



Ministry  
of Defence

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Ref: FOI2021/03025

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08 June 2021

Dear [REDACTED]

Thank you for your email of 17 March in which you requested the following information:

*"I am writing to you under the Freedom of Information Act 2000 to request the following information from Regional Command HQ Cadets Branch.*

*Please may you provide me with information relating to the;*

*Safeguarding Practice Review, HQSW, June 2020.*

*This review was agreed between Brigadier Mark Christie OBE and Commander of HQSW Colonel Neville Holmes in June 2020. The review was conducted by Mr Steve Reeves, Non-Executive Director on the Army Cadets Safeguarding Management Group (ACSMG.)*

*Specific information requested; (copies of)*

- 1. The actual final report (in its entirety) submitted by Mr Steve Reeves.*
- 2. Any Action Plan produced in response to the final report.*
- 3. Any subsequent updates to the Action Plan.*
- 4. Minutes from the Army Cadets Safeguarding Management Group (ACSMG) discussing the submitted report or Action Plan.*
- 5. Minutes of any information Regional Command HQ or HQSW have relating to the above review.*
- 6. Any considerations discussed/concluded by Regional Command HQ and HQSW with regards to the final report.*

*Please provide the information in the form of hard copy (Paper).*

*If it is not possible to provide the information requested due to the information exceeding the cost of compliance limits identified in Section 12, please provide advice and assistance, under the Section 16 obligations of the Act, as to how I can refine my request. If you can identify any way that my request could be refined, I would be grateful for any further advice and assistance.*

*If you have any queries please do not hesitate to contact me via letter or email and I will be very happy to clarify what I am asking for and discuss the request, my details are at the head of this letter.*

*Thank you for your time and I look forward to your response."*

I wrote to you on 31 March advising that we considered that some of the information may fall within the scope of qualified exemptions. Since then, upon the review of the information, it was decided that qualified exemptions were not engaged.

I am treating your correspondence as a request for information under the Freedom of Information Act (FOIA) 2000. A search for the information has now been completed within the Ministry of Defence, and I can confirm that some of the information in scope of part 1 and 2 of your request is held and is attached. Information for parts 3 to 6 is not held.

Please find attached Safeguarding Practise Review and Action Plan. Please note that all personal information have been withheld under the Data Protection. This information is exempt from release under section 40 (Personal Data) of the FOI Act. Section 40(2) has been applied to the information to protect personal information as governed by the Data Protection Act 2018. Additionally, information that is confidential in nature and was supplied on a confidential basis have been withheld under section 41 (Breach of confidence). Section 40 and 41 are absolute exemptions and there is therefore no requirement to consider the public interest in deciding to withhold the information.

If you have any queries regarding the content of this letter, please contact this office in the first instance. Following this, if you wish to complain about the handling of your request, or the content of this response, you can request an independent internal review by contacting the Information Rights Compliance team, Ground Floor, MOD Main Building, Whitehall, SW1A 2HB ([e-mail CIO-FOI-IR@mod.uk](mailto:CIO-FOI-IR@mod.uk)). Please note that any request for an internal review should be made within 40 working days of the date of this response.

If you remain dissatisfied following an internal review, you may raise your complaint directly to the Information Commissioner under the provisions of Section 50 of the Freedom of Information Act. Please note that the Information Commissioner will not normally investigate your case until the MOD internal review process has been completed. The Information Commissioner can be contacted at: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. Further details of the role and powers of the Information Commissioner can be found on the Commissioner's website at <https://ico.org.uk/>.

Yours sincerely,

Workforce 2  
Army Policy & Secretariat

## Safeguarding Practice Review

1. [REDACTED], received a whistleblowing notification about a safeguarding incident in [REDACTED].

[REDACTED] 0. I was appointed by [REDACTED] to conduct a Safeguarding [REDACTED] Practice Review. while the review was underway.

3. The terms of reference for this Safeguarding Practice Review are:

- i) The period of time to be reported on is limited to [REDACTED]
- ii) [REDACTED]
- iii) Was the investigation into the counter allegations appropriately conducted?
- iv) Are the CEOs in the [REDACTED] area able to conduct their Designated Safeguarding Lead role in a way that places the welfare of cadets at the forefront of their decision-making?
- v) Are there any other matters that need to be brought to the attention of the Army Cadet Safeguarding Management Group (ACSMG)?

### Conflict of Interest Declaration

4. I confirm that I have no conflict of interest in relation to this matter and have no experience of any of those involved in these issues other than in my role as a Non-Executive Director on the Army Cadet Safeguarding Management Board.

### Documents and Methodology

5. Files and other documents were provided

by

and

[REDACTED]. Other documents were requested as the review progressed and all requests for information were complied with promptly, with the exception of key documents in the possession of personnel at [REDACTED]. These documents took in excess of a month to be provided and delayed the prompt completion of this review. It is notable that similarly important documents relevant to the counter-allegations at (iii) in the terms of reference were not provided proactively by [REDACTED]. All those asked to meet and provide evidence were cooperative and supportive.



6. Due to the Covid-19 pandemic, interviews were call, [REDACTED] conducted by telephone or video . There is no indication that this hampered the review process.

7. The formal whistleblowing notification has not been shared and the source remains protected.

**Background**

8. [REDACTED]

4. [REDACTED]

[REDACTED]

11 [REDACTED]

12. [REDACTED]

13

[REDACTED]

14

[REDACTED]

15

[REDACTED]

16

[REDACTED]

17

[REDACTED]

18

[REDACTED]

19

[REDACTED]

[Redacted]

0

[Redacted]

1

[Redacted]

2

[Redacted]

3

[Redacted]

4

[Redacted]

25.

[Redacted]

0.

[Redacted]

0.

[Redacted]

29.

[Redacted]

30.

[Redacted]



31.

[REDACTED]

36.

[REDACTED]

21.

[REDACTED]

28.

[REDACTED]

29.

[REDACTED]

30.

[REDACTED]

**Background and Relationships between [REDACTED] and the [REDACTED]**

37.

[REDACTED]

[Redacted]

38

[Redacted]

39

[Redacted]

40

[Redacted]

41

[Redacted]

42

[Redacted]

43.

[Redacted]

**Response to Terms of Reference:**

43. Was the matter detailed in the Whistleblowing notification managed in accordance with current best practice in safeguarding and were the decisions taken, appropriate:

*On the part of* [Redacted]:

44.

[Redacted]

45.

[Redacted]

46.

[Redacted]

47.

[Redacted]

48.

[Redacted]

*On the part of* [Redacted]:

49.

[Redacted]

*Strictly Confidential*

5 [REDACTED]

[REDACTED]

5 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



57.

[Redacted]

53.

[Redacted]

*(b) Incident Management*

58.

[Redacted]

59.

[Redacted]

60.

[Redacted]

61.

[Redacted]

62.

[Redacted]

6

[Redacted]

6

[Redacted]

6

[Redacted]

6

[Redacted]

6

[Redacted]

6

[Redacted]

7

[Redacted]



[REDACTED]

71.

[REDACTED]

72.

[REDACTED]

73.

[REDACTED]

74.

[REDACTED]

75.

[REDACTED]

**Was the investigation into the counter allegations appropriately conducted?**

76

[REDACTED]

77.

[Redacted]

78.

[Redacted]

79.

[Redacted]

80.

[Redacted]

81.

[Redacted]

82.

[Redacted]

83.

[Redacted]

84.

[Redacted]

**Are the CEOs in the [Redacted] area able to conduct their Designated Safeguarding Lead role in a way that places the welfare of cadets at the forefront of their decision-making?**

83. There are pressures on CEOs as a result of their safeguarding responsibilities, some of which are being addressed by the establishment of the Safeguarding Hub at Regional Command, and these are consistent with challenges experienced elsewhere in the UK.

77.  
78.  
79.  
80.

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[REDACTED]

90. BSSG meetings play a key role in the oversight and support of CEOs in their safeguarding functions

[REDACTED]

1. [REDACTED]

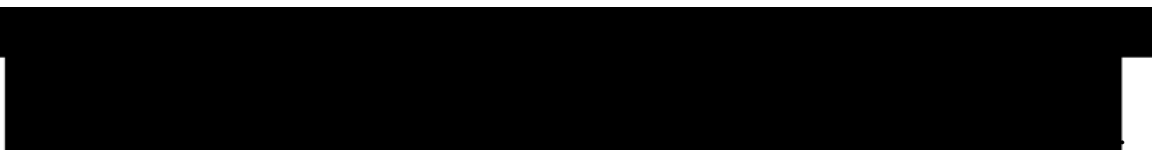
77 [REDACTED]

3. Greater clarity could be provided as to who may provide an independent SME presence at BSSG meetings. There was concern that with the establishment of the Safeguarding Hub at Regional Command that NEDs would not attend BSSG meetings and whether this would reduce the effectiveness of the meetings. There was some suggestion that existing ACF/CCF CFAVs with safeguarding roles in their paid employment could fulfil this function, which should be avoided.

91. [REDACTED]

92. [REDACTED]

**Are there any other matters that need to be brought to the attention of the Army Cadet Safeguarding Management Group (ACSMG)?**



94. To minimise the likelihood of similar systemic issues and ensure that the learning from this case is not lost, the following recommendations are made:

*General Safeguarding Management and Overview:*

1. Arrangements should be established to ensure that the removal of safeguarding cases from Designated Safeguarding Leads only occurs in exceptional circumstances and with the explicit consent of a competent safeguarding specialist. Where this action is required, a named safeguarding specialist should be designated as becoming responsible for the case.
2. Information sharing and data protection guidance should be provided to ensure a consistent approach to information parents receive about the outcome of cases involving their children.
3. The actions mandated at Brigade Safeguarding Steering Group meetings should be properly recorded. There should be clarity about appropriate people to serve as independent input to Brigade Safeguarding Steering Group meetings, which should make it clear that serving members of the ACF/CCF cannot fulfil this function.
4. There should be a review of the way in which the ACF and CCF safeguarding arrangements interact, making a decision that someone carries a risk of harm in one organisation should be binding on the other, except in exceptional circumstances sanctioned by a suitable safeguarding process.
5. If (or any ) staff are to provide support to Cadet activities, they should have suitable training on both the purpose and approach of the ACF and safeguarding delivered by someone approved by Regional Command.
6. The training of Commandants and Col Cadets should include content on the effective promotion of a safeguarding culture in their areas of responsibilities, including the limits of their authority when formal safeguarding processes are required. This training should be delivered by a safeguarding specialist approved by Regional Command.

*Specific Case Management:*



[Redacted]

8.

[Redacted]

9.

[Redacted]

93

[Redacted]

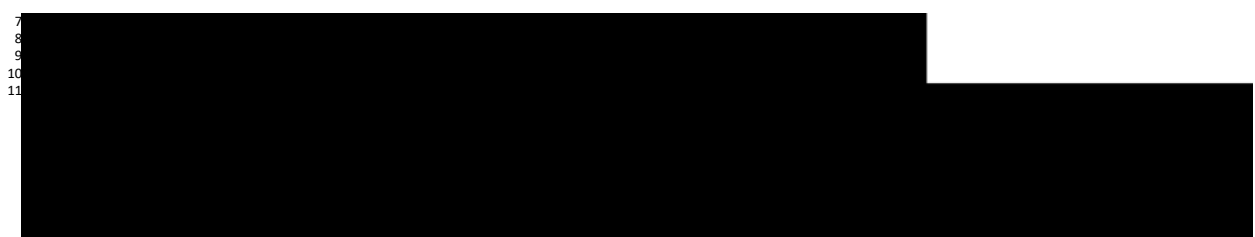
94

[Redacted]

Steve Reeves Non-Executive  
Director Army Cadet  
Safeguarding Management Board  
September 2020

Recommendations

Serial	BSSG recommendations:	when Agreed - review of BSSGs already underway and this recommendation can be incorporated <a href="#">Agreed</a>	BSSGs are now recording RoDs for each case discussed and all open cases are being discussed at each BSSG.
1	Minutes of the discussions were not taken with sufficient detail to give CEOs clarity and back up implementing decisions made at BSSG, nor allow others to hold counties to their actions - more detailed minutes of actions on cases would provide greater assurance	Agreed - review of BSSGs already underway including membership <a href="#">Agreed</a>	Membership has been reviewed and further detail on conduct of BSSGs is included in the draft CFSO for Safeguarding
2	Greater clarity could be provided as to who may provide an independent SME presence at BSSG meetings. There was concern that with the establishment of the Safeguarding Hub at Regional Command that NEDs would not attend BSSG meetings and whether this would reduce the effectiveness of the meetings. There was some suggestion that existing ACF/CCF CFAVs with safeguarding roles in their paid employment could fulfil this function, which should be avoided.	Agreed - review of BSSGs already underway. SME presence at BSSG will be provided by Case Workers and independence a LADO representative. NEDs future role will provide RC independence advice which can influence on nationwide practice <a href="#">Agreed - With the Safeguarding Hub, SME advice at BSSG will be delivered by RC SMEs</a>	Draft CFSO for Safeguarding includes inviting a LADO to BSSGs. It is also likely that they will be in breach of the accepted code of practice in the ACF, as expressed in these guidelines, and subject to ACF Disciplinary Action as contained in the Cadet Force Standing Order on ACF Discipline."
	General Safeguarding Management and Overview: 1 Arrangements should be established to ensure that the removal of safeguarding cases from Designated Safeguarding Leads only occurs in exceptional circumstances and with the explicit consent of a competent safeguarding specialist. Where this action is required, a named safeguarding specialist should be designated as becoming responsible for the case.	Agreed. Under our future working model, removing a case from a Case Worker will only happen in exceptional circumstances and any decision to reallocate will be made by SO1 Safeguarding. Such cases would give given to a different Case Worker. <a href="#">Agreed</a>	to observe proper safeguarding standards for Cadets in court action. It is also likely that they will be in breach of the accepted code of practice in the ACF, as expressed in these guidelines, and subject to ACF Disciplinary Action as contained in the Cadet Force Standing Order on ACF Discipline." Once the new CFSO on Discipline and the CFSO on Safeguarding is in place, a clearer differentiation will be drawn between those who are being assessed on a risk basis under Safeguarding processes, and those being investigated under Discipline processes.
2	Information sharing and data protection guidance should be provided to ensure a consistent approach to information parents receive about the outcome of cases involving their children.	Agreed. This can be incorporated into the future CFSO on Army Cadet Safeguarding <a href="#">Agreed</a>	A page long annex to the draft CFSO on Safeguarding will provide guidance about information sharing with parents
3	The actions mandated at Brigade Safeguarding Steering Group meetings should be properly recorded. There should be clarity about appropriate people to serve as independent input to Brigade Safeguarding Steering Group meetings, which should make it clear that serving members of the ACF/CCF cannot fulfil this function.	Agreed. See BSSG recommendations serial 1 & 2 <a href="#">Agreed</a>	Captured above
4	There should be a review of the way in which the ACF and CCF safeguarding arrangements interact, making a decision that someone carries a risk of harm in one organisation should be binding on the other, except in exceptional circumstances sanctioned by a suitable safeguarding process.	Not agreed. The decision making regarding CCF cases rests with schools. They have a different relationship with staff, and may be in a position to put in place different measures and mitigations than ACF. An inability for someone to practice as a CFAV in one setting does not automatically preclude them from another. There should however be set out information sharing protocols, so CFAV's understand that information shared with one agency (eg ACF) may be passed to another (eg school). <a href="#">Agreed - Schools have primacy over safeguarding, and we already share info - formalise it</a>	Information sharing is encouraged by the CCF Regs, which are currently being reviewed. A tri-service approach to considering how Safeguarding is managed within the is being looked at. In addition the draft Safeguarding CFSO includes a line about information sharing between ACF and other organisations. Also LonDist are being asked to look at more detail re challenges of information sharing between CCF and ACF, and how these may be overcome. That report will be asked to make recommendations to ACSMG





5 If HQSW (or any RPOC) staff are to provide support to Cadet activities, they should have suitable training on both the purpose and approach of the ACF and safeguarding delivered by someone approved by Regional Command.

Not agreed. 'Support to cadet activities' is too broad. However it's accepted that those who are involved in a safeguarding capacity, including those who attend BSSGs, need to understand the ACF and ACF safeguarding. Regulations and the future CFSo on safeguarding will equip this understanding. SO1 Safeguarding will also tour Brigades to deliver brief on future working and will include respecting safeguarding informed recommendations [Agreed](#)

Draft CFSo on Safeguarding includes recommendation that those involved with BSSGs have Safeguarding level 2 training, and DLE training on managing allegations against staff.

Roadshow has been completed to 4 areas (including SW) and more will be planned once the CFSo is signed off.

6 The training of Commandants and Col Cadets should include content on the effective promotion of a safeguarding culture in their areas of responsibilities, including the limits of their authority when formal safeguarding processes are required. This training should be delivered by a safeguarding specialist approved by Regional Command.

Agreed. This can be incorporated by SO1 Safeguarding into future briefs to Senior Volunteer training at Frimley Park [Yes, safeguarding briefs are given to all senior officer courses, in fact all CFAV courses, these will continue to be developed.](#)

Training to be delivered to senior volunteers needs further work. SO2 Safeguarding is working with the training team to understand how we can make best use of MoD processes to ensure robust training provision, both to these courses and beyond.

Specific Case Management: