

Archdiocese of Glasgow Independent Safeguarding Audit April 2022





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- identifying and sharing knowledge about what works and what's new
- supporting people who plan, commission, deliver and use services to put that knowledge into practice
- informing, influencing and inspiring the direction of future practice and policy.

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1 INTRODUCTION

1.1 THE AUDIT

- 1.1.1 The Social Care Institute for Excellence (SCIE) has been commissioned to undertake an audit of the safeguarding arrangements of the Roman Catholic Archdiocese of Glasgow and Diocese of Dunkeld. This follows from completed audits in the Dioceses of Aberdeen, Motherwell and Galloway and the Archdiocese of St Andrews and Edinburgh.
- 1.1.2 The aim of the audit is to work with the archdiocese to support safeguarding improvements by identifying how well safeguarding is working, identifying where there might be weaknesses and exploring the rationale for both strengths and weaknesses found.
- 1.1.3 The audit has used SCIE's established methodology, Learning Together, which has been used throughout a three-year programme of Church of England diocesan audits. While some of the areas to be explored differ slightly, the methodology remains the same. The audit was completed by Jane Scott and Jane Bee in November–December 2021 with quality assurance provided by SCIE through Sheila Fish, Senior Research Analyst.
- 1.1.4 The audit process involved interviews, written contributions, a survey and documentary analysis. This included:
 - eight conversations with key clergy and lay staff involved in safeguarding within the Archdiocese (referred to as 'participants' throughout)
 - two written contributions from multi-agency partners
 - 27 survey returns from parishes including returns from parish safeguarding coordinators (PSCs), parish priests, children's liturgy, retreat managers and facilitators with safeguarding responsibility
 - documentary analysis of ten case files, strategic action plan, policies and procedures for safeguarding, and minutes of meetings
 - contributions from 12 people with first-hand experience of seeking or receiving a response to clergy abuse or safeguarding concerns.
- 1.1.5 In order to seek involvement from survivors of abuse who had received a service from the archdiocese, the Archdiocese of Glasgow made requests through information shared in local parishes and various media outlets across Glasgow. The auditors were able to speak with 12 individuals who came forward, and while small in number, their views are a key contribution (referred to as 'contributors' throughout).
- 1.1.6 The audit was designed to be proportionate. Auditors aimed to cover enough breadth and depth to gain an insight into safeguarding within the Archdiocese, recognising that, within the timescales available, this was not wholly comprehensive.
- 1.1.7 The audit was carried out during the time of the global Covid-19 pandemic during which the UK was in lockdown. A site visit was not possible and the fieldwork was carried out over three days, virtually. Files were transferred via a secure file share IT application. The methodology and approach to the audit were amended in advance by

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SCIE. This report reflects the commitment of the archdiocese to ensure smooth running of the audit during difficult circumstances.

1.1.8 Just prior to the audit, the Bishop's Conference of Scotland competed its revisions to *In God's Image* (2018) and published the updated version, *IGIv2* in October 2021. Part of the process of the audit is to consider the expectations laid out within *In God's Image* and how progress has been made within diocese or archdiocese against the standards. As the audit was undertaken in Glasgow only one month following publication of *IGIv2*, references through the report are to both versions although it is acknowledged that *IGIv2* has developed the thinking and practice of safeguarding within the Catholic Church in Scotland.

1.2 THE ARCHDIOCESE

- 1.2.1 The Archdiocese of Glasgow includes the city of Glasgow and extends to Cumbernauld in the east, Bearsden, Bishopbriggs and Milngavie in the north and Dumbarton, Balloch and Garelochhead to the west. Eighty-nine parishes are divided into nine deaneries ministering to an estimated Catholic population of around 215,000.
- 1.2.2 Until March 2020, the most reverent Philip Tartaglia was the Archbishop and responsible for ensuring the governance of the Catholic Church within the archdiocese. Following the death of Archbishop Tartaglia in January 2021 and in line with canon law, some curial officials automatically lose office on the death of a bishop. The College of Consultors is responsible for electing any priest in the diocese to assume the office of Diocesan Administrator during the period of *sede vacante*. On the death of Archbishop Tartaglia, Mgr Hugh Bradley was elected Diocesan Administrator.
- 1.2.3 An archdiocese remains in the state of *sede vacante* until a new archbishop is appointed. This means the Diocesan Administrator enjoys the powers required to ensure continuity in the governance of the archdiocese, but is not permitted to make decisions or policy changes which would be deemed as 'innovations'. The definition of an innovation, however, is not always clear and there are times noted in the audit report where this lack of clarity impacted on progress as regards safeguarding. There was no archbishop in place for the duration of the audit, but just as this report was being finalised, Bishop Nolan was appointed by Pope Francis as the Archbishop of Glasgow in February 2022. He was translated to the Archdiocese of Glasgow later that month.

1.3 DESCRIPTION OF THE SAFEGUARDING STRUCTURE

1.3.1 Before his death, Archbishop Tartaglia had prime pastoral and canonical responsibility for meeting safeguarding commitments. The Diocesan Administrator is now responsible for leading efforts to keep people safe, for dealing with all allegations against Church personnel within his archdiocese and for acting in compliance with civil and canonical legislation. The Archbishop had been supported by the archdiocesan curia of the Vicar General, the Chancellor and Vice-Chancellor, a full-time Diocesan Safeguarding Adviser (DSA) and part-time Diocesan Safeguarding

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Coordinator and Diocesan Safeguarding Administrator. The Diocesan Administrator continues to have responsibility for the team previously supporting the Archbishop.

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- 1.3.2 In line with *In God's Image*, the archdiocese set up a Diocesan Safeguarding Advisory Group (DSAG) chaired currently by the Diocesan Administrator and a Diocesan Risk Assessment and Management Team (DRAMT), previously chaired by the Archbishop and now the Diocesan Administrator. The DSAG membership includes those with safeguarding knowledge and experience in the field of safeguarding. DRAMT members were appointed by the Archbishop to provide him with advice and recommendations in decisions relating to specific safeguarding issues or allegations made against both clergy and parishioners.
- 1.3.3 The archdiocese has charity status and the trustees have a responsibility towards safeguarding governance. Safeguarding is a standing item on the agenda and the DSA provides a written update for each trustee meeting.

1.4 STRUCTURE OF THE REPORT

- 1.4.1 This report is consists of:
 - introduction
 - the findings that the audit presented by theme
 - questions for the archdiocese to consider, listed where relevant at the end of each finding
 - conclusions of the auditors' findings: what is working well and areas where future development might be considered
 - appendices.
- 1.4.2 Each substantive section begins with a generic introduction. This is followed by a description of what the auditors learnt about arrangements and practice in the diocese followed by their analysis of the strengths and systemic vulnerabilities identified. The description is value neutral. In the analysis the auditors make assessments of the safeguarding arrangements and practice they learnt about. SCIE methodology does not conclude findings with recommendations. Instead for each theme, the report provides the archdiocese with questions to consider in relation to the findings. The appendices outline the audit process and any limitations to the audit.
- 1.4.3 This approach is part of the SCIE Learning Together methodology and requires those with local knowledge and responsibility for progressing improvement work to have a key role in deciding what to do in order to address the findings and to be responsible for their decisions. This methodology also helps to encourage local ownership of the work required in order to improve safeguarding.

2 FINDINGS

2.1 SAFEGUARDING LEADERSHIP AND MANAGEMENT

2.1.1 Within the current arrangements of *sede vacante*, safeguarding leadership within the archdiocese lies with the Diocesan Administrator, but ultimately it will lie with the newly appointed Archbishop. Safeguarding leadership takes various forms with different people or groups taking different roles. The key areas considered by the audit were theological, strategic and operational leadership, and how these are defined and understood. How they fit together can be determinative in how well safeguarding is led.

THEOLOGICAL LEADERSHIP FOR SAFEGUARDING

Introduction

- 2.1.2 McLellan Commission report (2015) wrote of the need for 'a clear account of the theological principles which underpin safeguarding' (p. 215, para. 3.24). The Commission emphasised the importance and the urgency of the task in setting out a compelling and coherent theology of safeguarding for the Catholic Church in Scotland. Recommendation 3.110 addressed this specifically: 'The relative absence of theological insight in the "Awareness and Safety" manual must be replaced with a clear explanation of the task of safeguarding as a Christian privilege with a firm theological foundation' (para. 3.78). In response to McLellan, Archbishop Tartaglia set out the foundations for future developments in the section he wrote on the theology of safeguarding in *In God's Image* (Bishops' Conference of Scotland 2018).
- 2.1.3 It is for the archbishop or bishop, vicar general, vicars episcopal, chancellor and deans to help parish priests, congregations and others around the diocese or archdiocese to understand that safeguarding is intrinsic to the Catholic faith and therefore a priority. This aspect of the leadership role is the foundation for the culture of the Church and is critical in terms of making it a safer place for children and vulnerable adults.
- 2.1.4 *IGIv2* discusses more explicitly the Church's culture for safeguarding and at 2.7 states:

When Jesus was asked which was the first of the Commandments, he responded: 'This is the first: Listen, Israel, the Lord our God is the one Lord, and you must love the Lord your God with all your heart, with all your soul, with all your mind and with all your strength. The second is this: You must love your neighbour as yourself. There is no commandment greater than these' (Mark 12: 28–30). Seen from this perspective, the safeguarding of children and of all vulnerable adults is a work of love that emerges from the fundamental programme of Christian faith and living, mandated by Jesus himself. This is true, too, of the Church's commitment to respond in justice and compassion to the care of victims and survivors of abuse. (Bishops' Conference of Scotland 2018, p 7)

Description

2.1.5 The Diocesan Administrator is currently responsible for the spiritual leadership of the archdiocese and is clear that the term 'in God's image' was the epitome of the

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theology of safeguarding – every man, woman and child is created in God's image and all have a right to live life in all its fullness with love, respect and the virtues praised as Catholics. Participating clergy also articulated a clear theology of safeguarding.

- 2.1.6 Participants acknowledged, however, that some clergy and religious orders struggle with the term 'theology of safeguarding' and find it hard to connect safeguarding activity with a deeper theology. These include those who are assiduous in their structural, organisational and managerial responsibilities. Participants reflected that the protection of vulnerable people and minors is a gospel value and, therefore, safeguarding is a theological reality. This, however, is not always the view across parishes. Participants also reflected that if a parish has little direct experience of safeguarding then it could be seen only as Protecting Vulnerable Groups (PVG) processes, audits and paperwork, and contributors identified that compassion in some priests and parishes was lacking.
- 2.1.7 It was felt by participants that improvements had been made in the past three to four years locally through annual messages delivered to parishes by Archbishop Tartaglia before his death. A message from the Archbishop was also added to the national training delivered locally. Participants reflected that the Archbishop had been instrumental in the development of the annual day of prayer for survivors and for the annual announcement for safeguarding before Lent to link with the day of prayer. This was supported by the survey results and comments that reflected that the importance of safeguarding within the Church had been clearly communicated by senior clergy (81%; n = 27). It was hoped that *IGIv2* would increase the focus on scripture and the inclusion of quotes from the present Pope would help develop a clearer theology and hold senior clergy to account more transparently. Safeguarding was beginning to be seen as integral to the Church, but remained inconsistent across the archdiocese.

- 2.1.8 The understanding that safeguarding is at the heart of the Catholic mission was clear to the team responsible for safeguarding within the archdiocese. There was also reflection that *IGIv2* provides the platform to build a strategy to demonstrate the importance of safeguarding and develop a more consistent understanding across the parishes.
- 2.1.9 While the restrictions of *sede vacante* need to be acknowledged, this remains an area that requires further development. It has been surprising throughout the audits to date, including the Archdiocese of Glasgow, to hear that some priests struggle to see safeguarding in terms of the protection of an individual's human dignity, especially in terms of the core principle of compassion.
- 2.1.10 It might be more helpful to reframe this as a theology of human dignity. It is every person's right to life in all its fullness growing and thriving, and protecting people who are vulnerable. Views were expressed by the curia that safeguarding should permeate across all activities in parishes. Safeguarding is protecting and defending human dignity practically through the protection of all individuals.
- 2.1.11 Clear and overt leadership from the newly appointed Archbishop and his senior clergy is needed to raise the profile of safeguarding and provide leadership to all priests in their local ministries, and develop a consistent message to clergy, those who are active in the parish such as parish safeguarding coordinators (PSCs) and parishioners. This could be achieved through messages across the archdiocese from the Archbishop and meeting with local parishes. Currently, overt theological

leadership is not strong enough; only a third of respondents (n = 27) thought the diocesan senior clergy were visible in parishes with just over half (52%) commenting that it was average.

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Questions for the Archdiocese to consider

- How can the Archdiocese help the accessibility of the theology of safeguarding through, for example, exploring it in terms of human dignity?
- What is needed to increase the visibility of theological leadership and what messages are needed to reinforce that safeguarding is core to the mission of the Church?
- What are the ways to engage more effectively with deaneries and parishes to reinforce the theological message of safeguarding?
- What are the plans for how best to engage the new Archbishop in this crucial area?

STRATEGIC LEADERSHIP FOR SAFEGUARDING

Introduction

- 2.1.12 Strategic and operational leadership are commonly considered essential aspects of the leadership and governance of organisations. Strategic leadership develops the vision and mission, strategies, systems and structures for achieving that vision and overall accountability. Operational leadership delivers that vision and mission on a day-to-day basis. Roles and forums for strategic leadership and governance exist in dioceses to cover a range of areas and activities, for example bishop's/archbishop's councils. It is useful therefore to consider how strategic leadership is provided for safeguarding in the context of these fora.
- 2.1.13 The original version of *In God's Image* stated that safeguarding commitments lay with the Bishop: 'In this responsibility, the Bishop must be supported by those he has appointed to advise him and to manage safeguarding arrangements in the diocese or archdiocese the Diocesan Safeguarding Adviser (DSA), the Diocesan Safeguarding Advisory Group (DSAG) and the Diocesan Risk Assessment Management Team (DRAMT)' (Section A, para. 6.2). It did not, however, specify how the Bishop and senior clergy team should provide any strategic leadership and management of these roles and fora.
- 2.1.14 *IGIv2* reaffirms the bishop's role in terms of local safeguarding arrangements and at 6.2.1 states:

The bishop is ultimately responsible for ensuring that the safeguarding arrangements within his diocese are properly embedded within a culture of care. Above all, in his manner of reaching out and responding to survivors, the bishop must provide a powerful example of humility, Christian love and compassion. In appointing competent, qualified, and experienced individuals to key safeguarding posts, he will ensure that the strategic planning and organisation of safeguarding are secure and well regulated. (Bishops' Conference of Scotland 2021, p 68)

2.1.15 Furthermore, *IGIv2* now speaks of 'Church leaders showing personal commitment to, and strategic planning of, safeguarding' (p. 74). It is easier for organisations to be

clear about progress and improvements if the objectives and actions to take are set out in a strategic plan. For the diocese or archdiocese, a work plan would set out how the safeguarding service will be developed and who would lead on the different aspects of achieving the plan. Although not outlined in *In God's Image*, governance of the delivery of this plan would logically sit within the local governance arrangements of each diocese or archdiocese. Setting out the goals of the service and tracking progress against them enhances accountability and should assist operational leadership by identifying barriers to development that need to be addressed.

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Description

- 2.1.16 Under the previous Archbishop, the Vicar General exercised ordinary powers across the business of the archdiocese, which included safeguarding, and retained this responsibility as the current Diocesan Administrator. The Diocesan Administrator is supported by the Chancellor and Vice-Chancellor and is responsible for the safeguarding team of Diocesan Safeguarding Adviser (DSA), Diocesan Safeguarding Coordinator and Diocesan Safeguarding Administrator. Together clergy and laity has evolved into an informal safeguarding team.
- 2.1.17 The work of the Archdiocese of Glasgow is overseen by the diocesan trustees, who have responsibility for most aspects of diocesan life and activities including safeguarding. Safeguarding is a standing item on each agenda with a written report provided by the DSA for each meeting. The Chancellor also has an important part to play in the day-to-day administration of the archdiocese. There is both a DSAG and DRAMT in place and the DSAG's strategic action plan of 2021 sets out the detailed work under each of the eight standards as set out within *In God's Image*. The DSA updated the Archbishop verbally on the work of the DSAG and the Archbishop had been a member of the DRAMT. The safeguarding team also included an update on safeguarding in the most recent quinquennial¹ report of the state of the archdiocese provided to Rome. The report does not ask for updates on safeguarding specifically, but it was included as this was felt to be a significant area of work for the Archdiocese.
- 2.1.18 Participants' feedback and comments in the short self-evaluation prepared for this audit identified that the need for a strategic focus was felt across all areas of the archdiocese mission; each department is likely to have a plan, but this is not brought together into an integrated strategy.
- 2.1.19 Information about safeguarding sent from the safeguarding office had not always been shared locally; for example, information about this audit had not publicised in one local parish. This needs to be tackled strategically in terms of setting out the expectations of all communities, whether clergy or religious. From the case files and contributors, it was clear that there have been significant abuses of power by a small number of clergy and religious, and not all were felt to have been addressed equally robustly by the Church.
- 2.1.20 The recognition of the need for strategic leadership and a willingness to take this forward was evident in discussions with participants, but all acknowledged that more work was needed to develop and set up a strategic framework. Part of the challenge

¹ The quinquennial report sets out the current status and operations of a diocese or archdiocese, and is delivered every ten years to the Pope, in person, by the bishop or archbishop.

was the demand of direct operational work, meaning less time was available for developmental and strategic work.

Analysis

- 2.1.21 Strong strategic leadership is needed from the Archbishop to ensure that there is a clear understanding of the expectations of all parishes in terms of safeguarding and that abuses of position and power should not be tolerated. It is important that this message extends to both the clergy and religious orders involved in the work of the archdiocese. Leadership needs to be underpinned by a strategic action plan which sets out the vision and priorities for safeguarding and is supported by a communication plan. Transparent structures are needed for good governance, accountability and measuring performance. This would include a framework to monitor commitments in *IGIv2* such as each parish priest or major religious superior to take responsibility for ensuring that good safeguarding practice is observed in either parishes or religious institutes.
- 2.1.22 The elements are in place in the archdiocese. Safeguarding is a standing item at each meeting of the trustees and there are good informal links between the DSAG, the safeguarding team and wider associated laity and clergy. More thought should be given to how safeguarding links with the wider business of the trustees.
- 2.1.23 The current strategic action plan is a good start, but needs to be located within a broader safeguarding strategic plan, which sets out the vision for the next three to five years and includes issues such as safeguarding, continuity planning and forward planning. The recent publication of *IGIv2* provides the opportunity to review the current plan and develop it further. At the time of writing, the appointment of Archbishop Nolan had just been announced. It is acknowledged that until he is formally in post developments could not be agreed, although it was recommended that discussions and planning could begin.

Questions for the archdiocese to consider

- How can the development of strategic leadership for safeguarding best be brought up the priority list in the face of operational demands?
- Who needs to be involved in discussions and decisions about the strategic and governance arrangements, responsibility and accountability for safeguarding?
- Who needs to be involved in discussions and development of a communications plan?
- In what other arenas should safeguarding be a standing agenda item?

OPERATIONAL LEADERSHIP OF SAFEGUARDING

Introduction

2.1.24 Senior clergy leadership and management of the operational work of safeguarding needs to provide oversight of safeguarding in a diocese or archdiocese, including identifying barriers to implementation that need tackling. Leadership is also needed for accountability, particularly when the safeguarding service is delivered through collaboration between clerics, staff and laity. Operational leadership and management by the clergy can be seen as providing a strong link to the strategic leadership of

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senior clergy and ultimately the bishop. It is distinct from an operational decisionmaking responsibility.

2.1.25 There are inherent challenges to clergy, as non-safeguarding specialists, in fulfilling the operational leadership and oversight of safeguarding, given it is a specialist function. Leaving the centralised operations of safeguarding in a diocese or archdiocese without any clergy-led governance and oversight, however, would also weaken safeguarding arrangements.

Description

- 2.1.26 Operational leadership for safeguarding in Glasgow lies with the Diocesan Administrator who has line management responsibility for the DSA, who oversees the Diocesan Safeguarding Coordinator and Diocesan Safeguarding Administrator. The DSA previously had unrestricted access to the Archbishop and support from senior clergy in all operational matters. Being based in the same building allowed ongoing and frequent communication, which was important in this particular archdiocese because of the volume of work.
- 2.1.27 The safeguarding team provides operational leadership evidenced through conversations, feedback from partners and survey results. All were aware of the processes in relation to safeguarding. Of survey respondents, 78% (n = 27) reported they felt the support from the safeguarding office was good, and 74% (n = 27) thought communication was good, although a quarter felt this could be improved. This was not in relation to individual operational matters, but to the general operational leadership of safeguarding.
- 2.1.28 In relation to individual cases, multi-agency partners and those active in local parishes commented that the safeguarding team was available, helpful and supportive in terms of providing support and advice on a range of issues from support to set up local safeguarding processes, to tailored online training, to advice on individual cases. In difficult situations, the team was said to be level-headed and calm. Contributors, who had approached the safeguarding team, also reported positive and supportive experiences, but one or two felt the responses from the Church had been less than sympathetic (discussed in Section 2.8, Responding to concerns).
- 2.1.29 As mentioned in 2.1.17, operational actions are set out in the most recent strategic action plan covering some broader priorities with detailed actions for implementing each of the eight standards in *In God's Image* and *IGIv2*. A complaints procedure is also being developed, which sets out the process for raising any concerns about how cases are managed.

- 2.1.30 The Diocesan Administrator is clear about the importance of operational leadership, and the delivery of safeguarding advice is strong. There is a sense of good operational leadership and working relationships across the informal safeguarding team and with multi-agency partners. The current informal operational management team should be strengthened into a formal safeguarding management team which reports to the trustees and is informed by the work of the safeguarding team, DSAG and DRAMT. A communication plan should set out how the safeguarding office will communicate with deaneries and parishes and consider the development of feedback loops.
- 2.1.31 The auditors saw evidence from the case files that the more recent professional approach had not been as apparent historically and processes were now working

more effectively. More formal structures for governance and accountability need to be put in place. The draft complaints procedure was welcomed, particularly as it suggested an independent third party could be instructed to review complaints. This procedure needs to be available through the website.

Questions for the Archdiocese to consider

- What could help to enable a distinction between strategic and operational leadership, and operational leadership and operational delivery, in a set-up where key people are inevitably wearing different hats at different times?
- What is the role of those in operational leadership positions in terms of helping instil a greater confidence in the parishes regarding managing safeguarding situations?
- Are the operational leadership and management roles made sufficiently distinct from safeguarding delivery roles, for those who may wish to speak to operational leadership? How might confidentiality arrangements be more clearly articulated?

DEALING WITH THE LEGACY OF A HIGH PROFILE CONVICTION

Introduction

- 2.1.32 Across all settings, dealing with the legacy of a high-profile case of abuse presents opportunities and challenges. Assuming leadership of a diocese or archdiocese with a high-profile case of clergy abuse is no different. A change of leadership creates the possibility to focus on restorative practice:
 - to help all affected parties come to terms with the facts, the betrayal and the possibility of their own, albeit unwitting, part in allowing abusers to go unchecked
 - to identify and right any wrongs of the past, working closely and compassionately with survivors to hear and respond to what they need.
- 2.1.33 It is challenging, however, when the prominent member of senior clergy has formed close working relationships and friendships with many in the diocese, when survivors and the efforts of others to bring the abuse to light have not been responded to appropriately and there is inevitable loyalty to your predecessors. The response by bishops to these issues is key to setting the tone of their leadership and the tenor of the safeguarding culture they are trying to propagate.

Description

- 2.1.34 In the past decade, there have been several high-profile cases in the Archdiocese of Glasgow including individuals who have caused harm and abuse which have resulted in criminal proceedings. Priests have been removed from their ministry, which has meant removing them from their role and vocation and their professional and social networks, resulting in loss of earnings and home, although the Church has a duty to provide support and shelter.
- 2.1.35 As early as the mid-1980s, the response to the behaviours of one priest was to remove him from his ministries, however, his actions and removal from ministry were not reported to the police or other dioceses and there were no processes in place to

monitor his activity. This allowed the behaviour of grooming through to sexual assault to continue across three decades.

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- 2.1.36 While this case is outwith the timescales of this audit in terms of the initial allegations, the impact of the abuse across three decades raises several issues relevant for today in terms of risk assessments, monitoring and management of such individuals (explored in sections on DRAMT and casework), and also in terms of how the archdiocese acknowledges the legacy of past abuse. How the Church works with survivors in addressing previous abuse is also important. For example, the name of one individual appeared in the archdiocese response to the Scottish Child Abuse Inquiry (SCAI) without their knowledge or permission. There had been discussion within the archdiocese about how to maintain confidentiality and fairness to victims, and the archdiocese had initially anonomised its submission to the SCAI. The archdiocese was subsequently served notice to share the information, resulting in the identification of an individual without their prior knowledge. While this may have met the requirement to respond to the Inquiry, it is unlikely this is a desired outcome for individuals and does not help build trust and confidence with the Church.
- 2.1.37 In 2015 and following the publication of the McLellan Commission's report, Archbishop Tartaglia issued a highly public apology to all those who had been harmed and who had suffered as a result of actions by anyone within the Catholic Church. This encouraged some individuals to come forward, but other contributors commented that the lack of a dialogue with the Church to address the legacy of the abuse by priests has meant there remains a mistrust in the Church's commitment to learning from past mistakes and acknowledging crimes and abuses of power. The removal of priests previously was often explained in softer terms such as 'retirement through ill health'. Without a clear message and public discussion, this has meant that even today some clergy, families and wider congregations continue to disbelieve abuse took place despite a priest being tried and convicted.
- 2.1.38 More recently, there have been improvements. In one parish, a statement was made by the Archbishop at Mass that their priest had been removed because of allegations made, with a request for anyone else affected to come forward. In other cases, individuals were offered a meeting with the Archbishop, which for some allowed some healing to begin, but others felt more was needed to build trust.
- 2.1.39 Organisations need to insure themselves against a variety of risks, which requires the services of insurers who operate independently and have their own philosophy, working practices and language, and will have a clear understanding of the distinctions between litigation, compensation and redress. Participants recognised that the approach of one organisation may not always be compatible with that of their insurers and it has been difficult at times for individuals to separate out the approach of the Church from that of the insurers. Participants reported that the Church often negotiated on behalf of individuals for funding for counselling irrespective of an investigation or proof.

- 2.1.40 Without clear leadership, the varying safeguarding practices historically in the archdiocese may still impact on current levels of trust and confidence for individuals when approaching the safeguarding office with allegations of non-recent or current abuse.
- 2.1.41 Reflections of both contributors and participants show that the struggle of some to believe that abuse has happened is generational to some extent. Younger members

of the clergy and parishes accept that abuse has happened and understand a need to address this for individuals, and for the Church to progress. Within parishes, some individuals today are still not believed and instead of the priest receiving criticism, the individuals themselves are viewed as 'difficult' or 'troubled'. Those individuals feel that no-one cares or wants to listen. The example in connection with the SCAI highlights the complexity and tension in trying to keep individuals at the heart of a legal or inquiry process. While there is concern about approaching and re-traumatising individuals 'out of the blue' to seek permission to share details, approaches need to be considered about how best this is done. The responsibility for addressing these issues is with the organisation and not individuals.

- 2.1.42 There is unquestionably a need for visible leadership across the archdiocese to consider how to address publicly cases of abuse by former priests and religious, and to involve those individuals who were hurt or harmed in public discussions. The response to the most recent case mentioned above highlights that the archdiocese can respond appropriately in terms of publicly acknowledging the alleged behaviour of the priest and in offering support to both individuals who come forward and the respondent against whom allegations have been made.
- 2.1.43 The safeguarding team acknowledged that continued efforts are needed to find frequent and varied ways of renewing the apology that has been offered to help build trust with the individual and wider communities affected and to challenge publicly some of the views which continue today. An effective strategic safeguarding plan could set out the required support for individuals and provide the help needed to heal a parish.

Finally, there is a strong and clear message for the Catholic Church in Scotland from all contributors that a public dialogue is needed to progress the process of healing. From the start of the audits, the question of liability has arisen: to what extent is the Church liable financially for the hurt and damage? The safeguarding team acknowledged the need for a compassionate approach to healing for individuals (see Section 2.9 on survivors for a fuller discussion) and, in the matter of redress and spiritual healing, felt the archdiocese could influence the language and culture towards compassion and acceptance, although this may be more limited when the insurers are involved. Other organisations across the UK, including faith-based institutions, have made much progress in this area and there is perhaps learning that could be shared with the Catholic Church to help developments in Scotland. This is further evidence for the need for a strategic approach to safeguarding.

Questions for the Archdiocese to consider

- Does the appointment of a new Archbishop create a fresh opportunity to provide a clear public narrative about past high-profile clergy abuse cases in Glasgow, and any errors in their management?
- What leadership is needed to address any remaining disbelief among parishes and congregations?
- How can the archdiocese ensure that the requirements of the General Data Protection Regulation (GDPR) are met when information is released about individuals and that approaches are developed about how best to work with individuals in these situations?
- Has the Archdiocese heard sufficiently from victims and survivors of past high-profile cases to be confident they are being given sufficient help to rebuild broken lives?
- Is there an opportunity nationally to identify learning from other organisations in the UK, including faith-based organisations, about redress schemes and working with insurers?

2.2 DIOCESAN SAFEGUARDING ADVISER

Introduction

- 2.2.1 The Diocesan Safeguarding Adviser along with the DSAG and DRAMT, remain key to the infrastructure as set out in *IGIv2* to advise and assist the bishop to fulfil safeguarding responsibilities.
- 2.2.2 The role is summarised at 6.2.2 in *IGIv2*:

The role of the Diocesan Safeguarding Adviser (DSA) is to advise and assist the bishop in meeting his safeguarding responsibilities. These include endeavouring to protect children and vulnerable adults in their contact with Church personnel, in Church activities, and on Church property.

- 2.2.3 *IGIv2* states that the DSA is responsible for:
 - coordinating efforts to raise awareness of safeguarding within parish communities, including the training of PSCs, the recruiting of diocesan safeguarding trainers and the safeguarding training of diocesan clergy
 - advise the bishop on good practice in responding to safeguarding concerns and allegations of abuse
 - collaborating closely, not only within their diocesan teams, but with safeguarding colleagues across the country, as well as with the statutory authorities
 - as the main link between the diocese and the Scottish Catholic Safeguarding Standards Agency: the DSA is responsible for promoting national safeguarding standards and demonstrating compliance with them.
- 2.2.4 Membership of the DSAG must include the DSA (*IGIv2*, para. 6.2.3) and, in relation to the DRAMT (para.6.2.7) in the absence of any allegations for any significant period of

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time, the DSA should support the DRAMT by providing some scenarios of the types of allegations that might arise. In this way they will be able to practise their skills and develop their understanding of the complex situations that might arise at any time.

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2.2.5 It is recommended that the DSA role should be undertaken by an appropriately qualified and experienced layperson.

Description

RESOURCING AND RELATIVE ROLES

- 2.2.6 The DSA post in the Archdiocese of Glasgow is full-time and salaried. The DSA had previously been the assistant DSA and came into post in 2016. The post was originally three days per week, but has increased due to the extent of the caseload within the archdiocese.
- 2.2.7 The role is both operational and strategic. The DSA deals with all queries in relation to safeguarding, has a caseload and links with PSCs when safeguarding issues are raised locally and facilitates their ongoing training and development. The DSA organises and attends four DSAG meetings a year, as well as DRAMT meetings. The DSA also develops and progresses the strategic action plan.
- 2.2.8 The DSA is supported by, and supervises, two part-time posts which include a safeguarding coordinator and a safeguarding administrator. Interviews and the parish survey results show that the DSA and team are highly regarded and well respected throughout the archdiocese.

RESOURCES

2.2.9 The DSA works either from home or from the diocesan office and is provided with the required resources for the role.

QUALIFICATIONS

2.2.10 The DSA in Glasgow is a qualified social worker and has worked in various social work roles, having particular knowledge of gender based violence and child protection. The archdiocese has supported the DSA through giving study time or financing them to undertake relevant training and qualifications. The DSA is currently completing a Diploma in Interpersonal Psychology, has attended three conferences on trauma, and the archdiocese has allowed them time for additional external commitments in terms of teaching and involvement with the Children's Hearing System.

CONFLICTS OF INTEREST

2.2.11 There are no known conflicts of interest for the DSA in this role. Interestingly, due to the DSA's previous roles within social work, there may be times when the DSA will be known to survivors within a different context. In these circumstances it might be necessary to offer a range of routes for individuals to come forward with allegations.

LINE MANAGEMENT AND SUPERVISION ARRANGEMENTS

2.2.12 The DSA was line managed by the previous Vicar General. This arrangement has continued in his role as Diocesan Administrator. The archdiocese supports the DSA through support provided by the Diocesan Administrator for matters within the

archdiocese and monthly external professional and peer supervision is provided to support complex caseloads and working with survivors.

Analysis

- 2.2.13 The DSA brings a knowledge of gender-based violence, child protection and an understanding of dealing with trauma to the role. This experience together with the DSA's continuing professional development and supervision has shaped the safeguarding office's approach to managing caseloads, working with survivors and working with external partners. The provision of professional supervision to the DSA is both positive and necessary.
- 2.2.14 The DSA had formed an effective working relationship with the Archbishop and had informed his response to individuals. The DSA continues to work closely with the safeguarding team of clergy and laity. There is a sense of supportive relationships and close teamwork. The current arrangement is effective because of good relationships, but currently lacks a formal process to manage disagreements or concerns about performance should the need arise.
- 2.2.15 Similar to previous audits, the role of the DSA in Glasgow has developed beyond that described within the original *In God's Image*, illustrated by the increase in hours to full-time. The DSA also works effectively with the Diocesan Safeguarding Coordinator and Diocesan Safeguarding Administrator. Also similar to other salaried posts, the DSA has been able to take forward key operational developments in managing cases, support to survivors and support to parishes in line with the job description. The significant operational role in Glasgow has meant less time available for the DSA to contribute to wider strategic developments. With the publication of *IGIv2*, it might be valuable to reflect on the role of the DSA and the support required in Glasgow to allow both operational and developmental aspects of the role.

Questions for the Archdiocese to consider

- In order to ensure good safeguarding systems, how might formal processes be developed to underpin the good relationships within the team?
- How can the Archdiocese ensure the DSA role remains well supported?
- How can the strategic and operational aspects of the DSA role be differentiated and best managed?
- How can adequate integration between line management and external supervision arrangements be achieved for the DSA role?

2.3 ARCHDIOCESE SAFEGUARDING ADVISORY GROUP (DSAG)

Introduction

- 2.3.1 The DSAG along with the DRAMT and the DSA is a core part of the safeguarding infrastructure, whose function it is to support the Bishop in his responsibilities for safeguarding.
- 2.3.2 Within *In God's Image*, the role of the DSAG was threefold: first, it is described as having an operational function around the organisation of PVG applications, monitoring of ongoing membership of the scheme across the diocese or archdiocese and organising training for parish clergy, safeguarding volunteers and PSCs; second,

it should play an oversight, scrutiny and challenge role in order to ensure compliance with national safeguarding standards across the diocese or archdiocese and discuss ongoing issues related to safeguarding arrangements in the diocese or archdiocese; third, it has a strategic leadership role in its responsibilities for responding to issues emerging from the safeguarding audit and liaising with the Scottish Catholic Safeguarding Service on national developments, resources and legislative change.

2.3.3 In *IGIv2*, the role and membership of the DSAG is set out at 6.2.3:

The diocesan Safeguarding Advisory Group (DSAG) should consist of people with relevant experience and skills, appointed by the bishop to support the DSA and to ensure diocesan-wide adherence to the safeguarding standards to which the bishop is co-signatory. Their responsibilities should also include analysis of the annual safeguarding audits, the formulation of the diocesan safeguarding action plan and the planning of relevant safeguarding training for clergy, religious, PSCs and volunteers. Membership of DSAG must include the DSA. Its work may by enhanced by the involvement of representatives of relevant diocesan groups – e.g., Pilgrimage leaders, SPREd, Youth Office, and religious congregations – for whom safeguarding is particularly significant. (Bishops' Conference of Scotland,2021, p 68)

2.3.4 Sections 8.3.1–8.3.3 in *IGIv2* set out the DSAG monitoring role and consider the implications of results of the parish audit for training, support and further improvements. This analysis and reflection, together with any recommendations emerging from any independent reviews of safeguarding practice, should enable the DSAG to prepare a safeguarding action plan that will address some areas of improvement required within the diocese or archdiocese over the subsequent year. The actions planned should be measurable and achievable, and be sharply focused on the intended outcomes of each action.

Description

- 2.3.5 Throughout Covid-19, the DSAG has continued to meet virtually four times a year, chaired by Vicar General, and now in his role as Diocesan Administrator. Minutes from the DSAG demonstrate that discussions are wide-ranging, including updates on safer recruitment, PVG disclosures, local and national updates and sharing information on activities relating to the safeguarding of all groups represented.
- 2.3.6 This continued development of the DSAG is one area which has been impacted by *sede vacante*. Its membership was reviewed in 2019 to strengthen the knowledge and experience of safeguarding from the different perspectives of social work, criminal justice and survivors, as well as the skills and experience of working with survivors, quality assurance and ongoing self-evaluation. The strategic action plan supports the work of the DSAG and is considered at each quarterly meeting with each member responsible for the progress of one standard as set out within *IGIv2* and within the plan. Some DSAG members interviewed felt the strategy was clearly within the strategic action plan, whereas others felt this could be developed further.
- 2.3.7 Participants thought the current action plan was helpful in the current circumstances, but probably too detailed and reflecting processes. *IGIv2* provided an opportunity to review the action plan in terms of a more strategic approach. It was acknowledged, however, that this could not be progressed until a new archbishop had been

appointed, the new curia was in place and the structures and roles of the new national service were clearer.

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- 2.3.8 Those interviewed felt that younger voices, those from different cultures, the views from survivors and a health perspective would bring added benefit to the DSAG. Participants reflected that, previously, the DSAG had perhaps been more passive and less proactive, but there was now an appetite for it to be more dynamic and strategic.
- 2.3.9 Some of those interviewed discussed the need to develop feedback loops through to deaneries and parishes in terms of national and local developments, the audits and the action plan. Parish priests have responsibility and autonomy, but feedback loops are needed to help develop a more consistent approach to safeguarding across the archdiocese. The two subgroups of the DSAG (religious and training) were thought to be helpful in keeping connected with religious orders and monitoring the training programme across a large archdiocese with over 2,000 volunteers. One final suggestion was for a third DSAG subgroup or survivors' panel to inform the work across the archdiocese both operationally and strategically. Participants reported that one key role for the new Scottish Catholic Safeguarding Standards Agency would be to set up a national survivors' panel.
- 2.3.10 Previously, Archbishop Tartaglia had been updated verbally on the work of the DSAG by the DSA.

- 2.3.11 The review of the DSAG had been timely and it was unfortunate that positive developments could not be progressed further during *sede vacante*. The membership was able to demonstrate its current activity, but was aware that further developments were needed. The allocation of a member to a standard relevant to their experience to provide challenge and act as a critical friend is a positive development in terms of quality assurance and bringing in people with knowledge and experience of safeguarding to provide support and challenge.
- 2.3.12 The DSAG now needs to be developed to meet its strategic function which will be informed by how the archdiocese develops it safeguarding approach in terms of governance and accountability and the approach of the new Archbishop. The formalisation of the current safeguarding team into a safeguarding management team, more dynamic links with the trustees and developing feedback loops with the deaneries and parishes should all be considered. The new developments of *IGIv2* and the revised national office provide opportunities for review and reflection which should include an update of its current terms of reference. This might usefully inform discussions on the DSAG's strategic role.
- 2.3.13 As mentioned under strategic leadership, the auditors felt that the current strategic action plan was more process orientated than strategic and needs to be reviewed. The auditors welcomed the suggestions for new membership and particularly the suggestion of a national survivors' panel which could encompass a broader range of views and experiences. It would be helpful to explore how this national panel could link to local development work.

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Questions for the Archdiocese to consider

- How can the planned National Survivors' Panel contribute to local views of survivors to inform the operational and strategic developments of the archdiocese and vice versa?
- Within the framework provided by *IGIv2*, what aspects of the DSAG's development can be progressed in spite of *sede vacante*?
- Who is best placed to conduct a risk assessment of significant further delay to different aspects of DSAG developments and alternative options?

2.4 DIOCESAN RISK ASSESSMENT MANAGEMENT TEAM (DRAMT)

Introduction

- 2.4.1 *In God's Image* sets out that the DRAMT along with the DSAG and the DSA is a core part of the safeguarding infrastructure, whose function it is to support the incumbent bishop in his responsibilities for safeguarding.
- 2.4.2 In IGIv2, section 6.2.4 states that:

Members of the Diocesan Risk Assessment Management Team (DRAMT) are appointed by the bishop to assist him, within the strict limits of the law, in the management of individual cases where allegations have been made against a diocesan cleric, employee or volunteer. This team's advice and recommendations should assist the bishop to come to decisions about how to proceed, in accordance with both civil and canon law, in response to reported allegations and concerns. The DRAMT should comprise a small number of individuals with relevant expertise, including those with experience of working in the legal profession, in canon law, in healthcare, social work and the Police. Its composition should be mixed, in numbers of ordained and lay members, and in their gender. (Bishops' Conference of Scotland 2021, p 68)

2.4.3 The detail of the DRAMT outlined in *IGIv2* does not address the previous identified potential conflicts of interest. These hinge on the advisory nature of the DRAMT. The DRAMT gives advice and recommendations, but decision-making authority remains with the bishop/archbishop. This means he is making decisions about the clergy, employees or volunteers for whom he also has pastoral responsibilities. The relationship between a volunteer and a bishop may be more distant, but bishops appoint and ordain priests, make decisions about many aspects of their lives and have the responsibility for their pastoral care, including when they have safeguarding allegations made against them (see Standard 5). This makes it essential that there are clear processes for identifying and dealing with disagreements where they emerge between the DRAMT and the bishop/archbishop so they can be resolved swiftly and transparently.

Description

2.4.4 The Archdiocese of Glasgow has a small DRAMT consisting of the DSA, the Diocesan Administrator, the Chancellor, the Vice-Chancellor, and laity representation from law and human resources. (The previous Archbishop was also a member.) The DRAMT meets a minimum of four times a year but often more frequently where a risk assessment is required. Single case meetings are also called when needed. The DSA reports to each meeting, with relevant background reading circulated. Each case

is considered with full discussions and appropriately limited information noted to provide a formal record of each case. Consistent formats are used for diocesan risk assessments and for recording recommendations.

- 2.4.5 Members of the DRAMT felt the process worked effectively in terms of discussion, challenge and recommendations. The attendance of the Archbishop had allowed him to hear all views and helped him gain a full understanding of individual situations. The Archbishop had not interfered with the process of the meeting, the debate and discussions or the recommendations and had always enacted the DRAMT's recommendations.
- 2.4.6 If situations arose where there was felt to be a conflict of interest or the situation involved those personally close to the Archbishop or clergy then those members were asked to leave the meeting and did not take part in discussions or making recommendations. There was no formal local escalation process to challenge the decision of the Archbishop, although some commented that conflict could be escalated to the Apostolic Nuncio in London or to Rome. The recent publication *Vos Estis Lux Mundi* by Pope Francis had highlighted that concerns about someone in a position of authority having responded inappropriately could be forward to the Vatican; in principle there was a route if there were concerns that situations had been mishandled.
- 2.4.7 There was acknowledgement from those the auditors spoke with that the DRAMT's membership should be small due to the confidential nature of cases discussed, but that the membership needed to expand to include those with knowledge of psychology, risk assessment and the criminal justice process. New members had been identified by Archbishop Tartaglia. A member of the judiciary had been approached, but as the individual was still in practice it was felt to be a conflict of interest. Archbishop Tartaglia had been in the process of approaching a second individual at the time of his death. Due to the fact that the name was known only to the Archbishop and *sede vacante*, this had not been progressed. Arrangements were in place, however, to draw on professional expertise of risk assessment if required and also a professional with significant experience of working with survivors. These ad hoc members are from within and outwith the DSAG.
- 2.4.8 DRAMT members spoke of good discussion and challenge within the team and good working relationships and advice sought from multi-agency partners. There is regular use of risk assessments although some members reflected that individuals on the DRAMT may have different levels of knowledge and understanding and that training for DRAMT members would be helpful, particularly in assessing and managing risk.

- 2.4.9 The role of the DRAMT in making recommendations is clear and similar to other dioceses. The role of the DSA has developed from the 'conduit' originally set out within *In God's Image* to a more active member. The DRAMT could also consider drawing on the wider knowledge and experience from the DSAG as appropriate in individual cases as this model has worked effectively in other dioceses. Several issues emerged for further consideration.
- 2.4.10 First, the auditors agreed with comments about widening the DRAMT's membership in terms of risk assessment in the context of the criminal justice system. Key to discussions within the DRAMT is an understanding of risk assessment in the context of safeguarding. The high caseload in Glasgow means it is likely that this DRAMT is making decisions on complex situations with high levels of risk. It was felt that

increased understanding by the DRAMT would allow for greater challenge to risk assessments undertaken in individual cases.

- 2.4.11 There have been informal discussions about the DRAMT's membership within the safeguarding team, but it was not clear to what extent DRAMT members themselves were involved in discussions identifying gaps and individuals. It seems appropriate that the DRAMT itself discusses future proposals for new members.
- 2.4.12 Second, as mentioned throughout this report, the DRAMT needs to be brought within the governance arrangements and strategic oversight for the archdiocese. This would ensure that the messages or issues arising from cases inform strategy, policy and practice.
- 2.4.13 On a more practical note, the terms of reference need updating and the auditors agreed with the reflection that there should be training available for DRAMT members, both in terms of the general role and expectations, and also in more specialist areas such as understanding trauma and managing risk.
- 2.4.14 Finally, as has been raised in all previous audits, there remains the difficult issue of independent scrutiny. The auditors heard compelling arguments for inclusion of the Archbishop in observing DRAMT discussions, listening to the debate and asking questions to gain a full and nuanced understanding of the recommendations made. While decision-making remains with the Archbishop then there is justification for him being part of full discussions.
- 2.4.15 There remains, however, a lack of independent processes for escalation or challenge to decision-making. The current arrangement is based on good working relationships, but more thought might be needed in terms of how the provision of an independent third party reviewing decisions can be expanded. The routes laid out in *Vos Estis Lux Mundi* are welcomed, but it feels as though there should be intermediate steps before escalating to London or Rome.
- 2.4.16 The responsibility that lies with a bishop or archbishop is set out in canon law and, it has been argued, cannot be changed at diocesan or archdiocesan level. Law, however, is dynamic and perhaps greater thought should be given as to how accountability and transparency could be built into the process. There are also the options of delegating responsibilities.

Questions for the Archdiocese to consider

- What needs to happen to progress plans for the current DRAMT to draw on wider professional skills and knowledge?
- How should plans for any disagreement between the DRAMT and the archbishop be put in place as a contingency including plans for escalation if required?
- What are the routes and processes for changing canon law?

2.5 LINKS WITH THE SCOTTISH CATHOLIC SAFEGUARDING SERVICE

Introduction

2.5.1 In early 2021, the National Coordinator for the Scottish Catholic Safeguarding Service left their post and the Bishop's Conference of Scotland took the opportunity to review the role of the national safeguarding service in line with the revisions to *IGIv2*.

The recent publication of *IGIv2* states that: 'At the time of publication, the Bishops' Conference of Scotland have decided to replace SCSS with the Scottish Catholic Safeguarding Standards Agency (SCSSA)' (p. 73). The role of this new agency will be:

- to develop and promote the 'culture of care' that should be the hallmark of the Church's safeguarding efforts
- to be informed by those who have been harmed by abuse
- to provide strategic leadership and direction in safeguarding to all components of the Church in Scotland
- to promote and regulate consistent compliance with safeguarding standards through the provision of training, the development of common resources and other forms of support
- to develop the culture of an annual improvement cycle involving audits, analysis, planning, training and sharing of good practice
- to commission or undertake independent scrutiny of safeguarding practice in all jurisdictions
- to report on the outcomes of audits and reviews in transparent ways
- to coordinate a safeguarding complaints system that is transparent.

Description

2.5.2 Previously, there were no strong links between the Archdiocese of Glasgow and the safeguarding service. Part of this was thought to be because the role of the DSA was full-time and salaried with a busy caseload and there was experience of safeguarding within the team.

Analysis

2.5.3 While the role of the new agency is set out in *IGIv2*, it is unclear what progress has been made in setting up the agency, what will be the focus and content of training resources and to what extent it will independent of the Church in terms of the complaints process, particularly if it upholds complaints against a bishop or archbishop. In its absence, developments have been taken forward by DSAs across all eight dioceses which has impacted on their workloads. This has been an issue, particularly for those who are volunteers or working part-time.

Questions for the Archdiocese to consider

- How might the Archdiocese take forward ideas for a different model and structure for the national office being discussed within the Bishop's Conference of Scotland?
- How might the Archdiocese escalate to the Bishop's Conference the need for interim arrangements while the new agency is being set up?

2.6 GUIDANCE, POLICIES AND PROCEDURES

Introduction

2.6.1 Recently, a working group of DSAs developed a set of templates for essential policies and procedures which should be in place within each diocese or archdiocese to each of the standards within *IGIv2*.

Description

2.6.2 The archdiocese has a section on its website dedicated to safeguarding which has an online link to *IGIv2*, details of how to approach the safeguarding team, information about what to do if someone is worried about a child, young person or adult at risk, safe recruitment and training policies, and the conduct that all should expect from all employees and volunteers working within the archdiocese. There is also a policy on reopening following Covid-19 in the context of safeguarding.

Analysis

- 2.6.3 As described, the archdiocese has some policies in line with *In God's Image* and the auditors felt the policy on reopening following Covid-19 in the context of safeguarding was a welcome development. Overall, the development of a comprehensive set of guidance, policies and procedures needs more development. It is important that information, policies and procedures are published and accessible as this helps demonstrate the commitment of the archdiocese to safeguarding.
- 2.6.4 The challenge for the archdiocese is developing policies while the national agency is being set up, and the caseload in Glasgow means there is little time for development activity. It is also unclear whether a national set of templates have been produced and agreed.
- 2.6.5 Other dioceses publish online information leaflets about safeguarding, results of the annual audits, information on the importance of supporting survivors and what survivors need, as well procedures for safe recruitment, training, GDPR, complaints, whistleblowing and a summary of the safeguarding policy (*IGIv2*). There may also be a need for Glasgow to develop policies and procedures on online safety and social media, especially during Covid-19.
- 2.6.6 The website could be used more effectively, with links to key policies and procedures.

Questions for the Archdiocese to consider

- What other policies are needed in addition to those already available and how could these be made more accessible on the Archdiocese website?
- What help can the Archdiocese get from other dioceses who may have more comprehensive policies?

2.7 COMPLAINTS AND WHISTLEBLOWING

Introduction

2.7.1 A complaints process is required so that anyone who has contact with the diocese or archdiocese about safeguarding knows how to complain should they feel that they need to. A strong policy is clear about who complaints should be made to, and how they can be escalated if necessary. Positive features include an independent element,

and clarity that raising a safeguarding concern, and making a complaint about a safeguarding service, are two distinct things. The outcome of complaints enables an organisation to learn from those who have had to use their service, enabling them to make any necessary changes or improvements.

- 2.7.2 Whistleblowing and complaints procedures can be part of a general complaints procedure, but it is important that the process for making a complaint about the safeguarding response or service is clear and is different from sharing safeguarding concerns or allegations.
- 2.7.3 While 'complaints' or 'whistleblowing' did not feature within *In God's Image*, *IGIv2* now sets out at 8.6.4:

In collaboration with dioceses and religious institutes, the SCSSA will coordinate a national policy on a tiered process of responding to a complaint about how a safeguarding allegation has been handled in any jurisdiction. Anyone wishing to make such a complaint will be able do so, either to the original diocese/religious institute which handled the allegation or directly to SCSSA. The process will include, as a final stage, a case review managed by an independent party. (Bishops' Conference of Scotland 2021, p 89)

Description

- 2.7.4 The Archdiocese of Glasgow is developing a draft complaints procedure, but it is unclear in the policy what routes for escalation are available if an individual is still unsatisfied by independent third-party review of the situation. Nor does it appear that a whistleblowing policy is in place or available on its website. This is an area concerning wider archdiocesan policy and is not specific to safeguarding.
- 2.7.5 Some participants acknowledged that the current lack of an independent route to escalate concerns is a weakness in the system and while a function of the new national agency is to provide a transparent complaints process, this new agency has yet to be set up. The lack of an independent route to either raise or escalate concerns was raised by almost all contributors.

- 2.7.6 While the national agency may eventually manage a complaints process nationally, local complaints and whistleblowing process will still be needed with links between the two made transparent. Local processes for whistleblowing need to be developed and made accessible, and greater clarity about how individuals can escalate concerns is required within the draft complaints procedure. The Pope's publication of *Vos Estis Lux Mundi* in 2019 helpfully sets out the process of escalating concerns to Rome and the Nuncio in London also offers a role, but thought is needed as to how this could be developed locally.
- 2.7.7 It is important and necessary for the archdiocese, and Church more widely, to establish a process to manage disagreements and complaints independent of the safeguarding team as a means of protecting all individuals involved and helping to build trust in the Church.

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Questions for the Archdiocese to consider

- How can the Archdiocese make whistleblowing and complaints procedures more visible across parishes? How can sufficient priority be given to this task?
- How can some independent scrutiny be brought into local systems while national discussions are underway?

2.8 CASEWORK

Introduction

- 2.8.1 In order to manage concerns well and respond to allegations there must be a system in place which clearly defines escalation for seeking advice regarding concerns and reports of abuse. There should be effective and clear recording of issues and incidents which are kept securely and are compliant with GDPR 2018. Integral to managing concerns well is the requirement to work jointly with statutory agencies and to debrief and reflect on any areas of weakness in order to improve practice.
- 2.8.2 The auditors looked at a range of casework material that was identified by the archdiocese as related to safeguarding. These included general enquiries dealt with by the DSA.
- 2.8.3 The auditors focused on recording systems, quality of response to allegations, information sharing, risk assessments and safeguarding agreements. For this section description and analysis are presented together for each subsection.

RECORDING SYSTEMS

Description

- 2.8.4 All paper case files are kept in a locked filing cabinet in a locked room.
- 2.8.5 It was also raised that there have been developments in terms of a national case recording system, however, there were concerns that the system currently proposed does not appear to link or cross-reference cases, which is needed for the complex cases often spanning different dioceses, decades and involving several individuals.

Analysis

2.8.6 The case management system is confidential. Cases are clearly ordered with chronologies and both formal recording of meetings and informal recording of conversations and actions agreed. The auditors saw referrals to the police and good multi-agency working.

Questions for the Archdiocese to consider

• Can the newly proposed client information system be developed to link or cross-reference cases?

QUALITY OF RESPONSE TO CONCERNS AND ALLEGATIONS AND INFORMATION SHARING

Description

- 2.8.7 Auditors saw evidence of how allegations are managed by the archdiocese safeguarding office, heard about the support sometimes needed by parish priests in responding to initial concerns and how individual cases are discussed at the DRAMT and followed through. The auditors also heard that DRAMT members are encouraged to discuss situations and space is allowed for challenge.
- 2.8.8 All disclosures of harm or abuse, past or present, are reported to Police Scotland in line with the Church's mandatory reporting policy. Similar to other dioceses, participants and contributors commented on the process of mandatory reporting of concerns immediately to Police Scotland. This reflects Church policy, but some participants and contributors raised concerns about how the process of reporting to Police Scotland is managed with survivors in relation to non-recent abuse and where there is no immediate risk to children or vulnerable adults.
- 2.8.9 Adult survivors often need time to reflect on the issues they have raised and to speak with family and friends. It is key, where there has been an abuse of power, that individuals retain some control in the process of disclosing abuse, which can be emotionally, physically and spiritually painful, and retain some control when this is reported onto other agencies. It was suggested that the process of reporting could be more closely aligned with the needs of individuals and more time given to working and deciding together when the police are contacted.
- 2.8.10 The safeguarding team was clear to stress that although the archdiocese has to report an allegation to Police Scotland, the individual can choose not to engage with the police, but it still remains that this information has been shared. Concerns were expressed that this may prevent individuals coming forward to the Church.
- 2.8.11 It was also important to report that the experience of one contributor was initially to approach another diocese to share their experiences of abuse, although the events did not happen in that diocese. It was expressed that it can be difficult to approach people 'close to home' if an individual remains involved in their local parish. Individual written approaches addressed to archbishops or bishops and marked confidential need to be handled with suitable sensitivity. In this situation and without the individual's consent, the diocese approached redirected this information, sharing it with the archbishop or bishop of the diocese where the abuse had taken place, as it was viewed as their responsibility. This can have a significant negative impact on individuals coming forward.
- 2.8.12 When an allegation is received, the auditors also heard that there are discussions with Police Scotland in terms of risk assessments of respondents, and restricting a priest's ministry while investigations are undertaken to ensure that boundaries are maintained between a police investigation and responding to the allegation as an archdiocese.
- 2.8.13 In the past two to three years, there has appeared to be a more robust response in considering or establishing a canonical hearing when Police Scotland or the Crown Office and Procurator Fiscal Service do not progress a case. The auditors heard from contributors that this did not appear to be consistent across all cases. Some cases, which did not progress within the criminal system, did not progress within canonical processes either. The reasons for progressing some and not others were unclear. Participants commented that the criteria set out in Appendix 1 of *In God's Image* were

applied in all cases, but acknowledged that in maintaining confidentiality on behalf of the person making the allegation and the respondent meant that the reason for decisions may not always be clear or public.

- 2.8.14 The auditors also heard from a small number of contributors about their experiences within local parishes. This was not in terms of allegations of current sexual or physical abuse, but in terms of bullying behaviour by clergy within these parishes. Each contributor described themselves as being labelled 'difficult' because of their previous experiences or alleged behaviour within each parish. It was not the role of the audit to investigate these allegations so they cannot be verified, but separate non-safeguarding reports described similar behaviour by parish priests towards parishioners.
- 2.8.15 In some cases, it appeared that individuals had not reported bullying behaviours to the safeguarding office as they did not believe it was necessarily a safeguarding matter. There were also instances where alleged bullying by parish priests had been reported to the archdiocesan safeguarding team, but one or two contributors did not feel their issues had been sufficiently addressed within a clear timeframe and process. Some participants were also unclear about the process for reporting concerns about alleged bullying.
- 2.8.16 Finally, the archdiocese has put in place two key developments: an HR complaints policy is being developed with its external HR consultants; and the process of secure emails for information sharing between the safeguarding team, parish priests and PSCs. Both were welcome developments, and while some parishes have not yet transferred to using secure email, the team was active in identifying and working with those parishes.

- 2.8.17 Cases audited included examples of non-recent allegations against priests, and convictions of abuse of children, young people and young adults by priests. There were also examples of allegations of abuse within religious communities or organisations run and managed by religious orders, at the time of the abuse. It was evident from the ten case files that, more recently, responses to concerns and allegations have been swifter, more supportive, more helpful and in line with good safeguarding practice. There is evidence of good working, professional relationships with multi-agency partners and thoughtful consideration of the impact on survivors and possible others within the parish who had also experienced abuse. There is regular reflection within case files on how cases were managed and on the wider issues for learning that emerged. The auditors heard about and saw in recent case files more robust challenge and significant improvement in the support offered to individuals wishing to disclose.
- 2.8.18 Where practice was more problematic, this related to issues of alleged bullying. While this was in relation to a small number of parishes, it reflects a confusion about the status of bullying specifically, whether bullying by clergy or non-clergy in Church-related roles is always a safeguarding issue or only where the person bullied is unable to protect themselves due to their own vulnerabilities. If bullying is not a safeguarding issue, adequate and well publicised HR processes need to be in place for dealing with allegations of bullying by parish priests or non-clergy in Church-related roles.
- 2.8.19 Without the necessary clarity, there is a risk that safeguarding roles and processes are mistakenly used to address incidents of alleged bullying. The auditors heard that while routes for reporting safeguarding issues are clear, there is currently insufficient

clarity about routes for sharing and managing concerns which relate to workplace conduct issues. The consequences of such situations can cause additional anxiety, stress or harm to both individuals reporting concerns and those responding to the allegations.

- 2.8.20 It is also important to consider consent in all contact with survivors and also the effectiveness of mandatory reporting in cases of non-recent abuse (discussed in Section 2.9).
- 2.8.21 A short, clear summary available on the website of the criteria set out in both versions of *In God's Image* is perhaps needed to help develop an understanding of canonical proceedings. Due to the extent of previous abuse within the Church, more is needed to build the trust and confidence of the wider public in decision-making. Without trust and confidence, appearing not to take action may impact on the wider work and integrity of those parish priests who are compassionate and care deeply for their parish. It also impacts significantly on the reputation of the archdiocese across Glasgow.
- 2.8.22 In Glasgow, strong, strategic leadership is needed to ensure there is clear and swift action in response to all cases of previous abuse and to build trust in the system to respond to wider concerns in relation to safeguarding. While identified in the archdioceses, these are issues that impact nationally.

Questions for the Archdiocese to consider

- Who would need to be part of discussions about how the Archdiocese can best respect the wishes of adults who come forward to disclose abuse, including those who do not give consent to share, in the context of the Church's mandatory reporting?
- Is the Archdiocese confident that the HR complaints policy being developed with external HR consultants will address the interface with safeguarding?
- What can the Archdiocese do to raise these issues at a national level?

RISK ASSESSMENTS AND SAFEGUARDING AGREEMENTS

Introduction

2.8.23 In God's Image version 2 states that:

The provision of safe environments is an essential requirement for all Church activities and especially for those involving children and vulnerable adults. The most common of these activities are religious services held within, or adjacent to, a Church building. It is the responsibility of the parish priest or the religious community leader to ensure that all such services are conducted in ways that demonstrate that the safeguarding of all, especially children and vulnerable adults, is paramount. (Bishops' Conference of Scotland 2021, p 14)

2.8.24 It continues on page 18:

When a high risk offender expresses a wish to participate in one or more religious services in a parish, an assessment of potential risk of harm must be made by the statutory authorities. Police Scotland has agreed an Information Sharing Protocol22 which is governed by the system known as the Multi Agency Public Protection Arrangements (MAPPA). The police service, prison service, health service, local authorities, and others are statutorily obliged to operate on a multiagency basis, with the objective of protecting the public from the risks that may be posed by Serious Criminal Offenders, including sex offenders.

When a high risk offender expresses a wish to attend a service in a Catholic Church, the relevant personnel from Offender Management or Criminal Justice should contact the dSA (or religious equivalent) to discuss if it is possible to create a safe context for the individual to worship in a church following the implementation of a Safe Worship Plan. Each agreement should be reviewed at least every 6 months, with advice provided by the statutory authorities. The diocesan risk assessment management team (dRAMT) should oversee the length of each agreement, and this should be kept under consideration within the review process.

- 2.8.25 It is recognised good practice (not specified within *In God's Image*) that such Safe Workship Plans should be underpinned by a risk assessment that details the risks posed by a worshipper, the measures in place to manage those risks, and therefore the reasons for the safeguarding agreement. Having a clear rationale for any restrictions helps people enforce the agreements with the level of diligence appropriate. Clarity about the risks that a safeguarding agreement is intended to address also allows for a robust reviewing process, which in turn allows safeguarding agreements to be strengthened where needed, or indeed terminated if appropriate.
- 2.8.26 *IGIv2* has also expanded on the role of the support priest to the role of support person when a priest or religious is asked to respond to an allegation of abuse. As *IGIv2* states at 5.3.1:

Pending an investigation, the bishop/major religious superior must offer the support of a priest, religious or layperson who will monitor the conduct and welfare of the respondent through what will be a difficult process. The appointment of this support person must be made in discussion with the respondent and following advice from the DRAMT (or religious equivalent). The respondent is NOT obliged to accept the offer of a support person. (Bishops' Conference of Scotland 2021, p 57)

2.8.27 It continues at 5.3.2:

'The person appointed to the role of Support Person should be reliable, trustworthy, discreet, honest and wise. She/he should possess good pastoral qualities and be able to respond to others with empathy, but must also be able to observe firm boundaries in interactions with others. She/he should understand how to identify risk-taking behaviours' (p.57). Sections 5.3.3 and 5.3.4 then set out what is within the remit and role of the support person and, importantly, what is not.

Description

- 2.8.28 Processes of assessment have been developed and include the offer of an external psychological assessment to all individuals referred to the DRAMT and consistent formats for assessing and identifying risk and recording recommendations.
- 2.8.29 Auditors saw a small number of cases involving the management of covenants of care and agreements for those within the archdiocese about whom there were concerns.

There were clear plans in place and a statement of the restrictions, whether voluntarily or compulsory, which were reviewed regularly.

- 2.8.30 There was also discussion about the changes to the role of the support priest to support person in *IGIv2*. This was felt to put in place more accountability, nevertheless careful thought would be needed to develop a pool of support persons with skills and understanding needed to work with perpetrators and risk, who can often be manipulative. In recognition of the challenges in this role, the archdiocese had already put in place support groups around the support person or support priest to help them in the role.
- 2.8.31 In the absence of the national standards agency, the DSA has taken a national lead in developing this work and has developed sessions and presentations on working with perpetrators on behalf of all eight dioceses.

Analysis

- 2.8.32 The process for risk assessment, including the external psychological assessment and consistent formats for assessing risk and recording recommendations, is excellent in terms of transparency in the decision-making which sits behind risk assessments. What is needed, however, is greater knowledge and understanding within the DRAMT of risk assessments and working with risk in the criminal justice system. As mentioned earlier, DRAMT membership should be a priority for the new Archbishop, and training in these areas would be beneficial for all members to increase confidence in being able to challenge the conclusion of risk assessments at times.
- 2.8.33 The development of a support person and additional support being put in place to support individuals were positive developments, especially the focus on the behaviour of perpetrators.
- 2.8.34 One issue that emerged as a concern was for the Church more widely. It was clear from one case file that the escalation of the restrictions placed on an individual's activity from voluntary to compulsory was appropriate. There was, however, extensive evidence of this individual contravening their restrictions at all times and refusing to engage over decades. The sanctions available to the Church were at best minimal. This is hugely concerning when individuals have not reached a level for a criminal process, but continue to behave in a way that is both risky and potentially abusive.

Questions for the Archdiocese to consider

- How can covenants of care be escalated and addressed in a timely fashion if an individual continues to ignore the restrictions in place?
- In accordance with the limitations of *sede vacante*, are restrictions on progressing plans to refresh the membership of the DRAMT in order that they can deliver more effectively on their vital safeguarding function appropriate?

2.9 SUPPORTING SURVIVORS

Introduction

- 2.9.1 Standard 4 of *In God's Image* relates to providing care and support for survivors: 'We provide a compassionate response to survivors of abuse when they disclose their experiences and we offer them support, advice, care and compassion'
- 2.9.2 An important part of the audit is to seek the views of survivors, as well as those working in the diocese or archdiocese.

Description

- 2.9.3 Much work has been undertaken by the safeguarding team and the DSA to develop the approach of the archdiocese when working with survivors. There was an understanding of the trauma experienced by individuals no matter when the abuse or sexual assault took place and of the hurt and harm that had been caused by the Church.
- 2.9.4 Central to the role of the DSA is to provide a key contact for all survivors and wider family members who wish to come forward to the Church. As mentioned previously, all disclosures of harm or abuse, past or present, are reported in line with the Church's mandatory reporting policy, and while the DSA works in line with this policy, the team also try to work with survivors to give them choice about their involvement in the process. Support is mainly offered through ten sessions of counselling. The auditors heard from both participants and contributors in terms of the stages of making initial contact with the archdiocese, reporting allegations and receiving support.
- 2.9.5 Some contributors felt that there was a conflict in terms of the role of the DSA being located within the Church and that they needed an independent route, whereas others felt there was a conflict between the approach of the safeguarding team, which put individuals at the centre, and the more legalistic approach of the insurers, which was felt to protect the organisation. Some participants agreed that the process of redress was challenging and highlighted why safeguarding needs to integrated into an overarching archdiocesan strategy.
- 2.9.6 It was felt by contributors that the Church needs to move from a defensive stance to a more proactive position similar to that of other organisations which have had to respond to similar issues and allegations. The development of the approach to survivors needs to be taken forward operationally and strategically by individual dioceses and nationally through the Bishops' Conference of Scotland. Some of the challenges described are not for the Archdiocese of Glasgow alone. At the heart of developments in safeguarding, it is essential that as one contributor identified there is 'acknowledgement, assistance and accountability'.
- 2.9.7 All contributors spoke of the need for a public apology from the Catholic Church in Scotland for the hurt and damage caused over several decades. It is essential that compassion is at the heart of the Church's response and that individuals feel believed from the outset by those they speak with personally and by the Church. As mentioned earlier, Archbishop Tartaglia issued a highly public apology to all those who had been harmed and who had suffered as a result of actions by anyone within the Catholic Church. This was viewed by many contributors as an important first step which needs to be supported by letters read out in Mass and public discussion. Within the archdiocese, strong strategic leadership from new Archbishop Nolan and curia will be

needed to ensure that all parishes are consistent in their approach to safeguarding and in their responses.

- 2.9.8 The auditors heard thoughts and ideas from both participants and contributors that could help develop the process of making initial contact with the archdiocese, reporting allegations and in receiving support, at both individual and strategic levels.
- 2.9.9 Initial contact could be offered through various channels such as local parishes, directly with the safeguarding office, through another diocese or through an independent agency if available. Individuals who have experienced harm may have remained involved with the Church, making it more difficult to approach the safeguarding team and share sensitive information. Being able to speak with either clergy or laity in another diocese might assist that first step in disclosing abuse.
- 2.9.10 Practically, a central telephone number or signing-in at the front door meant that some felt they would be recognised by the those answering the phone or on reception, which did not make them feel comfortable. Perhaps a separate safeguarding telephone number could be considered.
- 2.9.11 Support also needs to be equitable with the support offered to parish priests who have been removed from ministry, and for whom the Church continues to have a duty of care. The legacy for many survivors is that some have struggled financially, emotionally and with their mental health and wellbeing throughout their lives. Some talked of feeling hurt when those removed from their ministry continued to be looked after by the Church. This was seen by contributors as the Church looking after the same clergy who had caused the abuse better than those who had experience significant harm. Equally, some felt hurt because compensation claims were refused or questioned. Some who had approached the archdiocese have felt that the process of requesting financial support for counselling or to meet other health needs has been challenged or limited to what the archdiocese is prepared to offer rather than responding to individual need. Some individuals had paid for this support or counselling themselves.
- 2.9.12 Some contributors raised the importance of their spiritual needs and being able to attend Mass and take Holy Communion. They spoke of the challenges of finding the right counselling or coming back into Church and feeling included. Some wanted counselling or therapy provided through organisations with no connection to the Church, whereas for others it was important that the context of the abuse within the Catholic faith was understood.
- 2.9.13 Most individuals who contributed spoke positively of the support provided by the safeguarding team; some had met the Archbishop who had blessed a crucifix or written a prayer providing both spiritual and emotional comfort. Contributors talked of more variable responses including from parish priests and said that the message of safeguarding had not always reached local parishes. Individuals who are experiencing or have experienced trauma are often hyper-alert to responses and some felt they were labelled 'difficult' by their local priest or by groups of parishioners actively involved in their church. Some felt isolated within their own church and had had to move parishes several times or were asked to attend Mass in a different parish. Not being able to attend Mass in their own church had caused these contributors distress spiritually and one described it as causing spiritual and psychological harm.
- 2.9.14 This has implications for how and when individuals come forward and also for those who wish to continue practising their faith within local churches. There were suggestions that there could a' buddy' approach to help support individuals back into

their local or family church. Others felt that an apology by their local church would help redress this imbalance.

- 2.9.15 Participants also commented that it is important for the safeguarding team to continue to work in partnership with other organisations which can provide the ongoing support. The safeguarding team has published the details of all agencies locally which can offer a range of support. This is important so that support is seen as non-judgemental and will take on board what an individual survivor needs to be able to disclose.
- 2.9.16 The safeguarding team has also hosted sessions where groups of safeguarders and survivors come together to discuss a range of issues. Participants felt this to be incredibly useful and that more facilitated sessions could help those involved in the process to broaden and deepen their understanding.

- 2.9.17 Much work has been done to develop the approach by the safeguarding office on behalf of the archdiocese. The approach being developed towards working with survivors in the archdiocese starts from the premise that disclosing abuse is the start of a process and that individuals are believed. It was important to reflect that several individuals who had experienced abuse and harm or had been assaulted within the archdiocese were older young people or young adults at time. This has left many with feelings of responsibility or guilt for the events that happened to them, which were actually significant abuses of power.
- 2.9.18 There is a sense that the process of coming forward to the archdiocese, the process of providing support to individuals who have experienced hurt and trauma, and the process for achieving some form of redress can work against each other. The legalistic response by insurers, often based on financial grounds, did not always support the need for individual responses. While most spoke of very good support from the safeguarding team, there was still a sense that the archdiocese was defensive. It can feel as if the work of the safeguarding team is then undermined by other decisions and processes. Safeguarding needs to be part of the wider strategy for Glasgow and linked with the trustees' agenda as more than just an update.
- 2.9.19 The safeguarding team was clear that counselling could be offered other than through Church affiliated organisations, but this needs to be communicated more widely as some contributors thought the counselling was limited to services 'chosen' by the Church, and also time-limited. Support or assistance needs to be more wide-ranging than currently offered. Individuals should be offered a range of support through counselling, therapy, practical and perhaps financial support.
- 2.9.20 While it is important to ensure that requests for support are genuine, many felt questioned and a need to 'prove' to the insurers and wider Church that their experiences were genuine. While there are a very few who may take advantage, more often than not individuals are genuine and in need of compassionate support. A shift is needed within the Church to start from the premise of accepting the pain caused and for the Church to provide a compassionate response based on individual needs.
- 2.9.21 An independent route to making disclosures of abuse should be given consideration. No matter how effective the safeguarding team or individual priests, they are still within Church structures. For many there is little trust in the Church – therefore, different approaches or routes are needed. Some felt the situation had turned from

disclosing concerns and abusive behaviours of others to an investigation of themselves, causing high anxiety and distress.

2.9.22 Responding quickly, being listened to, being believed, an apology and support were key elements reported by some contributors for moving on.

Questions for the Archdiocese to consider

- What accountability does the Archdiocese hold for the approach and processes used by its insurers?
- How can the Archdiocese escalate the need for alternative forms of redress for abuse victims and survivors?
- How can the Archdiocese open communication routes for, and engage with, survivors who do not wish to have contact with the Church?
- How can co-production with survivors be made an aspect of all Archdiocese safeguarding work, strategic and operational?
- Could the Archdiocese, perhaps through theological leadership and pervasion of this through the deaneries and parishes, reach out to survivors rather than reacting to them when they do come forward?
- Could there be discussion about how to better align the timetable of the survivor with the need for mandatory reporting?

2.10 SAFE RECRUITMENT OF CLERGY, LAY OFFICERS AND VOLUNTEERS

Introduction

- 2.10.1 The mandatory safe recruitment process in the Catholic Church in Scotland is central to ensuring that everyone, including volunteers, is safe to work with children and vulnerable adults. *IGIv2* specifies the DSAG as having an operational function around the organisation of PVG applications and monitoring of ongoing membership of the scheme across the dioceses.
- 2.10.2 Standard 2 of *IGIv2* states at 2.1: 'We require all Church personnel and volunteers to be safely recruited to their roles, following the relevant statutory and Church requirements' (p. 15), and continues at 2.1.1:

Our mandatory safe recruitment process is central to ensuring that everyone – when working in, or training for, ministry as an ordained or religious, or working as a Church employee or volunteer – has passed through appropriate checks and assessments of their suitability to work with children or vulnerable adults. (Bishops' Conference of Scotland 2021, p 24)

Description

- 2.10.3 In Glasgow, the management of the safer recruitment process for over 2,000 volunteers is with the Diocesan Safeguarding Coordinator across the Archdiocese. The work is managed by the DSA and overseen by the DSAG.
- 2.10.4 As mentioned in previous audits, the PVG application process moved online in March 2021. In addition, the Disclosure (Scotland) Act 2020 changed definitions from

regulated work to a list of recognised regulated roles. The Coordinator had attended a course delivered by Disclosure Scotland on eligibility criteria, which led to a significant piece of collaborative work across the dioceses to map the roles in parishes, update or introduce job descriptions, and revise risk assessments for roles and groups to ensure the Church can evidence the criteria for a regulated role.

- 2.10.5 The Bishops' Conference of Scotland agreed to a three-tiered safe recruitment process where Tier 1 requires full checks, references and to complete the training and Tier 2 requires references and to complete the training. Tier 3 is still under discussion. As one participant reflected, those providing the flowers to a church or a reader may not be involved in any volunteer activity, but if involved with a church or asked to do activities on behalf of the priest then they can be seen as a person to be trusted. It is important, however, to keep the task manageable and to focus on the necessary and essential PVG checks.
- 2.10.6 Under the previous system, interested volunteers would contact either the Coordinator or local PSC about a particular role. The safeguarding team would review the role to decide whether a PVG was required. If a PVG was required the individual would be asked to complete the archdiocese application form, self-declaration form as well as a PVG form. The PVG form would be checked by an ID verifier, information entered on the database and application sent. At the same time, two references would be sought. The training would also need to be completed before volunteering.
- 2.10.7 Prior to the pandemic, new PSCs would meet with the DSA and Diocesan Safeguarding Coordinator prior to undertaking their role and a letter given confirming the process. Once all steps were completed, the approval letter would be issued by the safeguarding office and copied to the volunteer's parish priest and PSC. The main change is that the process is now online and there have not been in-person meetings through the pandemic, although the Coordinator acknowledged that the letter setting out the process could still be sent via the post or email.
- 2.10.8 There had been resistance from some clergy and parishioners to the more formal process, but wider recognition of the importance of safeguarding in society and the inclusion of local PSCs had improved awareness generally and adherence to the processes and the training. The DSA and PSC had also put a timetable in place for completion of Level 1 induction training and those who did not complete in time would not be allowed to volunteer or to continue to volunteer. With the process online, all volunteers are recorded on the database and not only those who require a PVG. All blemished PVGs are considered by the DSA and decisions made.

Analysis

2.10.9 There is clear evidence that the policies for safer recruitment within *In God's Image* and, more recently, *IGIv2* are being applied. All new staff and volunteers receive a letter from the safeguarding office and cannot begin their post or to volunteer until they have completed training, have supplied references and the PVG process is complete. The procedure outlined by the Diocesan Safeguarding Coordinator demonstrates that recruitment of PVGs is managed effectively with good communication between the Diocesan Safeguarding Coordinator, DSA and PSCs. Those in post prior to the requirements have also been asked to complete a PVG application and undergo training and, where individuals have refused or will not have completed their training by an identified date, they will no longer be able to undertake their duties.

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2.10.10 The responsibility of PSCs to make sure processes have been completed locally needs to be strengthened to ensure that practice is consistent across all parishes. Involving them in the process is a helpful start. Two further questions emerged: what was in place for those arriving from overseas; and should the decision-making process in relation to blemishes be written down to help support greater transparency, particularly if decisions are challenged.

Questions for the archdiocese to consider

- How best can the archdiocese cross-check information regarding staff and volunteers at parish level with the information held on the database to ensure accuracy?
- Does the archdiocese have adequate oversight of the compliance with safer recruitment processes across parishes?
- What is in place for those arriving from overseas?
- What is the timescale for formalising decision-making processes in relation to blemishes to achieve greater transparency, particularly if decisions are challenged?

2.11 TRAINING

Introduction

- 2.11.1 Prior to the introduction of *In God's Image*, training was not mandatory before volunteering or taking up a role within a parish. *In God's Image* clarified the importance of training and *IGIv2* stipulates that mandatory safeguarding training is required by the Church to enable those involved in working with children and vulnerable adults to be well equipped to understand, manage and reduce risk, and create safe environments. There is a basic level of expertise that all those involved in this work must first acquire, and this must be supplemented by participation in further training, within agreed timeframes, to deepen expertise, skills and knowledge specific to certain roles. This training must be provided within a framework of nationally agreed safeguarding training established by the Scottish Catholic Safeguarding Standards Agency in collaboration with key stakeholders.
- 2.11.2 Safeguarding Induction Training Part 1 must be completed by all who will be working in a regulated role prior to assuming any role in the Church involving children or vulnerable adults, and applies to seminary applicants, those accepted for the propaedeutic period and those entering any formation programme provided by religious institutes. Within 18 months, each person must also complete Safeguarding Induction Training Part 2.
- 2.11.3 Further training opportunities should be offered to clergy, religious, Church employees and volunteers in the context of support or update meetings, courses and conferences. These training opportunities should be shaped in response to needs identified through the processes of evaluation and audit.
- 2.11.4 In addition to the training provided locally, *IGIv2* also sets out that a safeguarding training advisory group will be established by the Scottish Catholic Safeguarding

Standards Agency, in collaboration with key stakeholders. This group will be expected to support the development of a framework of nationally agreed safeguarding training to meet specific training needs identified by various groups – bishops, clergy, religious, employees and volunteers.

Description

- 2.11.5 The Archdiocese of Glasgow has six volunteer trainers and, with the DSA, provides training to staff and over 2,000 volunteers. The DSA provides Level 1 training to all new volunteers to ensure consistency of training and to allow volunteers to meet the DSA. Training during lockdown had been online and almost all training was up to date at the time of the audit. Outstanding were only those volunteers unable to join training by Zoom and the team was awaiting for parish halls and similar venues to open up to complete the training programme.
- 2.11.6 The training subgroup reports to the DSA, who then includes updates in regular reports to the DSAG to coordinate training sessions and keep each updated on progress. The Safeguarding Administrator sends the list of those booked into each session and trainers confirm attendance. Participants talked of good communication between the safeguarding office and the trainers. In the absence of a national standards agency, the DSA provided additional training capacity if needed.
- 2.11.7 More targeted specialist training was provided to parish priests and PSCs in terms of domestic abuse, trauma and vicarious trauma. Some participants hoped that nationally there might be additional training to reinforce the learning from Level 2. Other areas of training have also being identified such as training in terms of the ministry in people's houses and members of St Vincent de Paul and for parish priests in working with trauma and the process of disclosure.
- 2.11.8 While safeguarding is part of training for priesthood, contributors talked of the need for seminarians to explore safeguarding specifically in terms of responding to those who wish to disclose, and remarked that this training and support should continue once in a parish. Participants reflected that annual updates are mandatory for parish priests and retired priests who are still active.

Analysis

- 2.11.9 The delivery of training feels dynamic and responsive, maintaining a focus on those who need to complete the training and also developing further training as areas and gaps in knowledge or confidence emerge. The range and content of training to PSCs is particularly good. Volunteers who do not complete their training within a certain date will no longer be able to volunteer.
- 2.11.10 Training requirements for the future were explored in interviews and the auditors heard that there is a need for a level of knowledge regarding working with trauma. Two areas which should be given further consideration are how the outstanding Level 1 sessions are delivered in person in light of Covid-19 and social distancing, and how a programme of refresher training, possibly every three years, could be developed and delivered in light of the numbers of volunteers within the archdiocese. This might include training sessions focused on aspects of safeguarding particularly relevant to the role of the parish priest.

Questions for the Archdiocese to consider

- What needs to be in place to provide training in the ways volunteers are comfortable post-Covid-19 and ensure all are trained?
- How might the Archdiocese disseminate the importance of a trauma-based approach where this is most needed?
- Should there be a training needs analysis undertaken to identify the needs of all involved with safeguarding?
- Should areas identified in the discussion be part of safeguarding teaching for seminarians?
- How can the Archdiocese move towards evaluating the impact of training provided?

2.12HOW THE ARCHDIOCESE PROVIDES SAFEGUARDING SUPPORT TO PARISHES

Introduction

2.12.1 In a centralised diocesan or archdiocesan structure of safeguarding, support from the diocese or archdiocese to parishes is key to safe and reliable safeguarding. Diocesan safeguarding is, in significant ways, only as good as its weakest parish.

Description

- 2.12.2 The safeguarding team is available to provide safeguarding support to parishes and with practical matters such as recruitment, completion of the parish audit and support with managing covenants and agreements (involving the Bishop where required). The DSA provides individualised support regarding parish issues and support for survivors. Of survey respondents, 78% (n = 27) replied that support from the safeguarding office is good.
- 2.12.3 Work has been underway to embed safeguarding in local parishes through the PSCs. Before beginning the role, PSCs meet with the DSA and Diocesan Safeguarding Coordinator to talk through the expectation and responsibilities of the role and to build relationships. PSCs also come together for training sessions and annual updates which provide an opportunity to share experiences and for informal peer reflective practice.
- 2.12.4 Participants and contributors thought that the support to parish priests was more mixed. Some priests were well supported by the PSCs and worked together on safeguarding matters, local training and annual updates. Priests who participated in the survey also commented that the safeguarding office provided good support in all safeguarding matters when help and advice was needed locally. There was also recognition that if there were no safeguarding issues locally then there was a danger that safeguarding would be seen only as forms to complete and a tick-box exercise. There was recognition that more development work could be done, but was difficult in light of current caseloads and the size of the safeguarding team.
- 2.12.5 Feedback from PSCs suggests that while they feel prepared for the role and have relevant skills and knowledge, being in the role can be quite different. Some had been involved in complex situations with fellow parishioners and, while support from their local parish priest, the DSA and the safeguarding team was felt to be excellent, the

situations had been challenging professionally and personally difficult for local friendships and relationships. Without preparation, knowledge, skills and support, some PSCs may feel out of their depth.

- 2.12.6 One suggestion was that when a parish priest nominates an individual for the role then perhaps they should be asked to justify the nomination. Another suggestion was to develop a 'buddy' system for PSCs and perhaps bring together a small group of experienced PSCs to explore the expectations, tease out the role and identify the boundaries of a 'buddy' system. The ideal was to have two PSCs per parish.
- 2.12.7 Participants reflected that priests can be concerned about how to respond to individuals when they are disclosing abuse, in case the priest increases the harm and hurt the individual is experiencing. In terms of the processes, parishes are clear what the steps set out, and feel they are supported by the safeguarding office. There were reflections that there is no script that can be followed because every experience is different and each individual is different

Analysis

2.12.8 The work and support underway is highly valued and valuable, including opportunities for bringing people together to share their experiences and help develop their role. The recruitment and retention of PSCs is an area that has been identified through the audits as challenging for the archdiocese, so listening to the suggestions and ideas of the safeguarding team and from local parishes would strengthen work in this area.

Questions for the Archdiocese to consider

- How might the Archdiocese identify additional support to PSCs who might be finding the role challenging?
- Is there good practice from other archdioceses that could be shared across all?
- Should more consideration be given to how the Archdiocese might establish and promote local safeguarding teams?
- How can adequate capacity be found to progress this work?

2.13 QUALITY ASSURANCE

Introduction

- 2.13.1 A safe organisation needs constant feedback loops about what is going well and where there are difficulties in relation to safeguarding, and this should drive ongoing cycles of learning and improvement. Robust quality assurance enables an organisation to understand its strengths and weaknesses. Potential sources of data are numerous, including independent scrutiny. Quality assurance needs to be strategic and systematic to support accountability and shed light on how well things are working and where there are gaps or concerns.
- 2.13.2 There are a range of mechanisms that can support this:
 - professional supervision of the DSA (see Section 2.2)
 - scrutiny by the DSAG (see Section 2.3)
 - independent audit of non-recent cases
 - routine benchmarking of the diocese or archdiocese against other dioceses or archdiocese within and outwith Scotland

- identifying lessons learnt from other dioceses or archdiocese and feeding these into planning the work of the diocese or archiocese
- abuse survivor 'customer' feedback
- routine PSC 'customer' feedback
- complaints procedure about the safeguarding service (see Section 2.7)
- independent 'lessons learnt' reviews of cases where things seem to have gone wrong or there are concerns that they may have.
- 2.13.3 Standard 8 of *IGIv2* sets out an expectation that each diocese or archdiocese will oversee effective planning processes to monitor, review, self-evaluate and report on local safeguarding practices. The Scottish Catholic Safeguarding Standards Agency will be tasked with arranging for independent reviews of the compliance of all jurisdictions with safeguarding standards.

Description

2.13.4 In 2013, the Bishops' Conference of Scotland committed to publish allegation statistics on an annual basis. Glasgow contributes to the annual audit and has clear processes and timetables for issuing, completing and following up parishes. For the three audits reports considered as part of the audit, there has been a 97–100% return rate. While it was clear that the results from the audit were discussed at the DSAG, it was less clear to what extent messages from the audit were fed back to deaneries and parishes.

Analysis

- 2.13.5 The annual audits and the safeguarding action plan are prioritised by the safeguarding office. Both provide a good foundation and bring together rich data. Alongside the need for strategic leadership, however, quality assurance is the second area to emerge that needs significant development. The overarching strategy for safeguarding needs to be underpinned and supported by a quality assurance framework clearly identifying feedback loops with the deaneries and parishes, where all can inform the safeguarding strategy as it develops.
- 2.13.6 The quality assurance framework should include measures against which progress in meeting the goals of the overarching strategy can be identified and self-evaluation built in. This might include snap case file audits, and feedback from parishes and survivors. Suggestions from a survivor advisory group or panel would be a key element.
- 2.13.7 There are good, effective informal relationships, but this needs to be in the context of clear structures of governance and accountability. The work of the archdiocese is predicated on relationships and while this is essential, the work of the archdiocese cannot be built on this alone.

Questions for the Archdiocese to consider

- What are the timescales for developing a quality assurance framework and who needs to be involved?
- How satisfied is the Archdiocese that the current model of parish audits elicits the most effective return of information?
- How might learning and knowledge of other archdioceses within Scotland be incorporated into wider quality assurance activity?
- How might the views and perspectives of survivors and parishes be sought and incorporated into quality assurance?

2.14 CULTURE

Introduction

- 2.14.1 The most critical aspect of safeguarding relates to the culture within any organisation. In a diocesan context, that can mean, for example, the extent to which priority is placed on safeguarding individuals as opposed to the reputation of the Church, or the ability of all members of the Church to think the unthinkable about friends and colleagues. Any diocese or archdiocese should strive for an open, learning culture where safeguarding is 'everybody's business' and a shared responsibility, supported by experts, in an atmosphere that encourages people to highlight any concerns in order that they can be addressed.
- 2.14.2 An open learning culture starts from the assumption that maintaining adequate vigilance is difficult. Such a culture proactively seeks feedback on how safeguarding is operating and encourages people to highlight any concerns about how things are working in order that they can be addressed.
- 2.14.3 A safe culture within a diocese or archdiocese is crucial to effective safeguarding, as is the priority given to safeguarding children and vulnerable adults over the protection of the Church's reputation. A safe culture also relies on the knowledge and understanding of all within the diocese or archdiocese of the need to react to allegations and disclosures of abuse even when these might be about those they know and admire. Crucially, a safe culture requires trust in the organisation's leadership and in fair and transparent systems and processes.

Description

- 2.14.4 Safeguarding is given priority and seen as central to the theological approach in the Church by the curia and laity who are working with safeguarding on a daily basis. Archbishop Tartaglia was described by some as a 'people person' and was perhaps less strategic and more operational in his thinking. This left a gap in both theological and strategic leadership which allowed variable levels of understanding and importance placed on safeguarding at a local level. For example, the auditors heard of difficult and abusive local situations which had been allowed to continue without a clear support or robust challenge from senior clergy.
- 2.14.5 There have been challenges historically in relation to safeguarding for the archdiocese which continue to impact on the trust in the Church and safeguarding processes today. This is both in terms of the trust in the Church to deal with issues publicly and in individual situations. As mentioned, some cases were not progressed

to criminal proceedings, but canonical processes were undertaken or started. For others, however, this did not appear to happen. This apparent inconsistency and lack of clarity about the reasons why some cases are not progressed increases feelings of mistrust and undermines the progress made by the safeguarding team.

Analysis

- 2.14.6 There is a variety of views across the archdiocese and, similar to other dioceses, there are a range of descriptions of safeguarding from being a 'bolt on' or addition through to it being integral to Church life. Some felt safeguarding had not yet been assimilated into the culture, whereas others felt that people were starting to embed safeguarding on a daily basis.
- 2.14.7 The safeguarding team was able to provide a clear articulation of the theological importance of safeguarding and what this means in practice. This now needs to extend across all parishes to challenge perspectives, thinking and inconsistencies.
- 2.14.8 The auditors judged that improvements are happening, but they are not yet embedded consistently across the archdiocese. A strong strategic framework with clear structures for governance and accountability supported by a quality assurance framework which helps to measure progress would help to provide such consistency. This is needed to support the good practice in place in many parishes and to address the concerns heard about a small minority of parish priests.
- 2.14.9 There is an enthusiasm, willingness and commitment from all involved in taking this forward, a range of skills and experience in laity involved in developing safeguarding and an understanding of what needs to be put in place, all of which will benefit the journey towards improvement.

Questions for the Archdiocese to consider

- How might the Archdiocese identify areas where safeguarding culture is less well embedded and spread good practice where it is?
- What proactive measures could the Archdiocese implement to bring those who might be more reluctant into a broader safeguarding culture?
- How can progress in the development of culture be quality assured and how will the Archdiocese be confident that things are improving?
- In what ways could survivors of abuse be invited to support the development of safeguarding culture?

3 CONCLUSION

- 3.1.1 In the Archdiocese of Glasgow, there are strong foundations in place and a commitment to change that needs to be built upon. The appointment of Archbishop Nolan provides the opportunity to begin the process of planning developments.
- 3.1.2 Greater visible theological and strategic leadership by senior clergy is needed in moving forward. To assist this, a strategic action plan should set out the vision and commitment to safeguarding. This needs to be supported by clear governance structures and a performance measure framework to identify what progress is being made against the strategic vision. The effective, but informal, arrangements need to be formalised and visible.
- 3.1.3 There have been distinct operational improvements in the past five years in terms of clarity and processes, improved case recording and developing the approach to talking and working with survivors. There is a strong sense of good working relationships within the team with involved laity and external agencies providing challenge. There is also work to strengthen support links with parish safeguarding coordinators and develop their confidence in taking forward this role.
- 3.1.4 While there are significant improvements, there are also clear areas of policy and practice identified throughout this audit in need of development. These include the need to:
 - increase the visibility of leadership and the theology of safeguarding
 - develop strategic governance structures
 - develop a strategic safeguarding plan supported by a detailed action plan and a communications plan facilitating effective information sharing
 - develop a greater number of support persons
 - continue developing the approach to working with survivors.
- 3.1.5 Consideration needs to be given to independent scrutiny and for managing disagreements or conflicts of interests is required, including escalation where the conflict cannot be resolved.
- 3.1.6 Overall, however, a key challenge will be to align an open and compassionate response to individuals with the legalistic approach of lawyers and insurers. Unless redress is made in this area, then no matter the developments in each diocese or archdiocese, there will continue to be mistrust and a sense that the Church is more interested in protecting the organisation than supporting and healing the people it has damaged.
- 3.1.7 There is an open commitment to constructive challenge within the safeguarding team in the Archdiocese of Glasgow. Going forward it will be important to see to what extent this desire for improvement is embedded within a wider learning culture.

4 APPENDIX: REVIEW PROCESS

4.1 DATA COLLECTION AND LIMITATIONS OF AUDIT

DATA COLLECTION

Information provided to auditors

In advance of and during the site visit, the Archdiocese of Glasgow provided auditors with the following:

- a self-assessment of safeguarding
- DSAG minutes
- the safeguarding action plan
- training overview
- diocesan context and local safeguarding structure and arrangements
- PVG database information
- safe recruitment procedures and forms
- three parish safeguarding audits (2019, 2020, 2021)
- safeguarding report form
- access to the website
- invitation to survivors.

Participation of members of the archdiocese

The auditors conducted the audit virtually and had conversations with:

- Diocesan Administrator
- Chancellor
- Vice-Chancellor
- Diocesan Safeguarding Adviser
- Diocesan Safeguarding Coordinator
- A lay member representing DSAG, parish safeguarding coordinators and training
- two lay members representing the DSAG in terms of survivors, criminal justice and risk assessment
- representatives from the parishes (via the survey).

The audit: records and files

Auditors looked at:

- ten selected case files
- safer recruitment files

LIMITATIONS OF AUDIT

It is possible that some survivors of abuse who have no further contact with the Church and who have not approached survivor support organisations would not have been made aware of the audit. We also recognise that those with strongly negative or positive views are more likely to come forward that those with broadly neutral views.

This audit was completed virtually in line with the government restrictions on travel during the Covid-19 pandemic. Limitations of not seeing members of the Archdiocese or parishes in person may have limited communications.

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