

Independent Inquiry into Child Sexual Abuse

The Inquiry into the Anglican Church in England and Wales

Closing Written Submissions on behalf of the Church in Wales

1. These submissions are made by way of addition to the oral submissions made on 12 July 2019 at the close of the Inquiry's investigation into the Anglican Church in England and Wales. They are designed to expand the commitment that the Church in Wales made to review their practices in the light of the evidence heard during the course of the investigation and in the light of other developments including the interim report into the Chichester Diocese and Bishop Peter Ball.
2. In making these submissions we have drawn on the conclusions and recommendations set out by Elaine Cloke in the Historic Cases Review (ANG000368) and by Anest Gray Frazer when reviewing the deceased clergy files (ANG000363).
3. Some of the areas that we wish to be addressed are outside our control but we would hope that the Inquiry, when making its report and recommendations could, *inter alia*, address the issues raised in the written and oral evidence of Fay Howe relating to the absence in Wales of an easily identifiable single point of contact in the Local Authorities (in contrast to the situation in England where the LADO system is well-established).
4. We have undertaken to provide the Inquiry with a progress report by the end of January 2020. The Inquiry will appreciate that of the list of desired outcomes set out below, decisions from a variety of different bodies will be required to set them in motion. Those bodies include the Governing Body, the Representative Body, the Bench of Bishops, the Safeguarding Panel, and St Padarn's Institute (which provides training and education across the Province).
5. Subject to the above the Church in Wales has identified areas as requiring attention in order that good safeguarding practice can be further promoted throughout the province. We have at this stage identified the following areas which we will address:
 - a) We are intending to deploy Independent Sexual Violence Advisors as a dedicated support resource, quickly deployable to support survivors with a degree of independence, and are currently investigating the most effective way to resourcing this.
 - b) We are looking to put in place alternative routes to suspension in the event that a Bishop refuses to implement suspension on professional advice from the Provincial Safeguarding Officers or recommendations from the Safeguarding Panel.
 - c) We are examining whether there should be a specific disciplinary heading for failure to comply with professional advice from the Provincial Safeguarding Officers or recommendations from the Safeguarding Panel.

- d) We will clarify our policy as to when and how fact-finding investigations should be undertaken by church authorities in cases where the police/local authority have taken no further action, prior to consideration of church disciplinary processes and/or risk assessment.
- e) We are looking to create a monitoring system to ensure that the Archbishop's Registrar's list is referred to for every clergy appointment.
- f) We are currently undertaking a scoping and commissioning exercise for electronic case management systems to deal with the gaps in record keeping identified by Ms Carmi and in the reviews carried out by Ms Cloke and Ms Gray Frazer.
- g) We are proposing policy changes to ensure that the Provincial Safeguarding Officers have access to the Personal Files of clergy as of right.
- h) In accordance with Ms Carmi's observations, we intend to begin formally minuting the discussions as well as the conclusions from the Safeguarding Panel. We also will start formally minuting the triage meetings.
- i) We are reviewing our template for Clergy Current Status Letters to ensure that the questions asked prompt full disclosure of all relevant safeguarding matters.
- j) We hope to enter into a formal information sharing agreement with the Church of England which would allow a more consistent sharing of clergy personal data between the two churches, in particular the 'Blue Files'.
- k) We are looking to improve information sharing with our statutory partners as we recognise that it is of variable quality and extent. We hope that the Welsh Government could direct or coordinate an all-Wales agreement involving Police, Local Authorities and the Church to facilitate this, and to ensure that there is not a postcode lottery when it comes to information sharing. We are raising this through the relevant channels ourselves, but also hope that the Inquiry will provide some support in its Report for this aim.
- l) We are looking to strengthen various arrangements relating to Worship Agreements – by whom are they to be signed, with whom the information is to be shared and (as raised by the evidence of Reverend Christopher Watkins), that an agreement is automatically reviewed when a new Incumbent takes up office.
- m) We will clarify our DBS guidance to ensure that the Parish Safeguarding Officer is DBS-checked whether or not a member of the PCC.

- n) We will be drafting a new section of the Safeguarding Policy to document internal procedures once a safeguarding referral has been made or a blemished DBS is received (as per the recommendations of Ms Carmi).
 - o) We are in the process of going through our historic safeguarding records to ensure that consideration is given to deposition from Holy Orders for any cleric convicted of a safeguarding offence.
 - p) We will discuss with the Principal of St Padarn's Institute how the three-year cycle of training can be supplemented by regular updates (possibly electronically).
 - q) We are investigating the commission of an external provider to audit safeguarding policies, procedures and case work on a regular basis.
 - r) In the light of the evidence of the Archbishop of Wales, we are considering how Chaplains in external organisations can be effectively monitored.
 - s) We will review the Bishops' Permission to Officiate policy in light of comments made during oral evidence.
 - t) We are reviewing whether specific provisions should be added to the Constitution to prevent persons convicted of certain offences from holding non-trustee positions (such as membership of the Governing Body) to supplement the existing legal provisions in civil law for trustee positions (such as membership of the Representative Body).
7. Some of the above issues can be addressed relatively quickly but that some will take longer than the six-month period mentioned in oral evidence. However, led by the Archbishop, the church is determined that the gaps in the safeguarding procedure that we have identified, or have been identified for us, will be dealt with as quickly as possible. We anticipate that the update report we have undertaken to provide in January 2020 will note that several items on the above list have already been implemented
8. We of course remain open to any suggestions either from the Inquiry or from Counsel to the Inquiry as to matters which concern the Inquiry about the practice of Safeguarding in the Church in Wales, either before or as a result of the Inquiry's final report.

3 August 2019

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