

5th February 2025

Dear Colleagues,

We are writing following the publication of GS2378, *Future of Church Safeguarding* ('GS2378'), and to express our concerns. As you will see, this letter is signed by 106 Diocesan and Cathedral safeguarding staff across the Church of England, including ten independent DSAP Chairs, representing 90% of Dioceses across England.

In particular, we have concerns about Model 4, which would detach diocesan and cathedral safeguarding staff from their current employment arrangements, relocating them to a new, yet-to-be-created national employer.

Before proceeding, we feel we must respond to something that a number of safeguarding professionals employed in the Church of England have heard, that our views on this subject should be excluded because we are simply seeking to protect our jobs. We would rather not have to address this point, preferring to engage with the substantive issues, but it has been made too often to ignore. Firstly, our jobs are not at risk: as GS2378 sets out, if Model 4 proceeds we would be transferred to a new employer, and under TUPE rules our terms and conditions would be protected. Secondly, there are more promotion opportunities in a large national organisation than a smaller local one: many of this letter's signatories have already reached the pinnacle of their promotion ladder with their current employer.

We have not written and signed this letter because we are concerned about jobs, but because our priority is, and always has been, the protection of children and adults in the Church of England.

Areas of Agreement

While we wish to set out our concerns, we also wish to highlight our points of agreement.

1. We agree that the situation the Church of England faces regarding safeguarding is serious, and that change is required. The Charity Commission [recently have written to General Synod members](#), emphasising the importance of public trust and confidence in charities. There is no doubt that recent events have damaged the public's trust in the Church's ability to administer safeguarding effectively. Moreover, and even more importantly, a number of survivors have expressed their dismay at the Church's failures.
2. GS2378 has not shied away from setting out the concerns many of us have about Model 4, for which we are grateful. Paragraphs 62 to 72 of GS2378 make clear many – although not all – of our concerns. We will not repeat those here but would ask readers to study these paragraphs carefully.
3. We agree that an external and independent scrutiny body should be created (paras. 45 to 52 of GS2378). All of us have worked in statutory safeguarding professions where this is

the norm. We agree that this body should be established on a statutory basis (para. 46), and that Church bodies should have a legal duty to cooperate with this scrutiny body (46c & 46d).

4. We agree that consistency of practice is key. However, we do not agree that Model 4 is the only way, or indeed the least risky way (see below) to achieve this. The ongoing implementation of IICSA Recommendation 1, particularly the recent employment of a number of highly skilled Regional Safeguarding Leads, along with the roll-out of Safeguarding Codes of Practice and the National Safeguarding Standards, will enable continued progress towards consistency. The emerging model from the [INEQE Safeguarding Group](#), which will be available for General Synod members when INEQE publish their first annual report in early February, would further enable operationally independent safeguarding whilst avoiding the risks of Model 4 which we set out below. We hope that Synod members will give that report serious consideration prior to the forthcoming group of sessions. Combined with a national scrutiny body and the suggestions we make towards the end of this paper, we believe that this would be a more effective, and far less disruptive, way of achieving the greater consistency which the Church rightly demands.

Model 4 – Our Concerns

GS2378 is written in response to a report by Professor Alexis Jay, published in February 2024. It is important to recall exactly what Professor Jay was, and was not, asked to do. In sessions with her and her team held in January 2024, Professor Jay made clear that the Archbishop of Canterbury approached her in July 2023, asking her to produce a report setting out a roadmap for independent operational delivery of safeguarding in the Church of England. She acknowledged that she had **not** been asked to:

- evaluate various options for the organisation of Church safeguarding;
- make recommendations to make the Church safer.

Professor Jay had been asked to provide a roadmap, but the destination – ‘independent’ delivery of safeguarding – was chosen by the archbishop. This destination is set out most clearly in GS2378’s Model 4.

We have serious concerns about this Model. There is no doubt that transferring staff from 85 current employers to one yet-to-be-created employer will be destabilising, expensive, and likely to take far longer than expected. The disruption to recruitment and retention of staff, to existing relationships, and to morale would be considerable. Moreover, new structures bring new problems: a large national organisation is at least as likely to multiply layers of management as it is to improve frontline service delivery.

These may, of course, be considered worthwhile risks if two criteria are met: firstly, that current practice is demonstrably and irretrievably poor, and secondly that Model 4 is a tried-and-tested model which had been shown to work in parallel contexts.

Neither criteria, we submit, is met here, notwithstanding some recent media reports (to which we will return). Considerably improved safeguarding practices were noted in the audits conducted by the Social Care Institute of Excellence in 2019¹, and even more so during the Past Cases Review (2) in 2022², which involved 65 independent reviewers reading over 75,000 files. More recently, the nine published reviews by the INEQE Safeguarding Group³ – whilst making many welcome recommendations for improvement - have identified much good practice across the country.

If the first criteria – widespread failure – is not met, the second is missed entirely. No other equivalent organisation in the UK employs its safeguarding staff in a separate body. In healthcare, education, sport, the arts, the armed services, uniformed organisations, NGOs – indeed, in many of the organisations for which the Charity Commission has statutory responsibility – safeguarding staff are employed within those organisations, by the same employer as all other staff.

As this was a point many of us made in an earlier letter from November 2023, we would have expected the Response Group to have found an effective parallel example if one existed. GS2378 presents no such example. Given this, we do not find it surprising to learn that Response Group members themselves have been unable to reach a consensus on which Model to propose to General Synod, noting for instance that ‘A number of members of the Response Group, *including professional experts in safeguarding*, do not support Model 4’ (para. 62, emphasis added).

Indeed, if something like Model 4 is necessary to protect safeguarding practitioners from actual or perceived conflicts of interest, it must follow that all the sectors listed above – including health and education – are operating models of safeguarding that have fatal flaws. It would also follow that the primary recommendation to the Church of England from the Independent Inquiry into Child Sexual Abuse (IICSA) is itself flawed. That recommendation (‘Recommendation 1’), which made the change from ‘Diocesan Safeguarding Adviser’ to ‘Diocesan Safeguarding Officer’, thus providing the basis for operationally independent safeguarding practice since enacted in Amending Canon 42⁴, also made clear that ‘Diocesan Safeguarding Officers should be employed locally, by the Diocesan Board of Finance’⁵.

We hope that members of General Synod will agree that it is unlikely that every other sector in the UK is running a model of safeguarding that is fundamentally flawed, or that the biggest public inquiry in British legal history recommended a model to the Church of England that must be jettisoned even before it is fully implemented⁶.

Our primary argument, however, is not that Model 4 is unnecessary, or that it is untried, although both of those things are true. Our primary argument is that may be **inherently less safe**. Detaching the Church of England’s safeguarding staff from their current employers will almost inevitably create additional barriers to communication and cooperation, harming service

¹ [scie-final-overview-report-of-the-independent-diocesan-safeguarding-audits-and-additional-work-on-improving-responses-to-survivors-of-abuse.pdf](#)

² [past-cases-review-2-national-report.pdf](#)

³ [Church of England - Ineqe Safeguarding Group](#)

⁴ [gs-2269x2-amending-canon-no-42-explanatory-note.pdf](#)

⁵ [D.4: Recommendations | IICSA Independent Inquiry into Child Sexual Abuse](#)

⁶ IICSA Recommendation 1 is being delivered across the country at present. The key legislative change required to make it necessary, Amending Canon 42, was passed by General Synod in February 2024.

delivery. Given that ‘service delivery’ in this context involves protecting children and vulnerable adults, any barriers whatsoever could have the most serious consequences. The very last thing the Church of England needs is to disrupt the working relationships between church officers and the safeguarding professionals who work with them.

As an example, when the Probation Service was split into two services in 2013, under the Government’s ‘Transforming Rehabilitation’ programme, the stated goal was to reduce reoffending. In reality, as the National Audit Office later found, ‘new operational interfaces’ were created which proved challenging to manage, even between former colleagues. Working relationships between the two services ‘presented significant challenges’, with ‘gaps in joint working’ which ‘undermined purposeful rehabilitation’⁷.

If this can happen within a professional, statutory safeguarding service there is every reason to believe that it will happen in the Church of England. Detaching the Church’s safeguarding staff from their current employment arrangements does not mitigate any risk that has credibly been identified, but it does introduce a new one. GS2378 gives no attention to this area of risk, but it is one to which members of General Synod must give serious thought.

Finally, GS2378 makes repeated reference to ‘actual or perceived conflict of interest’. We agree, of course, that ‘Safeguarding processes, and the people who operate them, must be unfettered’, and must ‘focus solely on protecting people from harm’ (para. 33), but we would draw readers’ attention to the observation GS2378 itself provides: ‘*extensive examination* confirms that safeguarding practitioners currently employed locally (at diocesan and cathedral level) report that they *do not* experience pressure from colleagues or bishops and in fact remain unfettered in their capacity to act professionally and impartially when delivering safeguarding’ (para. 64, emphasis added).

If one of the stated aims of Model 4 is to eliminate actual or perceived conflict of interest, and it has been shown that no actual conflict of interest exists, then, we submit, perception is all that remains. Whilst public confidence is important, putting perception above practice is at the heart of many of the Church of England’s safeguarding failures⁸. The Church must not repeat that error here.

A better way forward

We would like this letter to be about more than what we oppose. There are two longstanding issues, both mentioned in GS2378, which, if rectified, would contribute greatly to improved safeguarding across the Church of England:

⁷ National Audit Office (2019) Transforming Rehabilitation: Progress Review, accessed on 27.01.25.
<https://www.nao.org.uk/wp-content/uploads/2019/02/Transforming-Rehabilitation-Progress-review.pdf>

⁸ E.g. ‘The report concludes that in neglecting the well-being of children in favour of protecting its own reputation, the Church of England was in direct conflict with his own underlying moral purpose’, (IICSA Church of England report, 2020, [Inquiry report finds Anglican Church failed to protect children from sexual abuse | IICSA Independent Inquiry into Child Sexual Abuse](#))

- 1. Lack of resource at the ‘coalface’:** Many dioceses and cathedrals have grown their safeguarding teams, but INEQE persistently have found that local resources are inadequate. The link between available resources and the quality of safeguarding practice was identified by the Social Care Institute of Excellence in 2019⁹, whilst in 2022 the Past Cases Review¹⁰ noted that limited resourcing was a ‘recurring and consistent theme’. Despite this, no central resources have been allocated to dioceses or cathedrals so that they adequately can staff their safeguarding teams. It is true that the National Safeguarding Team has grown considerably in recent years, and that this represents a significant investment. The NST are our trusted and valued colleagues, but expenditure on a large central team without concurrent national investment in frontline services means that tensions between design and deliverability are now hard-wired across much of the system. We cannot state our views more plainly than this: the era of under-resourced frontline safeguarding teams must end, and for many dioceses and cathedrals this must mean central resource allocation for local delivery. **Nothing, we argue, would bring more consistent improvement to safeguarding in the Church of England than this.**
- 2. Gaps in legislative provision:** this is covered by GS2378, particularly in paragraph 66. We commend this section to the readers’ attention, and agree that it will not matter who employs the Church’s safeguarding staff if they do not have the tools they need to manage risk. Careful attention to cases recently covered in the media, such as in the Diocese of Chelmsford and at Blackburn Cathedral, reveal that it was gaps in the Church’s legislation, not the obstruction of safeguarding professionals, that prevented adequate safeguarding actions being taken. The church must equip itself with the legislative tools it needs to manage safeguarding risk.

GS2378 speaks of Model 4 as a ‘radical’ step, but something is not right simply because it is radical. Rather than implementing a model which no other major organisation has tried, we argue that the Church must turn its attention to interventions that have been proven to work wherever they have been implemented: resourcing frontline safeguarding teams properly and giving those teams effective tools to manage risk and respond to those needing support.

We understand how difficult the recent months have been for the Church. We understand that many will feel that the Church must ‘be seen’ to take radical steps. We end by asking readers to consider this: safeguarding, for us, is an expression of our deepest values, values which led us into the statutory safeguarding professions in the first place. Most of us describe safeguarding not as a job, but as a vocation – a concept with which the Church of England is familiar. We would never let the Church prevent us from taking whatever actions are necessary to protect children and adults. If we felt that there was any danger that we could not achieve this within our existing

⁹ [scie-final-overview-report-of-the-independent-diocesan-safeguarding-audits-and-additional-work-on-improving-responses-to-survivors-of-abuse.pdf](#)

¹⁰ [past-cases-review-2-national-report.pdf](#)

employment structures, we would demand change in the most vociferous terms: not only would we support Model 4, we would insist upon it.

Conversely, it is our professional responsibility to warn the Church when we feel it may be following a path that increases risk. Normally we do this on a local level, to individuals, to parishes, and sometimes to dioceses or cathedrals. In this letter, for the first time, we are giving this warning on a national level. Model 4 will be hugely disruptive in the short to medium term at the very least. It is untested, and without parallel examples to show it can be effective. It does not address the risks the Church faces – in particular the two we set out above – but it may well create new risks. It will also, in all likelihood, be irreversible.

There is a much better path ahead. That path involves continuing to implement IICSA Recommendation 1, setting up the independent scrutiny body, allowing the current programme of (extremely rigorous) independent audits to come to completion to inform that body's ongoing work, and addressing as matters of urgency the issues of funding and legislation set out above. It is to these tasks, we submit, that General Synod must insist that the National Church Institutions now turn their attention.

Signed:

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