Lux Mundi', and issue advice.</p> <p>Action to be taken by: BCOS Target date: March 2020</p> <p>Update: Appendix 4 published</p>

7. Training and Development

2019 IRG Recommendations	BCOS Comment & Actions planned in response
<p>14) <i>Each diocese should accompany its annual improvement plan with a training plan which will ensure appropriate continuous and compulsory training for all clergy, religious and those lay members with key roles within the Church.</i></p>	<p>We acknowledge the need for continuous and compulsory training for those responsible for Safeguarding; this is contained in Standard 7 of 'In God's Image'. We acknowledge, though, that there are concerns about the consistency of training opportunities and their availability and uptake across all Dioceses, Congregations and Organisations.</p> <p>Actions:</p> <p>14.1 Each Diocese will include, with its annual improvement plan, details of how identified training needs will be met. Action to be taken by: Dioceses Target date: March 2020 <i>Update: Diocesan Action Plans identify means of addressing training needs</i></p> <p>14.2 SCSS will establish a working group to explore the development of online courses for some 'basic' Safeguarding training. Action to be taken by: SCSS Target date: September 2020 Update: Timeline will be affected by COVID-19 impact</p>
<p>15) <i>There should be a clear national training plan based on a thorough diocese by diocese needs analysis to ensure that training provides appropriate risk assessment skills and fully meets the requirements of the different roles and functions within the Church.</i></p>	<p>We acknowledge that the development of skills in risk assessment is crucial for all responsible for safeguarding.</p> <p>Actions:</p> <p>15.1 SCSS, in partnership with Diocesan Safeguarding Advisers and CRSSC, will</p> <ul style="list-style-type: none"> • review the current level of identified need for training in risk assessment in parishes, dioceses, congregations and organisations and develop • develop a specification for courses in risk assessment, relevant to various target groups <p>Action to be taken by: SCSS, DSAs & CRSSC Target date: June 2020 Update: Resources Toolkit group is addressing this point</p>

16) The annual audits should be used to identify not only areas for improvement and requirements for support but also good practice to be shared as part of the process of mutual dependency.

The 2018 Safeguarding Audit asked parishes, dioceses, religious congregations and Catholic organisations to identify aspects of good safeguarding practice. We acknowledge that it will take some time to build confidence around the purpose of the audit process and to promote the sharing of good practice. While this first attempt did not produce many examples, we hope that continuous encouragement may lead to more examples being identified and shared in future years.

Actions:

16.1 Quarterly meetings of SCSS with DSAs & CRSSC will focus on discussing examples of good practice which they have identified and will consider how these can be shared.

Action to be taken by: SCSS, DSAs & CRSSC

Target date: February 2019

Update: Resources Toolkit being compiled collaboratively

A Theology of Safeguarding

IRG Comment	BCOS Comment & Actions planned in response
<p><i>A statement on the theology of safeguarding has been produced. There has not been any reference to it in the responses to the national audit. It remains to be seen whether or not there is an awareness of this development and its impact on underpinning the Church's fundamental commitment to putting the welfare of children and vulnerable adults first.</i></p>	<p>In acknowledging that 'In God's Image' sets out a theology of safeguarding, as recommended by McLellan, the IRG questions whether there is any awareness of this. This summary statement appears on the Safeguarding leaflet and poster which were distributed to every parish, religious congregation and Catholic organisation:</p> <p><i>"Safeguarding is a duty that is rooted in the message of Jesus and in the mission of the Church. The Catholic Church in Scotland aspires to the highest standards with regard to the care and protection of children and vulnerable adults, and actively promotes justice for and provides assistance to those who have been abused."</i></p> <p>Actions: 17.1 All Church statements re. Safeguarding matters will be prefaced upon this essential truth: "what we call safeguarding . . . comes from the very heart of the message of God's love, made incarnate in his Son Jesus Christ. . ." ('In God's Image', 4.1, p8)</p> <p>Action to be taken by: Bishops Target date: ongoing</p>

Appendix 4

Background to the Independent Review Group and its membership.

In December 2016, the Catholic Bishops' Conference in Scotland announced that Baroness (Helen) Liddell would Chair the Independent Review Group (IRG) set up as a result of the McLellan Commission Report into the current safeguarding policies, procedures and practices within the Church in Scotland. A press release issued at the time read as follows:

“Archbishop Tartaglia said:

“In December 2016, the Catholic Bishops' Conference in Scotland announced that Baroness (Helen) Liddell would Chair the Independent Review Group (IRG) set up as a result of the McLellan Commission Report into the current safeguarding policies, procedures and practices within the Church in Scotland.

“I am most grateful to Baroness Liddell for agreeing to become the first Chair of the Independent Review Group, which will review and audit the Catholic Church's Safeguarding work. In accepting the recommendation of the McLellan Commission to create an independent group, it was clear that a chairperson of national stature and proven competence would be required and I believe, that in Helen, these qualities are perfectly met.”

“On behalf of the Bishops of Scotland I welcome her appointment and look forward to working with her as we continue to implement in full the safeguarding recommendations presented to us last year. The IRG is an autonomous body which will function separately from the Church and will review safeguarding standards and carry out independent audits as recommended by the McLellan Commission.”

Responding to the appointment, Baroness Liddell said:

" This group will be a transparent and fearless means of ensuring that the McLellan Commission recommendations are implemented in full. We owe it to the survivors to ensure that their suffering is never repeated."

IRG Membership

It was agreed that the IRG Chair would choose and appoint members of the IRG. The Group was set up six months ahead of the schedule originally envisaged and met for the first time in May 2017. The following people, all of whom have extensive experience of safeguarding issues, agreed to join:

Helen Liddell (Baroness Liddell of Coatdyke) Chair, is a former Member of Parliament and Secretary of State for Scotland. She is a member of the House of Lords.

Bartolomeo Biagini is an educational consultant. He was formerly a lead HM inspector of education with responsibility for inclusion across all sectors of education and was involved in child protection inspections. He also held senior leadership posts within education authorities in Scotland, including a deputy director post as head of learning communities within South Lanarkshire Council.

Gordon Jeyes OBE was the UK's first Director of Children's Services and was the first Chief Executive of Ireland's Child and Family Agency (Tusla).He is currently engaged in governance assurance reviews and chairs the National Children's Hospital (Ireland) Community Benefit group as well as serving on the Legal Aid Board in Ireland.

Lisa Markham is a safeguarding practitioner with wide experience including work in criminal justice settings and within the Church in the Diocese of Hallam, Sheffield.

Roisin McGoldrick is a former member of the McLellan Commission. She is a registered social worker and is currently employed as a teaching fellow in the School of Social Work and Social Policy at Strathclyde University.

Lesleyann Russell is Compliance and Risk Manager for BBC Children in Need, specialising in safeguarding in the third sector and media production.

Donald Urquhart is the National Safeguarding Adviser to the Scottish Episcopal Church with considerable experience of public protection and safeguarding in both Scotland and England. He is a retired police officer and has worked as both a lead officer and an independent chair of child protection committees in Scotland.

In addition, the IRG may call upon specialist advice on Canon Law and Scots Law when required.

IRG Activities

Much of the IRG's work is conducted electronically. Formal meetings have been held as shown in the following table. The notes on topics discussed are intended to provide a guide to the IRG's evolving approach to its work, and the actions it has been taking.

Date	Main topics discussed	Guests attending part
2017		
27 May	Consideration of the BCOS update on McLellan implementation. Adoption of terms-of-reference. Scoping group to inform the IRG's conclusions on the methodology and approach to its work (including what an audit would look like) and whether additional resources will be required. IRG members to meet SCSS. Agreement on approach to victims/survivors. Administrative systems.	Representatives of BCOS (Canons Boyle and Bradley)
16 September	Consideration of the output of the scoping exercise as an aid to creating the structure within which the IRG operates and to unpacking the remit the BCOS had presented to the Group. Recognition that additional resources might be required to identify audit trails, roles and responsibilities. Agreement to approach SCIE etc. to cost potential consultancy work. Agreement that IRG should cover all vulnerable people (not just children).	
25 November	Report back on HL's meeting with the Bishops. They accepted the IRG's approach. Canon Boyle announced Michael McGrath's appointment. Need to clarify relation of National Office to Dioceses. IRG would not comment on new version of the Safeguarding Manual at this stage. Preliminary work on a tender document for a consultancy. Agreement that peer pressure resulting from publication of IRG's conclusions would help to ensure consistency of application in the dioceses.	Dr Andrew McLellan Canon Tom Boyle

2018

- 24 March Michael McGrath brought paper copies of the responses to the annual audit. Michael McGrath of BCOS
BB agreed to revisit the two relevant papers he produced last year and to re-circulate them Alan Draper and Helen Holland of INCAS
(perhaps with some amendment) to provide a consistent framework for members' analyses of Sister Mary Ross
the returns.
Discussion with Helen Holland and Alan Draper and (separately Sister Mary Ross).
Subsequently, LM agreed to lead on scoping document for an event for survivors*.
Acceptance of SCIE/CIS consultancy proposal (subject to some refinement).
- 30 June There was detailed discussion on the analysis of the 2017 audit and the summary of issues prepared by BB. Central issues included the need to advise on the production of a position statement for each diocese which could then be amended, if necessary on an annual basis.
Concern was expressed that there appeared to be little engagement with the audit, no qualitative comment, no reflection. Overall the tone and structure did not facilitate analysis.
The audit appeared to be a compliance task to be completed with minimum evaluation.
Report back on discussions with SCIE/CIS (revised proposal awaited).
RM and LM agreed to circulate a proposal for engagement with survivors in order to inform the IRG's recommendations for current and future practice including recognition that abuse is not an historic event.

8 September	<p>IRG recognised need for urgency in context of concern about current arrangements, need to emphasise complete independence of the Group, and likelihood of critical comment regarding insufficient pace.</p> <p>Agreed to extend invitation to Teresa Devlin. St Andrews and Edinburgh, and Galloway agreed as first external audits.</p> <p>Mr. McGrath's paper represented a step forward but final detail premature in advance of external audit.</p> <p>Agreement to develop proposal for an open forum in each diocese enabling input from all affected by abuse issues.</p> <p>More frequent meetings agreed.</p> <p>Formal mechanism for liaising with the BCOS should be established.</p>	
11 October	Independent Audits	Representatives of SCIE
27 October	<p>SCIE report should come to IRG first.</p> <p>To issue a press release after the 3 December meeting with the content decided at the meeting of the IRG on 1st December. LM and RM to develop further proposals for the open forums.</p>	
1 December	<p>Discussion with Teresa Devlin about the work of the National Board in Ireland.</p> <p>Arrangements for IRG participation in the stakeholders meeting on 3 December and associated publicity.</p> <p>Development of the IRG Outreach programme.</p>	Teresa Devlin, CEO of the National Board for Safeguarding Children in the Catholic Church in Ireland
2019		
2 February	<p>Discussion of safeguarding issues with representatives of the Conference of Religious in Scotland (Sr. Eileen Mearns, Fr. Dermot Morrin, Mr. John Brown). The Group noted the positive change coming from this part of the religious community and subsequently agreed to give further consideration to the points raised by the Conference of particular relevance to Religious on which it will comment at a later stage.</p> <p>Whistleblowing policy and practice.</p> <p>Development of the IRG Report.</p>	Representatives of the Conference of Religious in Scotland

	<p>Communication issues with SCIE/CIS. Outreach update. IRG representation at the Safeguarding Conference on 5 October 2019.</p>	
16 March	<p>The Chair's introduction included a description of recent contacts with the National Office. Development of the IRG Report, the Outreach programme and progress of the SCIE/CIS consultancy.</p>	
11 May	<p>Communications with SCIE/CIS. Report of the Chair's meeting with the BCOS. Impact of the recent letter by Pope Francis. Distribution of diocesan audits for analysis. Preparations for stakeholders' meeting scheduled for 31 May 2019. Development of the IRG Report (allocation of sections to members).</p>	
31 May	<p>Independent Audits Special meeting with representatives of SCIE prior to a discussion with representatives of the BCOS and the Archdiocese of St Andrews and Edinburgh.</p>	Representatives of SCIE
7 September	<p>Discussion of the IRG's first report with Bishop Toal and Michael McGrath. Progress of the SCIE audits of St Andrews and Edinburgh and Galloway.</p>	Bishop Toal and Michael McGrath
19 October	<p>Discussion with Br. Geary. Preparation for the Chair's forthcoming meeting with BCOS Progress on the SCIE audits and the proposed Memorandum of Understanding</p>	Brother Brendan Geary of the Marists
 2020		
11 January	<p>(Roisin McGoldrick took the Chair.) Approved the draft Memorandum of Understanding and revised IRG remit (both are available on www.bcos.org.uk) Discussions of attendance at DSAG meetings, the development of the Outreach programme, and the proposed IRG newsletter. Approved with thanks Bart Biagini's mapping paper subject to some minor additions.</p>	

22 February	Discussion with Michael McGrath on the follow up to the two SCIE audits.	Michael McGrath
18 April (Video)	Discussion with Michael McGrath covering the independent and diocesan audits, capacity issues within diocesan safeguarding teams and the Church's response to safeguarding during the health crisis. Subsequent IRG members discussion of the above issues, the Chair and Gordon Jeyes meeting with Archbishop Cushley, preparations for the independent audits of the dioceses of Motherwell and Aberdeen, arrangements for discussions with the Religious congregations, and the preparation of an update on IRG activities during the health crisis.	Michael McGrath
23 May (Video)	With Michael: Update of the BCOS Action Plan, his analyses of the 2019 Diocesan Audits and safeguarding information on diocesan websites. Then: Preparation of the second IRG Report. Arrangements for meeting with Religious Congregations	Michael McGrath
20 June (Video)	Discussion of the work of the CRSSC and agreement on follow-up. Status of next SCIE audits. Sign off of IRG Report.	Michael McGrath Representatives of the Conference of Religious in Scotland Safeguarding Commission: G. Bienkowski, Fr Morrin, T. Campbell, Sr MacLeod

Outreach Events.

The original rationale for the Outreach events arose from a desire on the part of the IRG to engage with as many sectors of the Church as possible in a process of informal consultation/listening in each diocese to understand how safeguarding is experienced. This process was designed as a collaborative exercise of working alongside Diocesan staff.

Whilst the IRG has neither the capacity nor remit to offer such a mechanism solely for victims and survivors, this could only be done by recognising that victims and survivors will be present in any gathering of peoples of the church and that the expertise and lived experience of those people, however challenging, is vital.

Only one such event, in Glasgow has so far taken place, with further events planned for October 2020 and January 2021. This is therefore an ongoing process, not without its complications. External contingencies have affected the schedules but we pay tribute to diocesan staff in their determination to ensure that the events are as safe for all as they can be, and the care they have taken around joint planning. We note that all but one Diocese have positively confirmed interest and that there have been preliminary discussions with Religious Order representatives.

Since only one full event has taken place the IRG must be cautious about generalising any conclusions. Some key messages from the have already been shared through the Annual Safeguarding Event and through other fora and seems congruent with other feedback.

Many generic points about safeguarding may be paraphrased here as “that training is good, that we do the simple things well, that responsibilities to those who are vulnerable are clear, that we use lay people well, that we have church leaders who are doing things differently” reflect improvements already made and ongoing.

Asked what needs to be different, however especially for those hurt by abuse, we hear

(also paraphrased)“that we don’t understand the magnitude of what safeguarding means, especially for those people who have been abused, we haven’t been proactive or got to grips with the bigger picture, cases are still being handled badly, we don’t reach out to people, there’s no transparency or clarity about good practice guidance, that cases are not being handled well, that it’s hard to complain and there is no whistleblowing policy”.

The IRG report 2019 comments that much still needs to be done to ensure that victims and survivors are seen, heard and supported and processes of healing take place. We hope that further Outreach events will be supported and address some of those Issues to, in turn assist the church in its deliberations.

Diocesan Safeguarding Advisory Group meetings

IRG members have attended, as observers, meetings of four DSAGs and hope to attend the remaining four, and report our considered observations in more detail, once normal business can be resumed.

Other meetings

In addition to the meetings listed above, the Chair and members of the Group have had a number of meetings with members of the Bishops Conference, the Secretariat of BCOS, and the Scottish Catholic Safeguarding Service. There has also been a substantial amount of contact with diocesan and parish safeguarding teams and with individuals with an interest in, or concerns about safeguarding issues. This has happened both face-to-face (e.g. at the stakeholders meeting held last year and at the Tulliallan conference, and by 'phone and in correspondence.

Costs

The Chair and members of the IRG receive no fees for their participation in its work. The costs of running the Group since its establishment in December 2016 have totalled about £18,950*, the main elements of which are the hire of meeting facilities and the fees and expenses of a part-time administrator.

* Paid up to February 2020

Appendix 5

Overview of the McLellan Report pages ix and x. (The full report is available on www.bcos.org.uk)

1. Support for survivors of abuse must be an absolute priority for the Catholic Church in Scotland in the field of safeguarding.

There are at least three reasons which make this support essential. The risk is that it has not been the priority in the past, and so there is lost ground to be made up. The second is that the Scottish Bishops, in line with the position of His Holiness Pope Francis, have made it clear that they want this to be the priority for the Church. It would be extremely damaging were they to make this strong statement of policy and then fail to match the words with actions. The third reason is that reaching out to the wounded to seek their healing is central to the faith proclaimed by the Church. Nothing will do more to restore the public credibility of the Catholic Church and to bring peace to the Church itself, than to take positive and determined steps to meet the needs of survivors.

2. The policy and practice manual “Awareness and Safety in our Catholic Communities” should be completely revised or rewritten.

Since “Awareness and Safety” appeared, it has been added to and improved. But safeguarding theory and practice have developed extremely rapidly in recent years, and it is unwise to hope that the present document can continue to reflect best practice. The new document must be revised or rewritten in such a way that every part of it carries the authority of the Bishops’ Conference of Scotland. It must make clear what the policy and practice of the Church is with regard to survivors, and it must give proper emphasis to the paramountcy principle.

3. There must be external scrutiny and independence in the safeguarding policies and practices of the Church.

There is no other way for the Church to escape from the suspicion of “cover-up” and secrecy, which has done it much harm. Difficult decisions will be involved for the Bishops’ Conference of Scotland: decisions about the way in which independence can be introduced and about the areas of safeguarding in which independent elements will apply. These are difficult decisions, for it will not be a straightforward matter to harmonise such decisions with the authority of the Bishop in his diocese. The courage shown by the Bishops in appointing this Commission suggests that they are ready to face such decisions.

4. Effectiveness and improvement must be measured at every level of safeguarding in the Church.

A clear and open system of measuring effectiveness and improvement in terms of quality, as well as quantity, must be introduced. The Church must be in a position to assure its members, the public and the Government that it can provide evidence that it is a safe place, and that it is becoming safer and safer. Non-compliance with

requirements, such as ‘Protecting Vulnerable Groups’ clearance and safeguarding training, must not be tolerated.

5. A consistent approach to safeguarding is essential: consistent across different parts of Scotland and consistent across different parts of the Church.

Much damage has been done – to survivors and to the credibility of the Church – by the complications of church administration when the circumstances surrounding Fort Augustus began to emerge. There may be legal and structural reasons why religious congregations are subject to different authority from diocesan Bishops, but that separation is not evident to those who have suffered: they feel that they have suffered at the hands of “the Church”. Consistency of approach between different authority structures must be enforced. Consistency of approach is also vital across dioceses. Survivors of abuse and those accused of abuse must be treated in the same way in every part of the country. Only then can it be assured that each is receiving the most appropriate treatment possible.

6. Justice must be done, and justice must be seen to be done, for those who have been abused and for those against whom allegations of abuse are made.

Both survivors and individuals accused of abuse are entitled to the full protection of the law. Nothing must be done by the Catholic Church which would deny any person the full protection of the law, just as nothing must be done by the Catholic Church which would protect any person from the penalties of breaking the law. His Holiness Pope-Emeritus Benedict XVI was responding to victims and survivors of abuse when he declared that the Church must “*ensure that the principles of justice are fully respected*”.

7. The priority of undertaking regular high-quality training and continuous professional development in safeguarding must be understood and accepted by all those involved in safeguarding at every level.

There is no place in safeguarding for paying “lip service” to the necessity of good training: the risks are too high. There is no place for creating training schemes without making absolutely sure that everyone participates in them. There is no place for the view that once in a lifetime is enough training. Training must be both general and specific. Everyone must know the law; everyone must know the paramountcy principle and everyone must know what abuse is. In addition, each person must know the particular responsibilities belonging to his or her role. Training produces good practice and develops confidence. The knowledge that everyone in the Catholic Church involved in safeguarding undertakes regular high-quality training will be a great reassurance to members of the Church, members of the public and survivors.

8. The Church must set out a theology of safeguarding which is coherent and compelling

When all of the recommendations in this report have been accepted and acted on, the Church will still not have done enough to demonstrate the centrality of safeguarding in its

life and work. No Catholic may be left in any doubt about the importance of safeguarding. Safeguarding must be at the heart of the Church's administration, its worship and its theology. For example, safeguarding should be a standing item at every meeting of the Bishops' Conference and at every diocesan executive meeting; guidance should be given to parish priests about the inclusion of safeguarding in the liturgy and preaching of the Church and the Church should set out a clear and simple theology of safeguarding, which emphasises that the protection of the weak is not merely a Christian duty, but a divine privilege.