## WILKINSON/JAY RESPONSE GROUP RESEARCH PAPER

Initial Survey: The Response to the Jay Recommendations

**Dr Samuel Nunney** *Research and Evaluation Lead* 

#### Preface

The Wilkinson Report was commissioned by Archbishops Council to review the creation, work and termination of the Independent Safeguarding Board ("ISB"). This report establishes the chronology of events leading up to the termination of the contracts of members of the ISB and identifies six lessons learned – on trauma, risk assessments, the "scrutiny gap", the governance of any new oversight body, case reviews and dignity.

The Jay (Future of Church Safeguarding) Report was commissioned by the Archbishops of Canterbury and York to make recommendations for the ways that Church safeguarding, and the scrutiny of Church safeguarding, could be made fully independent of the Church. This report was based on data from 120 interviews and 476 survey responses and makes a series of recommendations on how Church safeguarding can be made independent, accountable, fair and trusted.

In February 2024, General Synod passed a motion to commission a process of 'deep engagement' with a wide range of stakeholders to explore next steps in light of these two reports. This work is overseen by the Wilkinson and Jay Response Group.

This initial response survey is a first step in that deep engagement process. Its purpose is to collect a response of a wide range of stakeholders to key recommendations within the Jay Report, and for more general comment on both the Wilkinson and the Jay Reports.

The survey that collected the data used in this research paper was reviewed by three internal experts within the National Church Institutions (NCIs). External peer review of survey design was carried out by Professor Mathew Guest of Durham University.

This online survey was launched on March 21<sup>st</sup> 2024 and remained open for responses until April 18<sup>th</sup> 2024. Data used in this research paper was submitted by 2,003 individuals. A further 70 individuals started the survey, but did not give their consent for their data to be collected.

There is a commitment to transparency within this process of 'deep engagement'. This report concurs with this commitment by:

- Publishing summative data tables in Appendix A.
- Publishing the questions that were used in the survey, which can be seen in Appendix B.
- Ensuring that analysis of data in relation to *all* questions in the survey are provided either in the main body of the Research Paper, or in Appendix C.

#### **Executive Summary**

Data used in this research paper is based on all 2,003 submissions to the Wilkinson/Jay Response Group Initial Survey that was distributed online. This survey explored levels of agreement with five key recommendations made in the Jay Report, as well as the reaction to Jay and Wilkinson Reports more generally. There are views from all areas of the Church, as well as from survivors and advocates, external professionals, and members of the general public. Responses were grouped into the following categories:

- Survivors and their Advocates
- **Safeguarding Professionals:** National Safeguarding Team (NST), members of diocesan and cathedral safeguarding teams, Safeguarding Advisory Panel Chairs, external safeguarding professionals.
- **Church Governance and Operations:** National Church Institutions (NCIs), Diocesan Secretaries, Cathedral Chief Operating Officers.
- Senior Clergy: Bishops, Deans, Residentiary Canons, Archdeacons.
- Local Church: Clergy, Parish Safeguarding Officers, and other Local Church roles.
- **Other:** Members of the general public, and responses that could not be categorised.

### Recommendation 1: An organisation responsible for independent scrutiny of safeguarding in the Church of England.

- 79% of individuals agreed with this recommendation, and there was universal agreement across stakeholder groups.
- Strengths associated with this recommendation included: improved independence and transparency, consistency and standardisation, and the opportunity to rebuild trust and confidence in safeguarding in the Church.
- Limitations associated with this recommendation included: how independent the organisation would really be, the potential for a lack of knowledge of the Church, and what local engagement there would be.

### Recommendation 2: An organisation responsible for independent operational delivery of safeguarding in the Church of England.

- 55% of individuals agreed with this recommendation, although there were large variations between stakeholder groups. Agreement was high with Survivors and their Advocates (60%) and in Local Church (65%), but low with Safeguarding Professionals (21%), Church Governance and Operations (24%), and Senior Clergy (25%).
- Strengths associated with this recommendation included: improved independence, consistency, and professionalism.
- Limitations associated with this recommendation included: the impact it could have on current relationships and on the culture and perceived responsibility of the Church, as well as the practical challenges of the complexity of transitioning to an untested model.

### Recommendation 3: Adopting a statutory definition of safeguarding in the Church of England.

- 53% of individuals agreed with this recommendation, though again there were variations between stakeholder groups (58% agreement in Local Church and 30% in Church Governance and Operations).
- Strengths associated with this recommendation were improved clarity, consistency, and the ability to establish clear thresholds for safeguarding staff.
- Limitations associated with this recommendation were its narrow nature, a lack of clarity, and the potential loss of focus on culture.

### Recommendation 4: Removal of the term "Spiritual Abuse" in guidance and training in the Church of England.

- 31% of all individuals agreed with this recommendation, and 48% disagreed. While there were variations between groups, disagreement was the most common response for all stakeholder groups.
- Strengths associated with this recommendation included: improved clarity and simplicity, consistency with statutory services, and the ability to focus on psychological and emotional abuse.
- Limitations associated with this recommendation included: more challenges in addressing spiritual abuse, undermining efforts that have been made so far and the potential harm to victims and survivors.

#### Recommendation 5: Mandatory reporting in the Church of England.

- 72% of individuals agreed with this recommendation and this view was universal across stakeholder groups.
- Strengths associated with this recommendation included: improved clarity and accountability, early identification, and the protection of vulnerable individuals.
- Limitations associated with this recommendation included: loss of confidentiality (particularly in relation to the Seal of the Confessional), issues around enforcement and potential future issues surrounding clarity and consistency.

#### Reaction to the Wilkinson and Jay Reports

Reactions to these reports highlight intense difference of opinion between stakeholder groups. Strong feelings, including frustration, were expressed by many participants.

- Many participants welcome the insight that these reports offer on issues surrounding safeguarding in the Church of England.
- There is a suggestion that the two reports are incongruent; one being seen as promoting patience and careful consideration, while the other encourages urgency.
- There are voices that call for the immediate implementation of these recommendations.
- Other voices highlight perceived flaws in the methodology used in the Jay Report.
- The governance role of Archbishops Council is frequently questioned, particularly surrounding the terms of reference set for the Jay Report and its financial cost.
- There is a recognition that the Jay Report has damaged the morale of safeguarding staff.

#### **Questions for Reflection**

Each recommendation in this paper is followed by questions that are derived from the thematic analysis of the data. These are the questions raised by participants, which summarise their concerns with either the implementation or non-implementation of the recommendation. Addressing these questions, regardless of the chosen action, will assist the Church to move forward positively as it considers the future of safeguarding.

All questions for each recommendation can be found below.

#### If Recommendation 1 is to be implemented:

In addition to a complaints and appeals process...

**A1** – Can the Church's current Code of Practice and National Safeguarding Standards be transferred to a new independent organisation for scrutiny?

A2 – How will the current Independent Safeguarding Audit Programme be integrated?

• Will the independent organisation run its own audits, or be responsible for the future commission and management of the audits?

A3 – How can diocesan and cathedral safeguarding advisory panels be incorporated?

#### If Recommendation 1 is not to be implemented:

**A4** – What can be done to provide an independent safeguarding complaints and appeals process?

#### If Recommendation 2 is to be implemented:

**B1** – What can be done to ensure that relationships between safeguarding professionals and dioceses, cathedrals and parishes is improved, as opposed to damaged?

**B2** – How can a positive culture of safeguarding be maintained and strengthened in Church bodies, reflecting the principle that 'safeguarding is everyone's business'?

#### If Recommendation 2 is not to be implemented:

**B3** – What changes can be made to current structures that inspire trust and confidence in safeguarding practice within the Church of England?

**B4** – Will the delivery of the IICSA Recommendations 1& 8 project<sup>1</sup> address many of the issues cited within the Jay Report?

#### If Recommendation 2 is not to be implemented immediately:

**B5** – Would it be possible to ask the decision on independent safeguarding delivery to be made by an Independent Organisation for Scrutinising Safeguarding Practice in the Church of England once it has been established and other projects are embedded within the Church?

<sup>&</sup>lt;sup>1</sup> <u>https://www.churchofengland.org/safeguarding/safeguarding-programme/iicsa-1-and-8-regional-model-pilot</u>

#### If Recommendation 3 is to be implemented:

**C1** – What can be done to ensure that there is still an ownership of low-level concerns, early intervention and general culture in safeguarding in Church bodies?

#### If Recommendation 3 is not to be implemented:

**C2** – What can be done to ensure that safeguarding policy and procedure are well-adapted for implementation in parishes and cathedrals?

**C3** – What systems need to be in place to allow safeguarding professionals to efficiently pass on non-safeguarding issues to the relevant professionals?

#### If Recommendation 4 is to be implemented:

**D1** – How can we ensure that all of the abuse that is currently defined as spiritual abuse is still recognised and reported when it is no longer defined?

**D2** – How the experiences of those who are victims and survivors of spiritual abuse continue to be heard and validated?

#### If Recommendation 4 is not to be implemented:

**D3** – How can guidance and policy around spiritual abuse be adapted to help promote the understanding of it in parishes and cathedrals?

#### If Recommendation 5 is to be implemented:

E1 – How would this policy fit with the Seal of the Confessional?

**E2** – How can mandatory reporting be implemented with a degree of positivity and safety, as opposed to creating a culture of fear?

**E3** – Who would this policy be applicable to and what would the penalties be for non-compliance?

**E4** – What mitigations can be put in place to ensure that any policy created by the Church does not become unduly inconsistent with future governmental policy?

#### If Recommendation 5 is not to be implemented:

**E5** – In what ways can the reporting of abuse in the Church of England be simpler, clearer, and more accountable?

#### Contents

Preface
Executive Summary
Questions for Reflection
Methodology
Recommendation 1: An organisation responsible for independent scrutiny of safeguarding
in the Church of England11
Recommendation 2: An organisation responsible for independent operational delivery of
safeguarding in the Church of England17
Recommendation 3: The definition of safeguarding in the Church of England25
Recommendation 4: Removal of the term "Spiritual Abuse" in guidance and training in the
Church of England
Recommendation 5: Mandatory reporting in the Church of England
The Wilkinson and Jay Reports: Familiarity, Usefulness and Reaction
Appendix A: Data tables49
Appendix B: Questions used in the survey59
Appendix C: Data not presented in the main body63

#### Methodology

#### Survey Format

The online survey was created using SmartSurvey<sup>2</sup>. The format for this surveywas as follows<sup>3</sup>:

- Introduction, briefing and consent form.
- Selection of stakeholder group.<sup>4</sup>
- Establishing how familiar individuals were with the Wilkinson and Jay Reports.
- Establishing a response to the following five key recommendations from the Jay Report:
  - 1. An organisation responsible for independent scrutiny of safeguarding in the Church of England.
  - 2. An organisation responsible for independent operational delivery of safeguarding in the Church of England.
  - 3. The definition of safeguarding in the Church of England.
  - 4. Removal of the term "Spiritual Abuse" in guidance and training in the Church of England.
  - 5. Mandatory reporting in the Church of England.
- Establishing the perceived usefulness of the Wilkinson and Jay Reports.
- An open space to discuss thoughts on either the Wilkinson or Jay Reports.
- Debrief.

The five key recommendations were responded to with the following questions:

- 1. "To what extent do you agree with the above recommendation?"
  - (scored from 1-5, where 1 = Strongly disagree and 5 = Strongly agree)
- 2. "To what extent do you agree that implementing the above recommendation will make people safer across the Church?"
  - (scored from 1-5, where 1 = Strongly disagree and 5 = Strongly agree)
- 3. "Please identify up to three key strengths of implementing this recommendation"
  - (Open text boxes, with an additional space to tick "There are no strengths to implementing this recommendation").
- 4. "Please identify up to three key limitations of implementing this recommendation"
  - (Open text boxes, with an additional space to tick "There are no limitations to implementing this recommendation").

#### **Participants**

2,003 participants were initially presented with a list of 'stakeholder group' descriptions and asked which one they most identified with. Only one group could be chosen, to ensure that each response is only analysed once<sup>5</sup>. These selections would code participants into 'minor stakeholder groups', which were grouped together to form 'major stakeholder groups' for the purpose of analysing the data.

<sup>&</sup>lt;sup>2</sup> <u>www.smartsurvey.co.uk</u>

<sup>&</sup>lt;sup>3</sup> The full version of the questions used in the initial response survey can be found in Appendix B.

<sup>&</sup>lt;sup>4</sup> Participants were also asked whether they were a member of General Synod and if they were attached to a diocese or cathedral. Explorations of these questions can be found in Appendix C.

<sup>&</sup>lt;sup>5</sup> For those who did identify with more than one description, space was provided to disclose this.

The major and minor stakeholder groups (and the responses from each of these groups) can be seen in Table 1. Please note, in order to protect anonymity, this report follows a 'low numbers protocol', where groups of less than 20 individuals were either combined with another group or placed into the 'other' group within each major stakeholder group.

Major Stakeholder Group	Minor Stakeholder Group	Number of Responses
	Survivor of Church-related abuse	58
Survivors and their	Survivor of abuse not related to the Church	25
Advocates (120) <sup>6</sup>	Advocates of individual victims and survivors	20
	Other survivor or advocate (e.g., member of a survivor group, survivor of abuse who prefers not to disclose details of their experiences)	28
	National Safeguarding Team (NST) staff	23
Safeguarding	Member of diocesan or cathedral safeguarding team	112
Professionals (235)	Diocesan or Cathedral Safeguarding Advisory Panel Chair	27
	External safeguarding professional	73
Church Governance and	National Church Institutions (NCIs) staff and governance	22
Operations	Diocesan Secretary and diocesan staff	54
(97)	Cathedral Chief Operating Officer and cathedral staff	21
	Bishops (Diocesan, Suffragan, Assistant)	25
Senior Clergy (110)	Deans and Residentiary Canons	32
(110)	Archdeacons	53
	Parish and cathedral clergy	337
Local Church	Other clergy or similar role (e.g., chaplains, member of religious community, theological education institutions staff)	91
(1,394)	Parish Safeguarding Officer or Parochial Church Council (PCC) Member	710
	Other role in Church (e.g., church or cathedral volunteer, reader or licensed lay minister, churchgoer without other role)	256
Other (47)	Other (members of the general public, other responses that do not fit into one of the groups)	47

Table 1. Response rates Major and Minor Stakeholder Group.

<sup>&</sup>lt;sup>6</sup> Around 30 participants identified themselves as a survivor or an advocate, but did not choose it as their primary identification, meaning that are at least 150 survivors/advocates across the dataset.

#### Analysis

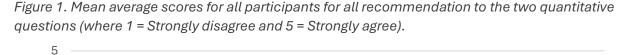
Across this report, data is presented by 'major stakeholder group'<sup>7</sup>. Where there are statistically significant differences between 'major stakeholder groups', the analysis will explore the contrasting groups in more detail. Where statistically significant differences do occur, they will be highlighted.

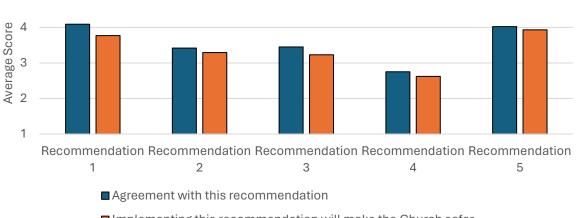
The quantitative data in this report will be presented as the breakdown of responses by major stakeholder group (with disagreeing answers combined, as well as agreeing answers).

In the main body of this report, quantitative data will primarily address the question of agreement with the recommendation.<sup>8</sup> This decision is because the two quantitative variables have a statistically strong correlation<sup>9</sup>. Although both variables exhibit similar patterns, the omitted variable shows a larger population selecting "not sure", indicating a dilution of the strength for feeling in this question. This trend can be seen in Figure 1 for all recommendations.

In analysing the perceived strengths and limitations to implementing the recommendations, a thematic analysis has undertaken to identify major themes for each. This was undertaken for all participants and for any statistically significant contrasting groups.

Each recommendation will conclude with suggested questions arising from the themes, concerning areas for further investigation if the recommendation is or is not taken forward.





Implementing this recommendation will make the Church safer

DR SAMUEL NUNNEY

 <sup>&</sup>lt;sup>7</sup> As 'Other' does not have more than 50 participants, it will not be included in the 'Major Stakeholder Group' analysis.
 Its data will still be used for analysis of all participants, and grouped data can be found in Appendix A.
 <sup>8</sup> Answer breakdowns for agreement as to whether the recommendation makes the Church safer can still be found in

<sup>&</sup>lt;sup>a</sup> Answer breakdowns for agreement as to whether the recommendation makes the Church safer can still be found in Appendix A.

<sup>&</sup>lt;sup>9</sup> R = .89, p < .001

## Recommendation 1: An organisation responsible for independent scrutiny of safeguarding in the Church of England

Currently, scrutiny of safeguarding in the Church comes from several sources. These include (but are not limited to):

- Independent Safeguarding Advisory Panels in all dioceses (and many cathedrals) that advise locally on safeguarding policies, procedures and practice (these are independently chaired and include external agency representation e.g., police, social care, victim and survivor services).
- The National Safeguarding Panel that advises on national policies and procedures.
- A programme of Independent Safeguarding Audits that regularly evaluate the effectiveness of safeguarding within dioceses and cathedrals.

The recommendation to consider here was the creation of a separate independent organisation with the remit of scrutinising safeguarding across the Church. This includes a single uniform complaints system with an appeals process, the integration of the current Independent Safeguarding Audit Programme and the issuing of safeguarding code of practice and safeguarding standards.

#### Analysis

Across all individuals, 79% of participants agreed with Recommendation 1, 9% disagreed with it and 12% were not sure. Regarding whether implementing this recommendation will make the Church safer, 65% agreed. These scores were fairly universal across major stakeholder groups, which can be seen in Figure 2.

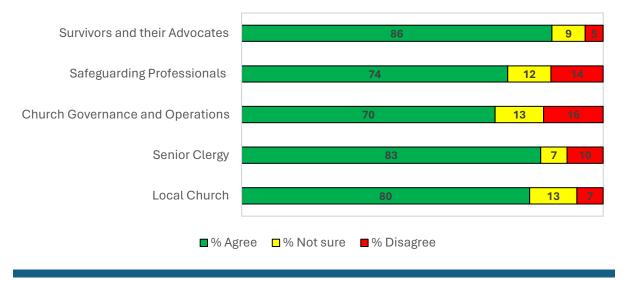


Figure 2: Agreement with Recommendation 1, broken down by major stakeholder group.

There are statistically significant differences between the major stakeholder groups<sup>10</sup>. Analysis shows that the 'Survivors and their Advocates' group have stronger agreement (86%) than 'Safeguarding professionals' (74%) and 'Church governance and operations' (70%) – though it should be said, all groups still have a large majority agreeing with this recommendation.

#### Strengths and Limitations

When analysing the perceived strengths of implementing Recommendation 1, three consistent themes emerge: independence and transparency, consistency and standardisation, and rebuilding trust and confidence.

Regarding independence and transparency, many comments emphasize the necessity of an independent oversight body to ensure impartiality and prevent conflicts of interest. The feeling of transparency was highlighted as crucial for the rebuilding of trust, preventing perceptions of cover-ups and to stop the church from 'marking its own homework'.

The importance of consistency and standardisation is regularly mentioned across all groups of participants. There is a suggestion that implementing Recommendation 1 will improve this across the Church. It is hoped that an organisation which promotes uniform standards and procedures, and more importantly, ensures compliance with them, will secure fair treatment of those involved in safeguarding cases and prevent any discrepancies.

Finally, there is a prevalent theme surrounding the rebuilding of trust and confidence in the Church's safeguarding processes, particularly among survivors and the wider public. The establishment of an independent oversight body is seen as a crucial step in achieving this, along with demonstrating commitment to transparency and accountability.

The analysis of the perceived limitations of implementing Recommendation 1 gives the following three themes: independence and autonomy, understanding and contextualisation, and practical implications and local engagement.

Regarding independence and autonomy, there are many concerns offered that revolve around how independent the proposed safeguarding body would truly be. Questions are raised about the funding of the body, where decision-making authority lies, as well as who the organisation would be accountable to.

<sup>&</sup>lt;sup>10</sup>  $F(5,1991) = 5.75, p < .001, N_p^2 = .014$ 

DR SAMUEL NUNNEY

A prominent theme that comes through in the limitations is understanding and contextualisation. Many state that there is a unique context and culture within the Church of England, and that any external body would need to be aware of this in order to address safeguarding issues effectively.

The final limitation theme is that of practical implementation and local engagement. Many suggest that safeguarding in the Church is done 'on the ground', in parishes and cathedrals, and performed in most cases by volunteers. There are questions about whether this external body would scrutinise this groundwork, or just that of professional safeguarding roles in the National Safeguarding Team and in dioceses and cathedrals. If there is scope to scrutinise the work at a local level, significant concerns are raised about the resource required to do this, and the potential impact on volunteers and clergy.

#### Major Stakeholder Group Comparisons

#### Survivors and their advocates

There are exceedingly high levels of agreement with Recommendation 1 by those in the 'Survivors and their Advocates' group, as can be seen in Table 2. None of the minor stakeholder groups have less than 80% agreement, and the survivor-focused groups all have less than 5% disagreement with the recommendation.

A perceived strength that is present and prominent within this major stakeholder group comes from the desire for a strong and effective complaints and appeals system. There is a collective emphasis on the importance of creating a robust mechanism for individuals to raise complaints or concerns regarding safeguarding practices and ensuring that there is a reliable process for appealing decisions or outcomes. It seems clear within this group that such a mechanism can only help to improve perceptions of transparency, accountability and fairness within safeguarding in the Church.

"There has to be an 'appeal mechanism' that we can all trust." *(Survivor of abuse not related to the Church)* 

One common limitation that is not seen elsewhere surrounds a concern for the potential of resistance from within the Church. Many individuals in this group anticipate opposition from various quarters within the Church, including senior operational staff, clergy (both senior and local), and safeguarding officers. There are concerns that there will be a lack of support for this

recommendation and that many will attempt to obstruct the establishment of such an

organisation. Some quotes regarding this can be seen below:

"The church hierarchy will try to control it." (Survivor of Church-related abuse who first disclosed abuse longer than five years ago)

"Bishops and Archbishops will still seek to meddle with this policy and its implementation." (Survivor of Church-related abuse who first disclosed abuse longer than five years ago)

The vast majority of all stakeholder groups here (including national structures and senior clergy) are in agreement with Recommendation 1. Therefore, the feelings of potential resistance to change will hopefully not be evident as this work progresses.

Table 2. Agreement with Recommendation 1, broken down by minor stakeholder group in 'Survivors and their Advocates'.

Minor Stakeholder Group	%Agree	%Not sure	%Disagree
Survivor of Church-related abuse	88	9	3
Survivor of abuse not related to the Church	80	16	4
Advocates of individual victims and survivors	85	0	15
Other survivor or advocate	88	12	0

#### Safeguarding professionals and Church governance and operations

'Safeguarding Professionals' and 'Church Governance and Operations' groups are analysed together here, this is because the average scores of the major groups are similar, and the themes that come out of the strengths and limitations are also comparable.

That said, there are small differences with the minor stakeholder groups, which can be seen in Table 3. While there is still a majority of participants that agree with Recommendation 1, there are small pockets of disagreement of around 20% in the external safeguarding professional, diocesan secretary and diocesan staff, and cathedral Chief Operating Officer and cathedral staff groups.

While the perceived strengths from these two major stakeholder groups mirror those presented already, there are some proposed limitations that delve into the detail of the recommendation.

Some participants expressed anxiety about the suggested production a new standards framework in the Church, given the recent publication of the National Safeguarding Standards of the Church of England<sup>11</sup> (published October 2023). Many state that these Standards have

<sup>&</sup>lt;sup>11</sup> <u>https://www.churchofengland.org/safeguarding/national-safeguarding-standards</u>

DR SAMUEL NUNNEY

been embraced since being published and worry that a new scrutinising organisation might seek to replace this work, which could diminish current momentum levels.

"We have just published National Safeguarding Standards, they are being embedded and tested locally as well as independently by INEQE, it would be a huge upheaval to rip them up and start again." (Diocesan Secretary)

A regular question is whether the proposed changes would be better than the Independent Safeguarding Audit Programme that is already in place. Some suggest that mechanisms for evaluating and improving safeguarding practices already exist within the Church.

There is also a concern that the implementation of this recommendation will lead to the disbandment of independent safeguarding advisory panels. There is a feeling that these panels currently provide context-specific guidance and support within dioceses and cathedrals. Some participants comment that these panels still have a role to play in the Church, either as a part of a new scrutiny organisation, or alongside one.

"Some safeguarding advisory panels are already working well and those benefits and relationships should not be jeopardised by reinventing the wheel" (*Diocesan or Cathedral Safeguarding Officer/Advisor*)

Summing up these views of these two major stakeholder groups, it seems that there is a desire for independent scrutiny, but there is a feeling that all of this is already in existence (except for the complaints and appeals process, which is seen by some as the missing piece). There are feelings of disquiet that surround phrase "the Church marks its own homework when it comes to safeguarding" (a phrase that is frequently used as a reason to support this recommendation), as some believe there already is extensive independent scrutiny, going beyond what occurs in many statutory settings. A code of practice and National Safeguarding Panel. Dioceses and cathedrals have their independent safeguarding advisory panels and are subject to the Independent Safeguarding Audit Programme. There is a feeling that if the remit of a new organisation is to continue all of these arrangements, it should not be redesigning or redeveloping concepts or policies that already exist without comprehensive consultation.

Major Stakeholder Group	Minor Stakeholder Group	%Agree	%Not sure	%Disagree
	National Safeguarding Team	74	17	9
Safeguarding Professionals	Member of diocesan or cathedral safeguarding team	77	10	13
	Safeguarding Advisory Panel Chair	78	19	4
	External safeguarding professional	67	11	22
	National Church Institutions staff and governance	86	9	5
Church Governance and Operations	Diocesan Secretary and diocesan staff	69	13	19
	Cathedral Chief Operating Officer and cathedral staff	57	19	24

Table 3. Agreement with Recommendation 1, broken down by minor stakeholder group in 'Safeguarding professionals' and Church governance and operations'.

#### Conclusions and questions for Recommendation 1

In summary, while there is broad support for Recommendation 1, there are also concerns and uncertainties about its implementation and potential impacts on existing safeguarding mechanisms within the Church of England. Balancing the need for independence, transparency, and accountability with the practical considerations of implementation and potential local engagement will be crucial in addressing these concerns.

#### If Recommendation 1 is to be implemented:

In addition to a complaints and appeals process...

**A1** – Can the Church's current Code of Practice and National Safeguarding Standards be transferred to a new independent organisation for scrutiny?

A2 – How will the current Independent Safeguarding Audit Programme be integrated?

• Will the independent organisation run its own audits, or be responsible for the future commission and management of the audits?

A3 – How can diocesan and cathedral safeguarding advisory panels be incorporated?

#### If Recommendation 1 is not to be implemented:

**A4** – What can be done to provide an independent safeguarding complaints and appeals process?

# Recommendation 2: An organisation responsible for independent operational delivery of safeguarding in the Church of England

For the purpose of this recommendation, operational safeguarding includes (but is not limited to): undertaking safeguarding casework, providing care and support to victims and survivors and those against whom allegations are made, and issuing guidance and training on safeguarding matters.

Currently, operational safeguarding is professionally delivered locally. This is done by locally employed safeguarding advisors and teams in every diocese (and many cathedrals). There is also a National Safeguarding Team which issues guidance, policies and training, as well as having a National Casework Team.

The recommendation to consider here was the creation of a separate independent organisation with the responsibility for delivering all operational safeguarding in the Church. This means that current diocesan and cathedral safeguarding professionals would be employed and line managed within the independent organisation (though the physical location in dioceses and cathedrals will be retained).

#### Analysis

Across all individuals, 55% of participants agreed with Recommendation 2, 26% disagreed with it and 19% were not sure. Regarding whether implementing this recommendation would make the Church safer, 47% agreed.

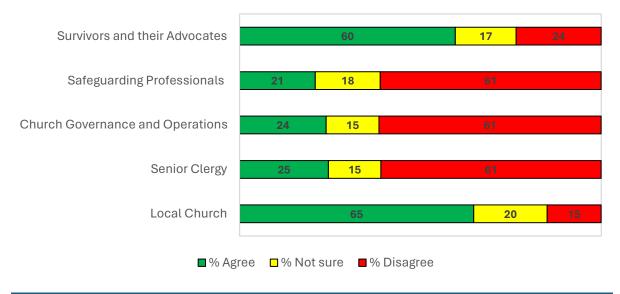


Figure 3: Agreement with Recommendation 2, broken down by major stakeholder group.

DR SAMUEL NUNNEY

There are major statistically significant differences between major stakeholder groups<sup>12</sup>, which can be seen in the response breakdown in Figure 3. All major stakeholder groups differ significantly from at least one other here, so the analysis of this recommendation will be broken down into each major stakeholder group. There are substantially larger levels of agreement amongst 'Survivors and their Advocates' (60%) and 'Local Church' (65%) than with 'Safeguarding Professionals' (21%), 'Church Governance and Operations' (24%) and 'Senior Clergy' (25%).

#### Strengths and Limitations

Three perceived strengths that are often mentioned when discussing Recommendation 2 are independence, consistency and professionalism.

Many in favour of Recommendation 2 consistently highlight independence as a key strength. They suggest that safeguarding actions and decisions must be free from conflicts of interest that could come from within Church hierarchy. For many, a level of independence is seen as crucial for maintaining fairness, trust, and accountability.

Being able to achieve consistency, uniformity and standardisation in safeguarding practice across different dioceses and cathedrals is put forward as a strength of implementing Recommendation 2. It is felt that the improved consistency ensures fairness and effectiveness, while the standardisation establishes clear expectations for all involved.

There are also frequent comments about how implementing Recommendation 2 will improve the professionalism of safeguarding in the Church. It is felt that having trained safeguarding professionals surrounded by and managed by other safeguarding professionals will help to improve competence, efficiency, and effectiveness. An additional strength associated with this is greater professional support for safeguarding professionals.

The limitations that are frequently mentioned regarding Recommendation 2 include the impact it would have on relationships between safeguarding staff and their dioceses, cathedrals and parishes, the safeguarding culture and responsibility in the Church, and the challenges of implementation.

 $<sup>\</sup>frac{12}{F(5,1982)} = 94.06, p < .001, N_p^2 = .192$ 

A recurring concern throughout the responses in relation to Recommendation 2 is that it could lead to the loss of trust and relationships between safeguarding staff and their dioceses, cathedrals and parishes. Many are anxious that safeguarding professionals could be viewed as outsiders and that this would lead to an erosion of trust.

There are many individuals that fear that implementing this recommendation would bring about a change to existing safeguarding culture within the Church. Several individuals are anxious that accountability will be weakened, that the improvement culture that many have worked to build will be reversed, and that safeguarding will no longer be perceived as an central responsibility for all Church officers.

Apprehensions about the practicality, complexity and cost of transitioning to an untested model are a common theme in the comments. It is felt that there is a lack of clarity on governance structures, accountability, and funding of such an organisation. Many point out risks of creating confusion, duplication, and bureaucratic inefficiencies in safeguarding processes.

#### Major Stakeholder Group Comparisons

#### Survivors and their advocates

There is much agreement with Recommendation 2 in this group, which can be seen in Table 4. Agreement levels are significantly higher in the survivors of Church-related abuse group (71% agreement), while survivors of abuse not related to the Church and advocates of individual victims and survivors have larger proportions of those disagreeing or selecting "not sure".

Identified strengths of implementing this recommendation are similar to those across all participants – independence, consistency and accountability.

"Resourcing and diocesan/parish independence is another massive issue. Every week I hear of cases where there is a huge disparity in how survivors are treated, in the resources available, in the extent to which dioceses follow current practice and policy. Having one national body responsible for safeguarding policy and investigation is the only way to resolve that." (Survivor of Church-related abuse who first disclosed abuse longer than five years ago)

Similarly to Recommendation 1, this group also includes many that suggest that a limitation in promoting this recommendation is that there will be many that are resistant to change.

Table 4. Agreement with Recommendation 2, broken down by minor stakeholder group in 'Survivor and their advocates'.

Minor Stakeholder Group	%Agree	%Not sure	%Disagree
Survivor of Church-related abuse	71	12	17
Survivor of abuse not related to the Church	48	32	20
Advocates of individual victims and survivors	47	21	32
Other survivor or advocate	53	6	41

#### Safeguarding professionals

Higher levels of disagreement are seen in this group, particularly within the National Safeguarding Team and with members of diocesan or cathedral safeguarding teams, with 61% and 73% disagreement respectively, which can be seen in Table 5.

There are slightly more individuals agreeing with this recommendation that are Safeguarding Advisory Panel Chairs, and the reason for this seems to be the potential for this to improve professional development and support for safeguarding professionals.

Limitations that come with implementing this recommendation here follow on from those identified across all participants – the loss of relationships and the impact on culture and responsibility. There are also many that suggest that implementing this recommendation would eventually lead to a loss of local knowledge and context, that as staff come and go and an independent role becomes normalised, that there could be a diminishing of understanding of unique challenges and dynamics within specific locations.

"I think the concept of a sperate body as practitioners will make it even harder to change culture across the church. We work hard to build relationships and trust and that would become harder if a separate body." (Diocesan or Cathedral Safeguarding Advisor/Officer)

"The biggest risk that this approach carries is that it will undermine the sense of responsibility that should be felt by every organisation working directly with vulnerable groups to embed safeguarding within its culture and practices. To have operational safeguarding externalised or outsourced risks creating barriers and disconnects between those carrying out the necessary functions and those that may be vulnerable. How can 'safeguarding is everyone's responsibility' be promoted when the structure says '...but in our context, the responsibility sits out there'?" *(External Safeguarding Professional)* 

Table 5. Agreement with Recommendation 2, broken down by minor stakeholder group in	
'Safeguarding professionals.	

Minor Stakeholder Group	%Agree	%Not sure	%Disagree
National Safeguarding Team	13	26	61
Member of diocesan or cathedral safeguarding team	14	13	73
Safeguarding Advisory Panel Chair	41	15	44
External safeguarding professional	26	25	49

#### Church governance and operations and Senior Clergy

These two major stakeholder groups have been analysed together as their scores relating to Recommendation 2 are similar and both express a particular limitation that differs from those mentioned across all participants.

These groups have very similar amounts of agreement and disagreement, and there are particular minor stakeholder groups within both with higher levels of disagreement (the majority of archdeacons, bishops, cathedral Chief Operating Officers and cathedral staff, and diocesan secretaries and diocesan staff), which can be seen in Table 6.

There are many within this group that question the effectiveness of the proposed model. The IICSA Recommendations 1& 8 project<sup>13</sup> is frequently mentioned as a model that is being rigorously tested and evaluated in the Church and that it should address many, if not all, of the concerns that are raised in the Jay Report. This project has been tasked with delivering IICSA Recommendation 1 of changing the Safeguarding Advisor role to a Safeguarding Officer role and providing professional supervision to Safeguarding Advisors. It has already delivered the new National Safeguarding Standards and begun the new Independent Safeguarding Audit Programme associated with IICSA Recommendation 8.Several participants suggest that safeguarding practice in the Church should be reviewed after the principles of the IICSA 1& 8 project are embedded, to establish whether further independence is needed.

"Jay report fails to provide assurance that the model being proposed is being applied successfully in other contexts. IICSA recommendations, if given time to be implemented and bedded in, would continue to improve practice without causing major upheaval that could be counter productive." (*Diocesan Secretary*)

<sup>&</sup>lt;sup>13</sup> https://www.churchofengland.org/safeguarding/safeguarding-programme/iicsa-1-and-8-regional-model-pilot

Major Stakeholder Group	Minor Stakeholder Group	%Agree	%Not sure	%Disagree
Church Governance and Operations	National Church Institutions staff and governance	45	14	41
	Diocesan Secretary and diocesan staff	24	24	52
	Cathedral Chief Operating Officer and cathedral staff	24	15	61
	Bishops	12	20	68
Senior Clergy	Deans and Residentiary Canons	53	6	41
	Archdeacons	13	17	70

Table 6. Agreement with Recommendation 2, broken down by minor stakeholder group in 'Church governance and operations.

#### Local Church

Those in the 'Local Church' group show the least variability in opinion, there is a noticeable regularity of responses across all of the minor stakeholder groups, all have around two-thirds of individuals agreeing with Recommendation 2, which can be seen in Table 7.

There are two key strengths identified by those in this groups – credibility and relationships.

In terms of credibility, numerous comments emphasize how the Jay Report endorses urgency for rebuilding trust and confidence in safeguarding within the Church. Many indicate that the public perceptions of the Church within the Jay Report need to be addressed, and that implementing the recommendations are the steps to doing that.

"This recommendation allows for a uniform approach that can rebuild trust between survivors and the Church and provides an appropriate 'distance' between the Church and those who hold responsibility for delivering operational safeguarding." *(Parish Clergy)* 

Regarding relationships, some discuss the tension between parishes and the National Safeguarding Team, suggesting that this recommendation could lead to a fresh approach. Comments from the 'Local Church' group imply that refreshing the current system might improve understanding of safeguarding in parishes. The believe that closer collaboration with a central safeguarding organisation could help to contextualise practices, policies, and procedures, leading to more effective implementation at the grassroots level. On the topic of relationships, it should also be noted that a significant limitation raised within this group is in fact the loss of local knowledge in safeguarding relationships, particularly between parish safeguarding officers and diocesan safeguarding advisors/officers.

Table 7. Agreement with Recommendation 2, broken down by minor stakeholder group in 'Local church.

Minor Stakeholder Group	%Agree	%Not sure	%Disagree
Parish and Cathedral Clergy	66	16	18
Other Clergy	67	20	13
Parish Safeguarding Officer or PCC Member	64	23	13
Other role in Church	66	18	16

#### Conclusions and questions for Recommendation 2

Recommendation 2 emerges as a divisive issue, stirring strong opinions from various perspectives. 'Survivors and their Advocates' and those in 'Local Church' generally support this, citing the need to prioritize the rebuilding of trust in safeguarding in the Church. Conversely, 'Safeguarding Professionals' express disbelief, citing concerns its potential impact on existing relationships and safeguarding cultures. Disagreement also arises from 'Church Governance and Operations' and 'Senior Clergy', who align with the apprehensions 'Safeguarding Professionals'. The argue that the recommendation may represent an overly hasty approach, suggesting that projects currently underway in the Church could address many of the issues targeted by Recommendation 2. They propose a cautious stance, advocating for further progress before endorsing a contentious and extreme change.

A final consideration revolves around an idea put forward below about how this recommendation interacts with Recommendation 1:

"I agree with an Organisation for Scrutiny. I would suggest that the current focus should be on setting that up, allowing it to 'bed in', and to continue with the implementation of IICSA Recommendation 1 and the INEQE audits under IICSA Recommendation 8. Responsibility for the future design of safeguarding in the CofE (including further considerations regarding 'independence' of operational delivery) should be handed to the Organisation for Scrutiny, which would therefore be a genuinely independent process."

(Diocesan or Cathedral Safeguarding Advisor/Officer)

#### If Recommendation 2 is to be implemented:

**B1** – What can be done to ensure that relationships between safeguarding professionals and dioceses, cathedrals and parishes is improved, as opposed to damaged?

**B2** – How can a positive culture of safeguarding be maintained and strengthened in Church bodies, reflecting the principle that 'safeguarding is everyone's business'?

#### If Recommendation 2 is not to be implemented:

**B3** – What changes can be made to current structures that inspire trust and confidence in safeguarding practice within the Church of England?

**B4** – Will the delivery of the IICSA Recommendations 1& 8 project address many of the issues cited within the Jay Report?

#### If Recommendation 2 is not to be implemented immediately:

**B5** – Would it be possible to ask the decision on independent safeguarding delivery to be made by an Independent Organisation for Scrutinising Safeguarding Practice in the Church of England once it has been established and other projects are embedded within the Church?

## Recommendation 3: The definition of safeguarding in the Church of England

Currently, the definition of safeguarding in the Church of England<sup>14</sup> is described as "wider and more pro-active than just responding to the actual abuse of one person by another" and should be understood as "acting in ways that mitigate any risk of harm".

This understanding includes definitions for:

- Safeguarding Children (Working Together Statutory Guidance, 2015)
- Safeguarding Adults (The Care Act 2014)
- Safeguarding Vulnerable Adults (Clergy Discipline Measure, 2016)
- Promoting a Safer Culture and Encouraging Safer Behaviours

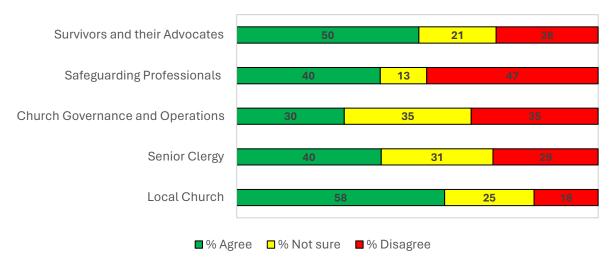
The recommendation to consider here was that the church adopt a statutory definition of safeguarding, which includes just:

- Safeguarding Children (The Children Act, 2004)
- Safeguarding Adults (The Care Act, 2014)

#### Analysis

Across all individuals, 53% participants agreed with Recommendation 3, 24% disagreed with it and 24% were not sure. Regarding whether implementing this recommendation would make the Church safer, 40% agreed. The breakdown of responses by major stakeholder group can be seen in Figure 4.

Figure 4: Agreement with Recommendation 3, broken down by major stakeholder group.



<sup>&</sup>lt;sup>14</sup> <u>https://www.churchofengland.org/safeguarding/safeguarding-e-manual/safeguarding-children-young-people-and-vulnerable-adults/1</u>

DR SAMUEL NUNNEY

There are statistically significant differences between major stakeholder groups<sup>15</sup>. Here it seems that those in the 'Local Church' group have stronger agreement (58%) with Recommendation 3 than the 'Safeguarding Professional' (40%), 'Church Governance and Operations' (30%), and 'Senior Clergy' (40%) groups.

#### Strengths and Limitations

When thinking about Recommendation 3, the perceived strengths tend to revolve around clarity and simplification, consistency and alignment with statutory services, and the ability to establish clear thresholds for safeguarding staff.

Many participants across different groups emphasised the importance of clarity and simplicity in defining what safeguarding is and what it is not. There is a feeling amongst some that using the definition in Recommendation 3 aids understanding, consistency, easing implementation, aligning practices and promoting accountability.

Another perceived strength comes from the alignment and consistency with statutory guidance. There is a perception that this provides a level of uniformity that improves consistency across dioceses and cathedrals, but also when it comes to working with statutory services.

Finally, another perceived strength is that implementing this would establish clear thresholds, which would assist the workloads of safeguarding professionals, allowing them to have a clear focus on vulnerable individuals. On top of reducing both confusion and workload pressure, it is suggested that this recommendation would make safeguarding policies easier to implement.

The three most common limitations that come up in discussing Recommendation 3 are concerns about narrowness and missing cases, a lack of clarity, and a loss of focus on culture.

A repeated theme is that participants view the proposed definition as too narrow, excluding many cases outside of defined parameters. There is a fear that implementing this will mean vulnerable individuals could be left unprotected.

There are many concerns regarding a lack of clarity about what happens to the things that do not fit into the proposed definition of safeguarding. There is anxiety that this could lead to creative interpretations that would end up propagating inconsistency of practice between safeguarding teams in dioceses and cathedrals. Again, the biggest concern in this is that there would be greater unresolved cases.

<sup>&</sup>lt;sup>15</sup> F(5,1970)= 21.173, p < .001,  $N_p^2$  = .05

DR SAMUEL NUNNEY

Finally, there is a lot of apprehension towards shifting towards a more "legalistic" approach to safeguarding. There is a fear that this would undermine the existing emphasis on promoting a safe culture and encouraging safer behaviours in the Church. There is a concern that a focus on such a legal definition could lead to neglecting the holistic care that should be available to those who need it, as well as overlooking the moral duty to protect all individuals within a church community.

#### Major Stakeholder Group Comparisons

#### Safeguarding professionals

The 'Safeguarding Professionals' group is largely split on Recommendation 3, as can be seen in Table 8. The majority of individuals within the Church (National Safeguarding Team and members of diocesan and cathedral safeguarding teams) disagree with the recommendation, while Safeguarding Advisory Panel Chairs and external safeguarding professionals largely agree with it.

While strengths put forward by those external to the Church mirror those made across all participants, distinct reasons for disagreement from those within the Church are suggested.

There is a concern that there is an overemphasis on reporting over prevention. There is a concern that the proposed approach does not sufficiently address the root causes of abuse or create proactive measures to foster healthier communities and prevent harm before it occurs (this limitation also comes up in the survivors and their advocates group).

There is also a suggestion that there is an inadequate recognition of Church context. Many argue that statutory definitions do not fully address the complexities of safeguarding within a faith-based organisation and highlight that the issue this recommendation is trying to solve is not solved by changing definitions, but by improving services elsewhere in the Church.

"The Church's current definitions are already consistent with statutory definitions of safeguarding and current safeguarding developments, so no change needed. The labelling of non-safeguarding matters as safeguarding is not an issue of definition; rather, it arises from poor behaviours e.g. lack of HR resources to deal with behaviours through HR processes." *(External Safeguarding Professional)* 

Table 8. Agreement with Recommendation 3, broken down by minor stakeholder group in 'Safeguarding professionals.

Minor Stakeholder Group	%Agree	%Not sure	%Disagree
National Safeguarding Team	30	4	65
Member of diocesan or cathedral safeguarding team	27	14	59
Safeguarding Advisory Panel Chair	56	26	19
External safeguarding professional	56	26	19

#### Church governance and operations and Senior Clergy

These two major stakeholder groups have been analysed together as their scores relating to Recommendation 3 are similar and neither express particular themes surrounding strengths and limitations that differ from those mentioned across all participants.

Table 9 highlights that there are not many minor stakeholder groups with a clear direction on Recommendation 3. There are high levels of National Church Institution staff, diocesan secretaries and diocesan staff, bishops and archdeacons that have all selected "Not sure". There are levels of agreement within the Cathedral community, with the percentage of those agreeing high in cathedral Chief Operating Officers and cathedral staff (40%) and deans and residentiary canons (56%), though it should be noted that cathedral Chief Operating Officers and cathedral staff also have 45% disagreeing with Recommendation 3.

Major Stakeholder Group	Minor Stakeholder Group	%Agree	%Not sure	%Disagree
Church	National Church Institutions staff and governance	32	45	23
Church Governance	Diocesan Secretary and diocesan staff	25	38	37
and Operations	Cathedral Chief Operating Officer and cathedral staff	40	15	45
	Bishops	36	28	36
Senior Clergy	Deans and Residentiary Canons	56	22	22
	Archdeacons	32	38	30

Table 9. Agreement with Recommendation 3, broken down by minor stakeholder group in 'Survivor and their advocates'.

#### Local Church

Those in the 'Local Church' group show consistent levels of agreement with Recommendation 3, which can be seen in Table 10. The perceived strengths and limitations do not differ from those reported amongst all participants – the need for clarity and simplification of the definition of safeguarding being the most common response.

Table 10. Agreement with Recommendation 3, broken down by minor stakeholder group in 'Survivor and their advocates'.

Minor Stakeholder Group	%Agree	%Not sure	%Disagree
Parish and Cathedral Clergy	55	29	16
Other Clergy	67	18	15
Parish Safeguarding Officer or PCC Member	58	23	19
Other role in Church	55	28	18

#### Conclusions and questions for Recommendation 3

Recommendation 3 offers more mixed views. Generally, there is more agreement than disagreement, which is driven by the large proportion of responses seen by those in a 'Local Church' context, who support it for its clarity and simplification of safeguarding processes. It must be noted that those safeguarding professionals working in the Church (National Safeguarding Team and members of diocesan and cathedral safeguarding teams) intensely disagree with this recommendation, with concerns raised about the overemphasis of reporting over preventive work and the inadequate coverage of the Church context.

#### If Recommendation 3 is to be implemented:

**C1** – What can be done to ensure that there is still an ownership of low-level concerns, early intervention and general culture in safeguarding in Church bodies?

#### If Recommendation 3 is not to be implemented:

**C2** – What can be done to ensure that safeguarding policy and procedure are well-adapted for implementation in parishes and cathedrals?

**C3** – What systems need to be in place to allow safeguarding professionals to efficiently pass on non-safeguarding issues to the relevant professionals?

## Recommendation 4: Removal of the term "Spiritual Abuse" in guidance and training in the Church of England

Currently in the Church of England, 'spiritual abuse' is defined as a form of emotional and psychological abuse.<sup>16</sup> It is characterised by a systematic pattern of coercive and controlling behaviour in a religious context. It states that spiritual abuse can have a deeply damaging impact on those who experience it and can be experienced in a variety of different relationships. In a faith context, using liturgy and scripture, spiritual abuse may occur on its own, or alongside other forms of abuse and may be used to 'legitimise' or facilitate other forms of abuse.

The recommendation to consider here was that the term and definition of "spiritual abuse" should be removed from all guidance and training and that these should focus on the terminology used in emotional and psychological abuse.

#### Analysis

Across all individuals, 31% participants agreed with Recommendation 4, 48% disagreed with it and 21% were not sure. Regarding whether implementing this recommendation would make the Church safer, 23% agreed. The breakdown of responses by major stakeholder group can be seen in Figure 5.

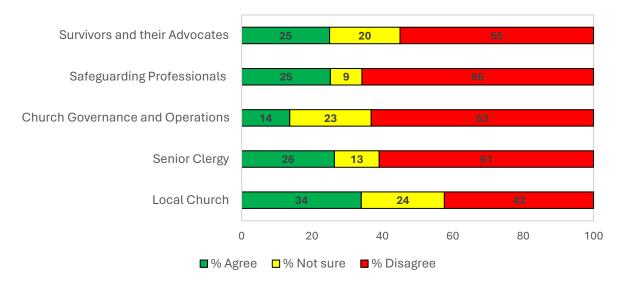


Figure 5: Agreement with Recommendation 4, broken down by major stakeholder group.

DR SAMUEL NUNNEY

<sup>&</sup>lt;sup>16</sup> https://www.churchofengland.org/safeguarding/safeguarding-e-manual/safeguarding-children-young-people-andvulnerable-adults/2

There are statistically significant differences between major stakeholder groups.<sup>17</sup> Here it seems that it is disagreement that is higher within the 'Survivors and their Advocates' (55%), 'Safeguarding Professionals' (66%), 'Church Governance and Operations' (63%), and 'Senior Clergy' (61%) groups in comparison to the 'Local Church' group (42%).

#### Strengths and Limitations

When analysing the perceived strengths of Recommendation 4, the most common themes surround clarity and simplification, consistency with statutory services and a focus on emotional and psychological abuse.

Many responses suggest that implementing Recommendation 4 can lead to the simplifying of terminology and removing any ambiguity, and list benefits that come with that. It is suggested that this would make it easier to implement safeguarding measurers and makes cases clearer for professionals and volunteers that deal with them.

Several responses that there is a benefit to promoting consistency with statutory services and that this alignment will avoid confusion when different organisations interact with the Church.

There's also a significant contingent that state that being able to focus on emotional and psychological abuse covers a range of harmful behaviours, including those often associated with spiritual abuse. There is a feeling that focusing on this can lead to clearer identification of abusive behaviours.

The perceived limitations of Recommendation 4 generally surround the loss of specificity and uniqueness, the undermining of efforts made so far, and potential harm to survivors and trust in the church.

Many argue that in a Church context, spiritual abuse is a distinct form of abuse that cannot be adequately covered by the broader definition of emotional of psychological abuse. It is thought that removing this term would result in a loss of specificity and in turn lead to more challenges in addressing the unique dynamics of abuse in religious contexts. It is seen as particularly important to acknowledge the specific power imbalances and dynamics that can be present in church scenarios.

<sup>&</sup>lt;sup>17</sup> F(5,1983)= 15.157, p < .001,  $N_p^2 = .037$ 

DR SAMUEL NUNNEY

Many express concern that as so much work and effort has gone into raising awareness of spiritual abuse, its removal could make it much easier to not adequately address in the future. Finally, there is a concern that removing this term could harm survivors that have experienced this abuse. There are also suggestions that its removal could erode trust in safeguarding efforts within the Church, as it might be seen to be minimizing or ignoring the reality of spiritual abuse. A few comments plead decision-makers to think of headlines for implementing this change, which could include "The Church of England no longer recognises spiritual abuse" and how that could lead to dramatic perceptions of the Church in the public domain.

#### Major Stakeholder Group Comparisons

#### Survivors and their Advocates

It is a minority of those in the 'Survivors and their Advocates' group that agree with Recommendation 4, with most minor stakeholder groups having a majority of individuals disagreeing with it, which can be seen in Table 11.

While the strengths and limitations identified across all participants are consistent with those in this group, there is a stronger limitation identified surrounding the denial of survivors' experiences. Many of those who state that they have experienced spiritual abuse express concerns that the removal of the term denies the validity of their experiences and could lead to feelings of marginalisation.

Minor Stakeholder Group	%Agree	%Not sure	%Disagree
Survivor of Church-related abuse	28	14	59
Survivor of abuse not related to the Church	20	40	40
Advocates of individual victims and survivors	25	15	60
Other survivor or advocate	24	18	59

Table 11. Agreement with Recommendation 4, broken down by minor stakeholder group in
'Survivor and their advocates'.

#### Safeguarding professionals, Church governance and operations, and Senior Clergy

These three major stakeholder groups have been analysed together as their scores across relating to Recommendation 4 are similar and themes surrounding strengths and limitations are comparable.

There are significant levels of disagreement with Recommendation 4 across many of the minor stakeholder groups here, which can be seen in Table 12. The strongest feeling of this is shown by 78% of National Safeguarding Team staff and 75% of diocesan or cathedral safeguarding teams disagree.

"For Spiritual Abuse, there was many years of work with academics and survivors to bring in this definition. This is dismissed by Jay with no rational or evidence." *(National Safeguarding Team Staff)* 

There are some areas of agreement, particularly with Safeguarding Advisory Panel Chairs and external safeguarding professionals, but these are still not a majority in those groups. The strengths expressed by these two minor groups does surround the alignment with statutory services.

Whilst is does not strive too far away from one of the general limitations listed, it is clear that across 'Safeguarding Professionals', 'Church Governance and Operations' and 'Senior Clergy' there is a strong anxiety for the impact that implementing this recommendation could have on victims and survivors. A concentrated narrative comes through that there is concern that this would undermine experiences, diminish recognition of their trauma, and hinder the ability to truly articulate and address harm that they have endured.

"I experienced spiritual abuse and had no language to describe what had happened to me - this prevented me being able to discuss and get response to my harm. When the language was introduced I finally understood what had happened to me. For me, and others it has been significant to have this language and policy so cases can be taken forward. Removing this silences us all once again. Removing this does not strengthen safeguarding. As a survivor I am asking you to reject this recommendation." *(External Safeguarding Professional and Survivor)* 

Major Stakeholder Group	Minor Stakeholder Group	%Agree	%Not sure	%Disagree
Safeguarding Professionals	National Safeguarding Team	13	9	78
	Member of diocesan or cathedral safeguarding team	17	8	75
	Safeguarding Advisory Panel Chair	42	19	38
	External safeguarding professional	36	7	58
Church Governance and Operations	National Church Institutions staff and governance	14	29	57
	Diocesan Secretary and diocesan staff	9	22	69
	Cathedral Chief Operating Officer and cathedral staff	25	20	55
Senior Clergy	Bishops	32	12	56
	Deans and Residentiary Canons	28	19	53
	Archdeacons	23	9	68

Table 12. Agreement with Recommendation 4, broken down by minor stakeholder group in 'Safeguarding professionals.

#### Local Church

Whilst there are significantly larger levels of agreement within the 'Local Church' group for Recommendation 4 in comparison to others, it should still be mentioned that the largest response selected was that of disagreement, which can be seen in Table 13.

Strengths and limitations within this group are congruent with those identified across all participants. But the one slightly more common strength identified is that abuse should be recognised regardless of context. There are some comments that outline that abuse is abuse, whether it is within a spiritual or secular setting. It is suggested that Recommendation would lead to the promotion of everyone being treated equally and inspire confidence in safeguarding in the Church.

"What is and is not spiritual abuse can be debated, but emotional and psychological abuse have well defined definitions in case law and best practices from psychology experts."

(Parish Safeguarding Officer or PCC Member)

Table 13. Agreement with Recommendation 4, broken down by minor stakeholder group in
'Survivor and their advocates'.

Minor Stakeholder Group	%Agree	%Not sure	%Disagree
Parish and Cathedral Clergy	26	24	50
Other Clergy	30	19	52
Parish Safeguarding Officer or PCC Member	38	24	38
Other role in Church	36	23	42

#### Conclusions and questions for Recommendation 4

Again, there are mixed opinions on Recommendation 4, with disagreement being the predominant response across stakeholder groups. Those who support the recommendation argue that it would bring clarity and consistency with statutory services, while those opposing it express concerns about losing specificity and potentially harming survivors of spiritual abuse. 'Safeguarding Professionals' within the Church, 'Church Governance and Operations', and 'Senior Clergy' worry about how this recommendation may undermine victims and survivors, which is consistent with the viewpoint of many individuals in the 'Survivors and their Advocates' group, who fear future denial of their experiences.

#### If Recommendation 4 is to be implemented:

**D1** – How can we ensure that all of the abuse that is currently defined as spiritual abuse is still recognised and reported when it is no longer defined?

**D2** – How the experiences of those who are victims and survivors of spiritual abuse continue to be heard and validated?

#### If Recommendation 4 is not to be implemented:

**D3** – How can guidance and policy around spiritual abuse be adapted to help promote the understanding of it in parishes and cathedrals?

## Recommendation 5: Mandatory reporting in the Church of England

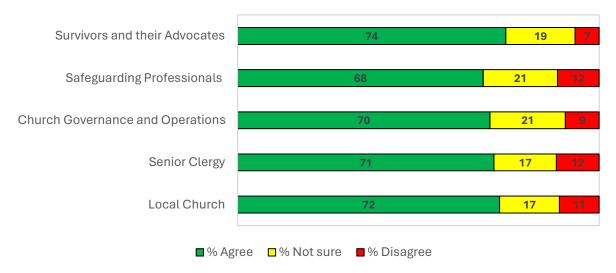
Currently, there is no general statutory obligation for individuals in England to report child abuse. Government statutory guidance on safeguarding, says "Anyone who has concerns about a child's welfare should consider whether a referral needs to be made to local authority children's social care and should do so immediately if there is a concern that the child is suffering significant harm or is likely to do so." While this does not impose a legislative requirement to report abuse, it creates an expectation that those working with children will comply with the guidance unless there are exceptional circumstances.

The recommendation to consider here was that Church of England should introduce a legal duty to report any complaint or concern regarding safeguarding to a safeguarding officer at the first available opportunity.

#### Analysis

Across all individuals, 72% participants agreed with Recommendation 5, 11% disagreed with it and 17% were not sure. Regarding whether implementing this recommendation would make the Church safer, 68% agreed. The breakdown of responses by major stakeholder group can be seen in Figure 6.

Figure 6: Agreement with Recommendation 5, broken down by major stakeholder group.



There are not statistically significant differences between major stakeholder groups.<sup>18</sup> Because of this, there will be no analysis of individual major stakeholder groups.

DR SAMUEL NUNNEY

<sup>&</sup>lt;sup>18</sup> F(5,1981)= 1.915, p = .089,  $N_p^2$  = .005

#### Strengths and Limitations

When analysing the perceived strengths of Recommendation 5, most comments underscore the preventive, organisation, and protective aspects of mandatory reporting within the Church community. The themes revolve around clarity and accountability, early identification and prevention, and protection of vulnerable individuals.

The most common theme surrounds clarity and accountability. There is a consistent emphasis on how mandatory reporting removes ambiguity about reporting responsibilities and provides clear lines of accountability. Many suggest that these features will promote a culture of accountability where safeguarding is seen to be taken seriously.

Many praise the idea of mandatory reporting for its ability to identify potential abuse cases early and therefore aid the prevention of further harm, whilst also acting as a deterrent for potential abusers.

Finally, participants frequently highlight the importance of mandatory reporting for protecting children and vulnerable adults. There is a feeling that its introduction will ensure that concerns are reported promptly and addressed effectively, ultimately creating a safer environment.

The themes that surround the limitations of Recommendation 5 comprise of confidentiality, enforcement and issues around clarity and consistency.

There are significant concerns about how mandatory reporting might intersect with existing practices such as confidentiality, the seal of the confessional is frequently discussed here. It appears that the upholding the sacredness of certain practices whilst fulfilling potentially legal obligations will pose a considerable challenge.

Regarding enforcement, there are challenges raised in the implementation and compliance of mandatory reporting. There are comments about needing to ensure that these changes do not bring about a culture of fear. There are also prevalent concerns surrounding potential overreactions and their consequences.

When it comes to clarity and consistency, there are suggestions that there needs to be both simplicity and precision when it comes to the details of such a policy. Participants note that thought must be given to penalties for non-compliance, who this policy applies to, and also what happens when national law on these changes and if it differs significantly to Church policy. Many participants summarise that any ambiguity on these topics could deter engagement in the process.

# Conclusions and questions for Recommendation 5

It is clear that there is a strong majority across all stakeholder groups for the implementation of mandatory reporting within the Church of England. However, it is also clear that implementing this policy will require careful planning, strong communication, clear guidance and training and ongoing support to ensure maintaining trust and community cohesion. Thorough consideration needs to be given on the potential impact on both safeguarding practices and current religious freedoms.

#### If Recommendation 5 is to be implemented:

E1 – How would this policy fit with the Seal of the Confessional?

**E2** – How can mandatory reporting be implemented with a degree of positivity and safety, as opposed to creating a culture of fear?

**E3** – Who would this policy be applicable to and what would the penalties be for non-compliance?

**E4** – What mitigations can be put in place to ensure that any policy created by the Church does not become unduly inconsistent with future governmental policy?

#### If Recommendation 5 is not to be implemented:

**E5** – In what ways can the reporting of abuse in the Church of England be simpler, clearer, and more accountable?

# The Wilkinson and Jay Reports: Familiarity, Usefulness and Reaction

# Familiarity with the Reports

It is clear that there is a large variance in levels familiarity with both of these reports, which can be seen in Table 14. Almost double the participants have read the Jay Report in detail in comparison to the Wilkinson Report and a quarter of responses had not read the Wilkinson Report.

Table 14. Familiarity response breakdown for the Wilkinson and Jay Reports across all participants.

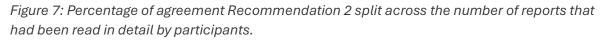
Report	% that have read in detail	% that have read key points	% that have heard about this from other sources	% have not read it
The Wilkinson Report	14	35	25	25
The Jay Report	31	34	19	16

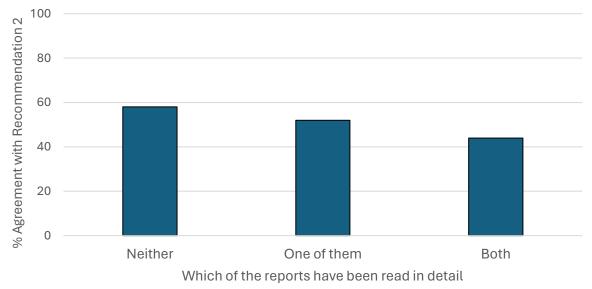
There are also huge variances in familiarity between stakeholder groups, which can be seen in Table 15. The 'Local Church' group were the least familiar (7% reading the Wilkinson Report in detail and 19% reading the Jay Report in detail) and 'Safeguarding Professionals' were the most familiar (35% reading the Wilkinson Report in detail and 70% reading the Jay Report in detail). It must be noted, exploring the minor stakeholder groups, that bishops in particular were high in familiarity (52% reading the Wilkinson Report in detail and 72% reading the Jay Report in detail).

Table 15. Percentage of those who have read the reports in detail across major stakeholder
groups.

Major Stakeholder Group	% that have read the Wilkinson Report in detail	% that have read the Jay Report in detail
Survivors and their Advocates	28	42
Safeguarding Professionals	35	70
Church Governance and Operations	29	56
Senior Clergy	25	52
Local Church	7	19

There is a concern for the level of familiarity of the data in this survey, as just 13% of participants had read both the Wilkinson and Jay Report in detail and 69% had not read either report in detail. But the survey was designed to provide summaries and briefings to allow every participant to give an informed opinion on the recommendations. An exploration of the data shows that familiarity of the report did not have any significant impact on four of the five recommendations. However, there is a significant impact that can be seen for Recommendation 2, which is shown in Figure 7. This highlights that the more familiar that participants were with the reports the lower the levels of agreement with the recommendation were. Those who had read both reports had an agreement level of 44% with Recommendation 2, an 11% drop from the total population (55% agreement). This needs to be reflected upon when addressing the questions faced in Recommendation 2.





### Perceived usefulness of the reports<sup>19</sup>

There is also a large variance in the perceived usefulness of the two reports, which can be seen in Table 16. In comparison to the Wilkinson Report, the Jay Report has four times as many participants selecting that they do not think it was useful, though this is still the minority with 16%. The vast majority believe both reports have been useful.

<sup>&</sup>lt;sup>19</sup> For the purpose of this analysis, those who had selected "I have not read this report" were removed.

Report	% Not useful	% Not sure	% Useful
Wilkinson Report	4	19	77
Jay Report	16	13	70

Table 16. Response breakdown for perceived usefulness of the Wilkinson and Jay Reports for those who had either read the report or head about it from other sources.

There are also huge variances in perceived usefulness of these reports between stakeholder groups, which can be seen in Table 17. All major stakeholder groups have a large majority that believe that the Wilkinson Report was useful – all around three quarters or more. The large amount of variance comes with the Jay Report. Over three quarters of those in 'Survivors and their Advocates' and 'Local Church' groups label the Jay Report as useful, while two thirds of 'Senior Clergy' do. However, the pockets of dissatisfaction come from 'Safeguarding Professionals' and 'Church Governance and Operations' groups, where over 40% of participants label the Jay Report as not useful (these scores within the National Safeguarding Team and the members of diocesan and cathedral safeguarding team are around 60% suggesting it is not useful and 20% suggesting it is useful, and around 20% not sure). Reasons given for these differences will be explored below.

Major Stakeholder	Wilkinson Report			Jay Report		
Group	% Not useful	% Not sure	% Useful	% Not useful	% Not sure	% Useful
Survivors and their Advocates	1	12	87	15	8	77
Safeguarding Professionals	5	21	74	43	19	38
Church Governance and Operations	5	7	88	41	14	45
Senior Clergy	1	15	84	20	14	66
Local Church	4	21	75	7	12	81

Table 17. Percentage of those who believe the reports to be either useful or not useful across major stakeholder groups.

### Reaction to the Reports

In this section, the responses to the open-text box question, inviting further comments from participants about either Wilkinson or Jay Reports, have been analysed thematically. This analysis again highlights the discordant split of opinion, which can be seen in the key themes: How these reports provide an insight into safeguarding in the Church of England, the perceived incongruence of the two reports, how the recommendations should be implemented immediately, the flaws in the methodology of the Jay Report, the role of Archbishops and Archbishops Council in the terms of reference and cost, and the morale of current safeguarding staff.

#### An insight into safeguarding in the Church of England

"Both reports are important as they give a window into current safeguarding matters of the Church of England" (Survivor of Church-related abuse who first disclosed abuse longer than five years ago)

There are many that agree with the above quote. These participants welcome both of the reports as they both speak to and reflect issues that may have experienced. For many in the 'Survivors and their Advocates' group, it has reinforced or confirmed their viewpoint that the Church is not trustworthy and not safe. The are numerous calls to set up an organisation responsible for independent scrutiny as quickly as possible, particularly with the issues surrounding the dismissal of the Independent Safeguarding Board (ISB) brought to light in The Wilkinson Report.

"I don't think there is any argument for not getting on with Org 'B' [Recommendation 1] straight away. Most people agree with this, and it's overdue, especially with fall out from ISB sacking."

 $(Survivor\ of\ Church-related\ abuse\ who\ first\ disclosed\ abuse\ longer\ than\ five\ years\ ago)$ 

The viewpoint from those working in and around safeguarding in the Church is that the reports do highlight real and true issues that exist in the Church, but with the Jay Report in particular, there is a view that there is nothing new here, and that all of these issues were already known.

"Whilst the Jay Report is helpful, I am not sure that it identified any key issues that were not already recognised. It did not fully recognise the significant changes that have been taking place over recent years, nor the developmental work of the pathfinder dioceses and the regional model [IICSA 1&8 Project], regarding which there is very positive feedback. It is important to build on these strengths. The report made very significant recommendations, but was light on the details. (Safeguarding Advisory Panel Chair)

#### Congruence of the two reports

"The Wilkinson and Jay report recommendations are not compatible - one warns against quick decisions, the other wants sweeping changes implemented quickly." *(Diocesan Secretary)* 

As the above quote dictates, the first theme to highlight is that there is a suggestion that the two reports are contradictory. Many note that the Wilkinson report underscores the necessity of cautious, well-researched approaches to safeguarding reforms in the Church of England, and to avoid hastily made decisions. The Jay Report recommends significant safeguarding reform and states that these should be made as a matter of urgency.

There are also worries and concerns that the publication of the Jay Report shortly before General Synod meeting in February 2024, has totally eclipsed the Wilkinson Report, which would explain the finding above regarding less participants being familiar with it. The below quote summarised the view of many: that these two reports should be read together.

"The two reports need to be read together. The National Church may understandably feel it needs to be seen to be acting on the Jay recommendations, but Wilkinson reminds us of the need for expert-led change management by a team of people with significant experience in a major religious institution." *(Safeguarding Advisory Panel Chair)* 

#### The implementation of the Jay Recommendations

"A new regime must be implemented as soon as possible. The CofE has prevaricated too long. Endless navel gazing serves no one. The status quo is not acceptable. Victims of historic abuse need urgent action to bring justice and truth. And then redress." (Survivor of Church-related abuse who first disclosed abuse longer than five years ago)

The quote above effectively highlights a recurring theme among participants, particularly those in the 'Survivors and their Advocates' and 'Local Church' groups, who stress the urgent necessity of implementing the Jay Recommendations. Within the 'Survivors and their Advocates' group, there is a prevailing sentiment that the current safeguarding system is insufficient. Likewise, the 'Local Church' group advocates for heeding and trusting the external expertise offered by Professor Jay. These groups share a common conviction that the Church must promptly implement the recommendations to address past abuses and prevent future occurrences.

"There is of course much work to do around detail, and I'm not sure that Jay understands spiritual abuse, that is outside her expertise. But the only way to restore confidence in church safeguarding (the lack of which is destroying the church) is to implement all her recommendations, I think."

(Survivor of Church-related abuse who first disclosed abuse longer than five years ago)

The demand for immediate and urgent implementation appears incongruent with the approach advocated in the Wilkinson Report, which would emphasise a fully evaluated and considered way forward. Among those advocating for immediacy however, some express frustration at the current process, believing that this survey hinders progress toward creating a safer church.

"I believe strongly that this survey will delay even further creating a safer Church of England. Just get on with implementing the recommendations of the Jay report." *(Churchgoer without other role)* 

Finally, some participants in the 'Survivors and their Advocates' group argue that the recommendations outlined in the Jay Report do not sufficiently address the issues raised, and in certain instances, may never do so. While these participants still endorse the recommendations put forth in the report, they express belief that they should extend further. However, there are some that acknowledge that even with the implementation of the recommendations, it might not necessarily restore trust and confidence in the Church.

"In my interview with her she said that varying degrees of support are being offered because of too much police in safeguarding in the church. I was promised that this would not be the case moving forward because no police officers would be hired into her new suggested organisation. I was told that the true safeguarding qualification would be needed to be involved."

(Survivor of Church-related abuse who first disclosed abuse within the last five years)

"The church must deliver all of these recommendations and more. I am not surprised that it's stalling. That said, no amount of change will ever give me confidence that it is not ready to cover things up to protect its own image." *(Survivor of abuse not related to the Church)* 

#### The methodology used in the Jay Report

"How good, objectively, is our safeguarding? The Jay report does not answer these questions. Having conducted the research and presented some of its results, the report then moves on to claim that the only correct answer to the Church of England's reported safeguarding problems is to set up two independent organisations. This is a significant leap. No working is shown and no attempt is made to argue from the reported problem to the proposed solution. I would very much have wanted, for example, to see some examples of best practice from elsewhere. Does any other organisation completely hand over all its safeguarding implementation and review to completely independent organisations? If so, how does that work out in practice?" (*Parish Clergy*)

The most common comment amongst 'Safeguarding Professionals', 'Church Governance and Operations' and 'Senior Clergy' made within the survey outlined issues with the methodology

used the Jay Report. These comments can be broken down into two themes – a lack of evidence and a lack of engagement.

Numerous participants criticise the report for its lack of evidence, asserting that it fails to acknowledge the improvements that have been made in safeguarding practice. Additionally, many of these participants express dissatisfaction with the report's negative tone and highlight biased presentations of data and selective use of evidence.

"I feel that the Jay report lacked a clear evidence base. For example, levels of dissatisfaction with the way cases and allegations are managed was not compared with any other organisations. It lacked the context that in any organisation doing safeguarding people will be dissatisfied as it is a difficult and uncomfortable topic. The section about resourcing needed a clear graph showing the link between Diocese size and team size. As someone external it felt as if the report had decided what it wanted to say and then found evidence to back it up." *(External Safeguarding Professional and a Survivor)* 

"The Jay report seems limited in its scope and appears to have cherry picked statements that support Jay's own preferred opinions and solutions, rather than taking an unbiased and comprehensive look at safeguarding across the whole church. I am very concerned ....we have one opportunity to get this right and may be about to make a huge error in the proposed change of direction."

(Other member of diocesan safeguarding team)

Finally, participants from various stakeholder groups express disappointment with the report's failure to adequately engage with a wide range of stakeholders across the church. This

sentiment is particularly strong in the cathedral community.

"I am disappointed that the presentation of the Jay report included a statement that all those registering interest in participation had been spoken to. Despite having register twice via the website I received no contact... This leaves my perception as to its integrity much reduced."

(Residentiary Canon)

"I have a concern that Jay makes no real reference to Cathedrals and their particular place in the economy of the Church of England. She consulted with no one from the cathedral sector according to her list of consultees in Annex A. The many quotes of failures in the current system contain none that suggest a cathedral context." *(Other role in Church)* 

#### The Terms of Reference in the Jay Report, the Role of the Archbishops and Archbishop's

#### Council, and Cost

"Professor Jay has been clear that she was asked to report on HOW to make safeguarding independent of the Church, rather than WHETHER this should be done. Recommendations should not be implemented unless there is reason to believe they would make the Church safer for those it serves. The report does not address this. The risk of weakening safeguarding practice - either temporarily during the process of change, or permanently due to unintended consequences - should be weighed against the assessed likelihood and impact of any changes." *(Diocesan Secretary)* 

The above quote highlights a strong sense of disappointment that is felt among many groups, but particularly those in the 'Church Governance and Operations' group - that the terms of reference offered for the Jay Report were flawed. The question of whether independence actually addresses the issues listed in the Jay Report is not explained and there is a feeling that this process has skipped consultation and evidence gathering. Many deem that there is a lack of clarity, a narrow focus, and enforcing a pre-determined agenda.

"I believe the primary issue raised by both reports is the question of governance and how decisions are made. As someone who has been involved at a senior level in the Church of England for some years, I was nevertheless shocked to read of how decisions were made, including the commissioning of these reports. The direct effect has been to serious damage the morale of staff and volunteers - the very people on whom we depend to make our churches safe places." *(Diocesan Bishop)* 

There are those from across all major stakeholder groups that question the role of the Archbishops and the Archbishop's Council on this. There are many who question the transparency of how the Jay Report was commissioned, and exactly how the terms of reference were set.

"I have significant concerns that the Jay report was instructed by the Archbishops without the full knowledge of the Archbishops' Council, raising grave governance concerns. The Archbishops' Council seem to have been under the impression that Jay was to advise on how to introduce independent scrutiny (see their July press release), yet Jay was explicitly told to look at operational independence too. *(Diocesan Secretary)* 

Finally, there are also many comments pointing toward the money that has been spent on the commissioning and delivery of the Jay Report. Those in more senior roles in the Church discuss how disappointing the quality of the report is, in comparison to the large amounts of money spent, while those in the 'Safeguarding Professionals' group highlight how much good would have been done by simply putting that money into operational safeguarding in the church.

DR SAMUEL NUNNEY

"We have paid huge amount of money to start an argument that no one has wanted, completely divided the church, and hugely obliterated the morale of our wonderful safeguarding staff. In my opinion this report being published was one of the bigger risks to our safeguarding practice right now." (Diocesan Bishop)

"I thought the Jay review was hopeless and a shocking waste of money. It stated at the beginning that it wasn't written to make a judgement on whether independent safeguarding was a good idea. It said limited consultation had taken place but then made a number of extremely judgemental statements about the current quality of diocesan safeguarding despite saying it wasn't going to do that or had any evidence to back it up. The report then drew random statements from the survey out of context (it is easy to find one or two comments to support your point) and the there was a complete lack of analysis of the (limited) data collected. The report made no assessment on the improvement journey taken in safeguarding and whether continuing that journey would lead to a better or worse outcome than an independent structure. There was no evidence to support why or how an independent structure would improving practice, there was no model offered for where it had worked well and a fundamental failure to capture the full role of safeguarding (it seemed to focus on case work only). I could go on! For me, the report is highly damaging. It undermines the progress made to date and fails to acknowledge how seriously safeguarding is taken." (Diocesan Secretary)

"I was shocked to find out the cost of the Jay report. It seems like such a poor way to spend money, which could have been put to such good use elsewhere in safeguarding within the Church. "

(External Safeguarding Professional)

#### Morale of Safeguarding Staff

"The communication of the Jay Report and its implications has had a devastating effect on Safeguarding Teams. They feel their credibility and professionalism has been undermined. Morale among them has never been so low. Our Diocesan Safeguarding Teams are made up of hard-working, committed and experienced individuals who do incredible work in extremely difficult circumstances, to see them treated in this way is unacceptable. My fear is that, because of this process, we will lose Safeguarding Staff as they chose to move to organisations where they will be valued. If this happens we will have a recruitment crisis and, even more important, a crisis of churches becoming unsafe places where perpetrators can offend unchallenged." *(Diocesan Secretary)* 

A final theme that does come through in the survey is that there is huge appreciation for safeguarding staff from the operational leaders and their senior clergy. There is a desire to protect them from the impact that the Jay Report has had on their morale and their wellbeing. There are those who also have taken this opportunity to celebrate and point to the good practice that they see within their safeguarding staff and hope that this is a narrative that is not lost along the way in this process. "I think the professional integrity of those employed in our Diocesan and Cathedral safeguarding departments should be celebrated. Problems can arise when their advice/opinion is not acted upon/taken by senior clergy/others. There are many victims and survivors who have found the care and concern of the church to be very helpful and healing."

(Archdeacon)

# Appendix A: Data tables<sup>20</sup>

	Disagree	Not sure	Agree
Church Governance and Operations	16	13	70
Cathedral Chief Operating Officer and cathedral Staff	24	19	57
Diocesan Secretary and diocesan staff	19	13	69
NCI Staff and governance	5	9	86
Local Church	7	13	80
Clergy	8	13	78
Other Clergy role	5	5	89
Other role in Church	9	13	78
Parish Safeguarding Officer or PCC Member	6	14	80
Other	7	7	87
Other	7	7	87
Safeguarding Professionals	14	12	74
Diocesan or Cathedral Safeguarding Advisory Panel Chair	4	19	78
External safeguarding professional	22	11	67
Member of diocesan or cathedral safeguarding team	13	10	77
NST	9	17	74
Senior Clergy	10	7	83
Archdeacon	15	6	79
Bishops	8	8	84
Deans and Residentiary Canons	3	9	88
Survivors and their Advocates	5	9	86
Advocates of individual victims and survivors	15	0	85
Other survivor or advocate	0	12	88
Survivor of abuse not related to the Church	4	16	80
Survivor of church-related abuse	3	9	88
Total	9	12	79

<sup>&</sup>lt;sup>20</sup> Because of rounding, percentages may not all add up to exactly 100.

	Disagree	Not sure	Agree
Church Governance and Operations	16	36	47
Cathedral Chief Operating Officer and cathedral staff	24	38	38
Diocesan Secretary and diocesan staff	19	37	44
NCI Staff and governance	5	32	64
Local Church	9	24	67
Clergy	11	22	67
Other Clergy role	7	23	70
Other role in Church	11	21	69
Parish Safeguarding Officer or PCC Member	8	27	65
Other	7	20	73
Other	7	20	73
Safeguarding Professionals	18	29	52
Diocesan or Cathedral Safeguarding Advisory Panel Chair	4	37	59
External safeguarding professional	23	29	48
Member of diocesan or cathedral safeguarding team	19	30	51
NST	17	17	65
Senior Clergy	11	25	65
Archdeacon	15	30	55
Bishops	12	12	76
Deans and Residentiary Canons	3	25	72
Survivors and their Advocates	8	13	78
Advocates of individual victims and survivors	10	15	75
Other survivor or advocate	6	24	71
Survivor of abuse not related to the Church	4	16	80
Survivor of church-related abuse	10	9	81
Total	11	25	65

Recommendation 1: Percentage agreement that this recommendation makes the church safer

	Disagree	Not sure	Agree
Church Governance and Operations	61	15	24
Cathedral Chief Operating Officer and cathedral Staff	52	24	24
Diocesan Secretary and diocesan staff	74	11	15
NCI Staff and governance	41	14	45
Local Church	15	20	65
Clergy	18	16	66
Other Clergy role	13	20	67
Other role in Church	16	18	66
Parish Safeguarding Officer or PCC Member	13	23	64
Other	31	13	56
Other	31	13	56
Safeguarding Professionals	61	18	21
Diocesan or Cathedral Safeguarding Advisory Panel Chair	44	15	41
External safeguarding professional	49	25	26
Member of diocesan or cathedral safeguarding team	73	13	14
NST	61	26	13
Senior Clergy	61	15	25
Archdeacon	70	17	13
Bishops	68	20	12
Deans and Residentiary Canons	41	6	53
Survivors and their Advocates	24	17	60
Advocates of individual victims and survivors	32	21	47
Other survivor or advocate	41	6	53
Survivor of abuse not related to the Church	20	32	48
Survivor of church-related abuse	17	12	71
Total	26	19	55

### Recommendation 2: Percentage agreement with the recommendation

	Disagree	Not sure	Agree
Church Governance and Operations	59	24	17
Cathedral Chief Operating Officer and cathedral staff	48	43	10
Diocesan Secretary and diocesan staff	74	17	9
NCI Staff and governance	36	23	41
Local Church	15	30	55
Clergy	19	27	54
Other Clergy role	13	26	61
Other role in Church	15	30	56
Parish Safeguarding Officer or PCC Member	14	32	54
Other	31	13	56
Other	31	13	56
Safeguarding Professionals	65	21	14
Diocesan or Cathedral Safeguarding Advisory Panel Chair	48	22	30
External safeguarding professional	51	29	19
Member of diocesan or cathedral safeguarding team	79	13	8
NST	61	30	9
Senior Clergy	56	20	24
Archdeacon	68	19	13
Bishops	60	24	16
Deans and Residentiary Canons	34	19	47
Survivors and their Advocates	24	17	59
Advocates of individual victims and survivors	37	16	47
Other survivor or advocate	35	12	53
Survivor of abuse not related to the Church	20	28	52
Survivor of church-related abuse	19	14	67
Total	26	27	47

Recommendation 2: Percentage agreement that this recommendation makes the church safer

	Disagree	Not sure	Agree
Church Governance and Operations	35	35	30
Cathedral Chief Operating Officer and cathedral staff	45	15	40
Diocesan Secretary and diocesan staff	37	38	25
NCI Staff and governance	23	45	32
Local Church	18	25	58
Clergy	16	29	55
Other Clergy role	15	18	67
Other role in Church	18	28	55
Parish Safeguarding Officer or PCC Member	19	23	58
Other	27	18	55
Other	27	18	55
Safeguarding Professionals	47	13	40
Diocesan or Cathedral Safeguarding Advisory Panel Chair	19	26	56
External safeguarding professional	36	8	56
Member of diocesan or cathedral safeguarding team	59	14	27
NST	65	4	30
Senior Clergy	29	31	40
Archdeacon	30	38	32
Bishops	36	28	36
Deans and Residentiary Canons	22	22	56
Survivors and their Advocates	28	21	50
Advocates of individual victims and survivors	42	21	37
Other survivor or advocate	29	18	53
Survivor of abuse not related to the Church	25	17	58
Survivor of church-related abuse	25	25	51
Total	24	24	53

### Recommendation 3: Percentage agreement with the recommendation

	Disagree	Not sure	Agree
Church Governance and Operations	40	38	21
Cathedral Chief Operating Officer and cathedral staff	40	30	30
Diocesan Secretary and diocesan staff	46	37	17
NCI Staff and governance	27	50	23
Local Church	20	37	43
Clergy	20	39	41
Other Clergy role	19	30	51
Other role in Church	18	40	42
Parish Safeguarding Officer or PCC Member	21	35	44
Other	30	23	48
Other	30	23	48
Safeguarding Professionals	49	21	29
Diocesan or Cathedral Safeguarding Advisory Panel Chair	19	37	44
External safeguarding professional	39	17	44
Member of diocesan or cathedral safeguarding team	63	20	18
NST	52	26	22
Senior Clergy	31	42	27
Archdeacon	32	45	23
Bishops	40	44	16
Deans and Residentiary Canons	23	35	42
Survivors and their Advocates	33	22	45
Advocates of individual victims and survivors	35	40	25
Other survivor or advocate	35	12	53
Survivor of abuse not related to the Church	28	20	52
Survivor of church-related abuse	33	19	47
Total	26	34	40

Recommendation 3: Percentage agreement that this recommendation makes the church safer

	Disagree	Not sure	Agree
Church Governance and Operations	63	23	14
Cathedral Chief Operating Officer and cathedral staff	55	20	25
Diocesan Secretary and diocesan staff	69	22	9
NCI Staff and governance	57	29	14
Local Church	42	24	34
Clergy	50	24	26
Other Clergy role	52	19	30
Other role in Church	42	23	36
Parish Safeguarding Officer or PCC Member	38	24	38
Other	38	20	42
Other	38	20	42
Safeguarding Professionals	66	9	25
Diocesan or Cathedral Safeguarding Advisory Panel Chair	38	19	42
External safeguarding professional	58	7	36
Member of diocesan or cathedral safeguarding team	75	8	17
NST	78	9	13
Senior Clergy	61	13	26
Archdeacon	68	9	23
Bishops	56	12	32
Deans and Residentiary Canons	53	19	28
Survivors and their Advocates	55	20	25
Advocates of individual victims and survivors	60	15	25
Other survivor or advocate	59	18	24
Survivor of abuse not related to the Church	40	40	20
Survivor of church-related abuse	59	14	28
Total	48	21	31

### Recommendation 4: Percentage agreement with the recommendation

	Disagree	Not sure	Agree
Church Governance and Operations	65	25	10
Cathedral Chief Operating Officer and cathedral staff	50	35	15
Diocesan Secretary and diocesan staff	69	24	7
NCI Staff and governance	68	18	14
Local Church	43	32	25
Clergy	49	33	19
Other Clergy role	53	25	22
Other role in Church	44	31	25
Parish Safeguarding Officer or PCC Member	38	33	29
Other	40	24	36
Other	40	24	36
Safeguarding Professionals	66	16	18
Diocesan or Cathedral Safeguarding Advisory Panel Chair	37	37	26
External safeguarding professional	56	15	29
Member of diocesan or cathedral safeguarding team	79	11	10
NST	70	17	13
Senior Clergy	62	24	15
Archdeacon	68	19	13
Bishops	56	32	12
Deans and Residentiary Canons	56	25	19
Survivors and their Advocates	58	18	24
Advocates of individual victims and survivors	60	15	25
Other survivor or advocate	71	0	29
Survivor of abuse not related to the Church	48	36	16
Survivor of church-related abuse	58	16	26
Total	48	28	23

Recommendation 4: Percentage agreement that this recommendation makes the church safer

	Disagree	Not sure	Agree
Church Governance and Operations	9	21	70
Cathedral Chief Operating Officer and cathedral staff	5	20	75
Diocesan Secretary and diocesan staff	11	24	65
NCI Staff and governance	9	14	77
Local Church	11	17	72
Clergy	14	17	69
Other Clergy role	9	18	73
Other role in Church	10	16	75
Parish Safeguarding Officer or PCC Member	10	16	73
Other	9	16	75
Other	9	16	75
Safeguarding Professionals	12	21	68
Diocesan or Cathedral Safeguarding Advisory Panel Chair	0	30	70
External safeguarding professional	10	19	71
Member of diocesan or cathedral safeguarding team	13	21	67
NST	27	14	59
Senior Clergy	12	17	71
Archdeacon	8	19	74
Bishops	24	8	68
Deans and Residentiary Canons	9	22	69
Survivors and their Advocates	7	19	74
Advocates of individual victims and survivors	5	10	85
Other survivor or advocate	6	18	76
Survivor of abuse not related to the Church	12	36	52
Survivor of church-related abuse	5	16	79
Total	11	17	72

### Recommendation 5: Percentage agreement with the recommendation

	Disagree	Not sure	Agree
Church Governance and Operations	10	25	65
Cathedral Chief Operating Officer and cathedral staff	10	15	75
Diocesan Secretary and diocesan staff	11	31	57
NCI Staff and governance	9	18	73
Local Church	11	21	69
Clergy	13	22	65
Other Clergy role	9	20	71
Other role in Church	10	18	72
Parish Safeguarding Officer or PCC Member	10	21	69
Other	5	27	68
Other	5	27	68
Safeguarding Professionals	12	23	65
Diocesan or Cathedral Safeguarding Advisory Panel Chair	0	30	70
External safeguarding professional	14	23	63
Member of diocesan or cathedral safeguarding team	12	22	67
NST	18	23	59
Senior Clergy	14	20	66
Archdeacon	9	23	68
Bishops	24	16	60
Deans and Residentiary Canons	13	19	69
Survivors and their Advocates	6	18	76
Advocates of individual victims and survivors	5	15	80
Other survivor or advocate	0	24	76
Survivor of abuse not related to the Church	8	36	56
Survivor of church-related abuse	7	11	82
Total	11	21	68

Recommendation 5: Percentage agreement that this recommendation makes the c	hurch safer
Recommendation 5. Fercentage agreement that this recommendation makes the t	Julich Salei

# Appendix B: Questions used in the survey

#### Engagement with the Wilkinson/Jay Reports

1. How familiar are you with the following reports? [I have read in detail/I have read key points/I have heard of this via other sources/I have not read this report]

- a) The Wilkinson Report Commissioned by Archbishops Council to review of the creation, work and termination of the Independent Safeguarding Board ("ISB")
- b) The Jay (Future of Church Safeguarding) Report- Commissioned by Archbishops of Canterbury and York to make recommendations for how Church safeguarding, and the scrutiny of Church safeguarding, could be made fully independent of the Church.

#### About you

#### 2. Which of the descriptions below do you most identify with? [Tick]

(If you identify with more than one description, please do express the others in the comment box provided - the reason for only being able to tick one option is to ensure that each response is only analysed once)

Survivors and victims and their advocates and group representatives

- Survivor of church-related abuse who first disclosed abuse to the Church within the last five years
- Survivor of church-related abuse who first disclosed abuse to the Church longer than five years ago
- Survivor of church-related abuse who has not disclosed the abuse

#### Church Roles (National and Local Level)

- National Safeguarding Team (NST) Staff
- Other National Church Institutions (NCIs) Staff
- NCI governing bodies and their subcommittees, working groups and networks (e.g., Archbishops Council Trustees, Church Commissioners)
- Theological Education Institutions (TEIs)
  Staff
- Diocesan Bishop
- Suffragan or Assistant Bishop
- Archdeacon
- Dean
- Residentiary Canon
- Diocesan Secretary
- Cathedral Chief Operating Officer

#### External Audiences

- External Safeguarding Professional
- Legal Professional
- Member of the general public who does not attend church

- Survivor of abuse not related to the Church
- Advocates of individual victims and survivors
- Representative of advocacy organisation working with victims and survivors
- Representative/Member of a survivors group
- Survivor, but prefer not to disclose details about my experience
- Diocesan or Cathedral Safeguarding Advisor/Officer
- Other member of diocesan safeguarding team
- Diocesan (or Cathedral) Safeguarding Advisory Panel Chair
- Parish Clergy
- Cathedral Clergy
- Other Clergy
- Reader or Licenced Lay Minister
- Parish Safeguarding Officer or PCC Member
- Member of a religious community recognised or acknowledged by the Church of England
- Church or Cathedral Volunteer
- Churchgoer without other role
- Other role in the Church
- Organisations which serve, support and equip clergy and lay ministries
- Civil Servant or Government Official
- Media

Other (please specify)

If you would like to describe your role or experience in safeguarding in more detail, please do so here: [Open text box]

DR SAMUEL NUNNEY

- 3. Are you currently a General Synod member? [Yes/No/Prefer not to say]
- 4. If you are attached to a diocese or cathedral, please write which one below: [Open text box]

# An organisation responsible for independent scrutiny of safeguarding in the Church of England

#### Current position in the Church of England

Currently, scrutiny of safeguarding in the Church comes from many sources: These include (but are not limited to) independent Safeguarding Advisory Panels in all dioceses (and many cathedrals) that advise locally on safeguarding policies, procedures and practice (these are independently chaired and include external agency representation e.g., police, social care, victim and survivor services). There is a National Safeguarding Panel that advises on national policies and procedures. There is also a programme of Independent Safeguarding Audits that regularly evaluate the effectiveness of safeguarding within dioceses and cathedrals.

#### Recommendation

This recommendation suggests the creation of a separate independent organisation with the remit of scrutinising safeguarding across the Church. This includes a single uniform complaints system with an appeals process, the integration of the current Independent Safeguarding Audit Programme and the issuing of safeguarding code of practice and safeguarding standards.

5. To what extent do you agree with the above recommendation on independent scrutiny? [Strongly disagree – Strongly agree]

6. To what extent do you agree that implementing the above recommendation on independent scrutiny will make people safer across the Church? [Strongly disagree – Strongly agree]

7. In a few words, please identify up to three key strengths of implementing this recommendation on independent scrutiny. [Three open text boxes, and a tick box for "There are no strengths"]

8. In a few words, please identify up to three key limitations of implementing this recommendation on independent scrutiny. [Three open text boxes, and a tick box for "There are no limitations"]

# An organisation responsible for independent operational delivery of safeguarding in the Church of England

For the purpose of this recommendation, operational safeguarding includes (but is not limited to): undertaking safeguarding casework, providing care and support to victims and survivors and those against whom allegations are made, and issuing guidance and training on safeguarding matters.

#### Current position in the Church of England

Currently, operational safeguarding is professionally delivered locally. This is done by locally employed safeguarding advisors and teams in every diocese (and many cathedrals). There is also a National Safeguarding Team which issues guidance, policies and training, as well as having a National Casework Team.

#### Recommendation

This recommendation suggests the creation of a separate independent organisation with the responsibility for delivering all operational safeguarding in the Church. This means that current diocesan and cathedral safeguarding professionals would be employed and line managed within the independent organisation (though the physical location in dioceses and cathedrals will be retained).

# 9. To what extent do you agree with the above recommendation on independent operational safeguarding? [Strongly disagree – Strongly agree]

10. To what extent do you agree that implementing the above recommendation on independent operational safeguarding will make people safer across the Church? [Strongly disagree – Strongly agree]

11. In a few words, please identify up to three key strengths of implementing this recommendation on independent operational safeguarding [Three open text boxes, and a tick box for "There are no strengths"]

12. In a few words, please identify up to three key limitations of implementing this recommendation on independent operational safeguarding. [Three open text boxes, and a tick box for "There are no limitations"]

#### The definition of safeguarding in the Church of England

Current position in the Church of England

The current definition of safeguarding in the Church can be found in 'Safeguarding Children, Young People and Vulnerable Adults' Church of England House of Bishops' guidance. It is described as "wider and more pro-active than just responding to the actual abuse of one person by another" and should be understood as "acting in ways that mitigate any risk of harm".

This understanding includes definitions for:

- Safeguarding Children (Working Together Statutory Guidance, 2015)
- Safeguarding Adults (The Care Act 2014)
- Safeguarding Vulnerable Adults (Clergy Discipline Measure, 2016)
- Promoting a Safer Culture and Encouraging Safer Behaviours

#### Recommendation

This recommendation suggests that the church adopt a statutory definition of safeguarding, which includes just:

- Safeguarding Children (The Children Act, 2004)
- Safeguarding Adults (The Care Act, 2014)

13. To what extent do you agree with the above recommendation on the definition of safeguarding in the church? [Strongly disagree – Strongly agree]

14. To what extent do you agree that implementing the above recommendation on the definition of safeguarding in the Church will make people safer across the Church? [Strongly disagree – Strongly agree]

15. In a few words, please identify up to three key strengths of implementing this recommendation on the definition of safeguarding in the Church. [Three open text boxes, and a tick box for "There are no strengths"]

16. In a few words, please identify up to three key limitations of implementing this recommendation on the definition of safeguarding in the Church. [Three open text boxes, and a tick box for "There are no limitations"]

#### Removal of the term "Spiritual Abuse" in guidance and training in the Church of England

Current position in the Church of England

Currently, 'spiritual abuse' is defined in 'Safeguarding Children, Young People and Vulnerable Adults' Church of England House of Bishops' guidance as a form of emotional and psychological abuse. It is characterised by a systematic pattern of coercive and controlling behaviour in a religious context. Spiritual abuse can have a deeply damaging impact on those who experience it and can be experienced in a variety of different relationships. In a faith context, using liturgy and scripture, spiritual abuse may occur on its own, or alongside other forms of abuse and may be used to 'legitimise' or facilitate other forms of abuse.

#### Recommendation

This recommendation suggests that the term and definition of "spiritual abuse" should be removed from all guidance and training and that these should focus on the terminology used in emotional and psychological abuse.

17. To what extent do you agree with the above recommendation on removing the term and specific definition of 'spiritual abuse' from guidance and training? [Strongly disagree – Strongly agree]

18. To what extent do you agree that implementing the above recommendation on removing the term and specific definition of 'spiritual abuse' from guidance and training will make people safer across the Church? [Strongly disagree – Strongly agree]

19. In a few words, please identify up to three key strengths of implementing this recommendation on removing spiritual abuse from guidance and training. [Three open text boxes, and a tick box for "There are no strengths"]

20. In a few words, please identify up to three key limitations of implementing this recommendation on removing spiritual abuse from guidance and training. [Three open text boxes, and a tick box for "There are no limitations"]

#### Mandatory reporting in the Church of England

Current national position (and therefore, the position in the Church of England) Currently, there is no general statutory obligation for individuals in England to report child abuse. Government statutory guidance on safeguarding, says "Anyone who has concerns about a child's welfare should consider whether a referral needs to be made to local authority children's social care and should do so immediately if there is a concern that the child is suffering significant harm or is likely to do so." While this does not impose a legislative requirement to report abuse, it creates an expectation that those working with children will comply with the guidance unless there are exceptional circumstances.

#### Recommendation

This recommendation suggests that the Church of England should introduce a legal duty to report any complaint or concern regarding safeguarding to a safeguarding officer at the first available opportunity.

21. To what extent do you agree with the above recommendation on mandatory reporting? [Strongly disagree – Strongly agree]

22. To what extent do you agree that implementing the above recommendation on mandatory reporting will make people safer across the Church? [Strongly disagree – Strongly agree]

23. In a few words, please identify up to three key strengths of implementing this recommendation on mandatory reporting. [Three open text boxes, and a tick box for "There are no strengths"]

24. In a few words, please identify up to three key limitations of implementing this recommendation on mandatory reporting [Three open text boxes, and a tick box for "There are no limitations"]

#### **Reviews of the Relevant Reports**

25. Overall, if you have read either of the reports, what extent do you feel they provide useful guidance to improve safeguarding practice in the Church of England? [Not useful at all/Not useful/Not sure/Useful/Very useful/I have not read it]

- a) Wilkinson Report
- b) Jay Report

26. If there is anything else that you would like to discuss on either the Wilkinson or Jay Reports, that you feel you have not had the opportunity to do so until this point, please use the space below. [Open text box]

# Appendix C: Data not presented in the main body

# General Synod Members

After asking which group participants identified most with, they were then asked if they were currently a member of General Synod.

145 participants disclosed that they were current members of General Synod. The analysis below shows a comparison of mean average scores (where 1 = Strongly disagree and 5 = Strongly agree) for each Recommendation between those General Synod members, and the grand mean of all participants. There were no significant differences between groups.

#### Agreement with the Recommendation.

	General Synod Members	All Participants
Recommendation 1	4.39	4.09
Recommendation 2	3.10	3.42
Recommendation 3	3.42	3.45
Recommendation 4	2.60	2.75
Recommendation 5	4.02	4.02

#### Agreement that the Recommendation makes the Church safer.

	General Synod Members	All Participants
Recommendation 1	4.06	3.80
Recommendation 2	3.12	3.29
Recommendation 3	3.21	3.23
Recommendation 4	2.51	2.62
Recommendation 5	3.97	3.93

# Location of responses

Around 1,250 participants disclosed which diocese or cathedral they were attached to (if any). There are responses given from every single diocese across the Church of England, the numbers from each diocese ranged from 5 to 90.