

PCR Recommendations	Diocesan Response	Comment	Ongoing Plan	Key		
12.1 FILE MANAGEMENT AND RECORD KEEPING						For Bishop's Palace
12.1.1 Recommendation (local) [3.2.39]						For national church
The national policy for Clergy File management should be adopted by the Diocese	Accepted		Palace staff to check through the policy and identify which areas are not being followed, and put a plan in place to change procedures			
<i>This policy has been in since 2018 and provides clear direction on the management of Blue Files and information contained within which will address many issues identified with Chichester.</i>						
12.1.2 Recommendation (local and national) [3.2.39]						
Consideration should be given to moving to a digital solution for Clergy Files	For National Implementation	At present, we understand the legislation does not permit this, but it is planned as a future phase of the national People System project				
<i>Accepting there is a huge cost to this, the use of paper files in 2021 is archaic and leaves the Diocese open to risks of loss or destruction of data with no clear audit trail. Safeguarding and CDM records could easily be linked to the Blue File ensuring a holistic view of the individual.</i>						
12.1.3 Recommendation (local) [3.2.39]						
A retention and weeding policy should be adopted and all files should be subject to a review for GDPR compliance on a regular basis	Accepted	This will need to be a gradual project, as without additional funding for Bishop's Office Staff from the Church Commissioners, resources will not allow a through review of over 1,000 files all at once.	Every file leaving or arriving in the Palace to be weeded in accordance with the Retention Schedule in the national policy, prior to providing a CCSL where relevant, and other files weeded when consulted on a matter of substance.			
<i>The national policy provides a useful appendix with advice and guidance on what should be retained and for how long. Bulky files are less likely to be thoroughly reviewed when providing a CCSL which is a risk.</i>						
12.1.4 Recommendation (local) [3.2.39]						
A Blue File checklist detailing minimum requirements should be considered to assist in the administration of the file and compliance with the national policy	Accepted		Palace staff to create and use a checklist			
<i>This would ensure consistency and compliance and assist in CCSL and other personnel management queries.</i>						
12.1.5 Recommendation (local) [3.2.39]						
CPOMS and Sharepoint should be subject to a similar review in accordance with GDPR compliance particularly concerning personal details of survivors	Accepted		To be considered by DST			
<i>Evidence has been found of duplicated emails being retained, duplicated copies of minutes, correspondence relating to other individuals not relevant to the case and on some occasions medical information and information relating to survivors which could be a breach of GDPR.</i>						
12.1.6 Recommendation (local and national) [3.2.39]						
The movement of Blue Files needs to be more timely and deadlines should be set and followed up when Blue Files are expected	Already in Place		Requests and chasers for blue files are now monitored using a spreadsheet, and outstanding files regularly chased			
<i>Blue Files hold far more information than a CCSL and so it is important that when a priest moves Diocese, the Blue File follows as soon as practicable. The Diocese needs to have a process to ensure any requests for Blue Files are followed up quickly.</i>						
12.1.7 Recommendation (local) [3.2.39]						

An internal examination of the notification of deceased process needs to take place in order to identify the issue	Accepted	PCR2 has enabled the identification of deceased clergy whose files were held with the living, and it should be easier to move forward	Palace staff to check that Pensions Board are issuing the required notifications and that a system is in place for actioning them, including updating the database and moving the blue file			
<i>The national policy indicates that the Pension Board are responsible for notifying the Diocese of the death of a member of clergy, yet a number of files have been reviewed whereby the Diocese had no knowledge of the death. The Pension's Board are therefore either not notifying the Diocese of the death or if they are, this information is not being actioned by the Palace Admin team.</i>						
12.1.8 Recommendation (local) [3.2.56]						
Formal safeguarding meetings led by the Diocese must be supported with professional administration	Accepted	A review of resourcing is currently underway and this will be fed into that	To implement with benefit of new staffing arrangements			
12.1.9 Recommendation (local) [3.2.59]						
Data accuracy needs to be improved on CPOMS including the spelling of names and dates of birth of subjects.	Not Accepted	Dates of birth not always known. CPOMS does not allow a case to be entered without DOB. Therefore DST resort to obviously-wrong DOBs (e.g. 01/010/1800) in order to create entry.	No action necessary			
12.1.10 Recommendation: (local and national) [3.2.65]						
A central register for volunteers is kept which can be checked each time a volunteer is appointed.	For National Implementation	A central register can only be effective if held nationally. We will see what the NST's response is in the overview report				
12.2 PERMISSION TO OFFICIATE						
12.2.1 Recommendation: (local) [3.2.64]						
PTO should be removed when safeguard training has lapsed.	Accepted	Training for PTO clergy was deliberately put on 'back burner' during pandemic to prioritise training for clergy. Escalation process regarding non-compliance for PTO clergy currently in planning stage.	To implement new process once finalised.			
12.3 VICTIM / SURVIVOR CARE AND PASTORAL SUPPORT						
12.3.1 Recommendation (local) [6.1.6]						
IRs believe it is not too late to publish the Survivor Care Strategy and should do so in order to reach potential victims and survivors who have not yet come forward.	Partially Accepted	Current provision for people reporting abuse already published, but adapted version of PCR-2 specific provision to reflect ongoing provision should be published.	Ongoing survivor provision to be published, after work with new ISVA once appointed.			
12.3.2 Recommendation (local) [6.3.5]						
Consideration should be given to having a victim / survivor contract between the safeguarding team and the victim / survivor clearly setting out method and frequency of communication.	Accepted		Design of contract to be discussed and planned between DST caseworkers and Survivor's Network /ISVA			
12.3.3 Recommendation (local) [6.3.8]						

A pastoral service for both Clergy and victims / survivors should be implemented to ensure equity in pastoral care during a safeguarding investigation.	Partially Accepted	New national Responding Well policy places requirements on Dioceses to implement pastoral provision for survivors (beyond Support Person / ISVA). Chichester DSA has led on one model for implementation, 'Chaplaincy for Survivors'.	Chaplaincy for Survivors model to be implemented in Chichester forthwith.			
12.4 RESOURCING						
12.4.1 Recommendation (local) [11.2.14]						
The Diocese should review the current resourcing levels of the Safeguarding Team and assess whether further resources are required to deal with the high caseload.	Accepted	A review of resourcing is currently underway and this will be fed into that	Recruit appropriately following review			
12.4.2 Recommendation (local) [11.2.16]						
The role of the DSA should be reviewed against the Job Description to ensure the role is focussed primarily on safeguarding and not used for other time consuming, non-safeguarding administrative functions.	Accepted	A review of resourcing is currently underway and this will be fed into that	Review Job Descriptions for all relevant members of staff and recruit appropriately			
12.5 NATIONAL POLICY						
12.5.1 Recommendation (national) [6.3.12]						
A review of the legislation to give the Archbishop the power to remove Holy Orders from a member of the Clergy is needed.	For National Implementation					
12.5.2 Recommendation (national) [6.3.15]						
The church needs to take greater care during the C4 process and justify why, in such circumstances as in the case C125022, it is proportionate and necessary to make victims / survivors relive such trauma and at the very least, offer some professional support to those affected.	For National Implementation					
12.6 PCR 2 SPECIFIC						
12.6.1 Recommendation (local) [4.3.7]						
The PCR 2 Reference group or DSAP acknowledge and review all recommendations made on the Appendix D's and monitor their progress.	Partially Accepted	For DSAP to accept.	Schedule of recommendations will be reviewed and categorised with one DSAP member and progress reports given.			
12.6.2 Recommendation (local) [11.1.8]						

For completeness, the Diocese consider reviewing the outstanding deceased clergy files and files not fully completed by the 4 th IR.	Partially Accepted	It remains unclear whether there are files in existence for the remaining named deceased clergy, but they will be reviewed if located. It is expected that the second half of this recommendation will be amended in the final version of the report and that all files were completed, but that those completed by the fourth reviewer were not all re-reviewed. The diocese considers it would be disproportionate to re-review them.	Investigate remaining deceased clergy when Bishop's Chaplain returns to work.			
12.6.3 Recommendation (local) [11.1.8]						
The Diocese make every effort to try and locate blue files that should be in their possession but are currently unaccounted for.	Accepted	This work has been contracted out due to short staffing and good progress has been made already. Some will need to await the return of the Bishop's Chaplain				
12.7 SAFEGUARDING						
12.7.1 Recommendation (local and national) [5.1.6]						
As seen in other Dioceses, good practice would be for clergy to encourage congregations to undertake the C0 safeguarding course.	Accepted	Already in place in many parishes.	To be recommended in Safeguarding Newsletter			
12.7.2 Recommendation (local and national) [5.1.6]						
To highlight good leadership regarding safeguarding, all PCC members should take the safeguarding courses (C0-C2) which in turn may encourage others.	Partially Accepted	PCC members are required to take C0 and C1 and other modules, but not C2	Guidance to be issued to PCCs			
12.7.3 Recommendation (local and national) [5.1.23]						
Where an allegation has been made, the individual being accused needs to be informed as soon as is practicable unless clear rationale is provided as to why not.	Already in Place	This recommendation arose from one anomalous case already discussed by DSAP. This is standard practice already.	No implementation necessary			
12.7.4 Recommendations (local) [5.2.3]						
IRs were initially confused to learn that the Diocese are using the term 'core group' when this term is used in Children's Services. In order to gain clarity, it is recommended that the Diocese refers to this as a Diocesan led professionals meeting.	Partially Accepted	Agreed but forthcoming national Managing Allegations policy will amend a new term in place of 'core group'. Unwise to implement local change at this stage.	Will implement change when new national Managing Allegations policy is released.			
12.7.5 Recommendation (local and national) [5.3.3]						
For the NST to ensure that all DSA's receive specific safeguarding supervision on a regular basis.	For National Implementation	Agreed but for NST. Diocese of Chichester is one of the pilot Dioceses for the implementation of IICSA Recommendation 1 which includes DSA supervision by NST. CP due to take on a 'Lead User' role for this pilot programme.	Changes will be implemented locally as part of the national Recommendation 1 pilot			
12.7.6 Recommendation (local and national) [5.3.3]						
For management oversight to be present and clearly recorded on files when a case is discussed.	Accepted		See response to 12.7.7.			
12.7.7 Recommendation (local) [5.3.4]						

For the Diocese to set regular reviews of 4-8 weeks when managing a case in order to prevent drift.	Partially Accepted	DSA view is that 4-8 weeks for all cases is disproportionate and does not reflect available resources. Caseload should be stratified according to risk, with more frequent reviews taking place for higher risk cases. Suggested minimum for reviews is 3 months.	DST to discuss and plan to implement.			
12.7.8 Recommendations (local) [5.3.7]						
For the Diocese to ensure that all record keeping is up to date.	Partially Accepted	Recommendation arose from IR reviews of all casework records going back to 1990s. More recent case records already kept rigorously up-to-date.	To be implemented via Recommendation 12.7.7 (regular reviews of casework) and 12.7.6. (management oversight).			
12.7.9 Recommendations (local) [7.2.4]						
For the DST to comply with the National Policy regarding core groups being held within 48 hrs.	Partially Accepted	Not always achievable given diary commitments. Not always desirable given need to involve statutory services. This national requirement is included in a widely criticised policy that is due for renewal (the forthcoming Managing Allegations policy). What matters is that the <i>communication</i> that is required happens in a timely manner, which always occurs in Chichester. The Core Group itself is simply a tool to facilitate that communication.	Awaiting national policy and contributing to draft consultations.			
12.7.10 Recommendation (local) [7.3.8]						
For the DST to ensure that all relevant records are uploaded to the electronic systems in a timely manner.	Accepted	See above re response to 12.7.8	See above re response to 12.7.8			
12.7.11 Recommendation (local) [Parish visit appendix]						
The Diocese to consider more support for PSOs including CPD and potential area coordinators to ensure consistency, mentoring and support.	Accepted	DST to roll out PSO induction training in 2022 - already planned. Area coordinators possible but consideration must be given to capacity.	See previous column.			
12.7.12 Recommendation (local) [Minority Groups appendix]						
For the Diocese to have a specific equality and diversity or inclusivity strategy, which also covers recruitment from other underrepresented groups.	Accepted	Advice to be sought from the national church	Policy to be adopted			
Recommendation (local) [Minority Groups appendix]						
For the 'Unconscious Bias' training to be extended to PCC and lay members with a three year refresher course (or for new clergy arriving in the Diocese).	Accepted		Availability to be publicised to parishes, and course for clergy to be made available through Continuing Ministerial Development			
12.8 RISK MANAGEMENT						
12.8.1 Recommendation (local) [5.4.3]						

For risk assessments to be undertaken in a more timely manner before suspension is lifted and/or the CDM concluded.	Partially Accepted	Timing of risk assessments, CDM and suspension is dependant on various factors including the legal frameworks around when suspension can be imposed. Not always possible to maintain suspension until after a risk assessment is completed. There is no framework for incorporating risk assessments in the CDM.	Ongoing involvement of DST, particularly DSA, in national working groups regarding risk-assessment. Otherwise very difficult to implement locally.			
12.8.2 Recommendation (local and national) [5.4.3]						
DST to consider using a risk assessment template for every occasion when risk is being assessed.	Accepted	Current material for risk assessment templates is lacking. Ongoing national work looking at whole area of risk assessment, in which DSA is closely involved.	Ongoing work between DSA and NST around risk-assessment to develop national practice.			
12.9 DOMESTIC ABUSE						
12.9.1 Recommendation (local) [9.1.3]						
For the Diocesan Safeguarding Team to review their processes and procedures concerning domestic abuse.	Partially Accepted	Based on the discussion in the substantive report, the issues isn't the DST's processes or procedures, but the wider level of awareness of DV across the Diocese. The Diocese can accept that there is a need to raise awareness and to ensure provision and support are necessary.	No specific action for DST, other than that the national DV training needs to be rolled out.			
12.9.2 Recommendation (local) [9.1.10]						
For the Diocesan Safeguarding Team and the Bishop of Chichester to explore appropriate timescales when commissioning risk assessments.	Partially Accepted	See above answer to 12.7.9				
12.9.3 Recommendation (local and national) [9.1.12]						
Specialised domestic abuse training is provided for members of the PCC's and all Clergy.	Accepted	This is already in the national training framework	To be rolled out this year.			
12.10 WELFARE						
12.10.1 Recommendation (Local and National) [Welfare appendix]						
Within the Diocese, at all levels, supervisors hold regular 'one to one' welfare meetings with those for whom they are responsible.	Partially Accepted	Regular line management supervision for employees includes welfare checks. On clergy, see separate response to follow.				
12.10.2 Recommendations (local) [Welfare appendix]						
For the Diocese to ensure that HR issues are not undertaken by the DST but by specialist HR professionals.	Partially Accepted	A review of resourcing is currently underway and this will be fed into that. There are however likely to be continued areas of overlap.	Implement findings of review			