HOUSE OF BISHOPS

Managing Safeguarding Concerns and Allegations Code of Practice

Introduction

This paper seeks the House's approval of the *Amending Managing Safeguarding Concerns and Allegations Code of Practice* ("the Amending Code").

Overview of paper

- The Amending Code incorporates revisions intended to strengthen safeguarding decision-making, accountability and consistency, whilst responding to recommendations arising from the Regulatory Action Plan issued by the Charity Commission of England and Wales (CCEW) in regard to the Church of England's safeguarding arrangements.
- The Amending Code seeks to strengthen consistency, transparency and accountability in the management of safeguarding concerns and allegations.
- The Amending Code reflects the direction of travel presented and discussed at the informal gathering of bishops in October 2026 and is consistent with that earlier presentation.

  The principal amendments to the Code strengthen:

  - triage and decision-making where safeguarding concerns are received.
  - referral and escalation processes.
  - record-keeping and accountability requirements.
  - safeguarding case handover arrangements.
  - the management and review of Church Safety Plans.
- A table summarising the amendments to the mandatory reqquirements and their location within the Code is included in the 'Detail' section of this paper.
- Subject to the House's approval, the Amending Code will be presented to the General Synod under the procedure in section 5C of the Clergy Discipline and Safeguarding Measure 2016.
-

Action Points

The House is invited to:.

- **Approve the *Amending Managing Safeguarding Concerns and Allegations Code of Practice* and direct the Clerk to cause to the Amending Code to be published on the Church of England website and be sent to each member of the General Synod.**

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The documents

The House has before it the following documents in support of this paper

- **Annex 1**: The *Amending Managing Safeguarding Concerns and Allegations Code of Practice.* This document lists the amendments to the requirement and the guidance. **This is the formal legal instrument that the House is being asked to approve.**

- **Annex 2:** A full copy of the *Managing Safeguarding Concerns and Allegations Code of Practice* with the amendments in situ in lilac coloured text. This is to enable the House to see the whole document with the amendments in place for context.

- **Annex 3:** A copy of the 'Threshold Tool'. **This is not a Code of Practice.** The House is not being asked to approve this document. It will be considered on the NSSG on the 23 November 2026. It is being provided to the House to enable members to see the changes in the context of the wider guidance also being issued.

Detail

Background

The *Managing Safeguarding Concerns and Allegations Code of Practice* sets out the processes to be followed in the management of safeguarding concerns and allegations.

The Code has been reviewed and revised primarily in response to recommendations arising from the CCEW's engagement with the Church's safeguarding arrangements. The review sought to strengthen consistency in safeguarding decision-making, improve accountability and ensure safeguarding concerns are managed in a clear and transparent manner.

The proposed Amending Code forms part of a wider programme of safeguarding reform arising from engagement between the Church of England and the Charity Commission. During this engagement, the Charity Commission highlighted concerns regarding the treatment of allegations involving adults who were not assessed as vulnerable and emphasised that trustees must take reasonable steps to protect all people who come into contact with their charity from harm. In response, the Church commissioned an independent review of the Managing Allegations framework and associated safeguarding guidance.

The independent review recommended a number of changes to the Church's safeguarding framework, including alignment with Working Together to Safeguard Children 2023, the introduction of revised safeguarding definitions, the adoption of a single definition of harm applicable to both children and adults, and a revised approach to understanding vulnerability. These changes are contained within a new guidance document 'Safeguarding in the Church' which will be considered by the NSSG on the 23rd November 2026

The proposed direction of travel, including the proposed safeguarding and harm definitions and their role within safeguarding decision-making, was presented and discussed at the informal gathering of bishops in October 2026. The definitions are reproduced below for ease of reference:

Safeguarding: "*The duty to positively promote a safer culture and encourage safe behaviours in order to protect people from harm".*

Harm: "*For the purposes of safeguarding, harm means any act or omission that results in, or is likely to result in, abuse, neglect, exploitation or ill-treatment, causing impairment to an individual's physical, psychological, emotional, financial or spiritual wellbeing".*

These definitions are contained within *Safeguarding in the Church* guidance, and the Code refers readers to that guidance. They are intended to support consistency of understanding and practice across Church bodies.

The **Threshold Tool (which is included)** supports consistent safeguarding triage and decision-making by helping users determine when concerns fall within the Church's safeguarding remit and what action may be required.

The principal revisions to the Managing Safeguarding Concerns and Allegations Code strengthen:

- safeguarding triage and threshold decision-making;
- referral and escalation arrangements;
- safeguarding case handovers;
- Church Safety Plan arrangements;
- record-keeping and accountability requirements; and
- consistency in safeguarding decision-making.

Another key amendment to the Code specifies that if the Safeguarding Officer determines a concern or allegation falls outside the Code's scope, they must refer the matter to the appropriate internal or external body.

Work remains ongoing to strengthen the non-safeguarding procedures to effectively support these referrals.

Consultation

Two consultations have taken place in the development of this work. The first took place in May 2026, with 274 responses received. The feedback from this consultation informed the revisions and second consultation which is reported in more below.

The triage section of the Code was consulted on alongside the Threshold Tool, the definitions work in *Safeguarding in the Church* Guidance and the terminology used in the Code. The consultation which took place in July 2026 was an online survey. 51 people responded:

- 27 Church of England safeguarding professionals
- 5 external safeguarding professionals
- 5 members of clergy
- 5 Parish Safeguarding Officers
- 3 victims and survivors

- 6 others.

The consultation responses below, whilst appearing to be lower than you would expect to see, reflect an increased level of support and confidence in the direction of travel being taken. When focusing on responses from safeguarding professionals the overall level of support increases further in some areas. Details are provided below:

Definitions:

42% said the process for the definitions was workable. When referring to safeguarding professionals' responses, this figure reduces by one percent.

Triage:

41% said the MA triage section was robust enough. When referring to safeguarding professionals' responses, this figure increases to 50%.

Terminology:

80% supported keeping the terminology "safeguarding concern or allegation". When referring to safeguarding professionals' responses this figure increases to 86%.

Threshold Tool:

47% said the Threshold Tool helps decision making. When referring to safeguarding professionals' response this figure remains the same.

Alongside the consultation responses, the Charity Commission's recommendations in October 2025 and INEQE Independent Review recommendations have led to changes to the triage section to ensure that people are clear that all referrals must receive an outcome. Immediate risk and the statutory threshold are now the first things a Safeguarding Officer must consider, before deciding whether a matter falls within the Code. Where it falls outside, the allegation must be referred in writing to the appropriate person or body within and/or outside the Church, and a record kept. The guidance on who is a vulnerable adult has been retained. The Threshold Tool informs is available to support safeguarding professionals in their decision making but does not replace professional judgement.

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Amendments to the Code

The tables below summarise the amendments made to **requirements** within the Code and identifies where each amendment is reflected within the document.

Current Version	Proposed Amendments
Requirements Triage 1.1.1 The Safeguarding Officer must decide whether the matter is a safeguarding concern or allegation.	Requirements: **PG 22-23** Triage 1.1.1 On receiving a safeguarding allegation, the Safeguarding Officer must: • consider whether anyone is at immediate risk of harm or danger and, where this is the case, contact the police or other emergency services without delay; • consider whether the case may meet the threshold for referral to statutory services, to be confirmed in line with 1.1.10; and • decide whether the matter falls within the scope of this Code, using the Threshold Tool to inform that decision.
1.1.2 If the Safeguarding Officer decides that an allegation does not meet the definition of safeguarding, or it does not relate to an individual Church Officer, they must signpost the person raising it to the relevant organisation, service or department, within or outside of the Church, that may be able to support them.	1.1.2 If the Safeguarding Officer determines that the allegation does not fall within the scope of this Code, the Safeguarding Officer must refer the allegation to the appropriate person or body within and/or outside of the Church.

	1.1.3 The referral must be in writing and a record of it kept by the Safeguarding Officer.
1.1.3 If the Safeguarding Officer considers that an allegation meets the criteria in 1.1.4, they must refer it to the National Safeguarding Team (NST).	1.1.4 If the Safeguarding Officer considers that an allegation meets the criteria in 1.1.5, they must refer it to the National Safeguarding Team (NST).
1.1.4 The Safeguarding Officer must consider the criteria for referral to the NST, which are that: • an allegation has been made about an archbishop, a bishop, a dean, or in some circumstances, the leader of a religious community; • the case involves allegations across several dioceses and has additional complexities;	1.1.5 The Safeguarding Officer must consider the criteria for referral to the NST, which are that: • an allegation has been made about an archbishop, a bishop or a dean; or in some circumstances, the leader of a religious community • the case involves allegations across several dioceses and has additional complexities;

• the allegation is high profile and of significant national interest and has additional complexities; or • the allegation has significant complexities, for instance arising from multiple conflicts of interest.	• the allegation is high profile and of significant national interest and has additional complexities; or • the allegation has significant complexities, for instance arising from multiple conflicts of interest.
1.1.5 The NST must decide whether it will take responsibility for the case management of the respective allegation, and if they do not, they must refer it back.	1.1.6 The NST must decide whether it will take responsibility for the case management of the respective allegation, and if they do not, they must refer the case back and ensure the rationale is recorded.
	1.1.7 Where responsibility for case management transfers between Safeguarding Officers or safeguarding teams, a handover must take place in line with the Safeguarding Case Handover Protocol.
1.1.6 If the allegation refers to a Church Officer in a cathedral and that cathedral has a CSO, the CSO must discuss the matter with the DSO. The CSO and the DSO must agree on the course of action and who will lead on what aspect. 1.1.7 Where an allegation involves multiple dioceses, the Safeguarding Officer in those dioceses must work collaboratively and must agree	1.1.8 If the allegation refers to a Church Officer in a cathedral and that cathedral has a CSO, the CSO must discuss the matter with the DSO. The CSO and the DSO must agree on the course of action and who will lead on what aspect. 1.1.9 Where an allegation involves multiple dioceses, the Safeguarding Officer in those dioceses must work collaboratively and must agree which diocese will take

which diocese will take the lead coordinating role and how responsibilities will be shared. The rationale for which diocese takes the lead must be recorded. •	the lead coordinating role and how responsibilities will be shared. The rationale for which diocese takes the lead must be recorded.
Referrals 1.1.8 For all safeguarding allegations, the Safeguarding Officer must: • consider whether any referrals to statutory services are needed; • make any required referrals; and • keep a record of their decision and rationale for referring / not referring a matter to statutory services.	Referrals 1.1.10 For all safeguarding allegations, the Safeguarding Officer must: • consider whether any referrals to statutory services are needed; • make any required referrals; and • keep a record of their decision and rationale for referring / not referring a matter to statutory services; and • Where a referral has been made, and a timely response has not been received, or the referral has been closed, consider whether escalation is required and ensure they receive a clear rationale for the statutory body's decision; where the decision is not to escalate, this must be recorded with the rationale.

1.1.9 The Safeguarding Officer must explore what information is held in respect of the respondent and, if that information could be relevant to a police or social services investigation, they must share it with the relevant authorities.	1.1.11 The Safeguarding Officer must explore what information is held in respect of the respondent and, if that information could be relevant to a police or social services investigation, they must share it with the relevant authorities.
1.1.10 Church Bodies that are relevant persons must assess if an allegation constitutes a Safeguarding Serious Incident, in which case it must be reported to the Charity Commission.	1.1.12 Church Bodies that are relevant persons must assess if an allegation constitutes a Safeguarding Serious Incident, in which case, it must be reported to the Charity Commission.
	1.1.13 Where a Safeguarding Officer becomes aware that a subject of concern has relocated, or intends to relocate abroad, they must notify the NST.

Initial Contact

The following small change and one new bullet point has been added to the requirements:

PG 34

- explain what will happen next with regard to the Church's safeguarding processes, including timescales (as far as they are known and can be anticipated), and who has and will be informed including who is, or will be, part of the Safeguarding Case Management Group, if known at this stage;

- make the complainant aware that the respondent will be informed and explain what information will be shared and when, unless there are clear reasons why this would not be appropriate (for example, where doing so would increase risk or prejudice statutory processes);

Church Safety Plans

The following new requirements have been added to the section on Church Safety plans:

PG 96

4C.10 Where the subject of a Church Safety Plan refuses to agree to or comply with the Plan, the Safeguarding Officer must ensure that all reasonable, proportionate, and lawful steps are taken to manage the identified safeguarding risk to the Church community.

4C.11 The Church Safety Plan must contain a review date, allow for earlier review if circumstances change, and be reviewed at least every 12 months. Reviews must be carried out by the Safeguarding Officer (or nominated member of their team) in consultation with the subject of the plan, relevant statutory agencies and anyone involved in providing support and monitoring the arrangements set out in the plan.

Later under the Outcomes and Closure section some other small amendments have been made to the Requirements on the Church Safety Plans:

PG 155

- [The Safeguarding Officer must]…

- Record any refusal and the reasons given in the case files.
- Consider whether the refusal requires a reassessment of risk and whether alternative risk management options are required.
- Where other agencies (for example; police) are already involved, they must be informed at the earliest opportunity about a person's unwillingness to agree to a Church safety plan or any breach of the plan's requirements.

HOUSE OF BISHOPS

Title of Safeguarding Code of Practice	Amending Managing Safeguarding Concerns and Allegations Code or Practice
Author	National Safeguarding Team
Date issued by the House of Bishops	18 November 2026

Introduction

This is an amending safeguarding Code of Practice issued under section 5A of the Safeguarding and Clergy Discipline Measure 2016.

The contents of this code revise the Managing Safeguarding Concerns and Allegations first issued by the House of Bishops on 25 November 2024 and approved by the General Synod on the 12 February 2025

Part A of this document sets out the revisions to the **requirements** placed on relevant persons under the Code. These revisions are subject to the scrutiny and approval process by the General Synod as set out in section 5C of the Safeguarding and Clergy Discipline Measure 2016.

Part B of this document sets out the revisions to the **guidance** given on relevant persons under the Code. Pursuant to section 5C(5)(b) these revisions are **not** require the approval of the General Synod.

Part A: Revisions to the requirements contained in the Code of Practice

Section 1 (Pages 22 - 23)

Triage

1. *In paragraph 1.1.1 delete the text and replace it with -*

"1.1.1 On receiving a safeguarding allegation, the Safeguarding Officer must:

• consider whether anyone is at immediate risk of harm or danger and, where this is the case, contact the police or other emergency services without delay;

• consider whether the case may meet the threshold for referral to statutory services, to be confirmed in line with 1.1.10; and

• decide whether the matter falls within the scope of this Code, using the Threshold Tool to inform that decision."

2. *In paragraph 1.1.2 after "If the Safeguarding officer" delete the text and replace it with –*

"determines that the allegation does not fall within the scope of this Code, the Safeguarding Officer must refer the allegation to the appropriate person or body within and/or outside of the Church."

3. *After paragraph 1.1.2 insert -*

"1.1.3 The referral must be in writing and a record of it kept by the Safeguarding Officer."

4. *In paragraph 1.1.5 (amended to 1.1.6) and the end insert -*

"and ensure the rational is recorded"

5. *After the new paragraph 1.1.6 insert -*

*"*1.1.7 Where responsibility for case management transfers between Safeguarding Officers or safeguarding teams, a handover must take place in line with the Safeguarding Case Handover Protocol."

Referrals

6. *In paragraph 1.1.10 at the end insert -*

- "Where a referral has been made, and a timely response has not been received, or the referral has been closed, consider whether escalation is required and ensure they receive a clear rationale for the statutory body's decision; where the decision is not to escalate, this must be recorded with the rationale."

7. *After paragraph 1.10 insert (with revised numbering) -*

"1.1.13 Where a Safeguarding Officer becomes aware that a subject of concern has relocated, or intends to relocate abroad, they must notify the NST."

Section 2 (page 34)

Initial Contact and Support

8. *In paragraph 2.2 in the sixth bullet point after ', and who' insert –*

"has and will be informed"

9. *In paragraph 2.2 after the sixth bullet point insert –*

- *"*make the complainant aware that the respondent will be informed and explain what information will be shared and when, unless there are clear

reasons why this would not be appropriate (for example, where doing so would increase risk or prejudice statutory processes);"

Section 4C (page 96)

Church Safety Plans

10. *After paragraph 4C.9 insert –*

"4C.10 Where the subject of a Church Safety Plan refuses to agree to or comply with the Plan, the Safeguarding Officer must ensure that all reasonable, proportionate, and lawful steps are taken to manage the identified safeguarding risk to the Church community."

"4C.11 The Church Safety Plan must contain a review date, allow for earlier review if circumstances change, and be reviewed at least every 12 months."

Section 6 (page 155)

Church Safety Plan

11. *In paragraph 6.10 after the second bullet point insert –*

- "Record any refusal and the reasons given in the case files.
- Consider whether the refusal requires a reassessment of risk and whether alternative risk management options are required.
- Where other agencies (for example; police) are already involved, they must be informed at the earliest opportunity about a person's unwillingness to agree to a Church safety plan or any breach of the plan's requirements**.**"

Part B: Revisions to the guidance contained in the Code of Practice

(Under section 5C(5)(b) revisions to the guidance is not subject to approval by the General Synod)

Introduction

12. *On page 10 insert -*

"Safeguarding is the action Church Officers take to positively promote a safer culture and encourage safe behaviours to protect people from harm. A fuller explanation of what safeguarding means in a Church context, including guidance on harm and the safeguarding continuum can be found in Safeguarding in the Church Guidance."

13. *On page 11 in insert -*

> "This Code is designed for Safeguarding Officers and those involved in the management of safeguarding cases within the Church of England. It sets out the requirements and guidance that apply to the assessment and management of safeguarding concerns and allegations involving Church Officers; while also providing guidance on managing risks posed by other individuals who attend church, this covers both recent and non-recent matters."
>
> and

- "a replacement for the child and adult protection functions of statutory agencies, such as the police or local authority services."

Overriding Principles

14. *On page 12 insert -*

> "4. Where the subject of a safeguarding allegation has themselves experienced abuse, their role as a respondent and their experience as a victim or survivor must be treated as distinct and handled separately. Where such information is known, it should be handled sensitively and must not shape or extend the scope of the investigation into the safeguarding allegation. Regardless of the outcome of the allegation, a Church Officer in this position retains full entitlement to support."

Application in the Europe

15. *On pages 15 - 16 insert –*

> "It is recognised that the legal and regulatory framework within which the Diocese in Europe operates differs from that in England. Where local law or local arrangements require a different approach to meeting the requirements of this Code, the underlying safeguarding purpose and intent of the requirement must still be achieved. Any such adaptations must be recorded and include a clear rationale explaining how the purpose of the requirement has been met."
>
> And
>
> "This includes safeguarding, criminal, employment and data protection legislation. Local legal requirements may affect how concerns are reported, information is shared and cases are managed."

“Alternative reporting routes – Where local statutory agencies are unavailable, unable to respond appropriately, or where engaging with them would create additional safeguarding risks, reasonable steps must be taken to identify an appropriate lawful reporting route which achieves the safeguarding purpose of this Code. This may include seeking advice from the Diocese in Europe Safeguarding Team, relevant national or international law enforcement agencies, or British diplomatic or consular services, where appropriate.

Alternative support and risk management mechanisms – Where it is not possible to make a statutory notification and/or obtain an appropriate statutory response, the written rationale should also include details of the alternative support and risk management measures that have been taken. This may include making referrals to local specialist services or providing bespoke guidance and/or material support to mitigate risk.”

Determining the applicable pathway

16. *On page 17 insert –*

“Where a respondent’s role in the church has changed since the act or omission took place, the pathway is determined by reference to the time the safeguarding intervention is taking place, not the time when the act or omission took place. For example, where an allegation relates to events that occurred while the respondent was an ordinand, Section 4A (Members of Clergy) applies.”

Terminology

17. *On pages 18 -19 insert –*

“Harm: For the purposes of safeguarding, harm means any act or omission that results in, or is likely to result in, abuse, neglect, exploitation or ill-treatment, causing impairment to an individual's physical, psychological, emotional, financial or spiritual wellbeing.

Safeguarding: The action Church Officers take to positively promote a safer culture and encourage safe behaviours to protect people from harm. For a fuller explanation of safeguarding in a Church context, please refer to the *Safeguarding in the Church* Guidance.”

and

"The term "allegation" does not imply that the matter has been proven, or that the Respondent(s) have done anything wrong. It refers to a concern involving an identified person who may be a source of risk or harm."

Triage Guidance

18. *On page 24 insert -*

"Not every incident involving harm will constitute a safeguarding concern or allegation for the purpose of this Code. Harm may require a different organisational response, including conduct or disciplinary processes, pastoral support, or Health and Safety procedures. However, a Safeguarding Officer must assess all referrals to ensure that a decision and rationale can be recorded."

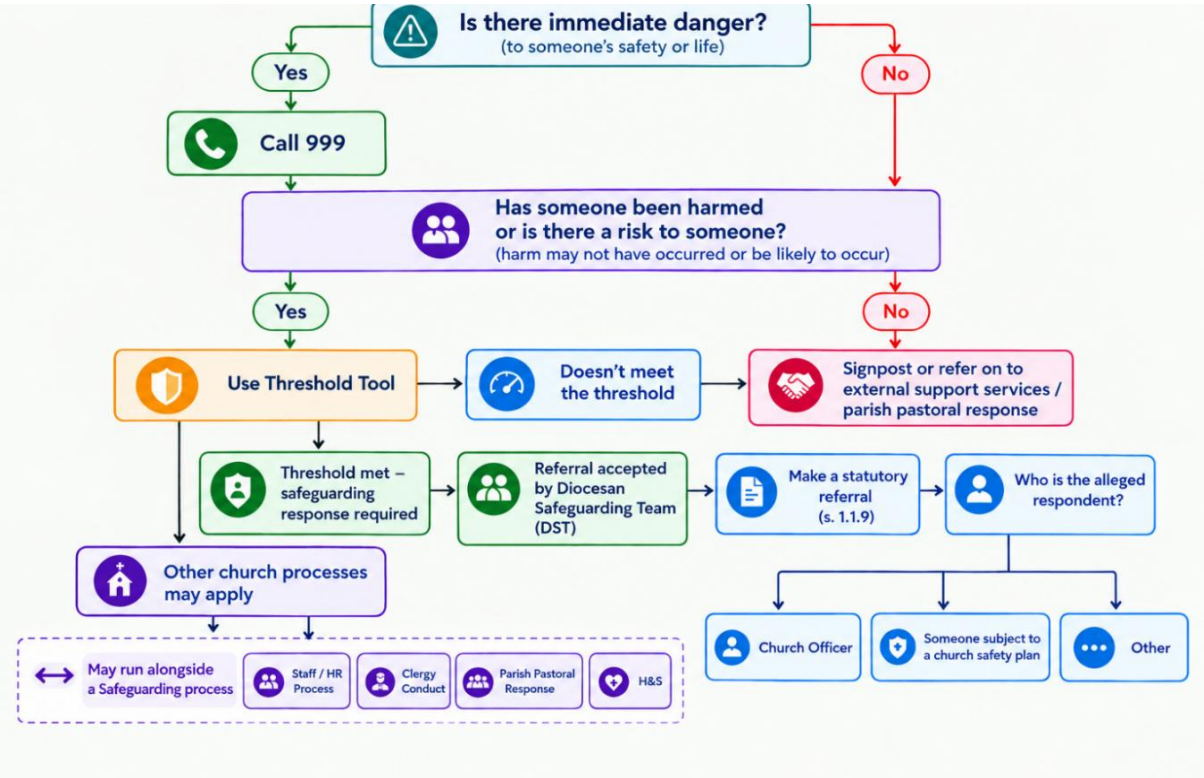
and

"In the first instance of a safeguarding allegation being received, the primary consideration must always be whether an individual is at immediate risk of harm. Where there is a concern that this may be the case, the Safeguarding Officer must contact the police or other emergency services in line with the *Reporting Safeguarding Concerns and Allegations* Code of Practice. Alongside this, the Safeguarding Officer must consider whether the case may meet the threshold for referral to statutory services; see section 1.1.10. Relevant statutory services may include Children's Services, Adult Social Care or the Local Authority Designated Officer (LADO), depending on the nature of the concern or allegation and those involved. Where a referral is made, or where a decision is taken not to refer, this must be recorded in the case management system along with the rationale. See section 1.1.10 for guidance on threshold criteria and decision-making.
"

19. *On page 25 insert -*

"Confirming the pathway

Where a concern is determined to be a safeguarding matter the allegation continues under this Code and is allocated to the relevant pathway. Further support on determining the appropriate safeguarding response can be found in the Threshold Tool.



Following this triage process, responsibility for the next stage of the response should be clearly identified. Where the decision is for the matter to be referred to another Church process, this must be recorded, including the rationale for the decision, the responsible person taking the matter forward, and any ongoing role the Safeguarding Officer will have, if any.

The complainant should be informed, as appropriate, which process will be followed, who will be responsible for progressing it, and what immediate next steps will be taken, where possible."

20. *On page 26 insert -*

"A broad approach should be taken to the question of vulnerability which, as the statutory definition makes clear, may arise in a variety of ways. Whilst the level of impairment is required to be significant the circumstances that give rise to it are wide. These include characteristics inherent to the adult such as age or disability but also factors such as illness, emotional fragility or merely distress. The nature of the impairment may be temporary or indefinite.

Care should be taken not to deem every adult as vulnerable merely because of the circumstances of the concern or allegation. However, it is important to note that the question of vulnerability is assessed at the time of the Church's intervention, not when the act or omission took place. This recognises that a

person who may not be vulnerable at the time of an act or omission may become vulnerable as a result of it, necessitating a safeguarding response from the Church.

It is for the Safeguarding Officer to determine in every case whether the response sits best with the procedures set out in the *Managing Safeguarding Concerns and Allegations* Code, whether it is better dealt with under HR policies or procedures, or whether some other response is needed.

Further guidance on definitions and statutory thresholds can be found in Safeguarding in the Church guidance."

21. *On page 27 insert –*

"Where the Respondent holds a Position of Trust, this may meet the criminal offence threshold regardless of the young person's age, see section 4A."

22. *On page 29 insert -*

"…the Code applies to safeguarding concerns or allegations involving individuals, not to decisions made collectively by a corporate body"

23. *On pages 30 insert –*

"The Safeguarding Case Handover Protocol sets out the minimum expectations for how safeguarding cases are transferred between Safeguarding Officers or safeguarding teams, including between dioceses/cathedrals and the NST.
Where responsibility for case management transfers between Safeguarding Officers or safeguarding teams, effective handover is essential to ensure continuity of safeguarding oversight, robust risk management, and clarity for those involved. Church bodies should ensure that this Protocol is embedded within local safeguarding arrangements, and that Safeguarding Officers follow it.

The Protocol sets a minimum standard for when a handover is required, who is responsible for initiating and completing it, how urgency is assessed, and how safeguarding risk is managed during periods of transfer. Local arrangements may add further detail but must meet this standard.
Supporting tools or templates may be used to facilitate timely and accurate sharing of key safeguarding information and to support clear communication with the complainant and respondent during transfer of" [case responsibility, including where this occurs as part of the SCMG process]

24. *On page 32 insert –*

> "Statutory bodies retain investigative authority, but making a referral does not transfer or pause the Church's own safeguarding responsibility. The duty to assess and manage risk continues throughout, and a slow or absent statutory response is a reason to act. Guidance on how to review, escalate, and record these decisions can be found in the Escalation Framework, supplementary to this Code."

Initial contact and support guidance

25. *On page 36 insert –*

> In the initial correspondence to the complainant and respondent it should be made clear that any evidence gathered through the SCMG procedure may be relied upon in later processes, including any disciplinary process

26. *On page 37 insert –*

> At the outset, the Safeguarding Officer should assess the risk of the complainant being re-traumatised through this process and discuss with them what measures might help minimise this.

27. *On page 39 insert –*

> Where the complainant is informed that the respondent will be notified, the Safeguarding Officer should consider and agree what support will be in place for the complainant at that point including the support options set out in *Responding Well to Victims and Survivors of Abuse* guidance

28. *On page 43 insert –*

> A Briefing Template is available to support a Link Person's first conversation with the respondent, to help them gather the information needed to provide consistent and appropriate support.

The Role of Safeguarding Case Management Groups guidance

29. *On page 50 insert –*

> "Any evidence gathered through the SCMG procedure may be relied upon in later processes, including any disciplinary process and this must be made clear to both the complainant and respondent. An example of good practice is to include notice of this in the Chair's letter to them.

The complainant should be proactively offered a choice in how and how often, they receive updates, rather than needing to request an alternative themselves, and this should be kept under review with them as the case progresses."

30. *On page 54 insert –*

"Church Bodies should ensure that all SCMG members access and complete the induction materials in advance of attendance where possible."

and

"Where responsibility for a case transfers to another Safeguarding Officer or safeguarding team, the requirements in Section 1 relating to handover apply."

31. *On page 55 insert –*

"Although the complainant does not attend SCMG meetings, consideration should be given to introducing them to the members managing their case where appropriate. See the *Responding Well to Victims and Survivors of Abuse* guidance for more on trauma informed approaches."

32. *On page 56 insert –*

"A minutes template is provided in the SCMG Resource Pack (Resource 3) and should be used for every SCMG meeting. The agenda, the approved minutes and any papers circulated before or during the meeting should be saved together in a folder for that meeting on the case management system:"

33. *On page 57 insert –*

- "Whether the respondent attends or seeks to attend more than one Church setting, and what enquiries have been made to establish this.**"**

and

"Where referrals have been made to statutory services, a review of statutory engagement is expected in which a decision around escalation may take place. Where a statutory body has not responded, or where the response has been inadequate, the SCMG should discuss whether to hold or escalate, in line with the Escalation Framework. This sits alongside the Safeguarding Officer's ongoing duty to review and escalate outside of scheduled SCMG meetings, set out in section 1.1.10. "

Members of Clergy guidance

34. *On page 60 insert –*

"All clergy remain subject to the safeguarding processes and standards of conduct set out in this Code, regardless of age or frailty"

and

"Where a safeguarding allegation is raised about an ordinand, please see Section 4B (Managing safeguarding concerns or allegations: Lay Volunteers). Where the allegation relates to events that took place while the respondent was an ordinand, but they have since been ordained, this pathway applies. See 'Determining the applicable pathway' in the introduction"

35. *On page 62 insert –*

"Where it is known that the subject of a safeguarding allegation has themselves experienced abuse, Safeguarding Officers should recognise that the respondent's role as a respondent and their experience as a victim or survivor must be treated as distinct. This should be handled sensitively. The safeguarding allegation must still be assessed and managed in accordance with this Code; a respondent's experience of abuse does not exempt them from safeguarding processes.

The investigation concerns the respondent's conduct as a Church Officer and must not be used as a basis for scrutinising their personal experience of abuse. Where a respondent's experience of abuse is or becomes known in the course of the investigation, this information may be relevant to understanding the context of their conduct but must be handled in accordance with the *Responding Well to Victims and Survivors of Abuse* guidance.

The respondent's entitlement to support under that guidance runs in parallel with safeguarding processes and is not contingent on the outcome of the allegation. Where appropriate, Safeguarding Officers should ensure the respondent is made aware of the support available to them."

36. *On page 64 insert –*

"This includes situations where there is a perceived risk to the respondent's own family or household, including partners/ex-partners, other family members and any children in their care."

37. *On page 66 insert –*

"A respondent's age, frailty or level of ministry, or the fact that they are no longer in active ministry or live overseas, is not in itself a reason to take no action or to conclude that there is no ongoing risk. The Safeguarding Officer should still assess what action is proportionate, and record the decision and the rationale in the case notes. Where a respondent lacks the capacity to engage with the process, see Withdrawal of PTO and OPTO."

38. *On page 72 insert –*

"Where a member of clergy, for example because of age or frailty, lacks the capacity to meaningfully engage with the safeguarding process set out in this Code, this should be considered when determining whether they continue to hold PTO or an active ministry role".

Managing Safeguarding Concerns or allegations: Lay Volunteers guidance

39. *On page 78 insert –*

"Where the respondent holds a Position of Trust, see section 4A for the legal definition.

For the purposes of this pathway, ordinands are treated as lay volunteers. Where a safeguarding allegation is raised about an ordinand, this pathway applies. It should be noted that the Clergy Discipline Measure does not apply to ordinands, and any concerns about their suitability for ordination should also be referred to the relevant sponsoring Bishop and Theological Education Institution (TEI)."

Church Safety Plans

40. *On page 102 insert –*

"Where the subject refuses to sign the Church Safety Plan, reasonable, proportionate and documented steps must still be taken to mitigate the risk posed to members of the Church Community. In such circumstances, the Safeguarding Officer must work with those involved in monitoring the individual (e.g. churchwardens, incumbents, PCC members, PSOs) and statutory services, where involved, to determine what measures may lawfully and practically be taken without the individual's agreement."

and

- "The Safeguarding Officer must record the refusal and the reasons given in the case files.

- The Safeguarding Officer must consider whether the refusal requires a reassessment of risk and whether further action is required to manage risk.

- Alternative risk management options must be identified and agreed, and the rationale for the approach taken must be recorded.

- Where involved, statutory partners should be made aware of the individual's decision not to sign or comply.

- Where there are uncertainties about information sharing or the implications of refusal, legal advice must be sought.

Such measures may include, where justified by the risk assessment:

- Restricting access to specific Church buildings or spaces, other than for published acts of worship;

- The Churchwarden may direct where the individual sits during acts of worship and require that they are accompanied while on Church grounds;

- Ensuring the individual is not left alone with children, young people or adults at risk by implementing appropriate supervision or stewarding arrangements;

- Limiting attendance to groups or activities that do not involve children, young people or vulnerable adults;

- Declining to appoint or permit the individual to hold any office, ministry, volunteer position or other role involving responsibility, trust or access to children, young people or vulnerable adults;

- Restricting contact with specific individuals, including victims, survivors and their families whilst on Church premises or participating in Church activities, and complying with any applicable court orders or statutory restrictions;

- Where necessary and proportionate, arranging attendance at particular services or at particular times where safeguarding risks can be more effectively managed;

- Refusing entry to the individual where they are not a parishioner."

41. *On page 105 insert –*

"Where a person who is subject to a Church Safety Plan attends or seeks to attend, more than one Church setting, the Safeguarding Officer should ensure that the Church Safety Plan and relevant risk management arrangements are applied consistently across those settings. This includes situations where

attendance at more than one setting arises by choice or because of restrictions or arrangements put in place to manage risk.
The Safeguarding Officer should ensure that Safeguarding Officers in relevant settings are informed as necessary for safeguarding purposes and that the rationale for sharing information is recorded."

Risk Assessments Guidance

42. *On page 149 insert –*

"In addition to the risks of harm described above, the Safeguarding Officer should consider the respondent's current and previous roles in the Church, any position of authority or influence they hold or have held, and the effect this may have on practice and culture within the Church Body."

43. *On page 153 insert –*

"When carrying out a risk assessment, the Safeguarding Officer should consider whether there are any risks of harm to children, young people or vulnerable adults connected to the respondent's family or household, including partners/ex-partners and any children in their care, and must act on any identified risks, making immediate statutory referrals where needed.

The Safeguarding Officer should also establish whether the respondent attends or seeks to attend multiple Church settings, whether within the same diocese, across dioceses, or in informal arrangements. Records should clearly document what enquiries were made to establish this and the rationale for any decisions taken, particularly where limited enquiries have been made."

Outcomes, Closure etc guidance

44. *On page 157 insert –*

"Where statutory agencies remain involved in the ongoing management of a case, the Safeguarding Officer should continue to keep that engagement under active review. Where a statutory body has not responded adequately, or where no update has been received, Safeguarding Officers must consider whether escalation is required in line with the Escalation Framework, supplementary to this Code."

Ending a church safety plan guidance

45. *On page 161 insert –*

"The final risk assessment should be evidence based and should address:

- whether the risks that led to the Plan have reduced, and the evidence for this, including the respondent's compliance with the Plan and any breaches since it began;
- any change in the respondent's role, circumstances or access to children, young people and vulnerable adults;
- whether protective factors are in place to manage any remaining risk without a Plan; and
- any police, disciplinary or other proceedings that are still outstanding.

The decision to end a Plan should be based on this evidence. Where the evidence is not available or does not support ending the Plan, it should continue and be reviewed again."

and

"Any refusal, and the reasons given, must be recorded in the case files. The Safeguarding Officer must also consider whether the refusal requires a reassessment of risk, and whether alternative risk management options are needed."

Recording Information Guidance

46. *On page 163 insert –*

"Safeguarding Officers should ensure that records are made of all key safeguarding discussions, decisions and actions taken in the management of a case. This includes recording consideration of whether an individual is involved in more than one Church setting, the information available at the time, and the rationale for any decisions taken, including where no further enquiries are made.

This includes safeguarding discussions between clergy and Safeguarding Officers, and other relevant safeguarding discussions, information about referrals, meetings held, decisions and outcomes.

Records should be made contemporaneously or as soon as practical, after the discussions or decision has taken place and should clearly record the rationale for safeguarding decisions. Where appropriate, records of discussions or meetings should be shared with those involved to confirm accuracy. This applies to safeguarding discussions across all stages of the process and is not solely limited to formal interviews or meetings.

Where an SCMG was convened, the complainant and respondent should be notified that any correspondence, records or reports prepared for the purposes of that group may be later used in a legal process.”