



INDEPENDENT INQUIRY  
CHILD SEXUAL ABUSE

# Child protection in religious organisations and settings

Investigation Report  
*September 2021*



## CORRECTION SLIP

Title: **Child protection in religious organisations and settings**  
– Investigation report

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### **Correction:**

Page 47, paragraph 38 – 2<sup>nd</sup> bullet point

Text currently reads:

**Standard certificates:** these are for those working in certain roles specified in legislation as a regulated activity (for example, those involving the teaching, training, care or supervision of children) and include unspent and spent convictions, cautions, reprimands and warnings.

Text should read:

**Standard certificates:** these are for those working in certain roles specified in legislation and include unspent and spent convictions, cautions, reprimands and warnings.

Date of correction: 9 March 2022

# Child protection in religious organisations and settings

Investigation Report  
*September 2021*

A report of the Inquiry Panel  
Professor Alexis Jay OBE  
Professor Sir Malcolm Evans KCMG OBE  
Ivor Frank  
Drusilla Sharpling CBE

Presented to Parliament pursuant to section 26 of the  
Inquiries Act 2005

Ordered by the House of Commons to be printed  
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HC 705



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# Executive Summary

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This thematic investigation augments the dedicated investigations into the Anglican and Roman Catholic Churches already conducted by the Inquiry.

In this investigation, the Inquiry obtained evidence from 38 religious organisations with a presence in England and Wales, which vary greatly in character and size. They may have a significant and even dominant influence on the lives of millions of children, often engaging a large proportion of a child's time outside of their full-time schooling, including through tuition in religious and cultural studies or national curriculum subjects (known as 'supplementary schooling') alongside social and leisure activities.

As we have said in other investigations, what marks religious organisations out from other institutions is the explicit purpose they have in teaching right from wrong; the moral turpitude of any failing by them in the prevention of, or response to, child sexual abuse is therefore heightened. The religious organisations and settings examined in this investigation have a range of theological beliefs and practices. Respect for a diversity of beliefs is a hallmark of a liberal democracy. However, freedom of religion and belief can never justify or excuse the ill-treatment of a child, or a failure to take adequate steps to protect them from harm.

As set out in the report, we have seen egregious failings by a number of religious organisations, and cases of child sexual abuse perpetrated by their adherents. For example:

- PR-A22, PR-A23, PR-A24 and PR-A25 were all sexually abused when they were approximately nine years old whilst they were being taught the Qur'an by a teacher in a mosque. In 2017, the perpetrator was convicted and sentenced to 13 years' imprisonment.<sup>1</sup>
- PR-A3 was sexually abused by a Sunday school activity leader when he was seven years old, shortly after his mother died. The sexual abuse took place in PR-A3's home and during Sunday school camps. The abuser told PR-A3 not to tell anyone because it would upset PR-A3's father and no one in the church would believe him. The abuse continued for approximately three years.
- PR-A10 was sexually assaulted by a church volunteer when she was 12 years old. PR-A10 disclosed the abuse to her mother, who reported it to the police. After being made aware of the allegations, a church minister told her mother that the abuser was "valued" and must be considered "innocent until proven guilty". It later became known that the abuser had previously been dismissed from a police force following charges of unlawful sexual intercourse with a minor.

## Child sexual abuse in religious organisations and settings

Precise and reliable evidence about the scale of child sexual abuse within religious organisations and settings is not currently available.

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<sup>1</sup> INQ005151\_013



Police forces are not required under Home Office counting rules to record whether the circumstances of a crime involving child sexual abuse involves a religious organisation or setting; there is thus no way of reliably knowing how many child sexual offences reported in England and Wales took place in, or were linked to, such settings.

The numbers of referrals to local authority designated officers and the internal records kept by some religious organisations themselves are unlikely to reflect the true scale of abuse, given what we already know about the under-reporting of child sexual abuse in general.

However, the evidence we received and heard from witnesses in this investigation leaves no doubt that the sexual abuse of children takes place in a broad range of religious settings.

## Barriers to reporting

Within some religious organisations and settings there are significant barriers to the effective reporting of allegations of child sexual abuse. These barriers may be linked to the organisation itself or to the wider community to which it relates. These include:

- victim-blaming, shame and honour: in some communities, ideas of sexual ‘purity’ and social and familial standing can make abuse markedly harder to report;
- discussion of sex and sexuality: in some communities, matters relating to sex are not discussed openly, or children are not taught about sex or sexual relationships; in certain languages, there are no words for rape, sexual abuse or genitalia;
- abuse of power by religious leaders: children are often taught to show deference and respect to religious figures, who are typically regarded as innately trustworthy; this trust can be exploited to perpetrate abuse;
- gender disparity: within many of the religious organisations examined, there was a preponderance of men occupying both positions of spiritual and religious leadership and senior lay positions;
- mistrust of external agencies: some religious organisations harbour mistrust about the involvement of government bodies in their affairs, which may emanate from concerns about religious persecution or discrimination, a view that such involvement is contrary to religious teachings or a view that government bodies are insensitive to religious practices and beliefs; and
- forgiveness: the concept of forgiveness can be misused, both to put pressure on victims not to report their abuse and to justify failures by religious leaders to take appropriate action where allegations have been made.

## Child protection policies and procedures

A child protection policy is the basic foundation on which organisations working with children should build their practices to keep children safe.

Although there is a range of guidance available to religious organisations and settings on child protection policies (such as the Department for Education’s *Working Together to Safeguard Children*), there is no legal obligation on such settings to follow this guidance. There is significant diversity between religious organisations as to whether they have adequate child protection policies in place and the extent to which they effectively follow

them. We were also alerted to the problem of 'disguised compliance', where an organisation might take care to have a policy in place but the reality is one of half-hearted or non-existent implementation.

Safer recruitment practices are central to keeping children safe in any organisation. This includes the use of disclosure and barring checks. Under the current disclosure and barring regime, the highest level of checks (ie an enhanced Disclosure and Barring Service (DBS) check, with a check of the barred list for children) is only available if a person is engaged in 'regulated activity'. However, the legislative definition of 'regulated activity' is complex and difficult for religious and other voluntary organisations to understand and apply. Even when a person is in a position of trust or authority within a religious organisation, they may not be eligible for the highest level of checks. This could mean that an individual who had, for example, been dismissed as a teacher as a result of safeguarding concerns would be able to undertake some volunteer or other activity without the religious organisation knowing of this breach of trust.

We heard evidence that many religious organisations and settings do not consistently undertake DBS checks of those who have contact with children within the organisation. There was little evidence of religious umbrella bodies and representative organisations taking decisive steps to help their member organisations with safer recruitment practices.

Staff and volunteers should receive training on how to recognise child sexual abuse and what to do in the event of a disclosure. However, again, we saw wide variation in the extent to which religious organisations ensure that their staff and volunteers receive such training. We also heard about a limited uptake by religious organisations of child protection training that is offered by local authorities.

## Responding to allegations of abuse

While some religious organisations and settings have effective systems in place for responding to allegations of child sexual abuse that are implemented throughout the organisation, others have procedures that are ill-defined or are not communicated and followed.

Few religious organisations have formal arrangements in place for the provision of professional counselling or therapy services for those who have been abused in the context of their religious organisation or setting. Some do have a system of pastoral support for victims and survivors.

Most of the religious organisations and settings we examined that employ staff have disciplinary processes which should be invoked when an allegation of child sexual abuse is made against an employee. A few of the religious organisations we examined had an internal process in place for taking action where an allegation is against a volunteer or congregant (who is not an employee).

## Supplementary schooling, out-of-school settings and unregistered schools

Some religious organisations provide education and services to children through 'supplementary schooling' or 'out-of-school provision'. It has been estimated that around 250,000 children in England and Wales receive education in supplementary schools with a

faith focus or that are organised by a religious organisation. However, because there is no requirement for such schools to be registered with any state body, this estimate cannot be relied upon.

Voluntary guidance is available (such as the Department for Education's *Keeping children safe in out-of-school settings: code of practice*), but supplementary schools and out-of-school settings are not subject to any compulsory minimum standards. Additionally, while there are some pilot projects, local authorities do not currently have powers to inspect or oversee such settings.

There are also a number of 'unregistered schools' which may pose as providing part-time education but in fact provide full-time education (and thus ought to be registered as a school), or provide the sole education that the child receives. There is a gap in the legislation whereby schools that provide solely religious education cannot register as a school, even if this is the only education a child receives.

The Office for Standards in Education, Children's Services and Skills (Ofsted) has serious concerns that a minority of out-of-school settings are putting children at risk by failing to adhere to basic child protection standards. Ofsted's remit in inspecting such settings extends only to determining whether an unregistered school is being conducted; it does not have any powers to take any action against these settings, except where they are deemed to be operating as unregistered schools.

In 2015, the Department for Education issued a consultation on whether to change the law in respect of the registration of schools. It recently made a public commitment to tighten the definition of an independent school and legislate to strengthen Ofsted's powers in respect of unregistered schools.

## Inspection and oversight

While there are a number of state and local governmental or quasi-governmental bodies that have oversight of some aspects of the services provided by religious organisations, none of them can or do provide oversight of child protection within such settings. These bodies include the Department for Education, Ofsted and the Charity Commission, among others.

Local authorities are legally responsible for running child protection services and taking action when children have been abused. This investigation obtained evidence from nine local authorities across England and Wales, covering large and diverse religious communities. Each one indicated that it wished to have greater powers to help religious organisations to better protect children.

We saw a few rare examples of internal quality assurance by religious organisations themselves. These include examples of audits, inspections and reviews arranged by the organisation. Such reviews and audits recognise the need for oversight of child protection arrangements, as well as the need to address past failures.

Charitable organisations and training providers such as thirtyone:eight and Faith Associates offer a range of services to assist religious organisations and settings with their child protection arrangements, including audits and inspections. Such auditing initiatives help to raise child protection standards within these settings, but their voluntary nature means that there is no compulsion for the organisation to comply with any recommendations.

The current system for oversight of child protection within religious organisations and settings is one of patchwork influence rather than mandatory standards and enforcement. While the religious organisations and settings that provided evidence to the investigation expressed different views as to how any oversight ought to work, there was clear evidence that some standard-setting and oversight is required.

## Conclusion

Two recommendations are made in this report: (i) that all religious organisations should have a child protection policy and supporting procedures; and (ii) that the government should legislate to amend the definition of full-time education to bring any setting that is the pupil's primary place of education within the scope of a registered school, and provide Ofsted with sufficient powers to examine the quality of child protection when undertaking inspection of suspected unregistered schools.

We will return to a number of the issues relating to the protection of children from sexual abuse raised in this investigation in our Final Report.

# Pen portraits

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## PR-A14, PR-A15 and PR-A16

Todros Grynhaus was a prominent member of the Charedi Jewish community in Manchester and the son of a rabbi.<sup>2</sup>

In the 1980s, when PR-A14 was 13 years of age, Grynhaus would frequently tickle him under his clothing and around his genitals. When PR-A15 was between the ages of seven and 15 years old, from the mid 1990s, she was sexually abused on a number of occasions by Grynhaus, including touching her genital areas and breasts, and being forced to perform oral sex on him. Over a four-month period in 2003, when PR-A16 was aged 15, Grynhaus showed her pornography, massaged her breasts and penetrated her vagina with his fingers. He also put PR-A16's hand around his penis and attempted to force her to perform oral sex on him.<sup>3</sup>

In 2004, while she was in Israel, PR-A16 disclosed her abuse to a rabbi, who sought advice from a rabbi in America. She also told a friend, who reported the allegations to another individual. Later in 2004, PR-A16 provided a statement to a rabbi regarding her abuse by Grynhaus. The rabbi sent Grynhaus for counselling.<sup>4</sup>

In 2006, when PR-A16 was 18 years old, she spoke to influential individuals within the Charedi community about her abuse and was offered £5,000 compensation. They told PR-A16 that this was the “*only route*” – it was “*not considered an option*” to go to the police because to do so would result in her being regarded as a ‘Moiser’ and being shunned by the community. A Moiser is a Jewish term for someone who informs on another Jew to secular authorities. Centuries of persecution and unfairness means that there is Jewish learning and tradition that someone should not be reported to secular authorities for fear of those authorities’ response to the Jewish community, or unfairness in the trial process. Someone who does so is considered to have betrayed their community.<sup>5</sup> The Charedi Jewish community is small. An individual’s social, religious and family lives often take place entirely within it, as well as their employment. To be shunned by the community would lead to significant social isolation, potentially even from family members, and loss of potential employment; it would be devastating for someone who had known no other life.

In 2011, Grynhaus met with a clinical psychologist together with his wife and two rabbis. Grynhaus “*admitted ... to ‘messing with PR-A15 sexually’, and to sexually abusing PR-A16*”. Both rabbis who went to this meeting eventually testified at his trial, though one required a witness summons to compel his attendance.<sup>6</sup>

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<sup>2</sup> <https://www.manchestereveningnews.co.uk/news/greater-manchester-news/paedophile-jewish-scholar-left-victims-9634593>

<sup>3</sup> INQ005151\_011-012; CPS004874\_001-002; CPS004865\_004

<sup>4</sup> CPS004865\_005

<sup>5</sup> CPS004865\_005

<sup>6</sup> CPS004865\_005

Grynhaus was charged with offences relating to PR-A14, PR-A15 and PR-A16 in 2012. While on bail, he fled the UK for Israel using a false passport and had to be extradited back to the UK in 2014. In 2015, Grynhaus was convicted of offences relating to PR-A15 and PR-A16, and was sentenced to 13 years and two months in prison. As a result, the Crown Prosecution Service did not proceed with the allegations relating to PR-A14 (which were to be tried separately).<sup>7</sup>

In sentencing Grynhaus, the trial judge observed:

*“I have no doubt that you felt able to rely on a prevailing attitude of insularity which you hoped would prevent these allegations ever coming to the attention of the police. You hoped that, at worst, you might have to pay a form of financial penalty ... You believed that the combination of the girls’ sexual ignorance, and the attitudes of some within your community, would make it even harder for your victims to complain about you”.*<sup>8</sup>

## PR-A4

PR-A4 attended a madrasah (an education setting for Islamic instruction) every day after school between the ages of 6 and 11 in the 1990s. The madrasah was held at the home of family friends, which was set up as a ‘house mosque’. Classes were taught by the family, including their teenage son, who was 16 or 17 years old.<sup>9</sup>

The son began to abuse PR-A4 when she was 8 years old and continued until she was 11 years old. He touched her genitals under the benches in the classroom and also assaulted her in the house mosque’s bathroom or in his bedroom. This progressed to PR-A4 having to perform oral sex on him – if she did not comply, he would force or blackmail her. He went on to rape PR-A4 vaginally and anally.<sup>10</sup>

PR-A4 told a teaching assistant at her secondary school of rumours of abuse at the madrasah, but did not disclose her own abuse. The police investigated the madrasah. It remained open and the alleged perpetrator continued to teach.<sup>11</sup>

When PR-A4 was 14 years old, she told her family about the abuse. Her mother tried to speak to the parents of other children. PR-A4 told us that no one wanted to support the allegations because of the cultural shame it would bring on the family of the boy. PR-A4 suffered harassment from others in the community who learnt of the allegations. She was called a “dirty tart” or a “slag”. No action was taken by the house mosque.<sup>12</sup>

The perpetrator was subsequently convicted of two offences, though acquitted of others. He was sentenced to one year in prison. During the trial, some members of the Muslim community who were influential within it supported the perpetrator. PR-A4 found the experience to be very distressing. The case was openly discussed on a local website and PR-A4 was publicly named as a complainant.<sup>13</sup>

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<sup>7</sup> CPS004865\_004-005

<sup>8</sup> CPS004874\_005

<sup>9</sup> INQ005151\_003

<sup>10</sup> INQ005151\_003

<sup>11</sup> INQ005151\_003

<sup>12</sup> INQ005151\_003

<sup>13</sup> INQ005151\_003

## PR-A10

In the 1990s, David North was a volunteer and active member of the Methodist Church congregation. PR-A10 attended church with her friends and participated in voluntary activities within the church. North would play games with PR-A10 after services and would also hug her from behind.<sup>14</sup>

When PR-A10 was 12 years old, North asked her to help him retrieve something from a storage room. He pushed himself against her, put his hands under her clothes and sexually assaulted her. PR-A10 felt *“absolutely trapped”* and *“completely powerless”*.<sup>15</sup> PR-A10 told a friend within a day or two and her mother soon afterwards, who informed the police.<sup>16</sup>

During the police investigation, three other young girls – of an age within two years of PR-A10 and from the same Sunday school – came forward with similar allegations.<sup>17</sup> North pleaded guilty part-way through his trial to two counts of sexually assaulting PR-A10 and another young girl.<sup>18</sup>

PR-A10 said that she was not provided with any support by her local Methodist minister following the disclosure. During a telephone call, the minister told PR-A10’s mother that North and his family were *“valued members of the church”* and that he must be considered *“innocent until proven guilty”*. PR-A10 and her mother interpreted that as insinuating that she might not be telling the truth, and PR-A10 felt *“a level of blame from the church”*.<sup>19</sup> Following North’s conviction, the minister did not provide any support to PR-A10, or apologise.<sup>20</sup>

In December 2018, almost 30 years later, and after PR-A10 had a career working with victims and survivors of abuse, she contacted the Methodist Church and made a disciplinary complaint against the minister. A panel concluded that the minister did not meet reasonable expectations of pastoral care.<sup>21</sup> In November 2019, the complaint was considered by a committee under the Complaints and Discipline Procedure, and upheld in part. The committee found that the minister had not intended to cause any harm or distress to PR-A10 – as a result, there would be no disciplinary sanction, except that the minister should apologise. If no apology was produced, alternative sanctions would be considered.<sup>22</sup>

PR-A10 was *“absolutely appalled”* that they could *“effectively make a sanction an apology ... If you force an apology, it’s not an apology”*.<sup>23</sup> When PR-A10 declined the apology, no further sanction was imposed. The decision of the committee was appealed. The appeal was heard in March 2020, with the outcome that the original decision was upheld and no further sanction was imposed.<sup>24</sup>

PR-A10 has been invited by the Methodist Church to assist with a review of its Complaints and Discipline Procedure. We are told that it is anticipated that the review will conclude with a final report being made to the Methodist Conference in 2022.<sup>25</sup>

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<sup>14</sup> PR-A10 16 March 2020 165-167

<sup>15</sup> PR-A10 16 March 2020 167/20-169/25

<sup>16</sup> PR-A10 16 March 2020 170/3-16

<sup>17</sup> PR-A10 16 March 2020 171/9-14

<sup>18</sup> PR-A10 16 March 2020 171/15-22

<sup>19</sup> PR-A10 16 March 2020 172/6-24

<sup>20</sup> PR-A10 16 March 2020 172/18-24

<sup>21</sup> MST000154\_003

<sup>22</sup> MST000154\_003

<sup>23</sup> PR-A10 16 March 2020 181/4-25

<sup>24</sup> MST000156\_001

<sup>25</sup> MST000156\_002

## PR-A5

PR-A5 was raised as a member of a congregation of the Jehovah's Witnesses. Peter Stewart attended the same Kingdom Hall as her family and was a 'ministerial servant'. Ministerial servants "primarily deal with routine organisational tasks, such as maintaining adequate stocks of Bibles and other religious literature, and assisting with the maintenance of the Kingdom Hall".<sup>26</sup> Stewart led Bible study classes at PR-A5's home and she attended lessons at his home.<sup>27</sup>

She was abused by Stewart in the late 1980s and early 1990s, when she was between four and nine years old. When PR-A5 was four years old, he lifted her up and touched her vagina following a Bible study session. He asked her if she liked it. He touched PR-A5 under her clothes during Bible study while her mother and sister were in the room:

*"Basically, every occasion that I saw him, where he could find some way either of getting me alone – or not even necessarily getting me alone. If he was able to manipulate the situation on every occasion that he saw me, something would happen. The degree of what happened depended on how much privacy ... he could get."*<sup>28</sup>

The abuse escalated to Stewart penetrating PR-A5's vagina with his fingers or with his tongue when they were alone in a room in her home or his, even if there were others in the house. When PR-A5 was six or seven years old, Stewart penetrated her vagina with his penis.<sup>29</sup> The abuse ended when PR-A5 was nine years old, when he disappeared from their lives after being arrested for sexual assault on another young person. PR-A5 did not disclose her abuse at that time:

*"I tried ... there were many times I tried. I just couldn't ever. I always used to say to her, 'Mum, I've got something to tell you. I've got something really important to tell you' and then I just couldn't tell her."*<sup>30</sup>

Stewart was arrested in 1994 and subsequently convicted when another victim reported to the police that he had abused her. During the investigation, the police found references to PR-A5 in his diaries and papers.<sup>31</sup>

In January 1995, Stewart 'disassociated' himself as a Jehovah's Witness (ie he chose to leave the organisation).<sup>32</sup> PR-A5 felt unable to tell her mother of the abuse and, unaware of the full facts, PR-A5's mother wrote a character reference in support of Stewart for his trial in 1994.<sup>33</sup>

Shortly before Stewart's release from prison, PR-A5 found out about his release. It affected her badly and, in 2000, she told her mother about the abuse.<sup>34</sup> Her mother wrote to Stewart, who replied admitting his abuse of PR-A5 and apologising for the hurt and damage he had

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<sup>26</sup> CJW000052\_004

<sup>27</sup> PR-A5 10 August 2020 21/9-22/15

<sup>28</sup> PR-A5 10 August 2020 22/20-23/1

<sup>29</sup> INQ005151\_004; PR-A5 10 August 2020 23/7-23

<sup>30</sup> PR-A5 10 August 2020 24/11-15

<sup>31</sup> INQ005151\_004

<sup>32</sup> JLE000032\_017-018 para 88

<sup>33</sup> JLE000032\_006 para 25

<sup>34</sup> JLE000032\_006 para 26



caused.<sup>35</sup> Upon receipt of the letter, PR-A5's mother contacted an elder of the congregation and also went to the police.<sup>36</sup> In May 2001, PR-A5 was interviewed by the police. When the police went thereafter to see Stewart about the allegation, they discovered he had died.<sup>37</sup>

PR-A5 commenced a civil claim against the Jehovah's Witnesses in 2013.<sup>38</sup> The claim was defended by the Jehovah's Witnesses. PR-A5's claim was upheld by the judge at trial.<sup>39</sup> In the course of the civil claim, PR-A5 discovered that, around the time at which Stewart had been abusing her, he had admitted to the Jehovah's Witnesses that he had abused another child in the congregation.<sup>40</sup>

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<sup>35</sup> JLE000032\_006 para 26

<sup>36</sup> JLE000032\_006 para 26

<sup>37</sup> JLE000032\_006 para 26

<sup>38</sup> INQ005151\_004

<sup>39</sup> JLE000032\_023 para 125

<sup>40</sup> PR-A5 10 August 2020 37/1-9

Part A

# Introduction

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# Introduction

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## A.1: The background to the investigation

1. Religious organisations play a central role in the lives of millions of children in England and Wales. The Charity Commission estimates that there are over 34,000 registered faith-based organisations, although it cannot break them down into the services provided.<sup>41</sup> Religious activities, and social and cultural activities related to religion or that take place in a religious setting, often form a large part of children's time outside full-time schooling.
2. Since the 2008 global financial crisis and the subsequent prioritisation of statutory services by local authorities, there has been a significant move away from youth services – educational, social, play, sporting, cultural or leisure provision for those under 18 years old – being provided by the state. The vast majority of this provision is now provided by voluntary organisations or charities.<sup>42</sup> A significant amount is provided by religious organisations – from religious classes to summer camps, from football coaching to language classes. Despite this, there has been little research into how religious organisations and settings manage and run this provision, and little focus on how they keep children safe.<sup>43</sup>
3. The Independent Inquiry into Child Sexual Abuse (the Inquiry) conducted two detailed investigations into child sexual abuse within the Anglican Church and the Roman Catholic Church.<sup>44</sup> Although these remain the two largest religious organisations that individuals in England and Wales attend, participate in or belong to, there are many other faiths with which a significant proportion of the population identify. It was therefore important that we consider child protection arrangements in a wide range of religious organisations and belief settings.
4. Evidence was obtained from a number of religious organisations in England and Wales about the activities they undertake with children, and their child protection arrangements. Each religious organisation that provided evidence to the Inquiry stressed its dedication to stamping out child sexual abuse, and categorically said that its religion does not tolerate it. This investigation did not examine the beliefs of any faith or organisation. It examined organisations' statements of intent about the protection of children and to what extent they were reflected in their policies and practices. As a result of this investigation, a number of religious organisations have told us that they have altered, improved or recognised the need for policies and procedures in respect of child sexual abuse.

## A.2: Religion in England and Wales

5. This investigation obtained evidence from 38 religious organisations with a presence in England and Wales, including interfaith groups, umbrella bodies and representative organisations. This included, but was not limited to, the following faiths:

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<sup>41</sup> CYC000440\_007

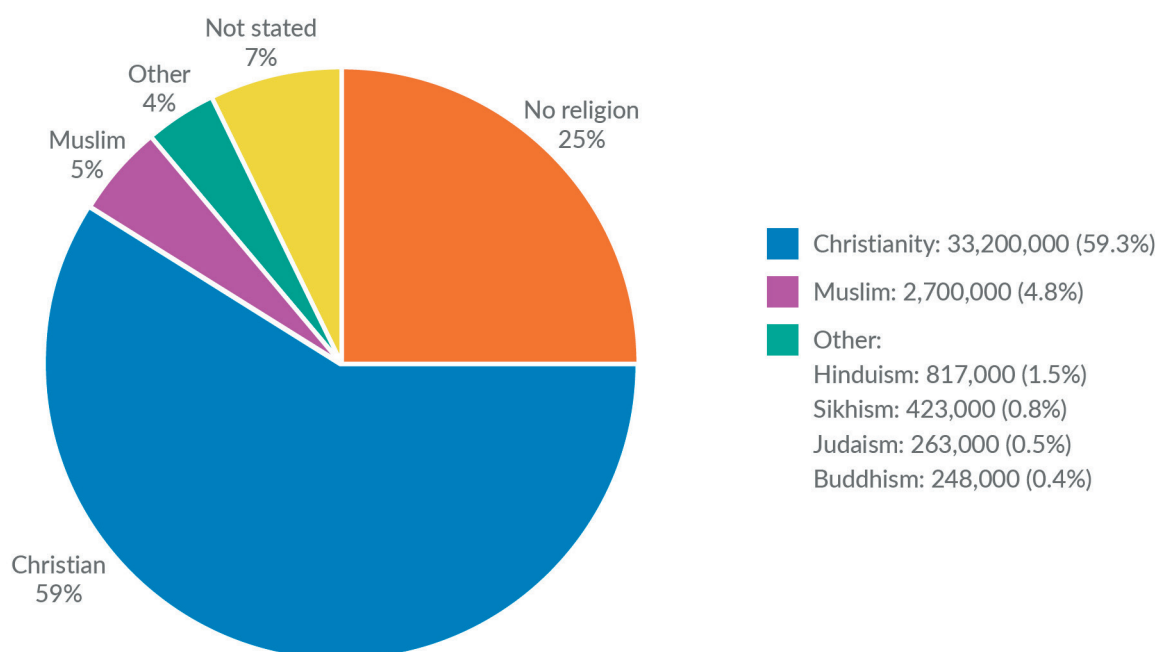
<sup>42</sup> Keith Brown 22 May 2020 36/7-17

<sup>43</sup> Keith Brown 22 May 2020 38/15-40/1

<sup>44</sup> For further details, see the Inquiry's *The Anglican Church Investigation Report* and *The Roman Catholic Church Investigation Report*.

- Buddhism;
- Hinduism;
- Islam;
- Judaism;
- new religious movements, such as Scientology and The Church of Jesus Christ of Latter-day Saints;
- non-conformist Christian denominations;
- non-trinitarian Christian organisations;
- Paganism; and
- Sikhism.

6. The Inquiry sought evidence from individuals and organisations that represented the majority of those with a religious affiliation within England and Wales.



*Religious affiliation as percentage of population, England and Wales, 2011*

Source: UK census, 2011 (<https://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/religion/articles/religioninenglandandwales2011/2012-12-11>)

7. There is no central list, register or authoritative source of information concerning religious organisations and settings that may be working with children in England and Wales. The Inquiry therefore approached organisations such as the Interfaith Council for Wales, the Inter Faith Network for the UK, the Board of Deputies of British Jews, and Churches Together in Britain and Ireland, and conducted open source research.<sup>45</sup> Even when organisations were identified, there were often no up-to-date contact details for or information about the person responsible for child protection. Forty-eight requests for information about work with children and child protection practices were sent to religious organisations and religious umbrella bodies or representative organisations, but the Inquiry

<sup>45</sup> ICW000001; IFN000001; CTB000002

experienced difficulties obtaining any response from some. In total, ten organisations did not reply to our requests for information, and two responded that they did not undertake any work with children.

**8.** In addition to diversity in the size and character of religious organisations, there is a wide range of ways in which those who practise communal religious worship structure their organisations and govern themselves.

**8.1.** Some organisations (such as the Jehovah’s Witnesses) operate a hierarchical structure, with directions and guidance coming from a headquarters or central body.<sup>46</sup> Others have no leaders of their faith group and little or no management or oversight structure (for example, the Pagan Federation).<sup>47</sup>

**8.2.** Some religions or belief traditions have a central body that provides national support, guidance and, in some (but not all) cases, leadership, but each individual congregation is a separate independent organisation in its own right. There is no ‘direction’ by the central body or power over the individual congregation by any national or central body.<sup>48</sup>

**8.3.** In many cases, religious organisations and settings are entirely autonomous. For example, all mosques and Hindu temples operate as separate organisations without direction from any central religious authority. Likewise, while synagogues may be part of a larger grouping, they are all separate organisations, without an express religious hierarchy.

**8.4.** Some religious organisations are also members of umbrella bodies or representative organisations (such as the Evangelical Alliance or the Muslim Council of Britain). Membership of such groups is voluntary. These organisations join together to provide information, guidance and support relating to their organisation and faith, but they do not necessarily represent the entirety of the faith group, and cannot direct or control member organisations.<sup>49</sup>

**9.** Religious organisations provide education and other services to millions of English and Welsh children each year.

**9.1.** A number of religious organisations operate full-time schools, whether funded by the state or independently. These full-time schools, registered with the Department for Education, did not fall within the scope of this investigation. We did however hear evidence about a small number of organisations that provide full-time religious education for children of school age, which currently do not need to be registered as schools.<sup>50</sup>

**9.2.** Religious organisations organise and provide a significant amount of the ‘supplementary schooling’ that takes place in England and Wales. This is education out of school hours, which can offer support in languages, religious studies, cultural studies as well as national curriculum subjects.<sup>51</sup> Data are not collected on a consistent basis about these organisations and settings. The Office for Standards in Education,

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<sup>46</sup> CJW000052

<sup>47</sup> PGF000002

<sup>48</sup> BUG000001; QUA000001; MNB000001

<sup>49</sup> For example, see MNB000001\_002; Jehudah Baumgarten 12 August 2020 88/20-89/5; EVA000001\_002

<sup>50</sup> OFS012297\_010-011; HAC000015\_018; DFE002833\_009-010

<sup>51</sup> OFS012404\_013-014

Children's Services and Skills (Ofsted) estimates that there are at least 5,000 such schools, teaching a total of around 250,000 children.<sup>52</sup> For example, we heard from the Green Lane Masjid and Community Centre, and the Islamic Cultural Centre Trust and London Central Mosque, both of which provide religious and language studies for around 400 children each week.<sup>53</sup> Bradford Council, which has connections with supplementary schools in its area, told us that – as at January 2018 – there were 130 supplementary schools registered with the local safeguarding children partnership. These range from madrasahs to Polish, Ukrainian, Sudanese, Arabic, Chinese, Sikh and Hindu supplementary schools, and cater for around 10,000 students in the Bradford area.<sup>54</sup>

**9.3.** More generally, places of collective worship are often the hub of community life and activity, for children as well as adults. Such places often offer religious or spiritual communal worship or spiritual guidance, but also community services, advice, social spaces, language classes, meals and even places where businesses or social enterprises can meet and develop. Many also provide after-school or holiday care for children.<sup>55</sup>

**9.4.** In addition to these more formalised group arrangements, some parents pay individuals to teach their children about their faith. These individuals may or may not have formal religious or secular education training or qualifications. Teaching may take place in the child's own home, in the home of the teacher or in the home of a third party.<sup>56</sup>

**9.5.** Our investigation did not seek to examine education provided by parents to their children in place of full-time schooling (sometimes known as 'home tuition' or 'home education'). According to the Department for Education and Ofsted, as well as local authorities, a significant group of parents choose this option in order to be able to provide a curriculum congruent with their religious beliefs and values.<sup>57</sup>

**9.6.** Leaders in religious organisations are important figures of authority and influence within those organisations and their wider community. Children are often taught to respect and even revere them. While many of these leaders will have received theological training, others will be members of the laity who have been asked to assume a leadership role.

Within each of these contexts, as in their secular equivalents, there exists a risk that children may be subject to sexual or other forms of abuse. Appropriate child protection measures reduce this risk and this is the focus of the Inquiry.

**10.** Victims and survivors, and the groups who represent and support them, told us that many children or adult survivors find it difficult to disclose their abuse within religious organisations and settings. There is a fear of being disbelieved, as well as a fear of being excluded or ostracised within their community.

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<sup>52</sup> OFS012404\_008-010

<sup>53</sup> Ahmad Al-Dubyan 13 May 2020 102/19-24; Kamran Hussain 13 May 2020 82/15-17

<sup>54</sup> BFC000088\_010

<sup>55</sup> See, for example, Harmeet Gill 15 May 2020 115/11-118/4

<sup>56</sup> MWN000001\_005

<sup>57</sup> Amanda Spielman 21 May 2020 81/15-82/6; Kate Dixon 13 August 2020 124/18-23; LBT004244\_005

### A.3: Freedom of religion in England and Wales

**11.** The respect of a range of religions or beliefs is seen as a hallmark of a liberal democracy such as that of the United Kingdom. Under Article 9 of the European Convention on Human Rights (enshrined in the law of England and Wales by the Human Rights Act 1998), everyone has the right to freedom of thought, conscience and religion. There is also the right under Article 9 to manifest one's religion or belief in worship, teaching, practice and observance. This is a 'qualified' right, in that a state may limit it if necessary "*in a democratic society in the interests of public safety, for the protection of public order, health or morals, or for the protection of the rights and freedoms of others*".<sup>58</sup>

**12.** Religious bodies and organisations, however, remain fully subject to general law and it is axiomatic that neither the freedom of religion or belief, nor the rights of parents with regard to the education of their children, can ever justify the ill-treatment of children or prevent governmental authorities from taking measures necessary to protect children from harm.

### A.4: Methodology

**13.** Given its thematic nature, this investigation considered whether there are common issues that apply to religious organisations and settings, and how these issues can be met and overcome. To do this, we examined a number of issues, including:

- the management of child protection within religious organisations and settings, including training and the awareness of child sexual abuse among volunteers, religious leaders and those who participate in religious organisations;
- any policies and procedures that exist within the organisation or any umbrella bodies or representative organisations;
- how the organisation or setting recruits or identifies those who provide activities for children (whether paid or unpaid), and how they recruit religious leaders. This included whether or not they use vetting and barring checks provided by the Disclosure and Barring Service, which includes examination of who can obtain such checks as some checks are only available to those engaged in 'regulated activity';<sup>59</sup>
- arrangements in place to respond to allegations of child sexual abuse, including the provision or absence of pastoral support;
- any internal processes for the auditing, inspection or oversight of practices and procedures;
- the existing statutory framework for the protection of children from sexual abuse, and its application to religious organisations or settings; and
- the existing framework for the auditing, inspection or oversight of practices and procedures of bodies other than the religious organisation itself.<sup>60</sup>

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<sup>58</sup> Article 9, European Convention on Human Rights

<sup>59</sup> As defined under the Safeguarding Vulnerable Groups Act 2006, as amended.

<sup>60</sup> Child protection in religious organisations and settings: scope of investigation

**14.** The process adopted by the Inquiry is set out in Annex 1 to this report. Core participant status was granted under Rule 5 of the Inquiry Rules 2006 to 24 institutions and other interested parties. The Inquiry held two preliminary hearings on 23 July 2019 and 14 January 2020. Substantive public hearings were held over 16 days on 16 March 2020, 11 to 22 May 2020 and 10 to 14 August 2020.<sup>61</sup>

**15.** In preparation for the final public hearing, the Inquiry obtained a significant volume of evidence, which included the evidence of 45 victims and survivors, 14 organisations that work with complainants, victims and survivors, 9 local authorities, and 10 organisations that are part of central government. We also received evidence from 20 religious organisations and settings, 18 umbrella bodies and representative organisations representing religious organisations and settings, 6 organisations that provide training and support to religious organisations and settings on their child protection practices and 3 interfaith organisations.

## A.5: Terminology

**16.** In this report, we use the following key terms:

- ‘Religious organisation or setting’, which includes:
  - places where people gather to bear witness or share collectively in their religious faith (eg mosques, temples, festivals and group prayers);
  - places of tuition regarding faith, tradition or cultural matters related to religious observance or faith, such as preparation for rites of passage (eg Jewish yeshivas and chadarim, Muslim madrasahs, Christian Sunday schools) or where the religious organisation provides supplementary tuition for children as part of its provision for the religious community; and
  - places where children and young people gather in social or leisure settings organised by a religious body, or where children are part of a particular religious organisation or community (eg youth groups, camps, sports clubs).<sup>62</sup>
- ‘Child protection’ rather than ‘safeguarding’, to reflect our focus on how to minimise the risks of potential abusers gaining access to children, and how organisations actively take steps to promote good practice in keeping children safe from harm. It also recognises that ‘safeguarding’ has attracted some negative associations because of its use in fields such as counter-extremism.
- ‘Complainants’, to refer to those who have made allegations of child sexual abuse and those allegations have not been proven by way of criminal conviction, civil findings or findings in the context of disciplinary proceedings.
- ‘Victims and survivors’, to refer to those who have made allegations of child sexual abuse and those allegations have been proven by way of criminal conviction, civil findings or findings in the context of disciplinary proceedings.

**17.** A full glossary of terms used in this report has been included in Annex 2.

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<sup>61</sup> The public hearing planned for 16 to 27 March 2020 was suspended after one day due to government advice on the COVID-19 pandemic.

<sup>62</sup> The Inquiry has not examined teaching that takes place in full-time schools run by religious organisations (whether funded by the state or independently, tuition provided at home by parents pursuant to section 7 of the [Education Act 1996](#)), or voluntary youth provision that may take place in a religious setting but is not connected to it (ie youth groups using religious buildings but not associated with that religion).



## A.6: References

**18.** References in the footnotes of the report such as 'OFS012404' are to documents that have been adduced in evidence or published on the Inquiry website. A reference such as 'Dixon 13 August 2020 132/10-135/2' is to the witness, the date he or she gave evidence and the page and line reference within the relevant transcript (available on the Inquiry website).

## Part B

# Child sexual abuse in religious organisations and settings

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# Child sexual abuse in religious organisations and settings

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## B.1: Overview

1. Child sexual abuse affects all parts of our society. According to the Office for National Statistics, an estimated 3.1 million adults in the UK experienced sexual abuse before the age of 16.<sup>63</sup> Evidence submitted to the Inquiry from victims and survivors, and the organisations that support them, has been clear that child sexual abuse occurs within religious organisations and settings.

2. Reliable evidence about the scale or prevalence of the abuse within religious organisations and settings has been difficult to obtain.

**2.1.** The Inquiry's Truth Project published a thematic report in May 2019, *Child sexual abuse in the context of religious institutions*. This was based on the experiences of 1,697 participants who stated that they were sexually abused in religious contexts between the 1940s and 2010s. Of these participants, 11 percent (183 individuals) said that they had been sexually abused as children in religious institutions, or by religious leaders or staff related to a religious organisation elsewhere.<sup>64</sup> While the majority of those who provided accounts were from an Anglican or Catholic background, there were also individuals from other faith communities.

**2.2.** Mr Phillip Noyes, Chief Advisor on Child Protection at the National Society for the Prevention of Cruelty to Children (NSPCC), told us that between April 2015 and March 2019 Childline provided 39,238 counselling sessions to children in which child sexual abuse was mentioned. Of those, 51 counselling sessions (0.13 percent) involved abuse in a religious setting.<sup>65</sup>

3. Any figures collected to demonstrate the scale and prevalence of child sexual abuse are likely to be a significant underestimate. As discussed in Part C, the barriers to reporting child sexual abuse within religious organisations and settings are numerous, varied and powerful. Those barriers are both organisational and cultural. We also heard specific evidence about distrust between some victims and survivors in religious communities, or some religious organisations on the one hand and the statutory authorities on the other. Work carried out in the Church of England suggests that those who are religious believers find it difficult to contemplate that fellow members of a congregation or religious leaders could perpetrate abuse.<sup>66</sup> This can lead to victims being belittled, ignored or blamed, which may in turn make disclosures of abuse less likely.<sup>67</sup>

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<sup>63</sup> *Child abuse in England and Wales: March 2020*, Office for National Statistics.

<sup>64</sup> For further details, see the Inquiry Research Team's Truth Project Thematic Report *Child sexual abuse in the context of religious institutions*, May 2019.

<sup>65</sup> NSP000147\_017

<sup>66</sup> ANG000645

<sup>67</sup> Lisa Oakley 18 May 2020 18/19-19/12

## B.2: Prevalence

4. The National Police Chiefs' Council (NPCC), which represents the 43 Chief Officers' teams across England and Wales, explained that Home Office *Counting rules for recorded crime* require police forces to flag crime records where the Home Office determines that they have a particular public interest, including offences involving child sexual abuse. There is, however, no additional requirement to record whether the circumstances of the crime involved a religious organisation or setting.<sup>68</sup> As a result, there is no way of reliably knowing how many of the child sexual offences reported to police in England and Wales took place in, or were linked to, religious organisations and settings.

5. The only information that the NPCC was able to provide to the Inquiry about the prevalence of child sexual abuse in religious organisations and settings was from Operation Hydrant, which has collected data in relation to non-recent child sexual abuse cases since August 2014.<sup>69</sup> Analysis of the data from early 2015 to January 2020 indicates that:

- of all known institutions where offending had taken place, 11 percent (443 instances) were committed within a religious organisation or setting; and
- 10 percent of suspects (726 people) were employed by, or somehow linked to, a religious organisation or setting.<sup>70</sup>

(In this context, religious organisations or settings also include the Anglican and Catholic Churches.)

6. Guidance produced by the Department for Education, *Working Together to Safeguard Children 2018*, requires local authorities to have a designated officer to be involved in the management and oversight of allegations against people who work with children, including allegations of child sexual abuse.<sup>71</sup> Employers, school governors, trustees and voluntary organisations should therefore have clear policies relating to the investigation of allegations against people who work with children. The local authority's designated officer (LADO) should be informed within one working day of all allegations against people who work with children that come to an employer's attention or are made directly to the police.<sup>72</sup>

7. Not all local authorities retain data about those referrals in a way that allowed them to provide the number of referrals made to them that related to child sexual abuse in religious organisations and settings, and there is no requirement for them to retain these data. Of those that could provide some data to the investigation:

- Ms Penny Thompson, Independent Chair of Birmingham Safeguarding Children Partnership, told us that between April 2017 and March 2019 its LADO received 2,719 referrals. Of these, 25 related to concerns or allegations in relation to the sexual abuse of a child or children in a faith-based setting.<sup>73</sup>
- Ms Kersten England, Chief Executive of the Bradford Metropolitan District Council, said that 32 of the referrals to the LADO between 2007 and 2019 were flagged as 'sexual' and linked to religious organisations and settings.<sup>74</sup>

<sup>68</sup> NAP000007\_002-003; Home Office *Counting Rules for Recorded Crime*

<sup>69</sup> NAP000007\_004-005

<sup>70</sup> NAP000007\_004-005

<sup>71</sup> DFE002815\_060

<sup>72</sup> DFE002815\_061

<sup>73</sup> BMC000047\_010-011

<sup>74</sup> BFC000088\_007; BFC000090

- Ms Jasvinder Sanghera, Independent Chair of the Leeds Safeguarding Children Partnership, confirmed that there were 105 notifications to the LADO between 2013 and 2019 that related to a religious organisation or setting, which accounted for 3 percent of all notifications over that period. The majority involving faith settings concerned physical chastisement, although 15 allegations related to sexual abuse.<sup>75</sup>

### B.3: Evidence of abuse

**8.** In order to understand the nature and effect of child sexual abuse in religious organisations and settings, this investigation obtained evidence from a number of victims and survivors. In addition, the Crown Prosecution Service provided evidence of a number of criminal prosecutions for child sexual abuse in religious organisations and settings. We set out some examples below.

**9.** PR-A1 was 13 years old at the time of his alleged abuse. In the 1970s, he met the alleged perpetrator through a youth group associated with an independent Christian church. PR-A1 alleged that he was sexually abused by a member of the congregation for a year and a half, in his own home and the homes of others. The alleged perpetrator would perform oral sex on PR-A1 and encouraged PR-A1 to perform oral sex on her. The abuse ended after the alleged perpetrator was called to a meeting in the church in which the elders “berated” her about “aspects of her behaviour”. No one at the church spoke to PR-A1 about the abuse or reported it to the police, and PR-A1 stopped attending the church.<sup>76</sup>

**10.** In the 1970s, Andrew Roy was a prominent figure in an evangelical organisation connected to the United Reformed Church. Roy organised and ran Sunday school activities, including camps and trips. PR-A3 was abused by Roy from the age of seven until he was 10 years old, in PR-A3’s home and at Sunday school camp. PR-A3 did not disclose the abuse as a child because Roy told him that, if he did, it would upset PR-A3’s father and no one in the church would believe him. In 2017, Roy was convicted at Sheffield Crown Court of four counts of indecent assault and sentenced to 12 months’ imprisonment.<sup>77</sup>

**11.** Mark Sewell was a ministerial servant in the Jehovah’s Witnesses, later becoming an elder.<sup>78</sup>

**11.1.** PR-A7 was abused by Sewell between the ages of 12 and 15. The abuse started with Sewell kissing PR-A7 with her mouth open and using his tongue. Sewell would sit PR-A7 on his lap, pull up her clothing and press his erect penis against her. On occasion, PR-A7 would stay at Sewell’s home. Sewell would get into bed with PR-A7 wearing only his underwear, and pull PR-A7 on to him. PR-A7 could feel Sewell’s erection. On one occasion Sewell forcibly removed PR-A7’s underwear. After the sexual abuse, Sewell would often say a prayer, during which PR-A7 was expected to sit quietly and join in with ‘Amen’.<sup>79</sup> On two occasions, when she was aged between 12 and 15, PR-A7’s parents approached Sewell with concerns about his behaviour towards their daughter

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<sup>75</sup> LEC000004\_009-010

<sup>76</sup> INQ005151\_001

<sup>77</sup> INQ005151\_002

<sup>78</sup> A ministerial servant is someone chosen by a regional elder (who has significant experience of being an elder) to assist the elders to run the congregation. Each separate congregation has a group of elders, who provide teaching, support and evangelisation to their congregation. Ministerial servants assist the elders, and are appointed because of their standing within the congregation and their ethics, integrity and leadership skills, in accordance with scripture.

<sup>79</sup> INQ005151\_005-006

– on both occasions, he told them that their daughter had “*misunderstood*”, as had they. They did not doubt his honesty because of his standing in the community. When PR-A7 was 16 years old, she disclosed her abuse to her parents, who reported it to the Jehovah’s Witnesses’ elders. Three elders attended PR-A7’s home and she had to report what happened without any supportive adult present. At a subsequent meeting in the Kingdom Hall, PR-A7 had to recount her abuse before her father, three elders, Sewell and Sewell’s wife. Sewell accused PR-A7 of lying and produced statements from young men of the congregation about whether PR-A7 had kissed anyone with her tongue. The elders contacted the Britain Branch Office of Jehovah’s Witnesses for advice. In response the Branch Office replied that:

*“the victim should consider going to the police or, if the victim did not want to, their parents should go to the police or the elders should search their consciences and consider whether they needed to go to the police.”*<sup>80</sup>

PR-A7’s father, who was a congregation elder at the time, reported the allegations to the police. The police declined to press charges. PR-A7’s father also wrote to the Bethel, the Branch Office of the Jehovah’s Witnesses in the UK, asking for assistance and reported the abuse by Sewell.<sup>81</sup> As a result, the regional elders became involved, and PR-A7 recounted her abuse to three further elders and a circuit overseer (in his car). A circuit overseer has spiritual responsibility for and provides guidance to a group of about 20 congregations. The circuit overseer is responsible for appointing elders and ministerial servants. PR-A7 was also interviewed by seven elders at a different Kingdom Hall. No further action was taken against Sewell.<sup>82</sup>

**11.2.** PR-A8 was also abused by Sewell. The abuse began when PR-A8 was 11 years old. Sewell began by kissing her on the lips and progressed to straddling her on a bed on the pretence that he was giving her a chiropractic massage. PR-A8 did not feel able to disclose her abuse. PR-A8 did not want to be labelled as ‘bad’ or ‘dirty’. PR-A8’s father alleged that he reported the abuse to the elders of the congregation but the elders who provided evidence in the case of *BXB v Trustees of the Barry Congregation* [2020] EWHC 156 (QB) say that no such allegation was made to them by PR-A8’s father about Sewell.<sup>83</sup>

Sewell was convicted in 2014 of child sexual offences and sentenced to 14 years’ imprisonment.

**12.** PR-A22, PR-A23, PR-A24 and PR-A25 were sexually abused by Mohammed Haji Saddique, a religious teacher who taught them the Qur’an at the Madina Mosque in Cardiff. The abuse occurred when they were aged approximately nine years old, between 1996 and 2001. All four reported that Saddique would touch their breasts and PR-A22 also reported that he touched her vagina. In 2017, Saddique was convicted and sentenced to nine years’ imprisonment.<sup>84</sup>

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<sup>80</sup> JWA000014\_022

<sup>81</sup> The Bethel is run by elders from the Jehovah’s Witnesses and has a department that provides advice and guidance to congregation elders.

<sup>82</sup> INQ005151\_005-006

<sup>83</sup> CJW000124\_003

<sup>84</sup> INQ005151\_013

**13.** The Inquiry heard evidence from Ms Sally Hirst of the Jesus Fellowship Survivors Association about the abuse suffered by the children who lived and grew up within communes run by the Jesus Fellowship Church.

**13.1.** The Jesus Fellowship Church was established in the early 1970s and, in 1986, broke away from the Baptist Union and Evangelical Alliance. It was likened to a cult due to its structure and “*extreme views, extreme teachings*”.<sup>85</sup> There were approximately 2,000 members nationwide, the majority of whom lived communally with property, money, clothes and possessions shared.<sup>86</sup> Life within the Jesus Fellowship Church was “*very insular and isolated from the outside world*” and days were “*very structured*”.<sup>87</sup> Though children attended school, “*Education wasn’t encouraged, particularly for girls*”.<sup>88</sup> Those living within the commune and mixing with children often had extreme mental health needs or were violent criminals.<sup>89</sup> Those who tried to leave the Jesus Fellowship Church were “*spoken ill of, cursed*”, and were “*prayed over very, very heavily by groups of men, rebuked in public, shouted at, screamed at*”.<sup>90</sup> Ms Hirst told us:

*“witnessing this as a child was highly traumatic and brought so much fear ... that, if you left, awful things would happen to you.”<sup>91</sup>*

**13.2.** Children experienced abuse that ranged from “*extreme sexual assault to grooming, real quite extreme physical violence and inappropriate relationships, peer-to-peer abuse as well*”.<sup>92</sup>

**13.3.** The allegations received by Northamptonshire Police included:

- an alleged perpetrator put his hands down a child’s trousers during a bike ride;
- a child was touched sexually while sitting on an alleged perpetrator’s lap;
- a child was abused in the bathroom of their home by a strange man while a religious gathering was held in the home;
- an alleged perpetrator put his hand up the skirt of a child while she was on a swing;
- an alleged perpetrator put his hands up the shorts of a nine-year-old boy and groped him while engaging in “*horseplay*”;
- a boy was anally raped between the ages of three and seven; and
- a 14-year-old girl was orally raped by an adult male.<sup>93</sup>

**13.4.** It was “*impossible*” for children to disclose abuse within the Church because “*they weren’t believed, nothing happened ... Or the abuser would have been spoken to, prayed over, possibly moved to another house with other children*”. It was seen as the children’s fault.<sup>94</sup>

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<sup>85</sup> Sally Hirst 19 May 2020 3/15-22; A cult is a social group defined by unusual or extreme religious, spiritual or philosophical beliefs or by its common interest in a particular personality, object or goal.

<sup>86</sup> Sally Hirst 19 May 2020 5/5-6

<sup>87</sup> Sally Hirst 19 May 2020 3/23-4/19

<sup>88</sup> Sally Hirst 19 May 2020 9/20-10/10

<sup>89</sup> Sally Hirst 19 May 2020 10/11-18

<sup>90</sup> Sally Hirst 19 May 2020 13/20-14/11

<sup>91</sup> Sally Hirst 19 May 2020 14/14-16

<sup>92</sup> Sally Hirst 19 May 2020 20/21-25

<sup>93</sup> NNP000029

<sup>94</sup> Sally Hirst 19 May 2020 32/14-22

Children in the Jesus Fellowship Church were “*taught to be very suspicious of outside organisations ... If people did question or raise concerns, this was seen as a threat to the church*”.<sup>95</sup>

**13.5.** In 2013, at the request of its insurers, the Jesus Fellowship Church publicly invited disclosures from anyone who had been abused or had witnessed abuse.<sup>96</sup> The disclosures were passed to Northamptonshire Police, which commenced Operation Lifeboat in 2014. Over six months, 11 suspects were arrested and seven were interviewed without arrest.<sup>97</sup> Seven suspects were tried for child sexual offences, which included buggery, indecent assault of a child and sexual assault. Six of those perpetrators were convicted of offences relating to 11 children.<sup>98</sup>

**13.6.** A further investigation by Northamptonshire Police remains ongoing into alleged failures within the Jesus Fellowship Church to protect vulnerable people under its care, including failures to report allegations of abuse.<sup>99</sup>

## B.4: Records kept by religious organisations and settings

### Records kept by religious denominations

**14.** Each religious organisation contacted as part of this investigation was asked to provide information about the number of allegations of child sexual abuse made to them over the 10-year period from 2009 to 2019. Some organisations were not able to provide us with figures because they did not collect any.

**15.** Other organisations were able to provide some data.

**15.1.** The Religious Society of Friends in Britain (Quakers) does not maintain records at a national level of the total number of allegations across local congregations.<sup>100</sup> There are 70 area meetings in Britain and, across a sample of six area meetings, there were a total of four allegations during this 10-year period.<sup>101</sup>

**15.2.** The Baptist Union of Great Britain is made up of approximately 1,945 Baptist churches in England and Wales.<sup>102</sup> At the time of the public hearing in May 2020 it did not collect or maintain records of the number of allegations made across its churches (unless allegations were made about accredited ministers that had then been referred up to regional or national teams).<sup>103</sup> It had plans in place to start gathering this information from the end of 2020 onwards.<sup>104</sup>

**15.3.** In 2018, the Salvation Army had around 20,000 members in England and Wales.<sup>105</sup> It does record the number of allegations made at a national level, and reported that 60 allegations had been made within the Salvation Army in the previous 10 years.<sup>106</sup>

<sup>95</sup> Sally Hirst 19 May 2020 15/9-13

<sup>96</sup> Sally Hirst 19 May 2020 17/22-18/22

<sup>97</sup> NNP000028\_001-003, 005

<sup>98</sup> NNP000028\_006

<sup>99</sup> NNP000028\_006

<sup>100</sup> QUA000001\_007

<sup>101</sup> QUA000001\_002; QUA000014\_002-003

<sup>102</sup> BUG000001\_001

<sup>103</sup> Rachel Stone 18 May 2020 128/18-129/11

<sup>104</sup> BUG000001\_017

<sup>105</sup> SVA000048\_002

<sup>106</sup> SVA000048\_013-014



**15.4.** The Jehovah’s Witnesses have more than 131,700 members in England and Wales.<sup>107</sup> Their records showed that allegations concerning 67 individuals were reported to their Branch Office within the previous 10 years. This included 25 allegations against elders, 32 allegations against ministerial servants and 10 people accused of abuse within an institutional context (such as abuse at a place of worship by a congregant or non-Jehovah’s Witness).<sup>108</sup>

**15.5.** The Guru Nanak Gurdwara in Smethwick receives approximately 1,000 visitors per day.<sup>109</sup> Its records showed only one allegation in the previous 10 years.<sup>110</sup>

**15.6.** Liberal Judaism has 40 member synagogues and communities across the UK and Europe, with roughly 10,000 members.<sup>111</sup> It recorded five allegations within the previous 10 years.<sup>112</sup>

**15.7.** The United Synagogue has 56 member synagogues, with a total membership of 38,599. It recorded 15 allegations within the previous 10 years.<sup>113</sup>

**15.8.** The Church of Jesus Christ of Latter-day Saints (Great Britain) has 157,457 members in England and Wales. There were 16 recorded allegations of child sexual abuse within the Church in the previous 10 years.<sup>114</sup>

**15.9.** The East London Mosque has a congregation of approximately 7,000 at any one time, with a typical weekly footfall of 32,000, and double that during Ramadan. It received no allegations of abuse in the previous 10 years.<sup>115</sup>

**15.10.** The Green Lane Masjid and Community Centre had an estimated 60,000 attendees in 2019, with approximately 2,000 people at Friday prayers. They had no recorded allegations of abuse.<sup>116</sup>

While the figures provided to the Inquiry by religious organisations and settings may reflect the known prevalence of child sexual abuse within such organisations, it is extremely unlikely that they reflect the full extent.

**16.** For example, Mr Shital Adatia (the President of the Shree Hindu Temple and Community Centre, the oldest Hindu temple in the Leicester area) told us that 300 or 400 people may attend the temple “*if it’s a quiet week*”.<sup>117</sup> He confirmed that there were no records of allegations having been made related to the Temple. However, Mr Adatia also accepted that there was, at the time of the hearing, no system in place in the Temple for recording disclosures, concerns or allegations of child sexual abuse, although the Temple had recently engaged consultants to assist them in this respect.<sup>118</sup> He confirmed that “*there haven’t necessarily been any systemic records*” and, if there had been an allegation, it may not have been written down.<sup>119</sup> This illustrates the danger in assuming that an absence of recorded allegations is evidence of an absence of abuse.

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<sup>107</sup> CJW000052\_002

<sup>108</sup> CJW000052\_023

<sup>109</sup> GNG000001\_002

<sup>110</sup> GNG000001\_007-008

<sup>111</sup> LIJ000002\_001

<sup>112</sup> LIJ000019

<sup>113</sup> UNS000001\_011, 030-036

<sup>114</sup> CJC000001\_001; 004

<sup>115</sup> ELM000020\_001-002

<sup>116</sup> GLM000001\_001; 003

<sup>117</sup> Shital Adatia 12 May 2020 35/15-36/17

<sup>118</sup> Shital Adatia 12 May 2020 42/11-43/13

<sup>119</sup> Shital Adatia 12 May 2020 42/11-43/13

## Records kept by umbrella bodies and representative organisations

**17.** Many religious organisations and settings are members of an umbrella body or a representative organisation, the purpose of which is not to regulate or govern their members but to provide assistance to them and to further their common objectives. The Inquiry contacted a number of umbrella bodies and representative organisations for assistance in understanding the scale of the allegations of child sexual abuse faced by their member organisations. However, this yielded little additional information. The Evangelical Alliance is a body that represents roughly two million evangelical Christians across the UK, including approximately 3,000 member churches.<sup>120</sup> The Muslim Council of Britain has over 500 affiliate members, including mosques, schools, charitable associations and professional networks.<sup>121</sup> The General Assembly of Unitarian and Free Christian Churches includes 161 independent chapels and 16 affiliated societies.<sup>122</sup> None of these organisations received details of allegations of child sexual abuse concerning their members.

**18.** The Mosques and Imams National Advisory Board (MINAB), which has 552 member mosques and imams, told the Inquiry that:

*“With a strong religious emphasis, sexual abuse is limited if not rare within the Muslim community.”*<sup>123</sup>

When pressed, Mr Moin Azmi, Vice Chair of MINAB, explained that this was based on the fact that MINAB had not been involved in any child sexual abuse cases within its members and none had been reported to it as an institution.<sup>124</sup> MINAB does not, however, require its members to report allegations of abuse to it, and it may be that this is not reported but dealt with internally.<sup>125</sup> Nonetheless, Mr Azmi was confident that if child sexual abuse “was a rampant issue within the Muslim community, then it would have certainly been raised” with MINAB by its members.<sup>126</sup>

**19.** By contrast, evidence to this Inquiry from victims and survivors, and the Crown Prosecution Service, demonstrated that abuse does happen within the Muslim community. Mr Shaukat Warraich, Chief Executive Officer of Faith Associates (which advises faith organisations, in particular mosques and madrasahs, on good governance, including effective child protection), confirmed that Faith Associates is aware of child sexual abuse within mosques and madrasahs. He did not believe that abuse was any less common in mosques and madrasahs, and confirmed that there is still under-reporting of child sexual abuse in the Muslim community:

*“With sexual abuse, cases will come out in time, just as it has with other religious institutions, and my expectation is that more cases will come out over time in the Muslim community.”*<sup>127</sup>

<sup>120</sup> EVA000001\_002\_003

<sup>121</sup> MCB000001\_002

<sup>122</sup> GAU000001\_001

<sup>123</sup> MNB000001\_003

<sup>124</sup> MNB000001\_003

<sup>125</sup> Moin Azmi 13 May 2020 30/1-8; MNB000001\_003

<sup>126</sup> Moin Azmi 13 May 2020 31/20-22

<sup>127</sup> Shaukat Warraich 13 May 2020 35/1-17

**20.** The Muslim Women’s Network UK (MWNUK) told us that even its knowledge of child sexual abuse within the Muslim community “*is only the tip of the iceberg and the scale of the problem is hidden due to the silence of victims*”.<sup>128</sup> Ms Nazmin Akthar, Co-Chair of the Board of MWNUK, described the danger in assuming that the absence of allegations is evidence that there is no abuse:

*“This is a serious hindrance because it makes room for excuses, such as there not being a problem of child sexual abuse in their institution setting or even community and that therefore nothing else needs to be done.”*<sup>129</sup>

**21.** Ms Akthar’s concern would appear to be borne out by the evidence of Mr Azmi. MINAB has a limited budget and finite resources, and Mr Azmi explained that its work was led by its members’ needs. As a result, it focusses its work on the issues that it considers to be important to its members. In recent years, this focus has been on issues such as terrorism and domestic violence. Currently “*MINAB’s members and the body feels that sexual abuse is not a massive issue*” within the Muslim community.<sup>130</sup> Mr Azmi confirmed that MINAB is in the midst of a period of organisational change and is hoping to become more proactive in terms of taking the lead on the issue of child protection for its members.<sup>131</sup>

**22.** The Union of Orthodox Hebrew Congregations (UOHC) has over 100 synagogue members, which provide the places of worship for the majority of the 60,000 to 70,000 Charedi Jews living in England and Wales.<sup>132</sup> Rabbi Jehudah Baumgarten, on behalf of the UOHC, stated that:

*“Disclosures of Charedi child sexual abuse are thought to be lower in number than would be expected for the size of population ... Per capita, the number of referrals is lower than would be expected. We do not have the research/data to support this but have a high level of confidence that it is correct.*

*This may be explained in part by the prevailing environment and culture within the Charedi community. There are significant protective factors in the community that are likely to reduce the incidence of child abuse.”*<sup>133</sup>

He also said that there have been only four calls to the UOHC Child Protection Committee Advice Line that “*raised concerns of a serious nature*”.<sup>134</sup> The UOHC provided no details of any allegations of child sexual abuse in the previous 10 years.<sup>135</sup>

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<sup>128</sup> [MWN000001\\_004](#)

<sup>129</sup> [MWN000001\\_004](#)

<sup>130</sup> [Moin Azmi 13 May 2020 32/3-7](#)

<sup>131</sup> [Moin Azmi 13 May 2020 22/20-23/9](#)

<sup>132</sup> [OHC000001\\_003-004](#)

<sup>133</sup> [OHC000001\\_011](#)

<sup>134</sup> [OHC000001\\_017](#)

<sup>135</sup> [OHC000001\\_016-017](#)

**23.** This contrasts with information received by the Inquiry. For example, Shema Koli, a helpline for survivors of abuse in the Orthodox Jewish community, received some 800 calls from April 2013 to December 2019, with calls increasing “*in complexity and severity*”.<sup>136</sup> Similarly, Migdal Emunah (a charity established to provide support and assistance to victims and families of those affected by sexual abuse within the Jewish community) provides support for 50 families per year on average.<sup>137</sup> More of those who approach Migdal Emunah are from an Orthodox Jewish tradition.<sup>138</sup> It has been contacted by a “*significant number*” of people who “*have been sexually abused during religious sleep away camps, at boarding schools, on synagogue premises and in rabbis’ homes*”.<sup>139</sup> The majority of those had reported their abuse to their rabbi and/or their Beth Din.<sup>140</sup>

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<sup>136</sup> SKI000001\_002

<sup>137</sup> Yehudis Goldsobel 11 May 2020 21/23-25

<sup>138</sup> Yehudis Goldsobel 11 May 2020 22/20-25

<sup>139</sup> MIG000001\_003

<sup>140</sup> A Beth Din is a Jewish rabbinical court.



## Part C

# Barriers to reporting child sexual abuse in religious organisations

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# Barriers to reporting child sexual abuse in religious organisations

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## C.1: Introduction

1. In some areas of the country, children attend schools with high concentrations of individuals from the same religious background, even if they are not faith schools.<sup>141</sup> In many minority religious organisations, ties of kinship, community, business and religion overlap and interrelate, regardless of ethnicity. As Ms Pragna Patel, the founder of Southall Black Sisters (SBS), said:<sup>142</sup>

*“I mean, everybody knows that religion and culture are intertwined. Religion is always experienced within a cultural setting. When women come to us and talk about their experiences of abuse, they also talk about the cultural and religious pressures on them to remain silent, to not disclose, to go back and resolve it within the community because they need to maintain the honour of the family and the community and not to shame their family. So this idea that culture and religion can be separated, when, in fact, they’re closely intertwined and closely experienced as a lived experience, is something that is a bit of a red herring.”<sup>143</sup>*

2. As set out in Part B, child sexual abuse in religious organisations and settings appears to be under-reported, both internally within the organisations and externally to statutory agencies. The barriers that may inhibit reporting of child sexual abuse in religious organisations may be linked to the organisation itself or factors related to the community in which the organisation operates.

## C.2: Victim-blaming, shame and honour

3. Within some religious organisations and settings, victims are blamed for their abuse. This is particularly the case if they are women: community values may suggest that abuse must have taken place because of their own behaviour, attitudes or approaches. Ms Nazmin Akthar, Co-Chair of the Board of Muslim Women’s Network UK (MWNUK) told us that, in her experience, *“misogynistic attitudes play a factor in such dismissal; that is, blaming the victim for not behaving or dressing a certain way”*.<sup>144</sup>

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<sup>141</sup> SBS000003\_113

<sup>142</sup> SBS was established in 1979 as an organisation to advise on and advocate for the needs of black and minority women. It has been operating frontline services for 40 years, providing advice, advocacy and support to women who need assistance; Pragna Patel 15 May 2020 4/25-7/7

<sup>143</sup> Pragna Patel 15 May 2020 56/22-57/9

<sup>144</sup> Nazmin Akthar 13 August 2020 4/20-5/12; MWN000001\_007-008

4. PR-A5 said that she experienced that blame. She was told by those within the Jehovah's Witnesses that her clothes were too provocative and "worldly". This was denied by the elder who was said to have made this comment.<sup>145</sup> PR-A5 told us:

*"Most exchanges I had, when I was being counselled, involved them having a good go at me about my clothing and making me feel that I was – I couldn't say what I felt like. It was incredibly demeaning."*<sup>146</sup>

5. Ms Patel told us of some of the experiences of those in South Asian communities, with whom SBS has worked:

*"we have seen the way in which women are blamed, young girls are blamed every time they disclose: they must have done something wrong; it's the way they have dressed; it's the way they have looked upon a man or a young person or another person. So this kind of constant blaming, constant attribution of blame, on women is also a way of policing and safeguarding their sexuality."*<sup>147</sup>

6. As a result of the way in which some communities respond to victims and survivors, many begin to internalise those views, to feel ashamed and to believe that their abuse was in some way their fault. Ms Natasha Rattu, Executive Director of Karma Nirvana (a charitable organisation that supports victims of honour-based abuse and forced marriage), suggested that the shame and stigma is "absolutely massive".<sup>148</sup> This was not limited to any specific religious organisation but seen in examples from Christian, Hindu, Sikh, Muslim and Jewish religious organisations. Ms Patel referred to cultures "shrouded in secrecy, shame and denial", which made it "very, very difficult to talk about issues of sexuality and sexual abuse".<sup>149</sup>

7. In some communities, the relationship between ideas of sexual 'purity' and social and familial standing are likely to make abuse markedly harder to report.<sup>150</sup> The imperative not to speak is bound up with notions of honour, with consequences for an individual's ability to marry, for their family and for the 'honour' of their community. In extreme cases, being seen as dishonourable can lead to violence against that individual or their family.<sup>151</sup>

8. Within a close-knit community based, at least in part, on shared religious beliefs – where ties of kinship, friendship, employment and social life may be enmeshed with each other – it may be difficult to keep disclosures of such abuse private.<sup>152</sup> In such communities, the concern that disclosures will not be kept confidential, and therefore may lead to public shame for the victim or survivor, can act as a significant barrier to disclosure.<sup>153</sup>

9. PR-A2 alleged that she was abused while attending a madrasah attached to her local mosque. When she disclosed her abuse to an imam, he discouraged her from reporting the abuse because of the dishonour and shame this would cause to her and to the community.<sup>154</sup>

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<sup>145</sup> CJW000125\_003-004

<sup>146</sup> PR-A5 10 August 2020 29/23-30/15

<sup>147</sup> Pragna Patel 15 May 2020 32/6-25

<sup>148</sup> Natasha Rattu 15 May 2020 28/9-16; KAN000012

<sup>149</sup> Pragna Patel 15 May 2020 31/5-9

<sup>150</sup> SBS000001\_006; MIG000001\_003

<sup>151</sup> SBS000001\_013; Natasha Rattu 15 May 2020 11/5-25; Nazmin Akthar 13 August 2020 46/9-47/6

<sup>152</sup> SBS000001\_005; Sadia Hameed 15 May 2020 27/14-24; Yehudis Goldsobel 11 May 2020 67/10-21

<sup>153</sup> Sadia Hameed 15 May 2020 27/14-24

<sup>154</sup> INQ005151\_001-002



PR-A4 also said that she was abused at a madrasah that was set up as a ‘house mosque’. When she reported her abuse, she suffered harassment from others within her local community. She was called a “dirty tart” and a “slag”.<sup>155</sup>

### C.3: Approaches to discussions of sex, sexuality and sexual abuse

**10.** Within some religious traditions and communities, matters relating to sex are not discussed openly. Those representing a large mosque in Birmingham stated that it had a “conservative” community and this would affect the information that they would give people about sexual abuse, sex and sexuality.<sup>156</sup> Similarly, Mr Shital Adatia, President of the Shree Hindu Temple and Community Centre, told us that “anything to have the word ‘sexual’ in it is a taboo within the Asian community”.<sup>157</sup>

**11.** The absence of open discussion on matters related to sex can make those subject to abuse feel unable to report it. Ms Yehudis Goldsobel, Chief Executive of Migdal Emunah, told us that most Charedi children would know nothing about sex or sexual relationships, nor would they have the vocabulary to describe sexual organs.

*“They most certainly don’t know the correct terminology. They wouldn’t call it a penis and a vagina, they would call it private parts or some other sort of name that the family have come up with. There’s no lessons, there’s no sex ed, there’s no – biology pages in the majority of the Charedi schools were superglued or stuck together for those sort of lessons, so to speak.”<sup>158</sup>*

**12.** In certain languages, there are no words for rape or sexual abuse, or for sexual organs.<sup>159</sup> Clearly, this can make disclosure difficult from a practical perspective. Ms Vanajah Srinivasan, Director of Abuse Never Becomes Us UK (an organisation that aims to “provide healing and empowerment through holistic support, resources and advocacy on behalf of Tamil people impacted by childhood sexual abuse”), told us that her organisation had “recently put together actual text to describe what [child sexual abuse] is, since there is no actual terminology in the Tamil language”.<sup>160</sup> SBS also told us of an absence of language for many acts of sexual violence in some South Asian languages.<sup>161</sup>

### C.4: The use of religious texts and beliefs

**13.** For many, religious beliefs are strongly held and deeply ingrained. Abusers have been known to take advantage of a victim’s faith in order to facilitate their abuse, and to ensure their silence.

**14.** The National Society for the Prevention of Cruelty to Children (NSPCC) analysed serious case reviews involving religious organisations and settings, and undertook work in 2017 in relation to Hindu and Buddhist communities. It identified that the use of religious texts and teaching affected attitudes and behaviours in safeguarding children.<sup>162</sup>

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<sup>155</sup> INQ005151\_003

<sup>156</sup> Kamran Hussain 13 May 2020 134/16-22

<sup>157</sup> Shital Adatia 12 May 2020 60/3-14

<sup>158</sup> Yehudis Goldsobel 11 May 2020 28/20-29/13

<sup>159</sup> Pragna Patel 15 May 2020 31/5-18

<sup>160</sup> ANB000001\_001-002

<sup>161</sup> Pragna Patel 15 May 2020 31/5-33/4

<sup>162</sup> NSP000147\_021

**15.** Dr Lisa Oakley, Chair of the National Working Group on Child Abuse Linked to Faith and Belief, told us that the “*use of sacred texts to control and coerce, to silence and to prevent disclosure are common*” in her experience.<sup>163</sup> Dr Oakley told us about a victim who experienced systematic physical and sexual abuse involving multiple rapes from a number of different men.<sup>164</sup> The victim said:

*“All of the sexual abuse that I experienced was linked to spiritual abuse or religious abuse. Religious scriptures were used as tools of control to force me to conform to their will. I was not allowed to question these religious beliefs. They used their religious ‘moral authority’ ... to control me through use of scripture”.*<sup>165</sup>

**16.** MWNUK published a report in 2013 entitled *Unheard Voices*.<sup>166</sup> This included an account of a young woman who was abused by her Qur’anic teacher and by her father. The teacher used verses of the Qur’an to justify his abuse and that of her father.<sup>167</sup>

**17.** SBS worked with a victim who had been abused by a *baba* – a Sikh holy man – who was engaged by a family when the teenage girl became unwell. He would massage her abdomen alongside providing her with advice on her spiritual life, and support that she viewed as paternal. She went to his house one day and he told her that Guru Nanak (the first Guru and founder of Sikhism) had come to him in his dreams and that her health problems would still go away. He gave her some holy water and then said that he would massage her stomach to help the holy water take effect. He then began touching her breasts and put his hands in her underwear, reciting a term of reverence in Sikhism the whole time.<sup>168</sup>

**18.** John Wilson, a pastor at Keighley Pentecostal Church who was convicted of child sexual offences in 2017, also claimed to be carrying out ‘deliverances’ or internal ministries.<sup>169</sup> While this is a recognised ministry in the Assemblies of God (the Pentecostal denomination with which the Keighley Pentecostal Church was associated), it should not involve the removal of clothing or any intimate touching of body parts, with or without consent.<sup>170</sup>

**19.** The Inquiry received evidence that belief in spirit possession, witchcraft and folk religion may be used to facilitate or justify abusive behaviours. For example, MWNUK received a call to their helpline from a woman who, when she disclosed sexual abuse as an adult, was told that she had “*black magic*” done to her.<sup>171</sup> SBS provided an example of someone who was told, in order to get rid of demons telling her to love other women, to have sex with a man while an imam watched. In SBS’s experience, some faith healers, or those who seek to exorcise spirits by way of religious healing, insist that such healing is carried out alone to isolate the victim and then exploit the relationship of trust.<sup>172</sup>

**20.** There is a governmental national action plan, on which the Department for Education is taking the lead, to tackle child abuse linked to faith and belief, which provides information about child abuse linked to belief in spirit possession, demons or the devil, the ‘evil eye’, *djinn*s (in the Islamic faith context), *dakinis* (in the Hindu context), and rituals related to magic

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<sup>163</sup> [LOY000001\\_003](#)

<sup>164</sup> [LOY000001\\_004-005](#)

<sup>165</sup> [LOY000001\\_005](#)

<sup>166</sup> [MWN000001\\_006](#); [MWN000008](#)

<sup>167</sup> [MWN000001\\_006](#)

<sup>168</sup> [SBS000001\\_028-029](#)

<sup>169</sup> [CPS004865\\_011-013](#)

<sup>170</sup> [INQ005151\\_013-014](#)

<sup>171</sup> [MWN000001\\_006-007](#)

<sup>172</sup> [SBS000001\\_028](#)

and witchcraft. Such beliefs are not confined to one faith, nationality or ethnic community. There are examples recorded in Christian, Muslim, Hindu and Pagan faiths, among others. While only a small minority of those who hold such beliefs go on to abuse children, such abuse is seen as being under-reported.<sup>173</sup> There is relatively little known about the nature, scale and frequency of this type of abuse.<sup>174</sup>

**21.** Part of the action plan to tackle this abuse is to understand the nature of such risks, and to build strong relations with faith leaders to try to be part of the solution.<sup>175</sup> Research undertaken in March 2017 by Dr Oakley and Mr Justin Humphreys, Chief Executive Officer (Safeguarding) at thirtyone:eight, along with the Victoria Climbié Foundation, explored the understanding within statutory bodies of the terminology associated with child abuse linked to faith and belief, and examined whether such bodies knew how to identify and manage allegations.<sup>176</sup> This research identified that the majority of those working in a variety of statutory agencies did not know about the national action plan, and that they had received limited training in these issues.<sup>177</sup>

**22.** Both thirtyone:eight and Africans Unite Against Child Abuse have offered to assist African churches by providing awareness training for church leaders and parents, and to provide good practice guidelines.<sup>178</sup> Between 2007 and 2011, thirtyone:eight (then known as the Churches' Child Protection Advisory Service) trained over 4,000 African church leaders in safeguarding.<sup>179</sup>

## C.5: Abuse of power by religious leaders

**23.** Religious leaders in all faiths have significant power. Children are often taught to show deference and respect to religious figures and, as explained by Ms Patel, “to regard them as innately trustworthy, authoritative, moral, and innately deserving of their status as spiritual and moral leaders”.<sup>180</sup> Both parents and children defer to religious leaders, and may be disempowered from asking questions of or criticising them.

**24.** In 2002, Churches Together in Britain and Ireland published a report entitled *Time For Action*, which examined the response of various Christian denominations to those who had been subject to sexual abuse. Among other things, it noted:

*“Fundamentally, sexual harassment and abuse is a serious misuse of power and authority, committed by the dominant partner in an unequal relationship. Power is a fact of life. It is present in every relationship and situation. Clergy and others with leadership roles have been granted power as a resource and responsibility to support, lead and serve other people. The institution of the Church, and individual members, have a right to expect that such authority will be trustworthy and used in the best interests of those who are served. Ministry carries with it spiritual authority, and privileged, if not unique, access to people’s homes. Clergy are expected to demonstrate high standards of moral and sexual integrity:*

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<sup>173</sup> DFE002826\_004

<sup>174</sup> DFE002826\_010

<sup>175</sup> DFE002826\_015, 017-018

<sup>176</sup> Thirtyone:eight is an independent, non-denominational Christian safeguarding charity established in 1977, providing support and services to in excess of 10,000 organisations nationally and internationally. These include a DBS umbrella body, training, helpline, policy support and consultancy; Justin Humphreys 18 May 2020 6/3-21; THO000063

<sup>177</sup> THO000063\_029

<sup>178</sup> DFE002826\_012, 014; Africans Unite Against Child Abuse is an organisation that works directly with families of African origin to support parents to keep their children safe and to help them to be successful – see DFE002826\_014

<sup>179</sup> DFE002826\_012

<sup>180</sup> SBS000001\_016

*those to whom they minister hope and expect, not that those whose vocation comes from God will be 'perfect' or beyond the reach of ordinary human complexity in relationship but that they should at least embody a mature and careful Christian understanding of the responsibility to respect and honour all members of their community.*"<sup>181</sup>

**25.** Dr Oakley noted that, in some Christian (and other religious) settings, a minister or leader of collective worship holds a "*divine position*". They must be obeyed and not challenged, which adds an additional layer of difficulty to disclosing abuse.<sup>182</sup> A key challenge in some church settings is deference. Some religious leaders perpetuate the belief that, as they have been appointed by God, they are not answerable to their congregation or organisations or others. In an exploration of spiritual abuse, a survivor noted:

*"We actually believed the general consensus underlying every conversation in our last church that our pastor was 'God's anointed' in a special way and shouldn't really be questioned."*<sup>183</sup>

**26.** In some communities, especially those bound by strict religious principles, leaders can provide guidance for, and play a part in, all aspects of a person's life. Where religious leaders interpret religious law for those who observe it strictly, advice can be needed regularly on all aspects of daily living. Mr Manny Waks, Chief Executive Officer at Kol v'Oz (now VoiCSA), identified that the role of a rabbi in the Charedi community has "*unlimited and unparalleled power and influence and is the ultimate decision-maker in every aspect of life, literally*".<sup>184</sup> Mr Waks described a culture of "*complete reverence and subordination to the Rabbi. It is often believed – consciously or otherwise – that the Rabbi can do no wrong*".<sup>185</sup>

**27.** Even in religious organisations with no ordained or full-time religious leader, or that do not wish to have leaders other than God, and in which lay individuals take on roles of spiritual assistance, there are individuals who are often seen as being more powerful than other members of the congregation. For example, while elders within the Jehovah's Witnesses are not meant to be seen as superior to others within the faith, children and young people may well still see them as important individuals within the community, and as more spiritually 'pure'.<sup>186</sup> PR-A6 was abused by a ministerial servant in the Jehovah's Witnesses, Peter Stewart, who would quote scripture to her and tell her that Jehovah wanted them to spend time together, and that it was important to be obedient and respect her elders.<sup>187</sup>

**28.** The United Reformed Church (URC) undertook a past case review in 2015, which aimed to "*ensure that the URC appropriately addressed any cases of historical abuse and examined the processes and procedures at the time of any complaints or grievances*".<sup>188</sup> This identified that ministers (religious leaders) needed to recognise the power differential inherent in their

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<sup>181</sup> MST000140\_008

<sup>182</sup> LOY000001\_003

<sup>183</sup> THO000076\_028

<sup>184</sup> Now VoiCSA, based in Israel and aims to raise awareness regarding child sexual abuse in Jewish communities worldwide; KOL000001\_001; KOL000001\_009

<sup>185</sup> KOL000001\_009

<sup>186</sup> PR-A5 10 August 2020 16/18-17/13; There are religious publications of the Jehovah's Witnesses which suggest to parents that they should teach their children a balanced view of obedience to adults: see CJW000053\_005-009

<sup>187</sup> INQ005151\_004-005

<sup>188</sup> URC000030\_005

relationship with congregants, and their responsibility to make sure that they did not misuse their position. The reviewers suggested that there needed to be clearer boundaries for those who are religious leaders around appropriate relationships.<sup>189</sup>

**29.** The Methodist past case review of 2013, *Courage, Cost & Hope*, stated that a review of the cases showed that its ministers found it difficult to recognise and accept that abuse had taken place when the perpetrator was a colleague.<sup>190</sup>

**30.** In our investigation into the Anglican Church, this Inquiry recommended in May 2019 that the government should amend section 21 of the Sexual Offences Act 2003 to include clergy within the definition of a position of trust. This would criminalise sexual activity between clergy and a person aged 16 to 18, over whom they exercise pastoral authority and involving the abuse of a position of trust.<sup>191</sup>

**31.** It is already a criminal offence to undertake sexual activity with a 16 or 17-year-old when an adult holds a defined 'position of trust' in respect of that young person.<sup>192</sup> Positions of trust are narrowly defined to be limited to those involved in education, health and social care.

**32.** A significant number of organisations told us of their disappointment and concern that this does not reflect or provide for prosecution of a person in a position of trust in a religious context, if the young person is between 16 and 18 years old. These include the NSPCC, which ran a 'Close the Loophole' campaign, the Legal Director of the Crown Prosecution Service and the All-Party Parliamentary Group (APPG) on Safeguarding in Faith Settings, which produced a report in January 2020 titled *Positions of Trust: It's time to change the law*.<sup>193</sup> The evidence from the organisations that contributed to the APPG report, which included a number of religious bodies, academics and professional child protection organisations, was that the law needed to be changed to protect young people.<sup>194</sup>

**33.** The Ministry of Justice accepted during this investigation that the current law "*may not be sufficient*" in dealing with situations in which an adult religious leader abuses a child who is a member of their congregation, or over whom they have pastoral responsibility.<sup>195</sup> Its review in 2019 – with a variety of organisations, including the police, Crown Prosecution Service, sports bodies, individuals and religious organisations – concluded that "*most stakeholders felt a change in the law was required*".<sup>196</sup> Mr Matthew Gould, Deputy Director of the Criminal Courts and Criminal Law Policy Unit, recognised that the law needed to change, but there was no consensus on "*how to improve it*".<sup>197</sup>

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<sup>189</sup> URC000030\_029

<sup>190</sup> MST000019\_020

<sup>191</sup> *Anglican Church Case Studies 1. The Diocese of Chichester 2. The response to allegations against Peter Ball Investigation Report*

<sup>192</sup> Sections 16 to 20 of the Sexual Offences Act 2003

<sup>193</sup> NSP000071; Gregor McGill 26 July 2018 85/16-86/21; THO000080\_001

<sup>194</sup> THO00081\_005

<sup>195</sup> MOJ0000911\_002

<sup>196</sup> MOJ0000911\_004; Matthew Gould 22 May 2020 15/1-20

<sup>197</sup> Matthew Gould 22 May 2020 16/4-9

**34.** No matter how difficult a drafting exercise it may present, a change in the law regarding positions of trust is required to keep children safe.<sup>198</sup> The government has now proposed to change the law in the way suggested by this Inquiry in the Anglican Church investigation report under the Police, Crime, Sentencing and Courts Bill, which was introduced into the House of Commons in March 2021.<sup>199</sup>

## C.6: Gender disparity

**35.** Within many religious organisations, positions of spiritual and religious leadership are only occupied by men. Within a significant number of the religious organisations examined in this investigation, there was evidence that there was also a preponderance of men occupying senior lay positions of responsibility.

**35.1.** In the London Central Mosque, approximately 70 percent of the staff, including teachers in the associated school, are women, but most of the senior leadership are men. Of the 24 trustees, only two or three are female. It does not have control over who its trustees are because they are the ambassadors and high commissioners of various Islamic majority countries. At the time of the hearing in May 2020, the designated safeguarding leads were male.<sup>200</sup> Following the hearing, the organisation set up a safeguarding committee comprising four people, including two women, to improve the gender diversity of the safeguarding leads and make it easier for female children to share their concerns and report abuse.<sup>201</sup>

**35.2.** Mr Adatia confirmed that all of the individuals who appeared in the Shree Hindu Temple and Community Centre's organisational structure were male. There were no women in positions of leadership, although there had previously been female committee members and one female vice president.<sup>202</sup> He was, however, aware of another Hindu temple in Leicester where some leaders, including the president and the secretary, were female.<sup>203</sup>

**35.3.** In the East London Mosque, one of the five members of senior management was a woman and 20 percent of the trustees were female. The designated safeguarding lead was male.<sup>204</sup> The Mosque has women-only facilities in the Maryam Centre, which offers counselling services to women.<sup>205</sup>

**35.4.** Within the Union of Orthodox Hebrew Congregations (UOHC), all positions of leadership were filled by men.<sup>206</sup>

<sup>198</sup> THO000081\_007; THO000080-015

<sup>199</sup> Police, Crime, Sentencing and Courts Bill 2021

<sup>200</sup> Ahmad Al-Dubyan 13 May 2020 109/13-110/17

<sup>201</sup> ILM000027; ILM000028\_007; ILM000029\_002

<sup>202</sup> Shital Adatia 12 May 2020 86/19-88/17

<sup>203</sup> Shital Adatia 12 May 2020 88/12-17

<sup>204</sup> Dilowar Khan 13 May 2020 115/12-116/7

<sup>205</sup> East London Mosque Maryam Women's Services

<sup>206</sup> Jehudah Baumgarten 12 August 2020 91/23-92/8

**36.** In the Jesus Fellowship Church, all of the leaders were men, with 10 men at the highest level as “*apostolic leaders*”, and Mr Noel Stanton at the very top.<sup>207</sup> Women and children were considered “*very much bottom of the rung*”.<sup>208</sup> Women were seen as a “*temptation to men*” and there were very strict modesty rules for girls about their appearance and clothing.<sup>209</sup>

**37.** Where only men have responsibility for receiving disclosures of abuse within an organisation, it is less likely that women will feel able to disclose. Strengthening Faith Institutions (an organisation that receives support from the Ministry of Housing, Communities and Local Government) is managed by a consortium of faiths and aims to “*create stronger, healthier, integrated and accessible places of worship*”.<sup>210</sup> It identified the need for women to be in positions of responsibility and influence in safeguarding as:

*“key to running a successful and healthy and safe institution, especially if you have young women present on a regular basis, that they should have someone of the same sex that they can go to and seek support from. It’s vital, we felt. If not ... it’s difficult for these young women to go, often, to a male figure sometimes, especially if there’s an issue of sensitivity and concern.”*<sup>211</sup>

**38.** According to Ms Patel, addressing this barrier requires much more than simply placing women in positions of responsibility:

*“having women representatives in your religious institution doesn’t necessarily translate into gender equality ... on the whole, it’s the wider institutional culture, patriarchal culture, and the sheer imbalance of power that needs to be tackled, not a question of whether they just bring a few more women into the fold”.*<sup>212</sup>

**39.** However, more can and should be done to encourage gender diversity among those in positions of responsibility in religious organisations, given the importance for child protection of there being women who have power to take steps to influence and bring about change in practices and policies and to whom other women and girls can turn.

## C.7: Distrust of external agencies

**40.** In many religious organisations, there can be a mistrust or fear of the involvement of government bodies in the religious organisation and people’s personal lives. This may emanate from a variety of sources, including:

- concern about religious persecution or religious or racial discrimination;
- a view that such involvement is contrary to religious teachings or law; and
- a view that governmental bodies are insensitive to, and judgemental about, religious practices and beliefs, and so will either not understand them or seek to dismiss them in a crude and heavy-handed way.

Research published by the Inquiry in June 2020 identified that cultural stereotypes and racism can affect how child sexual abuse is understood, identified and disclosed.<sup>213</sup>

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<sup>207</sup> Sally Hirst 19 May 2020 4/5-9; 5/20-24

<sup>208</sup> Sally Hirst 19 May 2020 3/23-4/11

<sup>209</sup> Sally Hirst 19 May 2020 7/13-21

<sup>210</sup> SFI000001\_002

<sup>211</sup> Natan Levy 12 May 2020 115/19-116/4

<sup>212</sup> Pragna Patel 15 May 2020 110/1-111/14

<sup>213</sup> “People don’t talk about it”: Child sexual abuse in ethnic minority communities p11

**41.** The persecution of religious minorities by state bodies throughout history has generated a strong fear of outside authorities within certain communities. For example, the Jewish Charedi community recognises this, particularly among those whose families are Holocaust survivors or Jewish refugees who fled from persecution to the UK.<sup>214</sup> Such inhibitions have historical roots that stretch far back in Jewish history, from times when the Jewish community was persecuted under Roman, Persian, Western European, Nazi and Soviet rule.<sup>215</sup>

**42.** Fear of racism or racial stereotyping is another factor that causes certain religious communities to avoid the involvement of external agencies in their affairs. Those in the Jewish community who do not have Charedi affiliation may also be concerned that speaking publicly about sensitive issues such as child sexual abuse could fuel antisemitism.<sup>216</sup> Mr Waks told us that there is:

*“a widely-held belief across many (but not all) Jewish institutions and among their leadership, that Jewish people must ‘protect their own’. This manifests, in large part, in efforts to prevent Jewish Community ‘dirty laundry’ from being aired in public as it may incite anti-Semitism.”<sup>217</sup>*

**43.** Religious organisations and those within religious communities can also be reluctant to report abuse because of a belief that local and central government bodies lack an understanding of their religious faith and practice. This gives rise to a fear that they will deal with faith communities in an insensitive way. Such fears can make religious organisations reticent to involve external bodies when faced with allegations of child sexual abuse.

**44.** PR-A17 was allegedly abused when he was 10 years old by a teacher from his Chabad Lubavitch Jewish school. Even as an adult, PR-A17 said he felt unable to report the alleged abuse to the police because the Charedi Jewish community of which he was a part had a culture of discouraging members from complaining to the police. The alleged perpetrator was subsequently tried and acquitted of the allegations.<sup>218</sup>

**45.** In Ms Patel’s experience, there are many within minority ethnic communities who would discourage speaking out about abuse within their communities:

*“Forty years ago, when we raised issues of domestic violence, when we raised issues of forced marriage and all those ... other forms of gender-related violence, the charge that was levelled against us ... was, ‘You are being racist. You are raising the issues. You are showing up our community in a bad light. You are doing this and it is fuelling racism. It will fuel racial stereotypes about our communities. It will fuel a racist backlash’. So now, instead of the racist backlash, the charge is, ‘You are fuelling Islamophobic backlash or a Hinduphobic backlash. You are fuelling hatred and hate crimes towards our communities’.”<sup>219</sup>*

She noted that these concerns have not deterred the work of her organisation:

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<sup>214</sup> SKI000001\_006

<sup>215</sup> KOL000001\_006

<sup>216</sup> KOL000001\_006-007

<sup>217</sup> KOL000001\_006-007 para 23

<sup>218</sup> INQ005151\_012-013

<sup>219</sup> Pragna Patel 15 May 2020 76/23-77/22



*“We do not want to fuel racism ... any form of racism is abhorrent and we need to tackle that, but that should not stop us from talking about the abuse that’s going on in our own communities, the injustice that’s going on in our own communities ... the cause of anti-racism, will not be helped by remaining silent because silence is complicity.”<sup>220</sup>*

**46.** In some religious communities, insularity is encouraged as a form of protection from perceived temptations or evils within secular society. Historically, members of the Jesus Fellowship Church lived in communes – “*large hostel-like complexes*” with everything shared among members.<sup>221</sup> Ms Sally Hirst, who appeared on behalf of the Jesus Fellowship Survivors Association, told us that within the Jesus Fellowship Church there was next to no contact with wider society:

*“Apart from the children going to school, there was no contact with the outside world; there really wasn’t. Even the GP was part of the church.”<sup>222</sup>*

Ms Hirst explained how adherents were “*taught to be very suspicious of outside organisations ... It was very, very insular*”.<sup>223</sup>

**47.** In some cases, the impulse dissuading disclosure may be more subtle. In 2020, the High Court heard a case concerning alleged child sexual abuse within a Jehovah’s Witness family where issues were raised about what certain elders in the congregation knew about the alleged abuse.<sup>224</sup> The mother in that case told us:

*“The Elders informed me that I had to think about the consequences of my actions as mentioned, I wanted to go to the police but the message I felt I was receiving was that police involvement was not the appropriate thing to do. I fully accept that this was not ... being said to me but this is what I was feeling.”<sup>225</sup>*

## C.8: Fear of external reporting and reputational damage

**48.** In many cases, concerns about external involvement are connected to a desire to protect the reputation of a religious organisation. Ms Hirst described how, within the Jesus Fellowship Church, “*the reputation as a church was above all else*”.<sup>226</sup> In Ms Rattu’s experience, religious institutions operate as “*gatekeepers to hide the abuse, keep it under the carpet, so as to not affect the reputation and status of a family, an individual or a community*”.<sup>227</sup> On this same point, Mr Humphreys noted that:

*“the perceived reason for placing responsibility [for child sexual abuse] on victims and survivors is more – in my experience, more about the need of individuals to protect the reputation of the church or organisation and maybe even God himself. So to speak out on this issue, you are damaging the church, you are damaging God’s reputation.”<sup>228</sup>*

**49.** We saw evidence of fear of discrimination operating as a barrier to disclosure and an obstacle to the effective handling of disclosures. Often, victims will be dissuaded from reporting their abuse for fear that doing so will bring their religious community into disrepute

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<sup>220</sup> Pragna Patel 15 May 2020 77/11-18

<sup>221</sup> Sally Hirst 19 May 2020 3/12-4/24

<sup>222</sup> Sally Hirst 19 May 2020 14/25-15/2

<sup>223</sup> Sally Hirst 19 May 2020 15/6-19

<sup>224</sup> INQ004963

<sup>225</sup> INQ004963\_004

<sup>226</sup> Sally Hirst 19 May 2020 32/14-33/1

<sup>227</sup> Natasha Rattu 15 May 2020 30/16-24

<sup>228</sup> Justin Humphreys 18 May 2020 27/6-18

and fuel discrimination. Ms Akthar told us that, within the Muslim community, victims are often told to stay silent so as not to “*put the Muslim community in a bad name ... because of the fear of Islamophobia*”.<sup>229</sup>

## C.9: The desire to manage allegations internally

**50.** As set out above, various religious organisations encourage victims to report matters internally rather than to external bodies. The religious institution then decides if such reports are to be disclosed further.

**51.** Dr Andrew Davies, Director of the Edward Cadbury Centre for the Public Understanding of Religion, told us that in some faith communities there is:

*“a sense that ‘nothing could go wrong here’, that they are safe places to attend, and that strict adherence to procedure is not essential in all cases since the community has the capacity to resolve its challenges together informally.”*<sup>230</sup>

**52.** Under current procedures of the Jehovah’s Witnesses, elders are required to contact the Legal Department and Service Department of the Central Branch Office for guidance about disclosure and if there is reason to believe a child is “*in danger of abuse*” to also go to the statutory authorities.<sup>231</sup>

**53.** In the Jewish context, there is an organisation called Agudath Israel of America, which Ms Goldsobel told us has “*worldwide influence*”. In 2011, it issued a ruling:

*“It reiterated ... that before any reports of child abuse are made to the police, they must, in the first instance, be reported to a rabbi who would decide whether ‘raglayim ledavar’ (lit. ‘Legs to the matter’) applied, i.e., whether there was a prima facie [sic] case to be made”*.<sup>232</sup>

**54.** We were also made aware of the child protection policy for the Yesodey Hatorah Senior Girls School in Hackney, which appeared online in 2015 and includes a stipulation that outside agencies should only be involved “*after consultation with the Rabbinate of the Union of Orthodox Hebrew Congregations*”.<sup>233</sup>

**55.** For some in Jewish Charedi communities, the concept of *mesirah* – that for one Jew to report another to a non-Rabbinic authority is forbidden – may prevent the reporting of abuse outside the Charedi community.<sup>234</sup> Specifically, it is believed to be forbidden under *Halacha* – the strict codes of biblical and Rabbinic law that govern the daily lives of those within the Charedi community.<sup>235</sup> Ms Goldsobel told us about *mesirah*:

<sup>229</sup> Nazmin Akthar 13 August 2020 39/13-40/9.

<sup>230</sup> EDW000001\_007

<sup>231</sup> CJW000052\_012-017

<sup>232</sup> MIG000001\_004

<sup>233</sup> MIG000001\_005; MIG000013

<sup>234</sup> The term *mesirah* does not appear to be well known outside the Charedi community. Dr Steven Wilson, the Chief Executive of the United Synagogue, which he states is “*the mainstream, moderate Modern Orthodox community*”, told us that he had not heard the term until he became involved in this Inquiry (Steven Wilson 12 August 2020 3/5-4/7; 62/5-21).

<sup>235</sup> KOL000001\_006

*"I think it literally translates as someone who reports a fellow Jew to the secular authorities. In slang terms, let's just call it a snitch almost. It's ... used as a weight and leverage against victims and survivors in reporting their abuse to the authorities, that you would be classed as a moser, as someone who has snitched."*<sup>236</sup>

**56.** That the concept of *mesirah* prevents the reporting of abuse was seen in a 2013 Channel 4 *Dispatches* documentary. A senior rabbi within the UOHC used the term to counsel a survivor of sexual abuse against reporting the perpetrator to the police.<sup>237</sup> Shema Koli, an organisation providing counselling and support to survivors of abuse who are members of the Charedi community, had to provide training in 2015 to make it clear that the concept should not be applied to the reporting of sexual abuse.<sup>238</sup> Rabbi Jehudah Baumgarten of the UOHC told this Inquiry:

*"mesirah does not apply where the person being reported is causing harm to others, such as in the case of CSA. The rabbinate is absolutely clear that this is not mesirah ... the rabbinate has made it clear via the tools of training through the Interlink Foundation."*<sup>239</sup>

**57.** Following the *Dispatches* documentary, the Rabbinate issued a position that set out that there are *"certain circumstances which it is right and proper to contact the social service and/or the police"*.<sup>240</sup> Although this statement is welcome, it is of note that it implies that there will be circumstances when it would not be proper to contact social services or the police. Rabbi Baumgarten accepted that this statement was not sufficiently clear. He said that the committee for the protection of children would not be required to go to the Rabbinate on every case and ask whether or not it can be reported.<sup>241</sup>

**58.** In some cases, religious communities have internal mechanisms for resolving disputes, often drawn on by their members in place of reporting to state bodies. As Ms Patel told us:

*"Family and community mediation in relation to family matters is extensively practised in many South-Asian communities ... religious or community figures ... usually male, who have some authority ... will bring together the accused and the accuser and will mediate in order to come to an informal settlement."*<sup>242</sup>

While Ms Patel's comments centred on the experience of women suffering domestic abuse, marital rape or other forms of violence, informal mediations also take place in the context of allegations of child sexual abuse, and can operate as a substitute for referral to state bodies.

**59.** A Beth Din is a Jewish religious court with religious judges (*dayanim*) who are experts in Jewish law.<sup>243</sup> Under Jewish law, Beth Dins can be made up of any three qualified males, and need not be registered to hold hearings or issue rulings. According to Rabbi Baumgarten, a Beth Din does not deal with criminal matters, and child sexual abuse cases would never be referred to it.<sup>244</sup> Ms Goldsobel told us that:

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<sup>236</sup> Yehudis Goldsobel 11 May 2020 60/18-61/2

<sup>237</sup> Jehudah Baumgarten 12 August 2020, video from 46:00

<sup>238</sup> SKI000001\_007

<sup>239</sup> Jehudah Baumgarten 12 August 2020 135/10-20; 'CSA' stands for child sexual abuse.

<sup>240</sup> OHC000007\_002; OHC000006

<sup>241</sup> Jehudah Baumgarten 12 August 2020 140/9-141/5

<sup>242</sup> Pragna Patel 15 May 2020 41/15-42/17

<sup>243</sup> Steven Wilson 12 August 2020 9/25-10/4

<sup>244</sup> OHC000001\_015

*“pop up’ Beth dins are sometimes convened to hear high profile or problematic cases, often held in secret and with no records kept.”<sup>245</sup>*

In her experience, while a Beth Din might not formally deal with cases of child sexual abuse, sometimes it is *“informally done, not at a Beth Din, so to speak, but yet, these people still represent the Beth Din even when they are sitting at their dining room table, not just when they are at work”*.<sup>246</sup> Ms Goldsobel said that she had heard *“multiple times”* of rabbis *“suggesting that if the alleged offender would pay for therapy for the victim, then that’s a really, in their eyes, effective way of dealing with the situation.”*<sup>247</sup>

**60.** The case of Todros Grynhaus is an example where rabbis became involved in attempting to resolve issues related to abuse without the involvement of the statutory authorities. Grynhaus was convicted in 2015 of the serious sexual abuse of two adolescent girls.<sup>248</sup> In 2011, he effectively admitted that the allegations against him were true at a meeting with two rabbis.<sup>249</sup> In sentencing Grynhaus in July 2015, Mr Justice Holroyde stated:

*“I have no doubt that you felt able to rely on a prevailing attitude of insularity which you hoped would prevent these allegations ever coming to the attention of the police. You hoped that, at worst, you might have to pay a form of financial penalty as directed by the Beth Din. I have no doubt that is why, when confronted ... with PR-A15’s allegations, you merely asked, in an unemotional and businesslike way, what they wanted you to do.”<sup>250</sup>*

## C.10: Forgiveness

**61.** The need to forgive is central to the teachings and practices of many religious organisations. Pressure may be placed on victims and survivors to forgive their abusers, which may operate as a significant barrier to the disclosure of abuse. Dr Oakley described that:

*“forgiveness is a tenet of many faiths, but where that becomes something where you cannot speak out because you need to forgive, that can be hugely difficult in people telling their stories.”<sup>251</sup>*

**62.** Placing pressure on individuals to forgive may also prevent any disclosures from being properly dealt with. Ms Hirst told us that, when people within the Jesus Fellowship Church did disclose, there was a *“cycle of forgiveness”* in which victims were *“told to forgive, told to pray or told it was God’s will or God alone would judge”*.<sup>252</sup> If there was a proven allegation, the perpetrator was forgiven and *“they would say, well, it’s repentance, reconciliation”* and convicted perpetrators would be welcomed back into the Church and into another leadership role.<sup>253</sup>

<sup>245</sup> MIG000001\_007

<sup>246</sup> Yehudis Goldsobel 11 May 2020 57/21-59/9

<sup>247</sup> Yehudis Goldsobel 11 May 2020 57/21-59/9

<sup>248</sup> CPS004874\_001

<sup>249</sup> CPS004874\_002

<sup>250</sup> CPS004874\_005

<sup>251</sup> Lisa Oakley 18 May 2020 57/11-19

<sup>252</sup> Sally Hirst 19 May 2020 32/23-33/14

<sup>253</sup> Sally Hirst 19 May 2020 33/5-14



Part D

# Child protection policies and procedures

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# Child protection policies and procedures

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## D.1: Introduction

1. A child protection policy is the foundation on which an organisation working with children should build its practices and processes to keep children safe. In addition to having clear policies, those working with children should implement safer recruitment processes to ensure that staff and volunteers do not pose a risk to children. Organisations also need to have in place arrangements to ensure that those working with children receive regular child protection training.

2. At present, despite an abundance of available guidance, there is significant variation in levels of compliance among religious organisations and settings. Some settings, despite serving large congregations, do not even have basic child protection procedures in place. Even where such policies are in place, some victim and survivor organisations have referred to 'disguised compliance' whereby organisations are primarily concerned to give the impression of having in place effective child protection procedures whilst the reality is one of half-hearted or non-existent implementation.<sup>254</sup>

## D.2: Child protection policies

### The legal framework and available guidance

3. Organisations, including religious settings, should be aware of specific legislation and guidance concerning the protection of children, and should have a child protection policy that meets the relevant standards.

4. The Children Act 1989 came into force in 1991 and established the key principles for decisions by the courts concerning the welfare and safety of children, including the 'Paramountcy Principle' (which requires the child's welfare to be the paramount consideration).<sup>255</sup>

5. In 1991, *Working Together Under the Children Act 1989*, which raised the issue of child sexual abuse, was issued as guidance to voluntary organisations (among others).<sup>256</sup> This was expanded on in the Home Office's *Safe from Harm* code of practice (1993), which set out how voluntary organisations in England and Wales should protect children and respond to abuse, based on 13 core principles.<sup>257</sup>

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<sup>254</sup> Yehudis Goldsobel 11 May 2020 73/9-74/14; Sadia Hameed 15 May 2020 48/22-49/17; Richard Scorer 14 August 2020 87/20-88/1

<sup>255</sup> Section 1, Children Act 1989

<sup>256</sup> INQ001095

<sup>257</sup> INQ001079

6. The most recent guidance is *Working Together to Safeguard Children 2018 (Working Together)*, produced by the Department for Education. This is addressed to all faith-based organisations in England that work with children, although there is no legal obligation for them to follow it and no sanction for non-compliance. *Working Together* states that:

*“Every VCSE, faith-based organisation and private sector organisation or agency should have policies in place to safeguard and protect children from harm. These should be followed and systems should be in place to ensure compliance in this.”*<sup>258</sup>

It also states that, within faith-based organisations:

*“Individual practitioners, whether paid or volunteer, should be aware of ... how they should respond to child protection concerns and how to make a referral to local authority children’s social care or the police if necessary.”*<sup>259</sup>

7. There are a number of sources for religious organisations and other voluntary organisations to draw on in preparing their child protection policies.

8. Under the Charities Act 2011, trustees must take reasonable steps to protect from harm those people who come into contact with the charity. The Charity Commission has published guidance for charities (which include more than 34,000 faith-based organisations), including *Safeguarding and protecting people for charities and trustees* (updated in October 2019).<sup>260</sup>

9. The Charity Commission’s guidance makes clear that trustees are expected to ensure that their charity *“has appropriate policies and procedures in place, which are followed by all trustees, volunteers and beneficiaries”*.<sup>261</sup> Failing to follow the guidance could amount to a breach of their obligations under the Charities Act 2011.<sup>262</sup> Although this guidance is not statutory, the expectation of the Charity Commission is that charities will follow it, and it is seen as a *“starting point”*.<sup>263</sup> Under the guidance, any child protection policy should set out how the charity will:

- protect children from harm;
- ensure child protection concerns can be raised; and
- respond to allegations or incidents, including reporting to the relevant authorities.

It makes clear that incidents of allegations of abuse should be reported *“to all relevant agencies and regulators in full”* and that *“You should report to the police if the incident or concern involves criminal behaviour”*.<sup>264</sup> Where charities work with children, they should refer *“all safeguarding concerns with children ... to your local safeguarding children ... team”*.<sup>265</sup>

10. Government departments have also provided advice and funding to develop greater awareness and capacity within charities to deal with child protection for the voluntary sector, which includes policy development.<sup>266</sup>

<sup>258</sup> DFE002815\_071; ‘VCSE’ refers to voluntary, charity, social enterprise organisations.

<sup>259</sup> DFE002815\_071

<sup>260</sup> There are over 34,000 faith-based organisations registered with the Charity Commission (CYC000440\_007 para 31); Harvey Grenville 14 August 2020 2/12-20

<sup>261</sup> CYC000426\_002-004; The amount of detail in the policy will depend on the charity’s activities, where it works and the level of the risk, but it should also be reviewed regularly and be publicly available.

<sup>262</sup> Harvey Grenville 14 August 2020 16/19-20/17

<sup>263</sup> Harvey Grenville 14 August 2020 20/1-7

<sup>264</sup> CYC000426\_009

<sup>265</sup> CYC000426\_010

<sup>266</sup> David Knott 14 May 2020 142/9-144/17; DFD000020\_004-005



**10.1.** The Department for Digital, Culture, Media & Sport has funded work between 2018 and 2020 to develop a digital decision tool, setting out the steps someone should take if they have a child protection concern.<sup>267</sup>

**10.2.** In October 2020, the Department for Education published out-of-school settings guidance, a voluntary code for the providers of after-school clubs and activities.<sup>268</sup> It expressly advises that a provider should have a clear and effective child protection policy, which should include as a minimum:

- a policy statement about the importance of keeping children safe;
- a commitment that under no circumstances should a staff member or volunteer inflict physical or psychological harm on a child;
- a list of procedures to enable children in their care to be kept safe;
- any additional guidance to be aware of, including details of a designated safeguarding lead, and how to contact the police or local authority team; and
- procedures covering what to do if a child may be at risk of abuse, or if allegations are made.<sup>269</sup>

**11.** The National Society for the Prevention of Cruelty to Children (NSPCC) published its guidance, *Safeguarding and Child Protection Standards for the Voluntary and Community Sector*, in 2009. This was designed to help organisations assess and improve existing child protection policies.<sup>270</sup> Standard 2 – ‘Protecting children and young people’ – provides that organisations should have in place a written safeguarding or child protection policy statement, signed by the most senior person in their organisation. They should also have written procedures for situations where a child or young adult may be at risk of abuse, and for dealing with allegations of abuse.<sup>271</sup>

**12.** To assist further, the NSPCC also has a step-by-step pathway “*to developing and acting on a plan for putting safeguards and child protection measures in place*” in its *Introductory guide to safeguarding and child protection for the voluntary and community sector*.<sup>272</sup> This includes:

- identifying a ‘nominated child protection lead’, whose role includes ensuring that safeguarding and child protection concerns are responded to appropriately, and “*whose job it is to liaise with other agencies*”;<sup>273</sup>
- having in place a procedure for responding to concerns that a child may be at risk of abuse or neglect, with “*details of key agencies who should be informed, including their contact telephone numbers*”.<sup>274</sup>

**13.** More generally, there are various training and consultancy organisations that provide assistance to religious organisations and settings as regards their child protection policies and practices. For example, thirtyone:eight has produced a model safeguarding template and

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<sup>267</sup> DFD000020\_006-007; DFD000023

<sup>268</sup> DFE003469

<sup>269</sup> See DFE002833\_016-018 for the background to the introduction of the voluntary code and DFE003469\_016-017 for the voluntary code of practice.

<sup>270</sup> NSP000147\_012

<sup>271</sup> NSP000155\_015

<sup>272</sup> NSP000156\_007

<sup>273</sup> NSP000156\_028

<sup>274</sup> NSP000156\_028

associated guidance notes.<sup>275</sup> Mr Justin Humphreys, Chief Executive Officer (Safeguarding) of thirtyone:eight, considered that there were five components of an effective child protection policy:

- details of the setting and the commitment to child protection;
- the understanding of abuse and neglect, safer recruitment, child protection training and management of workers;
- practice guidelines and working in partnership with other agencies;
- responding to concerns; and
- supporting those affected by abuse and working with offenders and those who pose a risk.<sup>276</sup>

## Adherence to guidance

**14.** The Inquiry asked all religious organisations to which it wrote to confirm whether or not they had child protection policies and the nature of their child protection structures. A table summarising the responses is included in Annex 3.

**15.** Despite the guidance and the advice available to religious organisations, there was significant diversity of practice among the religious organisations and settings from which we heard. Some organisations had no child protection policies at all. In other organisations the policy was of a standard commensurate with the basic information set out and seen as a minimum by child protection specialists.

**16.** We have included some illustrative examples of the responses we received from religious organisations and settings.

### *The Shree Hindu Temple and Community Centre*

**17.** The Shree Hindu Temple and Community Centre (the Shree Temple) in Leicester, which serves a community of more than 5,000 people, has had a *Safeguarding Children and Adults Policy* since around 2017.<sup>277</sup> However, the policy is rudimentary and incomplete, apparently based on a template, and references out-of-date government guidance. When asked whether the policy is circulated, Mr Shital Adatia (President of the Shree Temple) said:

*“Honestly, hand on heart, it is probably put in an office file and kept in the office there to refer to.”*

He accepted that the review of the policy is *“probably a tick-box exercise to say, ‘Yes, we’ll kind of be sorted for another year’, kind of thing”*.<sup>278</sup> We were told that the Shree Temple recently engaged consultants to assist in improving its child protection arrangements.<sup>279</sup>

### *The Guru Nanak Gurdwara Smethwick*

**18.** The Guru Nanak Gurdwara Smethwick, one of the oldest gurdwaras in England, receives approximately 10,000 people on a weekly basis for religious worship or to participate in community activities.<sup>280</sup> Around 250 children attend after school to learn the Punjabi

<sup>275</sup> THO000076\_017 para 16.3; THO000029; THO000018

<sup>276</sup> THO000076\_017 para 16.3

<sup>277</sup> Shital Adatia 12 May 2020 54/11-22; STC000009

<sup>278</sup> Shital Adatia 12 May 2020 55/5-6; 56/1-3

<sup>279</sup> STC000001\_001, 004 paras 1, 13

<sup>280</sup> Jatinder Basi 15 May 2020 119/10-18

language. Despite this, it has a policy that refers to obsolete statutory guidance and lacks detail or sufficient useful information.<sup>281</sup> The policy was only available in English, despite the fact that several more elderly members of the congregation, who often fulfil significant voluntary roles at the temple, may not have sufficiently good levels of English comprehension. One trustee of the gurdwara agreed that it should be translated into Punjabi, which is the spoken language of many of the congregation who may carry out significant amounts of voluntary work.<sup>282</sup> Following the hearing, the gurdwara has produced a draft updated safeguarding policy and procedures.<sup>283</sup>

### *The Jehovah's Witnesses*

**19.** The Jehovah's Witnesses have a child protection policy in place which is comprised of four core documents, each of which has a specific purpose and a specific target audience:

- the *Jehovah's Witnesses' Scripturally Based Position on Child Protection*, a worldwide policy, published in 2018, which is available on the Jehovah's Witnesses website and is designed to be used within congregations and for the general public;<sup>284</sup>
- *The Watchtower* (May 2019), which "explained and expanded on" the worldwide policy and is studied and read by Jehovah's Witnesses in group classes;<sup>285</sup>
- *Shepherd the Flock of God*, which provides direction for elders (voluntary lay leaders of each Jehovah's Witness community – known as a congregation – responsible for spiritual, pastoral direction and running the organisation at a local level);<sup>286</sup> and
- *Child Sexual Abuse – Guidelines for Branch Office Service Desks*, which provides further guidance for elders in the Service Department. The Service Department is a department within the Branch Office, which is the national headquarters of the Jehovah's Witnesses.<sup>287</sup> The Service Department provides guidance to congregation elders on implementing the child safeguarding policy of the Jehovah's Witnesses.<sup>288</sup>

The first two of these documents provide extensive reference to biblical passages for study. They also provide signposts to further articles produced by the Jehovah's Witnesses in other publications. All four of the documents are rooted in religious texts and written in 'scriptural language'. However, the *Scripturally Based Position on Child Protection*, designed to be used and looked at by all members of the Jehovah's Witness congregations, does not provide practical guidance on recognising signs of abuse. *The Watchtower* (May 2019), again, intended to be studied by all congregants, does not provide information on how to contact statutory authorities when there is concern. The two documents produced only for elders provide more detailed information as to how to refer matters to statutory authorities but these documents are not circulated to members of the congregation. A policy document available to all members of the organisation providing more practical information as to when and how to report would better enable every member of the congregation to protect children.

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<sup>281</sup> [GNG000002\\_002](#)

<sup>282</sup> [Jatinder Basi 15 May 2020 136/1-15](#)

<sup>283</sup> [GNG000005](#)

<sup>284</sup> [CJW000058](#); [CJW000052\\_010](#) para 41

<sup>285</sup> *The Watchtower*, May 2019: [CJW000060](#); Worldwide child safeguarding policy: [CJW000052\\_010](#) para 41; Paul Gillies [11 August 2020 9/10-16](#) and [10/16-19](#)

<sup>286</sup> [CJW000061](#) (this document is not circulated to members, only to elders); [CJW000052\\_010](#) para 42

<sup>287</sup> [CJW000062](#); [CJW000052\\_003](#) paras 8, 9

<sup>288</sup> [CJW000052\\_003](#) para 9

**20.** Chapter 14 of *Shepherd the Flock of God* concerns child abuse. Within the chapter, various legal considerations are set out concerning the reporting of child sexual abuse. This is followed by a section entitled ‘Congregation considerations’ in which the following is stated:

*“When discussing child sexual abuse from a congregation standpoint, we are not considering a situation in which a minor who is a willing participant and who is approaching adulthood is involved in sexual activity with an adult who is a few years older than the minor. Nor, generally speaking, are we discussing situations in which only minors are involved. (See 14:29-30.) Rather, we are referring to an adult guilty of sexually abusing a minor who is a young child, or an adult guilty of sexual involvement with a minor who is approaching adulthood but was not a willing participant.”*<sup>289</sup>

This is advice for Jehovah’s Witnesses around the world. In the context of England and Wales, it would be better to clarify what is meant by “*who is a few years older*” and “*willing participant*”.

**21.** Following the conclusion of the hearing in this investigation, we were referred by the Jehovah’s Witnesses to a report by Mr Ian Elliott, an independent safeguarding consultant, examining the adequacy of the Jehovah’s Witnesses’ current child protection policy.<sup>290</sup> Mr Elliott concluded in his report that the policy “*provides an adequate framework for delivering what it sets out to achieve*”.<sup>291</sup> We have found Mr Elliott’s report to be of limited assistance, as it was disclosed to us late in the investigation and was commissioned for a different purpose.<sup>292</sup> Concerns about the lack of practical guidance in some of the Jehovah’s Witnesses’ policy documents, as set out above, remain.

### *Religious organisations and settings without any policies*

**22.** There remain religious organisations without any child protection policies at all. This is not acceptable.

**23.** Mr Shaukat Warraich, Chief Executive Officer of Faith Associates (who has undertaken training, consultancy work and policy development for the Muslim community for more than 20 years), said that, of the mosques that Faith Associates has reviewed, “*roughly 60% had no policies in place, 30% had policies with limited adherence and the remaining 10% had policies and were following them to the letter*”.<sup>293</sup>

**24.** Rabbi Natan Levy is Head of Operations for Strengthening Faith Institutions (SFI), which aims to support places of worship that have “*potential to fall through the cracks*”. It works primarily with small or medium-scale institutions that are not affiliated with large umbrella bodies and whose congregants are largely from ethnic minority and urban backgrounds.<sup>294</sup> SFI offers ‘health checks’ to assess the understanding and nature of child protection policies and practices in those settings referred to them. Of the 446 places of worship that have completed such a check, 311 said that they had a policy. However, of these, more than 150 faith centres said that they could either not locate their policy, had a policy that was outdated or unfit for a faith institution, or had a policy that had never been signed off by trustees.<sup>295</sup>

<sup>289</sup> CJW000061\_039

<sup>290</sup> CJW000126

<sup>291</sup> CJW000126\_003

<sup>292</sup> CJW000126\_001, which was prepared as part of ongoing litigation in which the Jehovah’s Witnesses are engaged.

<sup>293</sup> INQ005160\_004 para 18

<sup>294</sup> Natan Levy 12 May 2020 98/2-99/1

<sup>295</sup> SFI000001\_007 para 17

**25.** While the Islamic Cultural Centre and London Central Mosque (a large London-based mosque) does not undertake any activities involving unsupervised access to children, it welcomes 4,000 to 5,000 members of the public each week for Friday prayers, including children, and over 15,000 students of varying ages annually for guided tours.<sup>296</sup> At the time of the hearing in May 2020 it did not have a child protection policy, but it has since put one in place.<sup>297</sup> It operates a school, the London Central Mosque School, which itself has a child protection policy.<sup>298</sup>

**26.** There are also many organisations that have not embedded their policies into day-to-day practice. As Mr Humphreys noted (supported by both Rabbi Levy and Mr Warraich, all coming from different faith perspectives), thirtyone:eight has:

*“often found ... that policies are not the living documents that they need to be. They are often not reviewed as frequently as they ought to be and consequently often fall out of date and [are] difficult to access by all that may need them”.*<sup>299</sup>

### ***Umbrella bodies and representative organisations***

**27.** A number of umbrella bodies (such as Chabad Lubavitch, Masorti Judaism and the United Synagogue) have child protection policies for their central organisational bodies. This is a positive step and recognises the need for child protection policies in this context.<sup>300</sup>

**28.** The Union of Orthodox Hebrew Congregations (UOHC) – a representative organisation for Charedi synagogues and households in London – did not have a child protection policy in place at the time of the hearing.<sup>301</sup> While it stated that it is not a provider of services for children, Rabbi Jehudah Baumgarten (a member of the executive committee of the UOHC) accepted that it might be “*a good idea*” for the UOHC to put in place a policy.<sup>302</sup> The UOHC has since put a policy in place.<sup>303</sup>

**29.** The Council for Mosques in Bradford, an organisation for mosques and Muslim faith supplementary schools within the Bradford Metropolitan District Council area, does not have any policies in place in respect of child protection, as it “*does not directly work with children*”.<sup>304</sup> It does not require its member organisations to have such policies in place, and was not able to assist the Inquiry as to whether and if so how many of its member organisations had such policies.<sup>305</sup>

**30.** The Council of African and Afro-Caribbean Churches UK does not have its own child protection policy, but does encourage member denominations to have one.<sup>306</sup> The Evangelical Alliance (a large representative organisation for evangelical churches from a number of different denominations and traditions serving approximately 2 million people) has a safeguarding policy but does not require its members to have one.<sup>307</sup>

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<sup>296</sup> ILM000001\_004-005 paras 14, 15, 18

<sup>297</sup> ILM000001\_008-011 paras 33, 42; ILM000027; ILM000028; ILM000029

<sup>298</sup> ILM000001\_009 para 34

<sup>299</sup> INQ005160\_004 paras 18–19; SFI000001\_007 para 17; THO000076\_018 para 16.5

<sup>300</sup> INQ005154

<sup>301</sup> OHC000001\_010 para 40

<sup>302</sup> Jehudah Baumgarten 12 August 2020 109/7-14

<sup>303</sup> OHC000011

<sup>304</sup> CFM000001\_005 para 20

<sup>305</sup> CFM000001\_001, 002, 005 paras 4, 7, 20

<sup>306</sup> CAC000003\_003 para 7

<sup>307</sup> Peter Lynas 20 May 2020 101/8-21; 103/1-4

## Positive examples

**31.** There were organisations and settings across a range of faiths, of different sizes and structures, that had policies that appeared to be appropriate. We set out some illustrative examples below.

**31.1.** Masorti Judaism has a comprehensive suite of policies, including a clear and simple child protection policy, a policy on confidentiality and referral, and a policy on disclosure. The organisation first introduced safeguarding and child protection policies in the 1980s, and has revised them annually over the past 10 years.<sup>308</sup>

**31.2.** The Baptist Union of Great Britain is another example of an organisation with effective policies in place. It has a model safeguarding policy and procedures for its member churches, as well as its own child protection policies, including a policy setting out the role of designated persons for safeguarding. It has structures at a local, regional and national level to ensure that its policies are implemented in practice.<sup>309</sup>

**31.3.** The Green Lane Masjid and Community Centre has a detailed *Safeguarding Policy and Procedures* document, which provides guidance about abuse, where it can take place (making it clear that it can happen anywhere), and responsibilities of staff and volunteers.<sup>310</sup> While the document is helpful and comprehensive, it is dated November 2014 and it ought to be updated to reflect the most recent government and other guidance in this area. The Centre also has a shorter *Child Protection Policy*, which applies to staff and volunteers working with the madrasah (a religious education school) and identifies different types of abuse and simple steps that must be taken if incidents of abuse are raised.<sup>311</sup>

**31.4.** The Triratna Buddhist Order and Community (Triratna) publishes sample child protection policies every year for use by local groups.<sup>312</sup> The 2019 policy includes guidance on spotting signs of abuse, recording allegations, escalating concerns and the need to refer cases to the police.<sup>313</sup> Safeguarding issues have been brought to the fore within Triratna as a result of the allegations made against its founder, Sangharakshita. Sangharakshita had sexual relationships with up to 24 young men who were his followers, the youngest of whom was 18 years old. A few have said “*they felt their consent was compromised to a greater or lesser extent by their respect for him as their teacher*”.<sup>314</sup> Another young person aged 17, unconnected with Triratna, reported that he had sex with Sangharakshita.<sup>315</sup>

## D.3: Safer recruitment

**32.** A central aspect of keeping children safe in any organisation (including religious organisations) is the use of safer recruitment. Safer recruitment includes, for example, having application processes that focus on child protection and rigorous examination of references

<sup>308</sup> MAS000001\_007 para 21

<sup>309</sup> BUG000001\_007-011

<sup>310</sup> GLM000003

<sup>311</sup> GLM000001\_002, 004; GLM000004

<sup>312</sup> TBO000001\_004

<sup>313</sup> TBO000003

<sup>314</sup> TBO000001\_002

<sup>315</sup> TBO000001\_002

and history, interviews that ask about values, attitudes and approaches to child protection, and applying for relevant checks of an individual's criminal record or suitability to work with children.

**33.** As the NSPCC stated, the purpose of safer recruitment is “to build as complete a picture of each applicant as possible and to identify and eliminate unsuitable applicants”.<sup>316</sup>

### Guidance on safer recruitment generally

**34.** According to *Working Together*, voluntary and faith-based organisations should have in place policies and practices for the safe recruitment of “individuals whom the organisation or agency permit to work regularly with children, including policies on when to obtain a criminal record check”.<sup>317</sup> It also states that these policies and practices “should be followed and systems should be in place to ensure compliance in this”.<sup>318</sup>

**35.** There are a number of sources for religious organisations and other voluntary organisations to draw on in preparing their own tailored safer recruitment policies.

**35.1.** The Charity Commission states that “commitment to safe recruitment, selection and vetting” are “essential inclusions for a child protection policy” for registered charities, and provides guidance to charities on what safer recruitment entails.<sup>319</sup>

**35.2.** The NSPCC’s *Introductory guide to safeguarding and child protection for the voluntary and community sector* recommends that organisations have a written policy on safer recruitment and induction, as well as on the recruitment of ex-offenders.<sup>320</sup>

**35.3.** *Keeping Children Safe in Education* is designed for use by schools and colleges when carrying out their duties to safeguard and promote the welfare of children.<sup>321</sup> It is not directly applicable to religious organisations but many such organisations do refer to it because it contains detailed guidance on Disclosure and Barring Service (DBS) checks, pre-appointment checks, employment history and references.<sup>322</sup> While this provides some helpful direction, most of the content is not intended for religious organisations which are largely volunteer-led.<sup>323</sup>

### Disclosure and barring

**36.** An important part of effective safer recruitment practice is checking that individuals who wish to work with children (in either a paid role or on a volunteer basis) do not have convictions that would make them unsuitable for such work, as well as ensuring that there is no intelligence about them suggesting that they should not work with children (‘vetting information’).

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<sup>316</sup> NSP000156\_034

<sup>317</sup> DFE002815\_056

<sup>318</sup> DFE002815\_071

<sup>319</sup> CYC000150\_003-004; CYC000426\_006

<sup>320</sup> NSP000155\_011

<sup>321</sup> *Keeping Children Safe in Education* September 2018: HOM003279; September 2019: ILM000011; September 2020: INQ006342

<sup>322</sup> The DBS is a non-departmental public body, sponsored by the Home Office, that currently operates this system (DBS000024\_001-002).

<sup>323</sup> Justin Humphreys 18 May 2020 74/16-75/18

**37.** Under current legislation, it is a criminal offence for an individual to seek to undertake 'regulated activity' (explained below) with children if they are on a DBS list of those barred from doing so (the barred list), or to permit someone who is known to be on the barred list to undertake regulated activity.<sup>324</sup>

### *Different levels of DBS check*

**38.** The type and level of check ('DBS check') that an organisation can undertake varies depending on whether or not someone is carrying out regulated activity. The DBS has the power to issue four types of certification:<sup>325</sup>

- **Basic certificates:** these are for any position or purpose. They include details of convictions and conditional cautions that are considered to be unspent under the terms of the Rehabilitation of Offenders Act 1974.<sup>326</sup>
- **Standard certificates:** these are for those working in certain roles specified in legislation as a regulated activity (for example, those involving the teaching, training, care or supervision of children) and include unspent and spent convictions, cautions, reprimands and warnings.
- **Enhanced certificates:** these involve the highest level of check and are for anyone working with vulnerable groups and in other positions involving a high degree of trust. They include the same information as standard certificates but also information that the local police force reasonably believes is relevant and ought to be disclosed.<sup>327</sup>
- **Enhanced certificates with barred lists checks:** these are for those working in regulated activity with children or vulnerable adults. They include the information in enhanced certificates, and also a check of the children or adult barred lists.

### *Regulated activity*

**39.** The highest levels of checks are only possible for those who are seen as being engaged in regulated activity.

**40.** Regulated activity is defined in the Safeguarding Vulnerable Groups Act 2006, as amended by the Protection of Freedoms Act 2012.<sup>328</sup> The majority of organisations involved in this investigation expressed concern about who should be checked in a religious organisation, because of the complexity of the definition of regulated activity. There is a genuine and widespread lack of understanding about this issue felt by a number of organisations.

**41.** Those within religious organisations who are teaching, training or otherwise instructing children are only considered to be carrying out a regulated activity if this is sufficiently regular (ie on more than three days in a 30-day period, or overnight between 2.00am and 6.00am with contact with children).<sup>329</sup> There is no basis on which someone who is

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<sup>324</sup> [HOM003279\\_033 para 121](#)

<sup>325</sup> [HOM003294\\_002-003 para 10](#)

<sup>326</sup> The DBS cannot access criminal records held overseas, and overseas criminal records will only be held on UK police records in a small number of cases ([DBS000024\\_007 paras 6.1–6.4](#)).

<sup>327</sup> Roles listed in the [Rehabilitation of Offenders Act 1974 \(Exceptions\) Order 1975](#) and the [Police Act 1997 \(Criminal Records\) Regulations 2002](#)

<sup>328</sup> [Safeguarding Vulnerable Groups Act 2006 schedule 4](#)

<sup>329</sup> [DBS000245\\_001](#)



in a position of power or trust over a child in a religious organisation, but who may not teach, train or instruct them directly, would automatically be considered to be undertaking regulated activity.

**42.** Furthermore, those who are volunteers and are supervised by someone who has an enhanced DBS check will not need to be checked. Given the significant number of volunteers in most religious organisations, this could lead to many of those working with children not requiring enhanced checks, depending on what is understood by supervision. The Charity Commission, the Home Office and the Department for Education all provide guidance on this issue for all organisations but the evidence we received was that some religious organisations still struggle with the notion of regulated activity notwithstanding the guidance.<sup>330</sup> The Charity Commission indicated during the hearing that it would be helpful if the current framework for regulated activity could be revisited because of its complexity.<sup>331</sup>

**43.** In the experience of Reshet (an organisation providing training and guidance to Jewish religious and youth organisations), there remains confusion about the definition of regulated activity. Ms Shelley Marsh, Executive Director of Reshet, did not “*think it does what it was set out to do*”.<sup>332</sup>

**44.** The key issue within the Jewish community was that “*you can be in a position of influence without necessarily having any kind of rabbinical status in the Jewish community*”, and such individuals would play a significant role in the life of a Jewish child.<sup>333</sup> There are a number of people involved in working in synagogues who she believed ought to receive a level of check which they are not currently able to receive.<sup>334</sup>

**45.** Ms Rebecca Fetterman, Director of Youth and Designated Safeguarding Lead at Liberal Judaism, told us that it uses freelance rabbis. Although they may go into people’s homes where children may be present, Liberal Judaism is unable to obtain an enhanced DBS check with a check of the barred list for children for these rabbis under the current guidelines.<sup>335</sup> Likewise, in its religious schools, teachers may work alone with children but only for an hour once a month. They cannot undergo these checks, even if Liberal Judaism’s risk assessment concludes that they ought to.<sup>336</sup> As a result, Liberal Judaism takes great care in selecting the job titles that it gives its employees to frame them in such a way that they are eligible for an enhanced DBS check with a check of the barred list for children.<sup>337</sup>

**46.** Mr Peter Lynas, UK Director of the Evangelical Alliance, reported that some of its 500 member religious organisations and settings found the guidance around regulated activity to be unclear, with many of the examples “*driven from the education sector and a more full-time working environment rather than a voluntary organisation setup*”.<sup>338</sup> Its members “*would like more discretion to check*” a greater number of people. As a result, the Evangelical Alliance would support the extension of DBS checks to those “*who are ultimately responsible for a regulated activity*”, but thought that it may be difficult to define what is meant by ‘ultimate responsibility’.<sup>339</sup>

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<sup>330</sup> CYC000455; DFE003468; Justin Humphreys 18 May 2020 69/16-71/15; CYC000426

<sup>331</sup> Harvey Grenville 14 August 2020 23/7-24/21

<sup>332</sup> Shelley Marsh 11 May 2020 138/25-139/3

<sup>333</sup> Shelley Marsh 11 May 2020 140/6-9

<sup>334</sup> Shelley Marsh 11 May 2020 139/4-18

<sup>335</sup> Rebecca Fetterman 12 May 2020 28/9-20

<sup>336</sup> Rebecca Fetterman 12 May 2020 29/6-17

<sup>337</sup> Rebecca Fetterman 12 May 2020 29/18-30/13; Ms Fetterman used the term ‘DBS check’. We have taken this to mean the barred list check, as Liberal Judaism would in fact be entitled to obtain an enhanced DBS check for these individuals.

<sup>338</sup> Peter Lynas 20 May 2020 82/10-20; 122/8-22

<sup>339</sup> Peter Lynas 20 May 2020 122/23-124/16

**47.** Ms Catherine Hopper (whose ordination name is Munisha) from Triratna said that, in deciding who within the Order met the definition of regulated activity, she found the guidance to be *“incredibly unclear. I find it very difficult to get really clear standard advice on who is eligible”*. She said that she had contacted the DBS for clarity but *“couldn’t understand the answers”*.<sup>340</sup>

**48.** Professor Keith Brown, Director of the National Centre for Post-Qualifying Social Work and Professional Practice, considered that all of those who are *“involved in pastoral ministry of any type should be subject to vetting checks”*, whether it amounted to regulated activity or not.<sup>341</sup>

**49.** Thirtyone:eight is the largest provider of DBS checks for the religious sector in the country, undertaking approximately 74,000 a year. Mr Humphreys did not believe that the current DBS system was effective in ensuring that those working with children within the faith sector are receiving the appropriate checks.<sup>342</sup> In particular, the concept of supervision poses a problem, especially with the use of volunteers:

*“So how much supervision is required? What does that supervision need to look like? And how much contact in the context of that supervision means that somebody really needs to have one level of check rather than another?”*<sup>343</sup>

As a result, Mr Humphreys did not think that the current definition of regulated activity captures the complexity of the activities that churches undertake with children in order to enable a comprehensive assessment.<sup>344</sup>

**50.** Mr Phillip Noyes, Chief Advisor on Child Protection at the NSPCC, thought there was often a mismatch between who the organisation thinks should be checked and who it is permitted to check under the definition of regulated activity.<sup>345</sup> Mr Noyes recommended removing the supervision exemption altogether. To do so would:

*“much better fit how children actually relate to people. It would also, I think, actually clarify more of a commonsense way for many of the people that use the system, the relevance of the checks, which are felt to be really quite formulaic and actually quite difficult to understand.”*<sup>346</sup>

**51.** Mr Daniel Greaves, Crime Director at the Home Office, thought the definition of regulated activity was *“proportionate and a practical response to identify those at highest risk of harming children”*.<sup>347</sup> He described the definition itself as *“fairly simple and straightforward”*, but that it was the *“complexity of the world around us and how that is applied to different contexts”* that creates the challenge.<sup>348</sup> He told us that the Home Office is committed to making the guidance around DBS checks as transparent as possible:

*“if a significant overhaul is required requiring new legislation or a new balance between public policy objectives, of course that would be for ministers”*.<sup>349</sup>

<sup>340</sup> Catherine Hopper 21 May 2020 25/8-17

<sup>341</sup> KBN000001\_004 para 19

<sup>342</sup> Justin Humphreys 18 May 2020 69/2-20

<sup>343</sup> Justin Humphreys 18 May 2020 72/2-14

<sup>344</sup> Justin Humphreys 18 May 2020 71/16-23

<sup>345</sup> Phillip Noyes 20 May 2020 65/6-12; 66/7-10

<sup>346</sup> Phillip Noyes 20 May 2020 65/24-66/7

<sup>347</sup> Daniel Greaves 13 August 2020 75/13-78/1

<sup>348</sup> Daniel Greaves 13 August 2020 82/14-22

<sup>349</sup> Daniel Greaves 13 August 2020 75/13-78/1

52. We anticipate that this is an issue to which we will return in the Inquiry's final report.

### *Implementation of disclosure and barring checks by religious organisations and settings*

53. Many religious organisations and settings do not consistently undertake DBS checks of those who may have contact with children, which is an essential prerequisite for adequate child protection.

54. SFI identified that, out of the 446 places of worship that had completed one of its 'health checks', only 37 percent had up-to-date DBS checks for all staff engaged in regulated activity with children.<sup>350</sup> The NSPCC Helpline received 142 contacts concerned about sexual abuse within a religious setting between April 2015 and March 2019, a significant majority of which related to Christian denominations. Among the issues raised was a concern that DBS checks and safer recruitment procedures were not being followed by religious organisations and settings.<sup>351</sup>

55. There are many reasons why such checks are not undertaken. Some religious organisations do not consider that their activities fall within the definition of a regulated activity.

**55.1.** The Church of Jesus Christ of Latter-day Saints does not routinely undertake DBS checks.<sup>352</sup> It believed that this is not mandated in law and considered that its "*clear, robust and well-managed policies, procedures and arrangements for safeguarding children ... minimise the risk of abuse and protect from harm the children and youth*".<sup>353</sup> Those procedures include that:

- a person must not be given a Church calling that involves working with children if their record has an annotation of child sexual abuse;
- at least two adults must be present when children are being taught, or at church-sponsored activities where children are present;
- members of the Church are only recruited after being 'called' to serve within the ward in which they live, following a "*thorough searching interview*" with the bishop, and after their name has been presented and maintained by the entire congregation of the ward.<sup>354</sup>

The Church does undertake ad hoc DBS checking. For example, it undertook checks for all members who worked directly with youth of the Church during a 'For the Strength of Youth' conference in August 2019. The Church told us that it is considering how it can more fully make use of these checks.

**55.2.** The Jehovah's Witnesses do not undertake vetting and barring checks on elders, ministerial servants (who provide practical help and assist the elders), or those who run the organisation regionally or at a national level.<sup>355</sup> This is because they consider that they do not separate children from their parents during religious worship, practice or when children are in the company of someone in a position of trust, and so such checks

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<sup>350</sup> SFI000001\_006 para 16; Natan Levy 12 May 2020 117/21-119/2

<sup>351</sup> NSP000147\_018

<sup>352</sup> It should be noted that all its religious elders are volunteers and it has no paid clergy or worship leaders.

<sup>353</sup> CJC000001\_011

<sup>354</sup> CJC000001\_011

<sup>355</sup> CJW000052\_002-004 paras 10, 12-17

are not permitted by law.<sup>356</sup> This fails to recognise that the mere presence of parents does not prevent those in positions of trust from developing inappropriate relationships with children, or being able to groom both the children and their families.<sup>357</sup>

**55.3.** Before Guru Nanak Gurdwara in Smethwick was contacted by the Inquiry, its Granthis (volunteer leaders of prayers and communal worship within Sikh gurdwaras) were not subject to a DBS check, although previous employers were contacted for a reference.<sup>358</sup> Those references were “to ensure they lead an exemplary life and are respectable individuals”.<sup>359</sup> This is not the same as checking their suitability to work with children. Granthis are not required to undergo any child protection training.<sup>360</sup> At the time of the public hearing in May 2021, Mr Jatinder Singh Basi, one of the trustees of the Gurdwara and a member of the Sikh Council UK, told us that all volunteers and staff teaching at the Gurdwara now receive an enhanced DBS check.<sup>361</sup>

**56.** DBS checks may not be undertaken because smaller organisations or those without significant financial resources find the system for processing them too onerous.<sup>362</sup> Rabbi Levy thought that this was because of a combination of a lack of expertise or understanding about the process, a lack of funding to pay for the number of DBS checks required or, in some cases, a belief that a DBS check from another employer was sufficient.<sup>363</sup>

**57.** There may also be discomfort about asking volunteers to undergo such checks. In a 2018 position paper, Reshet noted that, in relation to the Jewish organisations it surveyed and spoke with, volunteers and trustees were:

*“not all checked through the Disclosure and Barring Service prior to staffing youth activities. There are a number of organisations that continue to feel uncomfortable about asking volunteers ... to undertake this process.”*<sup>364</sup>

In Ms Marsh’s view, asking trustees to undergo DBS checks “can still be fairly challenging”, and it was an area that she thought required further work.<sup>365</sup>

## Implementation of safer recruitment

**58.** In 2015–16, Reshet carried out a survey of Jewish organisations to assess those areas where organisations thought that they required further child protection training. Twenty of the 64 individuals who responded, from 45 different organisations, felt that they needed further training on safer recruitment.<sup>366</sup> In 2018, Reshet prepared a position paper following a voluntary review of the policies and procedures in place within a sample of Jewish organisations. It concluded that, although most organisations had some form of child protection policy in place, a number did not have safer recruitment policies, which are required to support effective organisational child protection.<sup>367</sup>

<sup>356</sup> CJW000052\_021 para 75

<sup>357</sup> Duncan Corbett 10 August 2020 80/19-82/24; Paul Gillies 11 August 2020 10/20-13/17

<sup>358</sup> GNG000001\_002 para 7

<sup>359</sup> Jatinder Basi 15 May 2020 140/5-16

<sup>360</sup> GNG000001\_005 para 26

<sup>361</sup> Jatinder Basi 15 May 2020 140/3-141/3

<sup>362</sup> THO000076\_025; Natan Levy 12 May 2020 151/16-152/10; PGF000002\_011; GAU000001\_004

<sup>363</sup> Natan Levy 12 May 2020 118-119

<sup>364</sup> RES000009\_009

<sup>365</sup> Shelley Marsh 11 May 2020 137/21-138/20

<sup>366</sup> RES000004\_001-002

<sup>367</sup> RES000009\_008

**59.** SFI assessed the child protection policies and procedures of 446 places of worship, the largest proportion of which were Islamic.<sup>368</sup> They found a “*serious lack of the proper recruitment process*” for teachers within madrasahs.<sup>369</sup>

**60.** Mr Humphreys expressed concern about the quality of available guidance on safer recruitment within religious organisations and settings.<sup>370</sup> In his view, there should be specific guidance on safer recruitment in the voluntary sector, including the faith sector, because there are clear operational differences, including resourcing, structure and focus, with most religious organisations being led by volunteers. He said that the expectations on the organisations needed to be different:

*“frameworks that are applied to safer recruitment have to be sufficient that they can be flexed and scaled depending on the nature of the work, the size of the workforce.”*<sup>371</sup>

**61.** There was little evidence of religious umbrella bodies and representative organisations taking decisive steps to assist their member organisations with safer recruitment. The United Synagogue is a rare example of a religious umbrella body providing support in relation to safer recruitment. Dr Steven Wilson, Chief Executive of the United Synagogue, explained how, in addition to DBS checking all of those employed centrally on a national level, there is a child protection coordinator who checks that local congregations are carrying out checks appropriately and chases them up when they are not.<sup>372</sup>

**62.** There were some organisations with more comprehensive safer recruitment arrangements in place. For example, the Methodist Church in Britain uses selection criteria to consider the child protection compliance and suitability of candidates for ordination, ie to become paid or volunteer clergy. This includes assessing whether they are likely to breach boundaries in personal and pastoral relationships, and to fail to accept the discipline of the Church (including its standing orders).<sup>373</sup> A circuit superintendent, who makes a preliminary assessment of a candidate’s suitability, will consider whether a candidate shows “*an awareness of safeguarding, the discipline of the Church and a respect for the diversity of views within Methodism*”.<sup>374</sup> As part of the recruitment process, a candidate must complete an application form and provide two references – one from the candidate’s most recent employer and the other from a ‘critical friend’ (ie someone close enough to the candidate to know about their “*journey of discernment*”, but also able to identify areas of development). The employer’s reference form specifically asks “*Do you know of any reasons why this candidate should not work with children/young people or adults who may be vulnerable?*”<sup>375</sup> The Methodist Church makes use of compulsory psychological assessments, specifically including child protection.<sup>376</sup> All candidates must also obtain satisfactory DBS clearance prior to commencing training.<sup>377</sup>

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<sup>368</sup> The SFI Network is a programme supported by the Ministry of Housing, Communities and Local Government that aims to create stronger, healthier, integrated and accessible places of worship.

<sup>369</sup> Natan Levy 12 May 2020 143/2-10

<sup>370</sup> Justin Humphreys 18 May 2020 81/13-82/19

<sup>371</sup> Justin Humphreys 18 May 2020 74/16-75/15

<sup>372</sup> UNS000001\_019

<sup>373</sup> MST000149\_010-011

<sup>374</sup> MST000149\_011

<sup>375</sup> MST000149\_011 para 10.6

<sup>376</sup> MST000149\_011 para 10.9

<sup>377</sup> MST000149\_009 para 9.2

## D.4: Child protection training

**63.** There is also significant variation in the nature and scope of child protection training offered in the religious organisations and settings examined in this investigation.

**64.** Training offered by local authorities to the voluntary sector on child protection has a varied uptake among religious organisations, with some local authorities stating that no religious bodies had come to their training over the past few years.<sup>378</sup> There is variation, too, in the content of training and in who is trained. In some cases, it is simply staff employed by the organisation who are trained – in others, training is extended to volunteers too.

**65.** It is not the case that larger organisations necessarily have more sophisticated child protection training programmes. For example, Triratna offers child protection training, as do the Bahá'ís, the Religious Society of Friends in Britain (Quakers), the Church of Jesus Christ of Latter-day Saints and the Church of Scientology, each of which represent relatively small religious communities in this country.<sup>379</sup>

### Guidance on child protection training

**66.** Statutory bodies have been advising religious organisations to provide training for staff, office holders and volunteers for the past two decades. Since 2002, the Charity Commission has published safeguarding guidance for charities and charity trustees.<sup>380</sup> Presently, the Charity Commission advises that if a charity works with children or adults at risk, the trustees should “*make sure all staff and volunteers receive regular training on child protection or working with adults at risk*”.<sup>381</sup> A recent update to the Charity Commission’s guidance contains an infographic detailing 10 actions that trustees need to take to ensure good safeguarding governance, which includes that trustees should “*Regularly evaluate any safeguarding training provided, ensuring it is current and relevant*”.<sup>382</sup> While failing to follow this guidance may amount to a breach of the duty of trustees, there are no current statutory requirements for this guidance to be followed by trustees, nor that those engaged in work on behalf of charities should have such training.

**67.** There is no ‘standardised’ guidance at present for what training should look like for religious or other voluntary organisations, although there is a general presumption by statutory agencies that such training is necessary. For example, the Voluntary Code of Practice on keeping children safe in out-of-school settings, which is designed to include faith settings, provides that all staff and volunteers should have this training.<sup>383</sup> This should include knowing what indicators may amount to abuse, how and what to do if you suspect that a child may be at risk of abuse, the procedure to use in the event of allegations or concerns about abuse in the organisation, a complaints procedure for children and young people to raise child protection concerns, and also how to deal with a child who may disclose abuse.<sup>384</sup>

<sup>378</sup> LBT004244\_012-013 para 37; HAC000001\_004 para 17; BFC000088\_009 paras 44–45

<sup>379</sup> TBO000001; BAH000008; CJC000001; COS000001

<sup>380</sup> CYC000440\_015 para 66

<sup>381</sup> CYC000426\_007

<sup>382</sup> CYC000429

<sup>383</sup> DFE003469\_003-004\_018

<sup>384</sup> DFE003469\_018

## Current practice within religious organisations and settings

**68.** There is significant variation at present in the extent to which religious organisations and settings follow the guidance on child protection training that is available to them.

### *The Shree Hindu Temple and Community Centre*

**69.** The Shree Temple is an example of an organisation with no training processes in place, despite serving a community in excess of 5,000 people. The Temple retains a number of priests who work on a self-employed basis, as well as office staff, premises officers, kitchen staff and teaching staff who are all salary based, and a group of English teachers who are paid travel expenses only. At the time of the public hearing, no training relating to child protection had taken place at the Temple, nor was there any requirement for those working at the Temple to have undergone such training externally.<sup>385</sup> While the Temple has recently engaged consultants to assist in improving its child protection arrangements, its current child protection arrangements are inadequate.<sup>386</sup>

### *The Jehovah's Witnesses*

**70.** The Jehovah's Witnesses arrange their own in-house training and do not draw on any external assistance. Mr Paul Gillies, the Director of the Office of Public Information for the Jehovah's Witnesses internationally, and formerly a member of the UK Branch Committee (the body that runs the Jehovah's Witnesses organisation in the United Kingdom and Eire), explained that:

*"it's managed internally because the training is for what we do as a religious organisation ... it is very much a religious application of Bible principles."*<sup>387</sup>

As part of this training programme, elders appointed to serve on the Branch Committee (ie to be part of the 'Head Office' and thus provide advice about child protection to those elders in individual congregations who telephone to ask for it) are required to attend a five-month training school at the world headquarters.<sup>388</sup> The training deals with "*how to be a good shepherd*" and enables elders to "*familiarise themselves with ... the running of a branch office*" as well as relevant policies.<sup>389</sup> Those occupying other posts are required to undertake different forms of training. The Jehovah's Witnesses do not currently seek external assistance from child protection professionals in relation to their training. This is based on an assumption that the organisation itself has sufficient internal expertise. Like many other organisations, the Jehovah's Witnesses would benefit from external assistance from child protection professionals.

### *Religious umbrella bodies*

**71.** There is limited evidence of religious umbrella bodies and representative organisations taking a proactive role in encouraging or facilitating child protection training within their member organisations.

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<sup>385</sup> STC000001\_002 para 5; Shital Adatia 12 May 2020 52/1-5

<sup>386</sup> STC000001\_001, 004 paras 1, 13

<sup>387</sup> Paul Gillies 10 August 2020 157/25-158/19

<sup>388</sup> CJW000052\_011 para 47

<sup>389</sup> Paul Gillies 10 August 2020 156/20-157/8

**72.** Mr Adatia said that, as far as he was aware, umbrella bodies such as the National Council of Hindu Temples and the Hindu Council have not provided the Shree Temple with any advice or guidance.<sup>390</sup> This was confirmed by the Hindu Council UK, which stated that Hindu temples and religious organisations should have robust child protection policies.<sup>391</sup>

**73.** The Mosques and Imams National Advisory Board (MINAB) is a Muslim advisory board counting over 500 members, the majority of which are institutions.<sup>392</sup> MINAB does not itself offer any safeguarding or child protection training to its members, though it “*checks, verifies and recommends suitable outsourced service providers*”.<sup>393</sup> In particular, MINAB has recommended the work of Strengthening Faith Institutions to its members and has partnered with Faith Associates in its Beacon Mosque programme. In 2018 and 2019, MINAB undertook 15 roadshows for its members which focussed on safeguarding, including child sexual abuse.<sup>394</sup>

**74.** The UOHC does not impose any formal requirement on its member synagogues in relation to training, though it has recently begun encouraging synagogues to ensure that they have members who are trained in child protection.<sup>395</sup> The Interlink Foundation, which provides consultancy and training to a variety of Orthodox Jewish organisations, does provide such training, but there is no requirement that UOHC synagogues use its services.<sup>396</sup>

**75.** The 40 member communities and synagogues of Liberal Judaism, which themselves have a total of approximately 10,000 members, are autonomous in all areas, including finance, recruitment and the provision of services.<sup>397</sup> Until recently, Liberal Judaism did not offer oversight of its members’ child protection practices.<sup>398</sup> However, in November 2019, the Liberal Judaism Council decided that, in order to be a member of Liberal Judaism, there would be a requirement to have a child protection policy and to send senior staff or volunteers on accredited training.<sup>399</sup> Liberal Judaism has collaborated with Reform Judaism in creating two training programmes, one for trustees and another for designated safeguarding leads.<sup>400</sup>

### *External training providers*

**76.** A number of organisations, across the full range of faiths, use external training providers with expertise in child protection. Some of these training providers may be faith-based or faith-led but identify that the practices and processes of child protection must explain the requirements of child protection as practised by statutory bodies.

**76.1.** Thirtyone:eight has been providing training within the Christian faith sector for over 25 years. It provides three levels of training: Foundation, Advanced and Specialist.<sup>401</sup>

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<sup>390</sup> Shital Adatia 12 May 2020 65/25-66/17

<sup>391</sup> HCU000001\_001

<sup>392</sup> MNB000001\_001-002 paras 2, 6

<sup>393</sup> MNB000001\_002 para 9

<sup>394</sup> Moin Azmi 13 May 2020 24/19-25; 41/10-11

<sup>395</sup> Jehudah Baumgarten 12 August 2020 93/20-95/2

<sup>396</sup> TIF000001\_003 para 10

<sup>397</sup> LIJ000002\_001 para 5; LIJ000002\_002 para 7

<sup>398</sup> Rebecca Fetterman 12 May 2020 6/8-13

<sup>399</sup> LIJ000002\_002 para 7

<sup>400</sup> Rebecca Fetterman 12 May 2020 8/24-9/22

<sup>401</sup> THO000076\_003-004 para 8b



**76.2.** The NSPCC provides child protection training and consultancy services to a range of organisations, including religious ones. Training is offered face-to-face and online. It offers a range of courses as part of a National Training Programme, from an ‘Introduction to safeguarding and child protection’ to more advanced courses such as ‘Training for trainers in child protection’.<sup>402</sup> The NSPCC notes that most requests for training from religious organisations have been for an introduction to child protection and safeguarding awareness, though it has also been commissioned to design and deliver bespoke courses for child protection specialists working in faith settings.<sup>403</sup>

**76.3.** During 2015 and 2016, Reshet carried out a survey in order to understand what training had already taken place within the Jewish faith sector, and what training was required.<sup>404</sup> The survey had 64 respondents from some 45 organisations. The majority of respondents had received some form of training – fewer than 10 respondents had received no training at all.<sup>405</sup> Among all of the areas of training identified, the top two categories in which respondents felt they needed more training were safeguarding and child protection.<sup>406</sup> Reshet concluded that there was a “*clear remit*” for it to provide “*signposting and support in this area of work*”.<sup>407</sup> Reshet primarily trains informal educators. It works with individuals across the whole of the Jewish community, though its engagement with the Charedi community is more limited.<sup>408</sup> In an attempt to ensure the quality of the child protection training it delivers, Reshet works solely with the NSPCC and the Social Care Institute for Excellence in offering its training.<sup>409</sup>

**76.4.** SFI was established in June 2016, mainly through a grant from the Ministry of Housing, Communities and Local Government.<sup>410</sup> Its main objective is to support places of worship that “*have potential to fall through the cracks*” – that is, “*mostly independent institutions, mainly on the small or medium scale who are independent and are mainly urban and, more often than not, in the BAME communities as well*”.<sup>411</sup> As at December 2019, over 10,000 people had attended SFI training workshops for faith institutions.<sup>412</sup> These workshops cover a range of topics relevant to the management of faith institutions, including ‘Introduction to risk management and effective governance for faith centres’ and ‘Fundraising and grant application writing for faith institutions’. There are also child protection workshops on ‘Safeguarding for children and vulnerable adults’ for ‘Awareness’ (basic), ‘Management and trustees’ (intermediate) and ‘Designated safeguarding lead’ (advanced).<sup>413</sup>

**76.5.** Faith Associates was created in 2004 to help develop governance models, strategies and capabilities within faith organisations. Mr Warraich noted that it quickly became clear that “*the Muslim community needed a lot more help than others at the time*”, and that developing capacity for child protection would be a key element of the work.<sup>414</sup> For the past five years, Faith Associates has been offering child protection

<sup>402</sup> NSP000147\_005 paras 19, 20

<sup>403</sup> NSP000147\_007-008 paras 29, 30

<sup>404</sup> RES000001\_008 paras 27-28

<sup>405</sup> RES000004\_002

<sup>406</sup> RES000004\_002

<sup>407</sup> RES000004\_001

<sup>408</sup> Shelley Marsh 11 May 2020 106/12-108/8

<sup>409</sup> Shelley Marsh 11 May 2020 109/21-110/11

<sup>410</sup> Natan Levy 12 May 2020 97/22-99/1

<sup>411</sup> Natan Levy 12 May 2020 97/22-99/1

<sup>412</sup> SFIO00001\_004-005 paras 11-12

<sup>413</sup> SFIO00001\_004-005 para 11

<sup>414</sup> Shaukat Warraich 13 May 2020 3/21-4/12

training at different levels almost every month across the UK.<sup>415</sup> Mr Warraich estimated that as many as 90 percent of imams, in his experience, have not had child protection training.<sup>416</sup>

**76.6.** There are also various online training providers used by religious organisations. Mr Kamran Hussain, the Chief Executive at Green Lane Masjid and Community Centre, told us that all of the teachers working at the madrasah associated with the Centre are expected to undertake specific training in child protection, which is offered online through EduCare.<sup>417</sup>

**77.** Local safeguarding children partnerships (like their predecessors, local safeguarding children boards) offer training for voluntary bodies, including religious organisations, as part of their work with the community. We obtained evidence from nine local authorities, all of whom considered that engaging with local religious groups was important and identified to us the central work that many religious organisations did in providing activities and services for children. Many local authorities have recognised that the needs of religious organisations are such that specific development of engagement and partnership working is required, given the mistrust or difficulties that have sometimes been encountered between them and religious bodies. The evidence, however, presents a mixed picture as to how far religious bodies use safeguarding partnerships to provide training. Some local authorities reported good uptake of training, such as in Bradford, while others, such as Hackney Council, identified difficulties with the take-up of training from the religious community.<sup>418</sup>

**78.** Ms Claire Marchant, Director of Social Services in Cardiff Council and Co-Chair of the Cardiff and Vale of Glamorgan Regional Safeguarding Children's Board, explained that Cardiff Council has actively worked with the Muslim Council of Wales to promote child protection. This work led to the development of *Safeguarding Policy for the Faith Sector*, which was launched in November 2017. Following the launch of the policy, formal training events were organised across the mosques within the city.<sup>419</sup> Ms Jasvinder Sanghera, Independent Chair of the Leeds Safeguarding Children Partnership, explained that her partnership has tiers of training – levels 1, 2 and 3 – for the faith sector. For organisations with a budget of under £250,000, the training is free. The issue, she explained, is with its take-up.<sup>420</sup> This was also echoed by the London Borough of Tower Hamlets and Birmingham Children's Trust.<sup>421</sup>

**79.** Despite examples of promising efforts and initiatives, the evidence suggests that training offered by local authorities is not being taken up by religious organisations to the extent that might be expected. An explanation for this was provided by Rabbi Levy, who identified some of the challenges with training offered by local authorities that have been highlighted by those institutions with which SFI works. The training courses offered by local authorities ordinarily take place during working hours, but those requiring the training from faith institutions are often volunteers who are therefore only free to attend during evenings or weekends. Local authority training is often offered at the local authority's own venue, which can be difficult for those from faith institutions to get to because of transport difficulties.

<sup>415</sup> Shaukat Warraich 13 May 2020 4/22-5/2

<sup>416</sup> Shaukat Warraich 13 May 2020 51/22-53/4

<sup>417</sup> Kamran Hussain 13 May 2020 95/13-96/4

<sup>418</sup> HAC000001\_004; Jim Gamble 11 August 2020 138/11-141/7

<sup>419</sup> CAR000001\_001

<sup>420</sup> Jasvinder Sanghera 14 May 2020 114/15-115/7

<sup>421</sup> Richard Baldwin 14 May 2020 115/10-19; Graham Tilby 14 May 2020 115/21-117/4

Given that local authorities often offer a wide variety of training, sometimes organisations may have to wait a significant length of time before they are able to next access the particular training they require.<sup>422</sup>

**80.** In certain cases, it appears that the reasons for religious institutions not using training provided by local authorities are more ideological. As noted by Ms Pragna Patel, founder of Southall Black Sisters:

*“Local authorities have been providing free training. It is not an accident that these people have not been using the free training that’s on offer. It absolutely is not an accident, because their clear agenda is to prevent state intervention.”*<sup>423</sup>

**81.** Professor Brown identified that some organisations may be concerned that “outside people” may try to interfere with their faith, which causes a kind of “nervousness”.<sup>424</sup> He considered that this nervousness is not required, but he says that there is:

*“this kind of concern that, ‘If I bring these people in that don’t understand me or don’t understand us or don’t understand my faith, they might start making comments on my faith, the way I use my faith and the way I present my faith, and, therefore, I feel much happier about keeping that within closed doors.”*<sup>425</sup>

## Obstacles to effective training

**82.** There appear to be a number of obstacles to the development of effective training within religious organisations and settings.

## Concerns about the understanding of secular organisations

**83.** Mr Moin Azmi, Vice Chair of MINAB, noted that his organisation would be less inclined to refer mosques or other organisations to organisations that were secular in nature, or were seen not to understand faith. He noted that there have been many instances where “local authorities have been found not to have understood the cultural and religious sensitivities”.<sup>426</sup> Ms Marsh told us that it is important that people feel comfortable with, and feel respect for, those they are being trained by.

*“I personally wouldn’t necessarily want to go and be trained by someone that I don’t have respect for or that I don’t think understands the nuance of the way that I work.”*<sup>427</sup>

Rabbi Levy noted that:

*“It adds a certain dimension in a faith centre to have someone who (a) understands where that faith is coming from, (b) understands the sensitivities involved and (c) actively uses their scripture, their text and their traditions to make it more relevant.”*<sup>428</sup>

**84.** Local authorities identified that concerns about the ‘faith literacy’ (as it is sometimes called) of non-religious organisations can make religious organisations reluctant to engage with them.<sup>429</sup> They also stated that there was a nervousness in the statutory sector of being

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<sup>422</sup> Natan Levy 12 May 2020 130/13-132/8

<sup>423</sup> Pragna Patel 15 May 2020 95/16-96/23

<sup>424</sup> Keith Brown 22 May 2020 50/12-51/8

<sup>425</sup> Keith Brown 22 May 2020 51/1-8

<sup>426</sup> Moin Azmi 13 May 2020 63/14-64/13

<sup>427</sup> Shelley Marsh 11 May 2020 109/2-9

<sup>428</sup> Natan Levy 12 May 2020 128/3-17

<sup>429</sup> Richard Baldwin 14 May 2020 14/6-11

involved with religious organisations, and a reluctance to talk about issues of child abuse.<sup>430</sup> Birmingham City Council has sought to create a forum organisation, the Birmingham Council of Faiths (involving 11 faith groups), to promote dialogue between faiths and between statutory agencies and faith groups.<sup>431</sup> There are genuine concerns that statutory bodies do not understand faith groups, and may not share their values and seek to impose ‘secular’ values on them.<sup>432</sup>

## Cost

**85.** Local authorities have all identified that they can and do provide training for the ‘third sector’ (ie charitable or voluntary organisations) at low or no cost. However, a number of organisations have suggested that cost is a significant obstacle in relation to the child protection training that local authorities offer. Ms Marsh noted that “*cost is always an issue in the third sector, and ... that’s very challenging*”.<sup>433</sup> The NSPCC pointed out that the fees they charge have “*resulted in limiting the number of religious organisations that have commissioned our training and consultancy services as some could not meet the fee required*”.<sup>434</sup>

## Respecting cultural sensitivities

**86.** Mr Warraich stated that “*We know certain cultures have certain levels of cultural sensitivity and we are mindful of that*”.<sup>435</sup> Mr Azmi noted that:

*“within Islam, there are certain aspects of respect given to the male and female body. So when you are discussing certain elements, you don’t need to be crude about it. You can say the same things, make the same points, whilst having respectful language, for example.”*<sup>436</sup>

Some organisations may be fearful of training, in case it does not respect those sensitivities. To give just one example, the NSPCC runs a programme called ‘Pants’, which aims to provide primary school children with a basic understanding of their autonomy, of their right to privacy, that adults have no right to touch them indecently and that they should tell someone if this happens. It does use some limited anatomically correct language to identify genitalia, and encourages use of such language. The NSPCC identified that it has been harder to reach and provide this awareness-raising in more socially conservative schools, and there are clusters of those from socially conservative religious backgrounds who have opposed the programme in their schools.<sup>437</sup>

## Training and experience obtained in other settings

**87.** There is evidence that, sometimes, those who have had child protection training in the context of other roles – for example, in their work as teachers or doctors – struggle to see why they are additionally required to undergo training provided by a religious organisation or setting.<sup>438</sup>

<sup>430</sup> Jasvinder Sanghera 14 May 2020 26/2-16 and 27/2-15

<sup>431</sup> Graham Tilby 14 May 2020 39/11-19

<sup>432</sup> Graham Tilby 14 May 2020 106/22-108/13

<sup>433</sup> Shelley Marsh 11 May 2020 129/3-18

<sup>434</sup> NSP000147\_006-007 para 25

<sup>435</sup> Shaukat Warraich 13 May 2020 60/25-61/24

<sup>436</sup> Moin Azmi 13 May 2020 62/23-63/4

<sup>437</sup> NSP000147\_008-009 paras 33-36

<sup>438</sup> Steven Wilson 12 August 2020 31/21-32/9

## Provision of high-quality training

**88.** The challenge of quality assurance in child protection training was highlighted by a number of individuals working within this sector. Ms Marsh considered that this is a real challenge:

*“it’s very easy to look on the internet, pay a small amount of money and then feel that you have done some training.”*<sup>439</sup>

Externally set minimum standards were, in Ms Marsh’s view, “essential” to ensure consistency in training. Mr Humphreys expressed a similar view:

*“we continue to hear of an appetite for having some mechanism or measure for assessing the consistency and content of training courses across settings and sectors.”*<sup>440</sup>

## Identification

**89.** A significant obstacle identified by organisations that offer training was not knowing which religious organisations exist in a particular area, and therefore to whom training should be offered.<sup>441</sup>

**90.** Mr Jim Gamble, the Independent Child Safeguarding Commissioner of the City and Hackney Safeguarding Children Partnership, noted that, outside of the established churches in the area, it is “*virtually impossible*” to map religious organisations that undertake work with children.<sup>442</sup> Mr Gamble’s experience was mirrored by other safeguarding children partnerships. Ms Jane Booth, who appeared on behalf of Working Together to Safeguard Children – the Bradford Partnership, noted that in her experience the Partnership is to a large extent dependent on organisations self-identifying.<sup>443</sup>

## Minimum standards for training in child protection

**91.** Mr Humphreys suggested that:

*“A cross-sector standard for training in the faith sector should be able to articulate the manner in which core common issues need to be addressed within training provision at the same time as avoiding becoming over-prescriptive such that it allows flexibility to be applied in a broad range of different settings and faith communities.”*<sup>444</sup>

**92.** There are a number of features of child protection training that should be implemented comprehensively and consistently.

**92.1. Content:** Effective training needs to assist individuals to identify the signs of abuse and to know how to react in a timely and effective manner. There needs to be a focus on reporting to statutory authorities promptly. It needs to be made clear that any action taken by an organisation does not prejudice or delay any external investigation by the statutory authorities.

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<sup>439</sup> Shelley Marsh 11 May 2020 109/21-110/11

<sup>440</sup> THO000076\_020 para 17.6

<sup>441</sup> Natan Levy 12 May 2020 137/13-138/2

<sup>442</sup> Jim Gamble 11 August 2020 125/7-126/10

<sup>443</sup> Jane Booth 11 August 2020 126/11-127/18

<sup>444</sup> THO000076\_020-021 para 17.7

**92.2. Different levels of training:** Clearly, it is not just those who work directly with children who require training. Those who hold key responsibilities, such as designated safeguarding leads, require training specific to their roles and responsibilities. The use of descriptors to identify training at different levels, such as ‘basic’, ‘intermediate’ and ‘advanced’, is helpful. We agree with Mr Humphreys that the levels set out in *Working Together to Safeguard Children* (2010) were useful in this regard.<sup>445</sup>

**92.3. Regularity:** Good training is not a one-off event – training needs to be systematic and regular.

**92.4. Tailoring training materials to the specific religious context:** There is a need for training materials to make sense within the particular religious context in which they are being used. Ms Marsh gave the example of a scenario that she came across in training materials, in which “*a woman had popped into the mikveh for ten minutes and left her children in the car*”. Ms Marsh pointed out that “*That’s just not a likely scenario. It’s just not possible for that to happen*” because “*the mikveh doesn’t take ten minutes*”.<sup>446</sup> Mr Christian McMullen, Head of Professional and Community Engagement at the NSPCC, noted that it is important that “*in faith communities, if you are going to win the hearts and minds of the community, then they need to be able to see themselves*” within policies, procedures or training.<sup>447</sup>

**93.** There was general support among the religious organisations and settings examined in the course of this investigation for some form of minimum standards as regards training. However, there was a diversity of views as to what that would entail.

**93.1.** The Evangelical Alliance was of the view that any minimum standards ought to be voluntary. Noting the diversity of the faith sector, Mr Emrys Jones, Operations Director, stated that it is “*difficult to see how compulsory policies, qualifications or training could sufficiently reflect this diversity in order to be effective*”.<sup>448</sup> By way of contrast, the Bahá’í community (which is a much smaller organisation) considered that it should be mandatory for religious organisations to have in place certain minimum standards, including training, as did the Druid Network.<sup>449</sup> The Green Lane Masjid and Community Centre, a large mosque in Birmingham, considered that some form of compulsory training should be in place for those who work with children, as did the Guru Nanak Gurdwara Smethwick for all trustees.<sup>450</sup> Neither size nor financial resources dictated the view of religious organisations as to the need for compulsory training. Many smaller organisations would welcome the provision of further training, organised on a regional or national basis, as they often find it difficult to organise and source this themselves.<sup>451</sup>

<sup>445</sup> THO000076\_020-021 para 17.7

<sup>446</sup> Shelley Marsh 11 May 2020 111/17-112/7

<sup>447</sup> Christian McMullen 20 May 2020 8/1-7

<sup>448</sup> EVA000001\_003 para 9; EVA000001\_014-015 para 60

<sup>449</sup> BAH000008\_26 paras 13.4–13.5

<sup>450</sup> GNG000001\_009 para 54

<sup>451</sup> GAU000001\_006 paras 33–36; DRU000001\_002

**93.2.** A number of the organisations we heard from expressed the view that child protection training should be available not just to those who work directly with children – many were of the view that training ought to be extended to faith leaders too. Rabbi Levy suggested that all faith leaders should have some level of training as a condition of their being able to become a faith leader in the community.<sup>452</sup> Professor Brown noted that many faith leaders of larger churches and denominations undertake some form of training to become a leader. He was of the view that child protection and aspects of leadership in child protection could form a compulsory part of that training.<sup>453</sup> Mr Gillies stated that he did not consider that a common qualification for all faith leaders related to child protection would be necessary for elders within the Jehovah’s Witnesses, “*given that congregations do not provide any activities that separate children from their parents*”.<sup>454</sup>

**93.3.** Mr Humphreys noted that it is “*incredibly important for a leader in any setting, faith-based or otherwise, to model what they expect to see*”. He pointed out that, in many faith organisations, senior leaders are content with simply appointing a safeguarding coordinator and assuming that child protection can be left in that person’s hands.<sup>455</sup> Triratna told us that it would “*welcome compulsory child protection training for those training for ordination ... and for any ordained person who teaches under the auspices of a Triratna charity*”.<sup>456</sup> An example of good practice, in Mr Humphreys’ view, would be senior faith leaders discussing child protection in the context of their preaching, in order to “*embed*” and “*normalise ... understanding of safeguarding*” within the religious organisation.<sup>457</sup>

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<sup>452</sup> Natan Levy 12 May 2020 154/22-25

<sup>453</sup> Keith Brown 22 May 2020 72/22-73/12

<sup>454</sup> CJW000115\_002 para 6

<sup>455</sup> Justin Humphreys 18 May 2020 37/5-19

<sup>456</sup> TBO000001\_015-016 para 28

<sup>457</sup> Justin Humphreys 18 May 2020 38/13-39/15

## Part E

# Responding to allegations of abuse

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# Responding to allegations of abuse

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## E.1: Introduction

1. Child protection policies should set out clearly the ways in which an organisation will respond to allegations or incidents, including details of when allegations will be passed on to statutory authorities. Religious organisations and settings also need processes in place for providing support to victims and survivors of abuse, and to be able to take measures within their organisation, where appropriate, to manage the continuing presence of those who have abused children within their religious organisation, to keep children safe.

## E.2: Responses to allegations of abuse and reporting to statutory authorities

2. The processes of the organisations we examined ranged from ill-defined to more effective systems.

### The Shree Hindu Temple and Community Centre

3. The Shree Hindu Temple and Community Centre in Leicester (the Shree Temple) is an example of an organisation without any clearly defined procedure for responding to concerns about child sexual abuse or reporting to statutory authorities.

4. Mr Shital Adatia, President of the Shree Temple, explained that it does not have anyone in place who acts as a designated safeguarding officer or performs a similar role, or a system for recording concerns, disclosures or allegations of child sexual abuse.<sup>458</sup> When asked whether the Shree Temple had a formal process for managing allegations and referring complaints, Mr Adatia said the process would be:

*“firstly, go to the office manager; if they can’t resolve it, then it’s the committee members; if not, the trustees; and then, ultimately, it would be the Charities Commission”.*<sup>459</sup>

5. When asked how worshippers would know about this process, Mr Adatia told us that *“Unfortunately, I think it’s if you know, you know”*.<sup>460</sup>

### The Jehovah’s Witnesses

6. Mr Paul Gillies, Director of the Office of Public Information for the Jehovah’s Witnesses, described the process used for responding to allegations of child sexual abuse, which was published in 2018.<sup>461</sup>

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<sup>458</sup> Shital Adatia 12 May 2020 42/7-43/13

<sup>459</sup> Shital Adatia 12 May 2020 53/9-18

<sup>460</sup> Shital Adatia 12 May 2020 54/4-10

<sup>461</sup> CJW000052\_012-016 para 53

**6.1.** On learning of an allegation, two elders must contact the Legal Department of the Branch Office for legal advice on reporting the allegation to the statutory authorities.<sup>462</sup>

**6.2.** Another elder, in the Service Department of the Branch Office, provides “*spiritual and child safeguarding direction to the elders*”.<sup>463</sup> The Service Department will also review the matter with the elders “*to determine whether there is reason to believe the complainant or any other minor is in danger of abuse from the accused*”. If they are, the Legal Department will provide the elders with “*legal advice on how the report should be made*”.<sup>464</sup> Members of the Service Department are elders who are trained in the Jehovah’s Witnesses’ child protection policies, but they do not currently receive any form of ongoing external training by child protection professionals.<sup>465</sup> In the current structure and in the absence of any guidance from child protection professionals, the Service Department should direct the elders to pass all allegations of child sexual abuse to the statutory authorities.

**6.3.** According to the policy, reports to statutory authorities may be made even if there is only one complainant and no other corroborating evidence.

**6.4.** If it is determined that a report to the statutory authorities should be made, the elders will be directed to do so immediately and to report back to the Service Department or the Legal Department once the matter has been reported. Although the Service Department is the central body which coordinates and provides advice, it does not make reports to the statutory authorities. According to the Jehovah’s Witnesses, this is because elders have the first-hand information about the particular allegations to give to the police.<sup>466</sup> An alternative to the current referral mechanism would be to have allegations referred by the Service Department. Such an approach would replicate the referral mechanism in some other religious organisations and would enable the Service Department to ensure that a report has been made.<sup>467</sup>

**6.5.** Elders are required to offer pastoral support to the complainant and the complainant’s family. There is no express referral to therapeutic support or services, or counselling from someone with professional experience in these situations. Only men are eligible to serve as elders. As identified in Part C, some women may find it impossible to discuss such matters with a man. The elders will also consider (at the same time or later) “*whether there is sufficient evidence to establish the allegation from a Scriptural perspective*”.<sup>468</sup> As discussed further below, this requires either a confession or the evidence of at least two people – one making the allegation and another to verify it. Mr Gillies explained that this internal process “*is solely to determine whether the accused should remain one of Jehovah’s Witnesses. It is exclusively an ecclesiastical process*”.<sup>469</sup>

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<sup>462</sup> Elders are voluntary leaders who carry out a number of religious responsibilities, including presiding over religious services and attending to the spiritual needs of congregants. They also provide comfort and support to congregants who request pastoral visits. See [CJW000052\\_003](#) para 11. The Britain Branch Office coordinates the religious activity of Jehovah’s Witnesses in England and Wales. See [CJW000052\\_003](#) paras 8–9

<sup>463</sup> The Service Department, within the Britain Branch Office which is staffed by volunteers, is responsible for providing guidance to Congregation elders on implementing the child safeguarding policy. [CJW000052\\_013](#) para 53

<sup>464</sup> [CJW000052\\_013](#)

<sup>465</sup> [Paul Gillies 10 August 2020 157/9-159/4](#)

<sup>466</sup> [Paul Gillies 11 August 2020 40/20-13/17-41/1](#)

<sup>467</sup> [The Anglican Church: Safeguarding in the Church of England and the Church in Wales Investigation Report](#) p50

<sup>468</sup> [CJW000052\\_014](#)

<sup>469</sup> [CJW000052\\_014](#)

**6.6.** If there is sufficient evidence from a scriptural perspective that a gross sin has been committed, elders will form an ecclesiastical judicial committee, which usually comprises three elders. If the committee determines that the accused is not ‘scripturally repentant’, they will be disfellowshipped (ie expelled). Mr Gillies explained that repentance is about restoration of an individual’s relationship with God:

*“That’s only possible if he is genuinely repentant. So, again, the standards of holiness connected with God’s holy name, Jehovah, that’s what we are interested in, and, if possible, if an individual can restore his relationship with God, which is primary”.*<sup>470</sup>

There is discretion for someone who is repentant not to be expelled, even if they have admitted sexual abuse.

**6.7.** When an accused is found by the ecclesiastical judicial committee to be ‘scripturally repentant’, an announcement will be made to the congregation that he or she has been reproved (ie admonished and subjected to disciplinary action). In cases of child sexual abuse where the accused is not expelled, the Service Department will direct the body of elders as to restrictions to be imposed on his or her activities within the congregation. This will include directing elders to strongly caution the offender to “avoid compromising situations with minors”, not giving the offender any “responsibilities, privileges, duties or tasks” in the congregation, and meeting with the parents of all minor children in the congregation to caution them that their children should never be left alone with the offender.<sup>471</sup> Mr Gillies explained that the internal process of the Jehovah’s Witnesses is “exclusively an ecclesiastical process and does not substitute for any actions or punishment deemed necessary by the secular authorities”.<sup>472</sup> It is imperative that the Jehovah’s Witnesses continue to keep this distinction clear in their policies and practices, since such responses alone may not be sufficient to ensure the protection of children.

**6.8.** Those accused who are disfellowshipped may apply to be reinstated.<sup>473</sup> In cases of child sexual abuse, requests for reinstatement would only be given serious consideration by elders if sufficient time had passed (years) for the individual to demonstrate scriptural repentance. The decision would be made by an ecclesiastical reinstatement committee, which usually comprises the same elders that disfellowshipped the individual. The blanket restrictions would still remain in place. It remains the case, however, that these might not in themselves be an adequate response to the risk still posed to children.

**6.9.** If there is not sufficient evidence to form an ecclesiastical judicial committee, the Service Department may nonetheless instruct elders to be vigilant with regard to the conduct and activity of the accused during congregation activities.

**7.** The recent case of *Lancashire County Council v E & F and Ors* [2020] EWHC 182 (Fam) provides an example in which the Jehovah’s Witnesses’ process for reporting allegations failed. In 2016, a mother disclosed to elders that her daughter had been sexually abused by the daughter’s father. Despite the alleged abuser continuing to live in the same household as the child, the elders did not report the abuse to the police until July 2019. During subsequent family proceedings, the Jehovah’s Witnesses resisted requests, and ultimately a summons, to provide statements from the elders involved about the investigations they carried out.

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<sup>470</sup> Paul Gillies 11 August 2020 42/25-43/5

<sup>471</sup> CJW000052\_015 para 53

<sup>472</sup> CJW000052\_014 para 53

<sup>473</sup> CJW000052\_016 para 53

Mrs Justice Lieven, who heard the case, commented that it raised “*very great concern about the safeguarding of children within the Jehovah’s Witness community*”.<sup>474</sup> Mr Gillies explained to us that “*the elders accepted the reassurances of the mother that she was providing proper safeguarding, and her extended family, so a report wasn’t made at that time*”.<sup>475</sup> He added that the present policy is that a report would be made to the police even if the parent refused to make one. This case illustrates that prior to the introduction of the Jehovah’s Witnesses’ 2018–2019 child protection policy, there was a risk of elders not referring matters to the statutory authorities because of misguided assurances given by parents. In this case, a referral to the statutory authorities should have been made by the elders when they first learned of the complaint.

## Liberal Judaism

**8.** Liberal Judaism is a progressive Jewish denomination with approximately 10,000 adherents across the UK.<sup>476</sup> It applies an internal threshold of seriousness before referring concerns about child sexual abuse to the statutory authorities.

**9.** Ms Rebecca Fetterman, Liberal Judaism’s Director of Youth and Designated Safeguarding Lead, explained that it would contact the local authority designated officer (LADO) to confirm whether they advised that the threshold had been reached for reporting to the police and social services.<sup>477</sup>

**10.** Assessments of seriousness are made by Ms Fetterman and one of her colleagues.<sup>478</sup> In the previous 10 years, Ms Fetterman believed there had been five investigations – including three incidents that were reported to the statutory authorities and two “*very minor*” harmful sexual behaviour incidents that were not.<sup>479</sup>

## The Union of Orthodox Hebrew Congregations

**11.** The Union of Orthodox Hebrew Congregations (UOHC) is a membership body for Charedi synagogues and households.<sup>480</sup> There are approximately 100 synagogues allied with the UOHC, which provide religious support to some 40,000 people in London.<sup>481</sup>

**12.** Within the UOHC, there was a mismatch between the organisation’s stated position and its actual practice in responding to allegations of child sexual abuse. Rabbi Jehudah Baumgarten told us, on behalf of the UOHC, that the Rabbinat:<sup>482</sup>

*“is clear about its position as to how members of the community should respond to allegations of child abuse ... Allegations should be referred to the relevant authorities; either the person responsible for safeguarding in the setting concerned (if statutory guidance stipulates as such ... ), or if this is not applicable then to children’s social care/ the police.”*<sup>483</sup>

<sup>474</sup> INQ004963\_003 para 1

<sup>475</sup> Paul Gillies 11 August 2020 87/11-14

<sup>476</sup> Rebecca Fetterman 12 May 2020 3/12 4/22

<sup>477</sup> LJ000002\_008

<sup>478</sup> Rebecca Fetterman 12 May 2020 22/14-18

<sup>479</sup> Rebecca Fetterman 12 May 2020 23/10-23

<sup>480</sup> OHC000001\_001 para 2

<sup>481</sup> Jehudah Baumgarten 12 August 2020 75/11-14

<sup>482</sup> The Rabbinat is a group of senior rabbis selected by the UOHC council and executive whose role is to provide religious oversight and governance to UOHC operations. See OHC000001\_004-005 paras 19, 26

<sup>483</sup> OHC000001\_007 para 31

In 2013, however, a television programme involving an undercover interview showed Rabbi Ephraim Padwa (at the time the Chief Rabbi of the Rabbinate of the UOHC) dissuading someone from reporting abuse to the police, invoking the concept of *mesirah*.<sup>484</sup>

**13.** Rabbi Baumgarten sought to distance the UOHC from Rabbi Padwa's remarks, stating that "Rabbi Padwa was acting in his personal capacity" and that the incident that was filmed "does not reflect UOHC Rabbinate position today".<sup>485</sup> He said that:

*"Subsequent to the film the Rabbinate collectively considered their position on child safeguarding ... Prior to that incident, the Rabbinate had not collectively considered their policy or position in respect of responding to allegations of child sexual abuse."*<sup>486</sup>

**14.** We were referred to a letter to rabbis, educators and heads of educational institutions in London from the UOHC in January 2013, which stated:

*"There has unfortunately been produced a programme that is about to be broadcast on TV on the subject of abuse in our community where they allege that even after the actions of abusers have been known they are still able to carry out with their deeds, God forbid. The committee for the protection of children and instituting an appropriate policy for the protection of children will, please God, assist to silence the critics who complain that the UOHC does not fulfil its duties in this matter."*<sup>487</sup>

**15.** Nevertheless, despite Rabbi Baumgarten's assertions and the commitment made in the 2013 letter, the UOHC had still not developed a written child protection policy by the time of the hearing in August 2020, eight years later.<sup>488</sup> Following the hearing, the UOHC has developed a child protection policy.<sup>489</sup>

## Sri Guru Singh Sabha Southall

**16.** Sri Guru Singh Sabha Southall, a charity that operates gurdwaras visited by several thousand worshippers and visitors each week, has clear reporting procedures in place. Mr Harmeet Gill, the General Secretary, explained that in the first instance a safeguarding officer would deal with any allegations or issues. Ealing Council's Children's Integrated Response Service is the gurdwara's first point of escalation for a child.<sup>490</sup> If an allegation against a staff member is made, the gurdwara would get in touch with the LADO within 24 hours.

**17.** The gurdwara's policy includes contact details of the Children's Safeguarding Coordinator as well as contact details for the local authority (including an out-of-hours number for the Emergency Duty Team), and directs those who are concerned that a child or young person is at immediate risk to contact the police.<sup>491</sup> It also has a process for maintaining records of incidents confidentially.<sup>492</sup>

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<sup>484</sup> *Mesirah* means the action of reporting a fellow Jew to the secular authorities (see Part C).

<sup>485</sup> OHC000007\_001 paras 6, 8

<sup>486</sup> OHC000007\_002 para 9

<sup>487</sup> MIG000007\_001

<sup>488</sup> Jehudah Baumgarten 12 August 2020 141/19-142/10

<sup>489</sup> OHC000011

<sup>490</sup> The Children's Integrated Response Service is a single point of entry for all referrals where there is a need for support or there are specific concerns about the welfare of a child or young person.

<sup>491</sup> GUR000002\_001

<sup>492</sup> GUR000001\_003 paras 27, 29, 31

## Masorti Judaism

**18.** Masorti Judaism, a Jewish denomination with nine member synagogues across England with a total adult membership of approximately 4,000, has policies on safeguarding and child protection that were introduced in the 1980s and have been revised on an annual basis over the past 10 years.<sup>493</sup>

**19.** Its policy on disclosures and referrals makes clear that, when a young person discloses abuse, this must be referred to a designated officer, with detailed notes kept.<sup>494</sup> The continued employment of staff or membership of congregants who are subject to allegations of child sexual abuse is reviewed. It refers any allegations of criminal behaviour, including child sexual abuse, to the police or other relevant statutory authority, rather than investigating it internally.<sup>495</sup>

## Summary of challenges

**20.** As the examples above illustrate, there is a range of practice among the religious organisations and settings we examined. While a number of organisations had in place clear reporting procedures, in other cases reporting procedures were not clearly defined and would not have been known to members of the congregation. It is imperative that religious organisations do not, by failing to establish clearly defined procedures for escalating concerns, make it any more difficult for individuals to disclose information about child sexual abuse.

**21.** It is also important that religious organisations and settings do not attempt to deal with allegations of child sexual abuse purely internally – organisations ought to be referring concerns to statutory authorities. The Charity Commission’s guidance makes clear that incidents and allegations of abuse should always be reported to statutory authorities and to the relevant regulators (including the Charity Commission, using its serious incident reporting system, discussed in Part G) and to the police where appropriate.<sup>496</sup>

**22.** Risk to the reputation of an organisation or setting should not form part of any decision on reporting.

## E.3: Support for victims and survivors of abuse

**23.** Very few religious organisations that we looked at have arrangements in place for professional counselling or therapy services for child sexual abuse committed within the religious organisation or setting. For example, Mr Gillies said that the Jehovah’s Witnesses do not have in place any formal arrangement for providing resources for professional counselling or therapy for members who have been the victims of sexual abuse.<sup>497</sup> Mr Kamran Hussain, Chief Executive of the Green Lane Masjid and Community Centre, explained that it does:

*“not have specific pastoral care (apart from our safeguarding leads) and would expect the police and authorities to provide or sign-post victims or claimants to such support.”<sup>498</sup>*

<sup>493</sup> MAS000001\_001 para 1; MAS000001\_007 para 21

<sup>494</sup> MAS000002\_012

<sup>495</sup> MAS000001\_009 para 35

<sup>496</sup> CYC000426\_009

<sup>497</sup> Paul Gillies 11 August 2020 74/10-75/2

<sup>498</sup> GLM000001\_004 para 6

**24.** Within some organisations, there was evidence of an organised system of pastoral support.

**24.1.** The Bahá'í community has in place a structure at the national level – a Community Care Team – which is responsible for developing the capacity of local communities to “deal with a wide range of pastoral situations”. Among the team’s members are those with professional expertise in relevant fields.<sup>499</sup>

**24.2.** The Church of Jesus Christ of Latter-day Saints (Great Britain) provides:

*“Pastoral support ... to victims and survivors of abuse primarily by the bishop ... The bishop also provides pastoral care and support to those who bring the allegations or make complaints regarding the abuse, where they are not the same person.”*<sup>500</sup>

**24.3.** The Baptist Union of Great Britain – an umbrella body for Baptist churches in England and Wales, which currently counts 1,945 churches as members – has produced a guide to supporting those who have experienced abuse, which offers its member churches advice and signposts to a number of providers of pastoral care. The Union’s accredited ministers are trained to provide pastoral care to those in their congregations. It also recognises the need for specialist counselling and support. Designated Persons for Safeguarding are able to contact the Association Safeguarding Leads for their area for recommendations of professional counsellors, charitable organisations and social care contacts.<sup>501</sup>

**25.** There were other organisations that made informal spiritual or pastoral support available, but this support is often not systematic or well publicised. For example, Mr Michael Stygal, President of the Pagan Federation, said that it:

*“has not been directly involved in the provision of pastoral support to victims of child sexual abuse, partly because of the lack of recent allegations, and also because we do not have a pool of volunteers trained to provide such support.”*<sup>502</sup>

**26.** We note that there are a number of other organisations that do not have a system for pastoral support. This includes the Guru Nanak Gurdwara Smethwick (one of the largest Sikh gurdwaras in Europe with one of the largest congregations in the UK).<sup>503</sup>

**27.** The General Assembly of Unitarian and Free Churches does not have any arrangements in place to provide pastoral support when responding to allegations of child sexual abuse.<sup>504</sup> Ms Elizabeth Slade, Chief Officer, told us that the General Assembly has “limited accurate knowledge of the level of pastoral support within each member organisation”, as its members are independent.<sup>505</sup> The General Assembly has recently commissioned an independent audit of its safeguarding practices as part of which it is considering the role of pastoral support for those involved in responding to allegations of child sexual abuse.<sup>506</sup>

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<sup>499</sup> BAH000008\_003 paras 2.2, 2.4

<sup>500</sup> CJC000001\_006 para 38

<sup>501</sup> BUG000001\_032 paras 8.1, 8.2

<sup>502</sup> PGF000002\_008 para 60

<sup>503</sup> GNG000001\_008 para 50

<sup>504</sup> GAU000001\_001 para 1

<sup>505</sup> GAU000001\_003 para 10

<sup>506</sup> GAU000005

## E.4: Action taken against those accused of abuse

**28.** Under their policies and procedures, religious organisations and settings may provide some internal processes for taking action against those accused of abuse. In the case of employees or office holders, this commonly takes the form of an internal disciplinary procedure.

**29.** Most of the religious organisations and settings we examined that employ staff had disciplinary procedures in place, which would be invoked when allegations of child sexual abuse were made.

**29.1.** Liberal Judaism’s safeguarding policy makes clear that, when allegations are made against individuals who are employed, the individual will be suspended from the role that brings them into contact with children, young people or adults at risk of abuse or neglect.<sup>507</sup> Investigations will then take place, following which a final decision is made. The policy explains that it *“is possible that someone accused of abuse may be reinstated, depending on the circumstances of the case, once the matter is concluded”*.<sup>508</sup>

**29.2.** Mr Asad Jaman, Head of Assets & Facilities at the East London Mosque Trust, explained how, if any member of staff was subject to allegations of child sexual abuse, they *“would be dealt with through our disciplinary procedures, which are based on the ACAS guidelines”*.<sup>509</sup>

**30.** It is less common for religious organisations to have in place internal processes for taking action against an alleged perpetrator when they are not an employee but simply a volunteer or congregant.

**30.1.** As set out above, the Jehovah’s Witnesses is an example of a religious organisation with such an internal process in place. Having determined whether to make a referral to the statutory agencies, two elders will consider whether there is sufficient evidence to establish an allegation from a scriptural perspective.<sup>510</sup> This will be undertaken even in cases where the perpetrator has been convicted of child sexual abuse in a criminal court.<sup>511</sup> Internal guidance, *Shepherd the Flock of God*, states that sufficient evidence requires either:

- a confession, ie *“Admission of wrongdoing, either written or oral, may be accepted as conclusive proof without other corroborating evidence ... There must be two witnesses to a confession, and the confession must be clear and unambiguous”*, or
- eyewitnesses’ evidence (known outside the community as ‘the two-witness rule’): *“There must be two or three eyewitnesses, not just people repeating hearsay; no action can be taken if there is only one witness.”*<sup>512</sup>

<sup>507</sup> LJJ000005\_006-007

<sup>508</sup> LJJ000005\_006-007

<sup>509</sup> ELM000020\_003 para 20. The Advisory, Conciliation and Arbitration Service (ACAS) is a non-departmental public body that provides advice to employers and employees, and aims to promote strong industrial relations practice.

<sup>510</sup> CJW000052\_012-016 para 53

<sup>511</sup> Paul Gillies 11 August 2020 57/12-57/20

<sup>512</sup> CJW000061\_022; the two-witness rule comes from passages in the New Testament (Paul Gillies 11 August 2020 58/23-61/18).



When there is sufficient evidence, an ecclesiastical judicial committee is formed to investigate and to determine what steps need to be taken as regards the alleged abuser.<sup>513</sup> Mr Gillies explained that, if two individuals separately make an allegation of abuse against the same person, that would be sufficient to satisfy the two-witness rule.<sup>514</sup> However, as a result of this rule, if only one child makes an allegation of abuse and there is no confession, no further internal action would be taken, other than that elders may be instructed to be “*vigilant with regard to the conduct and activity of the accused during congregation activities*”.<sup>515</sup> The two-witness rule is not intended to be a safeguarding measure; it is part of an internal religious process for determining whether someone should remain a congregant. Nevertheless, the application of the rule in the context of child sexual abuse is likely to increase the suffering of victims and fails to reflect the reality that by its very nature child sexual abuse is most often perpetrated in the absence of witnesses.

**30.2.** The Salvation Army’s internal disciplinary process allows action to be taken against a range of individuals, not just employees. There are separate procedures for allegations against officers, employees and volunteers.<sup>516</sup> When allegations of child sexual abuse are made about a volunteer, the complaint is referred to the police and “*the situation will be risk assessed and the necessary safeguarding measures put in place to protect the victim(s) and the volunteer*”.<sup>517</sup> In such cases, advice will be sought and consultation will take place with the police and the LADO in order to consider the appropriate action to take, including whether to remove the individual from their role. If individuals are not removed, a risk assessment will consider the measures to be put in place to ensure that abuse cannot continue during the period of police investigation. The Salvation Army is one of very few organisations employing formal risk assessments by child protection professionals as part of these internal processes.

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<sup>513</sup> [CJW000052\\_012-016](#) para 53

<sup>514</sup> [Paul Gillies 11 August 2020 64/23-66/4](#)

<sup>515</sup> [CJW000052\\_012-016](#) para 53

<sup>516</sup> [SVA000048\\_014-015](#) paras 79–87. Salvation Army churches are led by officers who are responsible for leading congregations. Congregations are comprised of adult ‘soldiers’ and ‘junior soldiers’, who are children, as well as ‘adherent members’, who are individuals who do not sign up to all rules and regulations of membership. There are also volunteers who are not required to be members ([Dean Juster 19 May 2020 42/1-43/19](#)).

<sup>517</sup> [SVA000048\\_015](#) para 87

## Part F

# Supplementary schooling, out-of-school settings and unregistered schools

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# Supplementary schooling, out-of-school settings and unregistered schools

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## F.1: Overview

1. Many religious organisations and settings provide services to children through ‘supplementary schooling’ or ‘out-of-school provision’. The Department for Education (in a call for evidence about such settings between November 2015 and January 2016) defined an out-of-school setting as:

*“Any institution providing tuition, training, instruction or activities to children in England, without their parents’ or carers’ supervision, that is not a school, college, 16–19 academy, or provider caring for children under 8 years old, which is registered with Ofsted or a childcare agency.”*<sup>518</sup>

2. There are potentially 250,000 children in England and Wales receiving education in supplementary schools with a faith focus or that are organised by a religious organisation.<sup>519</sup>

3. Ofsted identified that there were a significant number of religious organisations and settings operating a comprehensive programme of after-school or weekend tuition. Many of these supplementary schools serve one ethnic community.<sup>520</sup>

4. The Royal Society of Arts’ Action and Research Centre undertook research that found that 60 percent of supplementary schools served a single ethnic community. Religious education was provided by just under half of supplementary schools. Of those, Islam accounted for 52 percent of religious supplementary schools, Christianity for 25 percent and Hinduism for 18 percent. Children typically attended for two to five years.<sup>521</sup>

5. The Children’s Commissioner for England, Ms Anne Longfield, visited some yeshivas and madrasahs with Ofsted in 2017 and 2018. The resulting report in 2019, *Skipping School: Invisible Children*,<sup>522</sup> expressed concern about the absence of oversight or standards in respect of child protection in these settings by statutory authorities. In Ms Longfield’s view, this resulted in children being more vulnerable to abuse.<sup>523</sup>

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<sup>518</sup> DFE002833\_008 para 24

<sup>519</sup> OFS012404\_008

<sup>520</sup> OFS012404

<sup>521</sup> OFS012404\_007-008

<sup>522</sup> *Skipping School: Invisible Children. How children disappear from England’s schools*, The Children’s Commissioner, February 2019.

<sup>523</sup> *Skipping School: Invisible Children. How children disappear from England’s schools*, The Children’s Commissioner, February 2019.

## F.2: Identifying supplementary schools and out-of-school settings

6. Very little is known about the true scale and diversity of ‘supplementary education’ or ‘out-of-school provision’. There is no reliable information on how many settings there are, how many children attend them and for how many hours, what activities are provided and who runs them.<sup>524</sup> This is because they do not have to be registered with any state body, and have no supervision or oversight from them in respect of child protection.

7. Between 2018 and 2021, the Department for Education has been running a pilot project with 16 local authorities to try and find out more about out-of-school settings. Ms Kate Dixon, Director of School Quality and Safeguarding at the Department for Education, told us:

*“I think the first thing that absolutely surprised us about the pilots is how long it has taken the local authorities who are piloting this to map, or even try to map, the number of settings that are in their patch. I don’t think any of them would say they have done that comprehensively.”<sup>525</sup>*

8. Local authorities have also had significant problems identifying which organisations providing services are within their areas, describing this as a “*challenge for us all*”.<sup>526</sup> In particular, Mr Richard Baldwin, Director of Children’s Services for Tower Hamlets Council, told us:

*“one of the challenges that we have particularly in our borough is that a number of these organisations are very fluid. They start, they stop, they close down, they reappear under different names with slightly different personnel. So the mapping of those organisations is very difficult and, if we were to do it, it would be very time consuming.”<sup>527</sup>*

## F.3: Safeguarding in unregistered school settings

### The legislative ‘gap’ for schools that provide solely religious education

9. Alongside ‘supplementary’ schooling, there are a small number of settings that may pose as providing part-time education but in fact such provision is either full time or the only educational input that a child receives. There is currently a gap in the legislation where a place that only teaches religious instruction cannot be registered as a school, even if this is the only education a child or young person receives. Ofsted says that this leads to a perverse situation where,

*“As the law stands, the more inadequate the educational provision, the more likely a setting is to be exempt from regulation.”<sup>528</sup>*

10. Under the Education and Skills Act 2008, it is unlawful in England for a person to conduct an independent educational institution – which is defined as including an independent school – unless it is registered.<sup>529</sup> There is no statutory definition of what

<sup>524</sup> OFS012297\_023-024

<sup>525</sup> Kate Dixon 13 August 2020 137/25-138/5

<sup>526</sup> Richard Baldwin 14 May 2020 14/3-25; Graham Tilby 14 May 2020 38/23-39/1

<sup>527</sup> Richard Baldwin 14 May 2020 14/12-25

<sup>528</sup> OFS012297\_011

<sup>529</sup> OFS012296\_005; Education and Skills Act 2008 Part 4, Chapter 1, section 96.

constitutes a school, though guidance produced by the Department for Education states that settings must register as independent schools if they provide ‘full-time’ education to five or more children, or one child who is either looked after or has an education, health and care plan (EHCP).<sup>530</sup> The Department for Education stated that it considers an institution to be providing full-time education if “*it is intended to provide, or does, provide, all, or substantially all, of a child’s education*”, but the current guidance does not reflect this aspiration.<sup>531</sup> The term ‘full time’ is also currently not defined in law; Department for Education guidance refers to this being more than 18 hours per week.<sup>532</sup>

**11.** According to Ms Amanda Spielman, Chief Inspector of Ofsted, there is a “*certain amount of avoidance activity*” about the definition of schools, such that for example “*people split their provision and ... describe it as being two separate providers, even though, in practice, the same people, the same premises may be used*”.<sup>533</sup>

### Challenges posed by out-of-school settings and those settings operating as ‘unregistered schools’

**12.** Ofsted has long held “*serious concerns*” that a minority of out-of-school settings are putting children at risk of harm by failing to adhere to basic child protection standards.<sup>534</sup> Ofsted’s remit in inspecting such settings extends only to establishing whether an unregistered school is being ‘conducted’. It cannot formally inspect and evaluate the effectiveness of safeguarding or child protection in these settings. It does not have powers to take any action against these settings, unless it is determined that they are operating as unregistered schools.<sup>535</sup> The vast majority of supplementary schooling is therefore unregulated and subject to limited or no oversight in respect of child protection.

**13.** If individuals are found to be operating unregistered schools, this may result in prosecution. The maximum penalty for such offences is six months’ imprisonment or a fine. Ofsted does not have the power to close unregistered schools. Ms Spielman noted that in one of its prosecutions:

*“the school carried on operating for some time after the conviction ... If somebody chooses to carry on operating after a conviction, the only thing we can do is to go back around the cycle of attempting to initiate another prosecution, which, of course, is a long, slow haul.”*<sup>536</sup>

**14.** Ofsted established a taskforce in 2016 to investigate suspected unregistered schools because of concerns that there were a significant number of out-of-school settings that may not be providing adequate education or child protection arrangements for those in their care. Of the 644 out-of-school settings Ofsted suspected of operating as unregistered schools, around one-sixth were settings providing religious instruction.<sup>537</sup> While not all of these settings were inspected by Ofsted and some of them did not have any direct complaints about child protection failures, the very absence of regulation creates a risk of harm to children.

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<sup>530</sup> This is a statutory plan setting out a child’s special educational needs and provision: approximately 250,000 children in England have such a plan. An identical system of registration exists in Wales.

<sup>531</sup> [OFS012296\\_009](#) para 28

<sup>532</sup> [DFE002817\\_005-006](#)

<sup>533</sup> [Amanda Spielman 21 May 2020 79/4-12](#)

<sup>534</sup> [OFS012297\\_022](#)

<sup>535</sup> [OFS012296\\_008](#) para 24

<sup>536</sup> [Amanda Spielman 21 May 2020 89/13-90/6](#)

<sup>537</sup> [OFS012296\\_005](#)

**15.** Between 2015 and 2019, Ofsted received referrals about 108 out-of-school settings providing religious instruction where there was concern that the setting was being operated as an unregistered school.<sup>538</sup> Of these, six were Christian, 29 were Jewish, 70 were Muslim, two were Hindu and one was Sikh.

**16.** In total, during this period Ofsted inspected 31 out-of-school settings that provide religious instruction. Two were Christian, 17 were Jewish and 12 were Muslim.<sup>539</sup> Ofsted has issued warning notices requiring settings to close or register to five settings that provided religious instruction and 13 that had a faith ethos but provided a broader education.<sup>540</sup>

### Examples of unregulated schools run by religious organisations

**17.** We heard evidence raising concerns about child protection in some yeshivas. A yeshiva is a place of learning for young men from the Charedi Jewish community. Such education begins in early adolescence and continues until these young men are in their early twenties. The education provided focusses on the study of traditional religious texts (the Talmud and the Torah) and learning Jewish law (Halacha). These places of education do not teach secular subjects. This education is full time (and in some cases very long hours), and young men do not attend other forms of secular education. It is not clear how many children are educated in these settings, but they are likely to be in the thousands.<sup>541</sup>

**18.** The London Borough of Hackney, where many yeshivas are situated, identified significant concerns about the safety of premises and whether adequate ‘safer recruitment’ practices were being appropriately applied.<sup>542</sup> Ofsted inspected three yeshiva settings between 2016 and 2018 to see if they were operating unregistered school settings.<sup>543</sup> It found significant problems in their running, including an inability to find out whether Disclosure and Barring Service (DBS) checks had been carried out in the recruitment of staff, and “scant” records. The culture of child protection in these yeshivas was weak.<sup>544</sup> Inspectors gained entry in two settings without challenge, and in none of the institutions could adults give the number and names of the children in the setting at any one time. There were also fire safety concerns, such as locked fire exit doors, and “significant” hazards (such as multiple broken and shattered windows, electrical sockets in disrepair with exposed wires, broken tiles, a dirty kitchen, uncovered vermin bait in classrooms and inadequate toilet facilities).<sup>545</sup> Ofsted was unable to take further action. The yeshivas either provided a curriculum based solely on religious education or did not provide full-time education. Consequently, as set out above, they are not required to be registered as schools under the current legislation.

**19.** Ofsted has a range of concerns about such settings. It was supplied with information and a booklet signed by members of the Charedi community involved in education in yeshivas, which advocated corporal punishment and suggested that a teacher passed on God-given truths that must be learnt and obeyed. Ofsted has also been provided with examples of corporal punishment in those settings.<sup>546</sup>

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<sup>538</sup> [OFS012296\\_007-008](#)

<sup>539</sup> [OFS012296\\_007-008](#)

<sup>540</sup> [OFS012296\\_024-027](#)

<sup>541</sup> [HAC000001\\_009-012](#)

<sup>542</sup> [HAC000001\\_010](#)

<sup>543</sup> [OFS012296\\_008-009](#), which defines the powers of Ofsted under section 97 of the Education and Skills Act 2008.

<sup>544</sup> [OFS012297\\_003](#)

<sup>545</sup> [OFS012297\\_003-004](#); [OFS012251](#); [OFS012252](#)

<sup>546</sup> [OFS012283\\_001](#); [OFS012297\\_009-010](#)

**20.** Local authorities also reported concerns about corporal punishment in madrasahs, as did other organisations working with some madrasahs.<sup>547</sup>

**21.** Ofsted reported its concerns about unregistered schools, including those with a faith basis, to the local authority, the London Fire Brigade, the Health and Safety Executive (HSE) and the Metropolitan Police Service, and has participated in numerous meetings about this issue.<sup>548</sup> Ofsted has found limits in what local authorities can do – for example, at present, local authorities have very limited powers to monitor home education (many of the children at these settings say that this is part of their home education, or parents identify it as such), and are often reluctant to intervene in the absence of a concern of abuse of a specific child.<sup>549</sup> For example, in relation to one educational setting, the HSE and the local authority considered that, in such cases, they did not have the power to intervene.<sup>550</sup>

**22.** These risks are not confined to one faith or denomination. Ofsted also encountered a Muslim early years setting with 3,000 children attending during the week. Staff had not undertaken any child protection training, and the policies were “*inaccurate*”. They were isolating children and forcing them to stand up for 15 to 20 minutes, even though they were very young.<sup>551</sup> Ofsted cancelled the setting’s early years registration – but even without registration, the setting remains open (de-registration simply prevents the claiming of tax-free childcare).<sup>552</sup> In another case, an individual running an out-of-school setting had already been prohibited from teaching in full-time schools. When approached by inspectors, he was aggressive.<sup>553</sup> Ofsted did not have the power to take any action in this instance, as it was not a full-time school setting. The local authority designated officer (LADO) also decided that she could not take any action because there was no proof of harm to any individual child.<sup>554</sup>

**23.** Other local authorities have significant and serious concerns about some out-of-school settings and their approaches to child protection. Local authorities are worried by their lack of powers to take action.<sup>555</sup>

**24.** To give an example, the Charity Commission conducted an investigation into the Essex Islamic Academy following a serious incident report made in 2017. Police found a volunteer who was allowed to provide oversight of children and teach them in an after-school madrasah without having any DBS certificate. He had exposed the children to videos of beheadings.<sup>556</sup>

**25.** Hackney Council has been dealing with concerns around schooling in yeshivas since at least 2014, yet “*no real progress*” has been made.<sup>557</sup> As a result, it set up a scrutiny commission, which investigated the situation in respect of unregistered schooling. In 2018, it concluded:

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<sup>547</sup> [Jasvinder Sanghera 14 May 2020 86/3-87/3; INQ005160\\_005](#)

<sup>548</sup> [OFS012297\\_004](#)

<sup>549</sup> [OFS012297\\_004-005](#)

<sup>550</sup> [OFS012297\\_005](#)

<sup>551</sup> [OFS012297\\_006](#)

<sup>552</sup> [OFS012297\\_007](#)

<sup>553</sup> [OFS012297\\_008; OFS012274](#)

<sup>554</sup> [OFS012297\\_008](#)

<sup>555</sup> [LBT004244\\_023-024; Jasvinder Sanghera 14 May 2020 51/10-52/1](#)

<sup>556</sup> [CYC000438\\_001-002, 006-008; Harvey Grenville 14 August 2020 59/5-61/17](#)

<sup>557</sup> [HAC000001\\_010 para 52](#)

*“the cultural and educational traditions of one particular group, the Charedi Orthodox Jewish Community, are at odds with the Council’s statutory duty to safeguard local children and Central Government’s duty to ensure they receive an appropriate education which conforms to national standards ... whilst the parents of at least 1,000 teenage boys in Hackney send them to unregistered establishments to access the learning that they wish them to receive, being unregulated, there are few, if any safeguards in place to ensure their safety and well-being or that they are being taught to an acceptable standard ... Despite repeatedly having been told by safeguarding and other professionals dealing with this issue that they have no legal ‘clear line of sight’ on children within these settings, the Department for Education has indicated that it has no plans to legislate in the current legislative cycle. We find this unacceptable and if a case of serious abuse were to be revealed in one of these settings we would consider that the Department for Education would have serious questions to answer.”<sup>558</sup>*

**26.** The City and Hackney Safeguarding Children Partnership (CHSCP), which has responsibility for strategic oversight of child protection, has written to central government on a number of occasions, expressing concern about its impotence in resolving its concerns about schooling in yeshivas.<sup>559</sup> It has sought to engage with the Charedi community and to seek their cooperation, but the Charedi community have been “unable, unwilling or lacked the overarching authority to commit to the changes required”.<sup>560</sup> Rabbis with whom the authority has engaged have stressed the autonomy of individual Charedi schools and the rabbis’ lack of authority over them. Formal requests to identify pupils attending these out-of-school settings have been met with silence.<sup>561</sup> The UOHC described the intervention of the CHSCP as “well meaning” but said that the CHSCP does not understand the Charedi community and takes approaches that are impractical. The UOHC is not an umbrella body for the whole of the Charedi community and does not have direct authority over any yeshivas. The UOHC agreed that engagement with the local authority had not yielded positive results and had caused “a lot of frustration”.<sup>562</sup>

**27.** The UOHC identified a number of barriers to a constructive relationship with CHSCP and other governmental bodies concerned with child protection.

**27.1.** When the local authority says that children should be in the ‘line of sight’ of the local authority, this is perceived as arrogant, overbearing and intrusive by the community. Settings regard their own community as providing greater safeguards for their children than the state. The “instinct” of these communities is also to keep authorities at a distance, as a result of centuries of persecution.<sup>563</sup>

**27.2.** There has been a view that Ofsted has sought to interfere in the Charedi community’s religious ethos in circumstances where it has criticised the policies of some registered schools within the community. Also, that the criticism of yeshivas is part and parcel of criticism of religious settings, and the views held within those settings that may not accord with those of secular society.<sup>564</sup>

<sup>558</sup> HAC000015\_002

<sup>559</sup> HAC000010

<sup>560</sup> HAC000001\_011 para 59

<sup>561</sup> HAC000001\_010-011 paras 52-54

<sup>562</sup> OHC000001\_008 para 35

<sup>563</sup> OHC000001\_008-009 para 36

<sup>564</sup> OHC000001\_008-009 para 36; Jehudah Baumgarten 12 August 2020 116/5-117/17



**27.3.** Local authorities can make negative portrayals and statements about the community.<sup>565</sup>

**27.4.** The local authorities may not understand that the UOHC cannot control the community or practically furnish the authority with a list of settings, and may have an unrealistic expectation of the administrative capacity of settings.<sup>566</sup>

**28.** The UOHC would prefer to use voluntary initiatives, using those within the community to provide training and advice, such as the Interlink Foundation or Shema Koli (a counselling and helpline organisation) rather than to compel registration.<sup>567</sup> Hackney Council has indicated that they use the Interlink Foundation to provide some training in child protection.<sup>568</sup>

**29.** Some members of the Charedi community, including some religious leaders, do not wish to change the current position – largely because they consider that having to register or have some formal oversight would lead to them having to teach matters they consider to be contrary to their faith, and would be an unnecessary interference with a form of education practised for centuries.<sup>569</sup> The UOHC and Rabbi Jehudah Baumgarten (who gave evidence on its behalf) do not necessarily disagree. The Charedi community consider that Ofsted’s inspections of some of the schools that are registered as independent providers of full-time education have led to what they consider to be “*deep interference*” in their religious ethos.<sup>570</sup> Ofsted has been criticised in its approach to inspections, not just in respect of the Charedi community but also in other educational settings with a faith ethos, for having a “*secular agenda*”.<sup>571</sup> Its answer, as given by Ms Spielman, is that Ofsted is just reflecting the need for all schools to comply with the Equality Act 2010.<sup>572</sup> It accepts that both the Charedi community and other faith groups dislike its inspection of whether these settings adhere to the Equality Act 2010 and consider that there is a disproportionate focus in inspections on these issues.<sup>573</sup>

**30.** A letter addressed to the Prime Minister, sent in May 2021 on behalf of a group of rabbis within the Charedi community and proprietors of yeshivas, set out the position as they perceived it:

*“Our schools were set up by the Orthodox Jewish community leaders and parents in order to safeguard its sacred teachings and lifestyle and to abide by the beliefs, practices and traditions of Torah and Rabbinic authority. It is therefore our position and conviction that any measures proposed which may conflict, with our honored religious principles, cannot be considered.*

*We are resolute in our position and our conviction that with regard to the education of our children and those of our congregants (who belong to the Traditional Orthodox Jewish Community Worldwide), we shall not diverge in the slightest degree from our faith, nor from the traditional Torah method of education handed down to us from earlier*

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<sup>565</sup> OHC000001\_008-009 para 36

<sup>566</sup> OHC000001\_008-009; Jehudah Baumgarten 12 August 2020 119/9-25

<sup>567</sup> OHC000001\_010 para 37; TIF000001; SKI000004

<sup>568</sup> HAC000015\_028 para 5.4.1; Jehudah Baumgarten 12 August 2020 93/13-19

<sup>569</sup> HAC000001\_010-011; Jim Gamble 11 August 2020 140/14-143/3; Amanda Spielman 21 May 2020 144/9-145/23

<sup>570</sup> OHC000001\_008; OFS012297\_009-010 paras 37–39

<sup>571</sup> Amanda Spielman 21 May 2020 143/1-19

<sup>572</sup> Amanda Spielman 21 May 2020 143/1-19

<sup>573</sup> Amanda Spielman 21 May 2020 112/13-25

*generations. Under no circumstances shall we adapt to accept any ideas that are contrary to our faith and our Holy Torah, or contrary to the traditional form of education handed down to us by our ancestors.*<sup>574</sup>

**31.** Both Ofsted and CHSCP were clear that, although they did not wish to interfere with the practice of faith, they consider that the current situation does not have due regard to the best interests of children. A system is required in which it is possible to take preventative action to tackle potential abuse and to ensure that all settings have basic standards in place in respect of child protection.<sup>575</sup>

## Government consultation on the law concerning unregulated schools

**32.** The Department for Education has consulted on whether to change the law in respect of registration of schools because of the concerns set out above. It produced a consultation in February 2020 (withdrawn because of the COVID-19 pandemic and re-issued in October 2020), through which it proposed to:

- clarify the definition of full-time schooling to make sure it covers children who are educated predominantly in one institution – defining ‘full time’ as over 18 hours during the course of a week in statute;
- amend the definition of ‘registration’ to encompass situations where children are attending the placement as their main form of education, registrable under the Education and Skills Act 2008 – this is deliberately designed to ensure that settings providing children with education have to register, irrespective of the nature of their curriculum;<sup>576</sup>
- legislate within this Parliamentary session to create a duty on local authorities to maintain a register of children of compulsory school age who are not registered at state-funded or registered independent schools.<sup>577</sup> There would be a duty on parents to register with the local authority and a duty on proprietors of education settings to respond to enquiries from local authorities. This would provide some oversight of settings where children are being educated but, as the Department for Education admits, would not amount to a scheme for regulating these settings. Those who attend out-of-school settings, not as their principal place of education, would also not be covered.<sup>578</sup> Moreover, the proposal would not create a duty on local authorities to provide support to parents who educate their children at home, given the financial resources this may require and the complexity of identifying what support should be provided.<sup>579</sup>

**33.** Ms Dixon told us that the Department for Education recently made a public commitment to legislate as soon as possible to “*tighten the definition of an independent school*”.<sup>580</sup> Ms Dixon also stated that it has committed to legislating to strengthen Ofsted’s powers in respect of unregistered schools:

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<sup>574</sup> OFS012596\_001-002

<sup>575</sup> *Regulating independent educational institutions: Government consultation*, Department for Education 13 October 2020; Amanda Spielman 21 May 2020 103/25-104/10

<sup>576</sup> *Regulating independent educational institutions: Government consultation*, Department for Education 13 October 2020.

<sup>577</sup> DFE002833\_019-020; DFE002825; Kate Dixon 13 August 2020 121/22-122/13

<sup>578</sup> DFE002833\_020

<sup>579</sup> DFE002824\_021-023; Kate Dixon 13 August 2020 123/12-125/22

<sup>580</sup> Kate Dixon 13 August 2020 115/24-117/21

*“we respect Ofsted’s work in this area, and they don’t have the powers that they would have in the equivalent of a school, so we would like to in some way replicate those powers so they can be as strong and as effective in those unregistered schools.”<sup>581</sup>*

**34.** In addition to the voluntary *Keeping children safe in out-of-school settings: code of practice*, there are pilot projects examining further ways in which powers of local authorities could be used.<sup>582</sup> However, at present, these do not amount to compulsory minimum standards for out-of-school or after-school settings. There are also no current powers or proposals to provide a form of oversight of such settings. While the Department for Education proposes to introduce legislation to require parents to register with local authorities if they are providing part-time tuition for those educated primarily at home, there are no plans for local authorities to inspect or oversee this tuition.<sup>583</sup>

## F.4: Child protection in out-of-school settings

**35.** Tower Hamlets has the largest percentage of Muslim residents in England and Wales, at 38 percent (as identified by the 2011 census) and the largest Bangladeshi community in the country, with one-third of its residents identifying as Bangladeshi.<sup>584</sup> Mr Baldwin explained that the local authority has received a “*high number of referrals from religious tutors and in Madrassas*”.<sup>585</sup> As a result, Tower Hamlets Council decided to employ a dedicated development worker to engage mosques and Muslim parents.<sup>586</sup> This member of staff delivered a range of seminars, covering a wide range of safeguarding topics – around 70 mosques or related educational providers had been engaged.<sup>587</sup> However, training uptake from religious organisations was low, and many teachers, in particular in respect of Qur’anic verse, are ‘freelance’ and not directly associated with or employed by a mosque.<sup>588</sup> They are recommended by word of mouth.

**36.** The National Resource Centre for Supplementary Education (NRCSE) is also doing work focussed on out-of-school settings and supplementary schools. The NRCSE was initially established in 2006 by the Department for Education and Skills (predecessor to the Department for Children, Schools and Families) and the Paul Hamlyn Foundation. Its aim is to campaign on behalf of supplementary schools and their students, and to work with them to raise their profile. As supplementary schooling is not registered in any way, staff do not need to have a teaching qualification, and may have little to no understanding of current teaching methods for dealing with the needs of children. Therefore, NRCSE provides accredited teacher training with a recognised certificate in teaching in the supplementary education sector, including options on teaching languages, teaching in Islamic supplementary schools and teaching those with special educational needs or disabilities.<sup>589</sup> NRCSE has provided a course in teaching in Islamic supplementary schools, which has been undertaken by 438 teachers from over 90 Islamic institutions around the country.<sup>590</sup>

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<sup>581</sup> Kate Dixon 13 August 2020 120/16-121/9

<sup>582</sup> DFE003469

<sup>583</sup> DFE002824\_015; OFS012297\_020-021

<sup>584</sup> Religion in Tower Hamlets: 2011 Census Update (Factsheet 2015-02)

<sup>585</sup> LBT004244\_017

<sup>586</sup> LBT004244\_017

<sup>587</sup> LBT004244\_017-018

<sup>588</sup> Richard Baldwin 14 May 2020 115/8-19; SHD000001\_005; MWN000001\_005; LBT004244\_007

<sup>589</sup> NRC000008\_001

<sup>590</sup> NRC000008\_001

**37.** NRCSE also provides a nationally recognised quality assurance scheme targeting providers of out-of-school education – the NRCSE Quality Mark.<sup>591</sup> This is designed to develop practical teaching skills and understanding of child protection. Nearly 500 schools have qualified for the Quality Mark.<sup>592</sup> In order to obtain it, schools must show that they can create an effective learning environment, and can select and support staff and volunteers.<sup>593</sup> This includes having to meet relevant child protection standards. This training is voluntary and significantly fewer religious organisations have used its services than in the out-of-school settings sector as a whole.<sup>594</sup> The NRCSE identified that clarity of responsibilities and the standards that should be implemented, and support for the sector, are needed.<sup>595</sup>

## F.5: The 2015 Department for Education consultation on out-of-school settings and the voluntary code

**38.** The Department for Education is the central government department with national policy responsibility for the overarching framework for child protection and safeguarding, which is overseen by local authorities as set out in the Children Act 1989 and in subsequent legislation.<sup>596</sup> The Department for Education has a policy remit for religious organisations and settings only in so far as those organisations and settings are responsible for the operation of faith schools, early years or nursery provisions, or social care settings (such as running adoption agencies). Its responsibility for the operation of out-of-school settings is very limited and consists of influence rather than any statutory responsibility.

**39.** As part of the government’s counter-extremism strategy, the Department for Education issued a consultation in 2015 about whether to create a statutory regulatory framework for out-of-school settings – not just those that were religious, but all of those that provided voluntary or paid-for supplementary education.<sup>597</sup>

**40.** As part of its call for evidence, the Department for Education sought views on proposals for a regulatory system for out-of-school settings, the key features of which would include:

- a requirement on settings that fell within scope to register, providing basic information so that there is transparency about where settings are operating;
- a power for a body to inspect settings to ensure that children are being properly safeguarded; and
- a power to impose sanctions where settings are failing to safeguard and promote the welfare of children, which could include barring individuals from working with children and the closure of premises.<sup>598</sup>

**41.** Additionally, the focus of the proposals was on the removal of what it determined to be “*undesirable teaching*”, which involved what it said was the undermining of fundamental British values or the promotion of extremist views.<sup>599</sup> This was defined as “*vocal or active opposition to our fundamental values*”, including democracy, the rule of law, individual liberty

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<sup>591</sup> NRC000008\_002

<sup>592</sup> NRC000008\_002

<sup>593</sup> BFC000102\_001

<sup>594</sup> NRC000008

<sup>595</sup> NRC000008\_003

<sup>596</sup> DFE002833\_003

<sup>597</sup> DFE002833\_021

<sup>598</sup> DFE002825\_003

<sup>599</sup> DFE002823\_013

and the mutual respect and tolerance of different faiths and beliefs.<sup>600</sup> As Ofsted, the Department for Education and some local authorities identified, some religious organisations perceived this to be a threat to their teaching and religious beliefs.<sup>601</sup> The focus on counter-extremism and implying that all such settings would need to respect “*fundamental British values*” on registration hindered the progress of potentially valuable measures for the protection of children from sexual abuse and other forms of physical abuse.

**42.** There were approximately 18,000 responses to the Department for Education’s call for evidence, about half of which were from faith groups and about three-quarters of which were against the Department for Education’s proposals.<sup>602</sup> Ms Dixon noted that among the concerns was the potential of “*overstepping of government’s role into religious freedom of expression*”.<sup>603</sup>

**43.** The Evangelical Alliance was among those organisations that opposed the Department for Education’s proposals. It wrote to its members highlighting its concerns and urging them to respond to the consultation.<sup>604</sup> Mr Peter Lynas, who appeared on behalf of the Evangelical Alliance, told us that:

*“The out-of-school setting ... consultation didn’t seem to understand different settings, and so came with the very blunt instrument in regard to those settings. It didn’t seem to comprehend that this could be the registration and the inspection of private homes or private businesses.”*<sup>605</sup>

**44.** Ms Dixon noted that the call for evidence came out of concerns related to undesirable teaching in the context of extremism, and that through the consultation, the Department for Education learnt that:

*“the way in which we asked the question at that point very much got people’s backs up, particularly from religious organisations ... five years on, the lens in which we would look through this question and how we would frame it would be far more to do with safeguarding, of which undesirable teaching or countering extremism might be a small part but not the overwhelming tone of the document.”*<sup>606</sup>

**45.** Ofsted called this consultation a missed opportunity, and considered that further regulation is necessary but that this should be focussed on improved access to appropriate child protection training and better model standards and curricula, rather than an idea of “*prohibition*”.<sup>607</sup>

**46.** Despite the strong negative reaction to the focus on radicalisation and extremism, the response to evidence also suggests that there was broad support overall for the general policy aim to safeguard children and enable action to be taken when there were concerns about their welfare and safety. For example, the Muslim Council of Britain agreed that

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<sup>600</sup> DFE002823\_013

<sup>601</sup> Kate Dixon 13 August 2020 134/1-17; OFS012297\_014

<sup>602</sup> Kate Dixon 13 August 2020 133/15-133/18

<sup>603</sup> Kate Dixon 13 August 2020 134/1-134/4

<sup>604</sup> Peter Lynas 20 May 2020 147/19-148/5

<sup>605</sup> Peter Lynas 20 May 2020 134/4-134/9

<sup>606</sup> Kate Dixon 13 August 2020 134/9-134/23

<sup>607</sup> OFS012297\_014-015, 023-024 paras 56, 89–92

supplementary schools that work with children should be regulated so that there are adequate checks and training in place, with a register of those that provide organised classes being accessible to the public.<sup>608</sup>

**47.** The question is therefore not whether oversight is required, but how that oversight would operate in practice. The majority of those who responded disagreed with the way that oversight could operate on the basis of that consultation.<sup>609</sup>

**48.** Following its decision in 2018 not to introduce a mandatory code, the Department for Education has provided resources for local authorities to run pilot schemes in order to identify and tackle concerns in out-of-school settings – including trying to work out if the current powers of public bodies are sufficient to meet concerns in this area.<sup>610</sup> The Department for Education has also identified a series of evidence-gathering pilot schemes that are designed to establish whether the regulation of existing out-of-school settings works, and the usefulness of current powers. The results of this could be used to identify best practice.<sup>611</sup>

**49.** The evaluation of those pilot projects was delayed due to the COVID-19 pandemic. The Department for Education has continued to fund six pilot projects where they show new or novel approaches that could be used to enhance the welfare of children in out-of-school settings. These will conclude in autumn 2021, and include:<sup>612</sup>

- funding a LADO to focus specifically on child protection referrals from out-of-school settings;
- local authority accreditation award schemes for out-of-school settings;
- testing new child protection arrangements by encouraging out-of-school settings providers to provide auditing and referral tools; and
- providing rights-respecting schools awards for out-of-school settings.<sup>613</sup>

**50.** The publication of the voluntary code issued by the Department for Education in October 2020, *Keeping children safe during community activities, after-school clubs and tuition: non-statutory guidance for providers running out-of-school settings*, provides assistance to such settings.<sup>614</sup> However, it does not create any obligations on religious organisations.

**51.** Many religious organisations recognise a need for common standards, advice and guidance about child protection. However, the government has no current proposals to introduce such measures on a compulsory basis.

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<sup>608</sup> MCB000001\_018 para 25

<sup>609</sup> DFE002833\_022-023 para 70

<sup>610</sup> DFE002833\_012-014 paras 36–40

<sup>611</sup> DFE002833\_012-014 paras 36–43

<sup>612</sup> DFE003373\_003 para 10

<sup>613</sup> DFE003465\_008-009 para 22

<sup>614</sup> DFE003469



Part G

# Inspection and oversight

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# Inspection and oversight

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## G.1: Introduction

1. While religious organisations provide extensive educational, social and leisure provision for hundreds of thousands of children and young people, there is little formal oversight of their management of child protection, unless they provide nursery, early years provision or full-time schooling facilities or formal social care services (such as fostering or adoption services, or run respite care centres or provide domiciliary care services). In this Part, we examine the external and internal oversight (including through audits) that seeks to ensure the safety of children while in religious settings. We also consider the views of religious organisations about compulsory (or mandatory) reporting of child abuse allegations.

## G.2: Current framework for oversight

2. There are a number of state and local governmental or quasi-governmental bodies that have oversight of some aspects of the services provided by religious organisations, but none of them can or do provide oversight of child protection.

### Department for Education

3. The Department for Education is responsible for the policy and legislation concerning children's education and social care. It does not have direct policy or legislative responsibility for charities or voluntary organisations, including religious organisations.

4. The department's guidance – *Working Together to Safeguard Children* (first published in 1991, and most recently updated in 2018), which all state bodies dealing with children must follow unless there are cogent reasons not to do so – includes four paragraphs about charitable and voluntary organisations. It recommends that they should have “*appropriate arrangements in place to safeguard and protect children from harm*”, and states that “*All practitioners working in these organisations and agencies who are working with children and their families are subject to the same safeguarding responsibilities, whether paid or a volunteer*”.<sup>615</sup> While this guidance is helpful, it is not directly applicable to charitable or voluntary organisations such as religious organisations and settings, which do not have to follow it.

### Ofsted

5. As discussed in Part F, the Office for Standards in Education, Children's Services and Skills (Ofsted) is a non-ministerial government department responsible for inspecting a range of educational institutions. It also inspects and regulates various services that care for children and young people.

6. There is no specific regulatory or inspection regime administered by Ofsted for religious organisations and settings providing education to children, except when they run full-time schools or nurseries.<sup>616</sup> A limited number of out-of-school settings may fall within Ofsted's

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<sup>615</sup> DFE002815\_070-071

<sup>616</sup> OFS012297\_001 para 2

remit if they are registered on its Early Years Register or Childcare Register, or if they are investigated because they are suspected of operating as an unregistered school.<sup>617</sup> Unless a religious organisation or setting falls within one of these categories, Ofsted will have no role in regulating it.

## The Charity Commission

7. Many religious organisations are registered with the Charity Commission.<sup>618</sup> Of the approximately 168,000 charities registered with the Charity Commission, approximately 34,000 are faith-based organisations.<sup>619</sup> Roughly 80 percent of those organisations are connected to the Christian faith.<sup>620</sup>

8. An organisation meets the legal definition of a charity if it:

- operates to provide services defined as “*charitable*” under the Charities Act 2011 – which includes education and religion;
- operates for the “*public benefit*”; and
- has a turnover of more than £5,000 per year.<sup>621</sup>

9. Those who make governance decisions in a charity are called trustees. They are under a general legal duty under the Charities Act 2011 to take reasonable steps to protect from harm those who come into contact with their charity.<sup>622</sup> This derives from their duties to act with reasonable care and skill, and the trustees’ duty to act in the best interests of the charity.<sup>623</sup>

## The role of the Charity Commission

10. The Charity Commission has no discretion to refuse to register a charity if there are concerns about the charity’s safeguarding arrangements or policies, except in extreme cases where an organisation may fail the public benefit requirement.<sup>624</sup>

11. The Charity Commission ensures that child protection responsibilities and governance are taken seriously and holds trustees to account for the actions of their charity.<sup>625</sup> It expects all registered charities to have child protection policies, but it does not routinely ask for them or require them to be provided.<sup>626</sup> There is no express statutory requirement under the Charities Act 2011 for a charity to have a child protection policy. The Charity Commission has its own safeguarding strategy (last updated in December 2017) for dealing with child protection issues in charities.<sup>627</sup> It states that child protection should be a key governance priority for all charities, and that the failure of trustees to safeguard those in their care, or to

<sup>617</sup> OFS012296\_002 para 4

<sup>618</sup> Charities Act 2011

<sup>619</sup> Harvey Grenville 14 August 2020 4/10-19; CYC000440\_032 para 157

<sup>620</sup> Harvey Grenville 14 August 2020 4/14-19; CYC000440\_032 para 158

<sup>621</sup> An explanation of the public benefit test as required under section 4 of the Charities Act 2011 is set out in statutory guidance, *Analysis of the law relating to public benefit*, published in September 2013 by the Charity Commission; CYC000440\_026-027 paras 126–129

<sup>622</sup> CYC000440\_001-002 paras 7–8; Harvey Grenville 14 August 2020 17/8-17

<sup>623</sup> CYC000440\_001-002 paras 7–8; Harvey Grenville 14 August 2020 17/8-17

<sup>624</sup> CYC000440\_027 paras 127–130; Harvey Grenville 14 August 2020 14/20-17/21

<sup>625</sup> CYC000440\_001-002 paras 7–8

<sup>626</sup> Harvey Grenville 14 August 2020 32/4-33/17

<sup>627</sup> CYC000458

manage risk, causes serious regulatory concern.<sup>628</sup> The Charity Commission indicated to the Inquiry that it will be improving its guidance, including by targeting its safeguarding guidance to specific subsectors, and it has enlarged its specialist safeguarding team.<sup>629</sup>

**12.** The Charity Commission has also identified that safeguarding deficits in the charitable sector arise when there is insufficient priority placed on adequate child protection by leaders, even when there is an adequate policy, by either a poor understanding of the issues or poor implementation.<sup>630</sup>

**13.** Over the last 10 years, the Charity Commission has developed its approach to taking action in cases of perceived child protection failure.<sup>631</sup> It has increased the amount of its child protection work, particularly since 2017.<sup>632</sup> The Charity Commission's approach to dealing with safeguarding issues in individual charities is governed by a risk framework, which prioritises cases involving harm to children.<sup>633</sup>

**14.** There have been increased reports from charities themselves in the light of the guidance and advice from the Charity Commission. Since 2007, charities and their trustees have been subject to the requirements of the serious incident reporting regime.<sup>634</sup> Under this regime, charity trustees have a responsibility to report adverse events that result in or risk significant harm to a charity's beneficiaries, staff, volunteers or others who come into contact with the charity through its work.<sup>635</sup> Reports should also be made if there has been harm to a charity's work or reputation (child protection failures or complaints are seen as causing harm to the beneficiaries, staff or others, and to their reputation and work). Between April 2014 and April 2019, the Charity Commission received 1,049 serious incident reports from faith-based organisations (excluding Anglican or Roman Catholic churches).<sup>636</sup> Of these, 88 percent involved safeguarding matters, as defined by the Charity Commission.<sup>637</sup>

**15.** The Charity Commission has no role in investigating or dealing with individual incidents of abuse.<sup>638</sup> We were told that, while it has sought to expand its remit over the past 10 years, the Charity Commission does not have the resources or the powers to oversee child protection in charities or provide an auditing mechanism.<sup>639</sup> It has a small faith outreach team of three full-time and three part-time staff, which engages with charitable religious organisations and settings (across five faiths: Islam, Hinduism, Buddhism, Christianity and Judaism) to raise awareness.<sup>640</sup> Its objectives are *"essentially to promote good governance on key topics, which includes safeguarding, although it is not limited to safeguarding. It covers, also, financial management and other topics"*.<sup>641</sup>

**16.** The Charity Commission does receive reports of concerns about safeguarding. It estimated that only 10 percent of serious incident reports are then referred for further investigation – known as 'compliance activity'. The majority of its compliance work comes

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<sup>628</sup> CYC000440\_004 para 19

<sup>629</sup> CYC000440\_027, 029 paras 131, 138–139

<sup>630</sup> CYC000440\_029 paras 136–142; Harvey Grenville 14 August 2020 77/1-78/21

<sup>631</sup> CYC000440\_014 para 63

<sup>632</sup> CYC000440\_014 para 64

<sup>633</sup> CYC000440\_036 para 179

<sup>634</sup> CYC000440\_016 para 74

<sup>635</sup> CYC000447\_002-004

<sup>636</sup> CYC000440\_034 para 168

<sup>637</sup> CYC000440\_034 para 169

<sup>638</sup> CYC000440\_002 paras 10–11

<sup>639</sup> CYC000440\_013-015

<sup>640</sup> Harvey Grenville 14 August 2020 41/25-42/23

<sup>641</sup> Harvey Grenville 14 August 2020 42/11-15

from other sources (such as complaints from individuals or media reports).<sup>642</sup> Most of this work involves the giving of “*section 15 regulatory advice*”, which usually involves the Charity Commission providing a charity with an action plan, with which they are expected to comply.<sup>643</sup> In the most serious cases, the Charity Commission would launch a statutory inquiry into the charity.<sup>644</sup> A statutory inquiry enables the Charity Commission to formally investigate matters of regulatory concern within a charity, and to use protective powers for the benefit of the charity, its beneficiaries, assets or reputation.<sup>645</sup>

**17.** Only a very small minority of statutory inquiries undertaken by the Charity Commission concerned matters relating to child protection in religious organisations and settings. Between 1 April 2014 and 6 November 2019, it opened 622 statutory inquiries, of which 137 (22 percent) involved charities in which the keyword ‘religious activities’ featured in their names or objectives.<sup>646</sup> Of these 137 cases, 13 had a safeguarding component.<sup>647</sup> Among these were:

- An inquiry into the Manchester New Moston Congregation of Jehovah’s Witnesses. This investigated, among other things, the charity’s handling of safeguarding matters, including its safeguarding policy, procedure and practice, and how the charity dealt with risks to it and its beneficiaries – particularly as regards the conviction and release of a former trustee. As set out in its report published in July 2017, the Charity Commission identified significant flaws in safeguarding procedures, including not reporting abuse and having a ‘confrontation’ between the complainant and her accuser.<sup>648</sup>
- An inquiry into the Jalalabad Association, a Muslim charity, which included concerns about safeguarding issues. As set out in its report dated October 2019, the Charity Commission discovered that teaching of the Qur’an had been undertaken with classes of children at the premises, but the trustees were unable to produce any documentation demonstrating whether appropriate Disclosure and Barring Service (DBS) checks had been undertaken or safeguarding measures considered.<sup>649</sup>
- An inquiry into the Watch Tower Bible and Tract Society of Britain (another charity operated by the Jehovah’s Witnesses), which is ongoing. It is examining, among other things, the charity’s handling of safeguarding matters, including the creation, development, substance and implementation of its safeguarding policy. In announcing the opening of the inquiry in 2014, the Charity Commission noted that its:

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<sup>642</sup> CYC000440\_035-036 paras 175–176

<sup>643</sup> Section 15 of the Charities Act 2011 enables the Charity Commission to provide compliance advice to charities, which they should follow; Harvey Grenville 14 August 2020 50/9-52/8

<sup>644</sup> Harvey Grenville 14 August 2020 51/18-52/8; CYC000440\_035 para 173

<sup>645</sup> *Statutory inquiries into charities: guidance for charities*

<sup>646</sup> CYC000440\_033 para 162

<sup>647</sup> CYC000440\_033 para 164

<sup>648</sup> CJW000096\_005-006

<sup>649</sup> CYC000457

*“concerns have been amplified by recent criminal cases concerning historic incidents of abuse involving individuals who appear to have been connected to Jehovah’s Witnesses congregations and/or the charity. In addition, there has been growing public interest in how the charity and congregations of Jehovah’s Witnesses deal with safeguarding matters”.*<sup>650</sup>

There has been considerable criticism from the Jehovah’s Witnesses of the Charity Commission’s handling of this investigation. Mr Paul Gillies, the Director of the Office of Public Information for the Jehovah’s Witnesses, told us that an ongoing inquiry in relation to the Watch Tower Bible and Tract Society of Britain is *“manifestly unfair”* and *“allegedly premised on unidentified complaints, which have never been disclosed”*.<sup>651</sup> He also said that the five-year inquiry had been *“spasmodic”* but that Watch Tower Britain had *“taken all reasonable steps to engage with the Charity Commission”*.<sup>652</sup> Mr Harvey Grenville, Senior Technical Advisor for the Charity Commission, did not recognise *“the characterisation or implication that somehow The Watchtower charity and the Branch Committee are fully co-operative with us”*, and noted that the level of legal challenge undertaken by the Jehovah’s Witnesses in the context of the two inquiries was *“simply unprecedented”*.<sup>653</sup> In 2020, the Jehovah’s Witnesses initiated a judicial review of the Charity Commission’s statutory inquiry, which had not concluded at the time of the finalisation of this report.<sup>654</sup>

**18.** Some of the Charity Commission’s investigations have taken a significant period of time to complete and report, which may in part be due to resourcing and complex processes of investigation. The current system is not an adequate mechanism for oversight and inspection. The Charity Commission is not funded, constituted or empowered to act as an inspectorate and its powers are not that of an inspectorate-style regulator.<sup>655</sup>

**19.** Registration with the Charity Commission does not amount to quality assurance of its conduct. It also does not mean that a charity’s safeguarding policies and procedures are appropriate, as there is no requirement to provide information about child protection policies and practices or a regular audit of them (although such policies and practices can be requested during registration, compliance or investigatory action or as part of outreach activity).<sup>656</sup> Charities also still under-report serious incidents, despite it being an obligation imposed upon them by the Charity Commission.<sup>657</sup>

**20.** A regulatory approach which now encompasses safeguarding issues is in place but this is only able to tackle limited numbers of cases. The Charity Commission has been clear that charitable organisations should not regulate themselves internally, due to *“the inherent weakness which can arise in managing conflicts of interest or loyalty and the complexity of safeguarding itself”*. In its view, the regulation of safeguarding and adult or child protection is best managed by an independent body or bodies experienced in safeguarding but cognisant of the spiritual context, and that are able to hold organisations to account for their safeguarding management and practice.<sup>658</sup>

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<sup>650</sup> CYC000463\_001

<sup>651</sup> CJW000052\_025 para 93; CJW000052\_026 para 95

<sup>652</sup> CJW000052\_026 para 96

<sup>653</sup> Harvey Grenville 14 August 2020 65/13-67/9.

<sup>654</sup> CJW000126\_001

<sup>655</sup> CYC000440\_025 para 114; Harvey Grenville 14 August 2020 66/19-24

<sup>656</sup> Harvey Grenville 14 August 2020 33/6-17.

<sup>657</sup> CYC000440\_017 para 75

<sup>658</sup> CYC000440\_046 paras 231-232

## Other central government bodies

### *Department for Digital, Culture, Media & Sport*

**21.** The Office for Civil Society within the Department for Digital, Culture, Media & Sport is responsible for ‘civil society’ policy. This includes young people, volunteering, social enterprises, social investment and public service mutuals in England.<sup>659</sup> It is also responsible for policy relating to charities.<sup>660</sup> While the Office for Civil Society is the policy lead for non-statutory youth services and positive activities for young people outside of school settings in England, it has no statutory, legislative or supervisory responsibilities in connection with religious organisations or settings.<sup>661</sup>

### *Ministry of Housing, Communities and Local Government*

**22.** The Ministry of Housing, Communities and Local Government (MHCLG) has policy responsibility for engagement with faith communities.<sup>662</sup> It has no statutory, legislative or supervisory responsibilities in connection with religious organisations or settings, nor does it have any role or responsibilities for setting or monitoring standards for child protection within religious organisations or settings.<sup>663</sup>

**23.** Ms Penelope Hobman, Acting Director of the Integration and Communities Directorate at the MHCLG, explained that there are a series of initiatives to support MHCLG’s work on faith engagement.<sup>664</sup>

**23.1.** The Faith Leader Training Initiative is a voluntary, non-theological training programme in England – in conjunction with the Edward Cadbury Centre for the Public Understanding of Religion, based at Birmingham University – which seeks to improve faith leaders’ understanding of various social, political, cultural, practical and governance topics.<sup>665</sup> Impetus for this programme came from the government’s Integrated Communities Action Plan (2017), which supported faith leaders to promote shared values.<sup>666</sup> There are also modules about child sexual exploitation, grooming and safeguarding within organisations. By October 2019, there had been 257 participants registered for sessions.

**23.2.** Strengthening Faith Institutions (SFI) works to “*professionalise*” places of worship, providing bespoke support depending on the particular challenges faced by particular faith institutions, although it usually only becomes involved following referral by the Charity Commission, statutory bodies such as the police or local authorities, or through other forms of intervention.<sup>667</sup>

**24.** The MHCLG’s role is limited and emanates from concerns about radicalisation and extremism.

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<sup>659</sup> DFE002833\_003-004 para 9b

<sup>660</sup> DFE002833\_003-004 para 9b

<sup>661</sup> DFE002833\_003-004 para 9b

<sup>662</sup> MHC000001\_002-004 para 5

<sup>663</sup> MHC000001\_004 para 6

<sup>664</sup> MHC000001\_002-004 para 5

<sup>665</sup> EDW000001\_005-007 paras 12–16

<sup>666</sup> EDW000001\_002 para 4

<sup>667</sup> CYC000440\_042 paras 211–213; SFI000001

## Home Office

**25.** The Home Office has a Tackling Exploitation and Abuse Unit, which manages policy on child protection and victims of sexual abuse, and includes a safeguarding hub.<sup>668</sup>

**26.** The Home Office is also responsible for policy on vetting and barring in relation to those working with children, which is dealt with in detail in Part D.

## Parliamentary groups

**27.** There is an All-Party Parliamentary Group (APPG, a crossbench organisation of peers and Members of Parliament) on Safeguarding in Faith Settings, which is to work on the understanding of the unique child protection challenges of communities of faith. It recently published a paper about extending the criminal law to include clergy and religious figures in positions of trust, as referenced in Part C.<sup>669</sup>

## The Children's Commissioner

**28.** The Children's Commissioner is an office independent of central government whose role is to promote and protect the rights of all children in England. The Commissioner can intervene and enter into any organisation to inspect it, and can undertake independent reports similar to a public inquiry.<sup>670</sup> To date, it has not specifically considered children and religious organisations.

## Local authorities

### Overview

**29.** The laws in England and Wales give day-to-day responsibility to local authorities to take action in respect of children who have been abused, and to run child protection services.<sup>671</sup>

**30.** Local authorities in both England and Wales, as part of child protection services, are under a duty to make arrangements to “*promote co-operation*” with a range of other “*relevant partners*”, as well as “*other bodies*” who work to promote the welfare of children.<sup>672</sup>

**31.** Religious organisations can fall within the category of ‘other bodies’ with whom local authorities are required to work, to the extent that those organisations exercise functions or engage in activities in relation to children in the authority’s area within the meaning of section 10 of the Children Act 2004. In reality, this is limited to those operating full-time schools, or health and social care services, as they otherwise would not be engaged in services that would come under section 10.<sup>673</sup>

**32.** Under the Children and Social Work Act 2017, in England from June 2018, multi-agency safeguarding arrangements in a local authority area involved:

- the chief executive of the local authority;

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<sup>668</sup> HOM003312\_002-003 para 5

<sup>669</sup> THO000081; THO000080

<sup>670</sup> See CCE000001\_001

<sup>671</sup> Under the Children Act 1989 and the Children Act 2004 in both England and Wales, and under the Social Services and Well-being (Wales) Act 2014; WGT000443\_004 para 18; DFE002833\_005

<sup>672</sup> Section 10 of the Children Act 2004; s25 of the Children Act 2004 in respect of Wales.

<sup>673</sup> DFE002833\_005

- the head of the clinical commissioning group – the body that is responsible for providing health services to the local community (or more than one if there is more than one Group); and
- the chief officer of police.<sup>674</sup>

They have a shared and equal statutory duty to make arrangements for “*safeguarding and promoting the welfare of all children in their area*”, through a local safeguarding children partnership.<sup>675</sup> This partnership is designed to coordinate child protection services in a local area, acting as a strategic leadership group, engaging others, implementing local and national guidance and, in particular, learning from serious child protection incidents in respect of abuse and neglect.<sup>676</sup> In Wales, regional safeguarding boards undertake a similar role.<sup>677</sup>

**33.** Under Part 7 of the Social Services and Well-being (Wales) Act 2014, local authorities have to establish safeguarding children boards composed of representatives from local authorities, local health boards, the police and others.<sup>678</sup> There are regional safeguarding children boards and a national independent safeguarding board in Wales.

**34.** In England, local safeguarding children partnerships have powers under regulations issued under the Children and Social Work Act 2017 to place a duty on ‘relevant agencies’ (including charities and representative organisations of religions for their schools) to cooperate if asked to do so as part of the local safeguarding arrangements.<sup>679</sup> One local authority – the London Borough of Hackney (Hackney Council) – sought to name all out-of-school settings as ‘relevant agencies’, but told us that the legislation lacks teeth and that there is no basis on which organisations who refuse to cooperate can be made to do so.<sup>680</sup> The Department for Education agreed.<sup>681</sup> Another local authority sought to identify a group of faith bodies that acted together as a ‘relevant agency’.<sup>682</sup> Many local authorities that provided evidence to this investigation have not used this power.<sup>683</sup> There are no such powers in Wales.

**35.** There is a general expectation that religious and voluntary organisations develop policies and processes in line with statutory guidance – in England, this is *Working Together to Safeguard Children* (published most recently in 2018) and in Wales the *All Wales Safeguarding Procedures* (published in late 2019). For example, *Working Together* states that voluntary organisations play an important role in safeguarding children and in supporting families and communities, and that all practitioners are deemed to be subject to the same child protection responsibilities, whether they are paid or a volunteer.<sup>684</sup> Compliance with the guidance is

<sup>674</sup> DFE002833\_006

<sup>675</sup> DFE002815\_006; Between 2006 and 2018, there were local safeguarding children board arrangements, designed to provide overarching strategy for child protection in the area, and to provide advice, training and guidance (LECO00004\_003; DFE002833\_005-007). This gave local authorities and other public bodies a practical mechanism by which they could cooperate with each other and take steps to promote the welfare of children, as required under the Children Act 2004.

<sup>676</sup> DFE002833\_006; See for example, LECO00004\_002; HAC000001\_001; Jasvinder Sanghera 14 May 2020 6/9-10/7

<sup>677</sup> WGT000441\_003-004 paras 1.11-1.15

<sup>678</sup> Social Services and Well-being (Wales) Act 2014, section 134; The Safeguarding Boards (General) (Wales) Regulations 2015

<sup>679</sup> The Child Safeguarding Practice Review and Relevant Agency (England) Regulations 2018; see Children and Social Work Act 2017 section 17E

<sup>680</sup> Jim Gamble 11 August 2020 155/1-4

<sup>681</sup> Kate Dixon 13 August 2020 112/16-116/10

<sup>682</sup> Birmingham Children’s Trust, on behalf of the Birmingham Safeguarding Children Partnership, have named the Birmingham Council of Faiths. See Graham Tilby 14 May 2020 37/23-38/8

<sup>683</sup> None except the London Borough of Hackney had designated all voluntary bodies as relevant partners: Birmingham had named a Faith Forum as a partner, and the Church of England was often a partner, as was the Roman Catholic Church given its role in running and administering schools in every area of the country.

<sup>684</sup> DFE002815\_070 paras 57, 60



not legally enforceable and religious organisations are under no duty to follow it, or even to take it into account. Some religious organisations in this investigation demonstrated a good understanding of *Working Together* and referred to it in evidence – others did not mention it at all.

**36.** This investigation sought evidence from nine local authorities with large and diverse religious communities about the work that they do with religious organisations, given their obligation to safeguard and promote the welfare of children and their obligation to investigate if children have been harmed.<sup>685</sup>

**36.1.** Although local authorities can ask voluntary bodies to complete information about their child protection activity (often known as ‘section 11 audits’), there is no compulsion for organisations to respond, and religious groups have criticised the process of doing so as cumbersome, complex and unwieldy.<sup>686</sup> These forms were designed for schools rather than voluntary settings such as religious organisations, and so may seek material that is irrelevant to other settings.<sup>687</sup>

**36.2.** Some local authorities have links with voluntary sector umbrella bodies and, through them, offer training on child protection and newsletters with best practice (although these are not designed specifically for religious organisations).<sup>688</sup> Many also offer free or very low-cost child protection training for not-for-profit organisations.

**36.3.** Some local authorities have informal links with individual religious organisations, though some of these links are stronger than others. For example in Bradford, work has been undertaken for many years between Bradford Council and the Council for Mosques, as well as the Anglican and Jewish communities.<sup>689</sup> In Liverpool, the local authority’s relationship has been mainly with the Catholic Church.<sup>690</sup> Tower Hamlets Council told us that they have a Muslim Children’s Safeguarding Coordinator who runs workshops with mosques and had run 87 parenting sessions in schools about the risk of unqualified home tutors. This is not universally replicated in other local authorities.<sup>691</sup>

**36.4.** All local authorities from which we heard evidence have developed standardised child protection procedures to be used by all statutory bodies and other partners, including identification of how to react to an allegation of abuse, recruitment of those who work with children, investigation of allegations, and training. As set out above, these do not have to be adopted by religious organisations. All nine local authorities wanted to have greater powers (alongside greater resources) in order to help organisations to be able to protect children to an adequate standard.

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<sup>685</sup> Birmingham City Council (BMC000047); Bradford Metropolitan District Council (BFC000088 and BFC000107); Cardiff Council (CAR000001); City and Hackney Safeguarding Children Partnership (HAC000001); Harrow Council (HAR000001); Leeds City Council (LEC000004); Liverpool City Council (LIV000001); London Borough of Tower Hamlets (LBT004244); Manchester City Council (MCC000002)

<sup>686</sup> Jehudah Baumgarten 12 August 2020 120/1-121/9

<sup>687</sup> Graham Tilby 14 May 2020 42/7-44/16; Jehudah Baumgarten 12 August 2020 120/1-121/9

<sup>688</sup> Birmingham City Council (BMC000047); Bradford Metropolitan District Council (BFC000088 and BFC000107); Leeds City Council (LEC000004)

<sup>689</sup> BFC000088\_007-015

<sup>690</sup> LIV000001\_009 para 11

<sup>691</sup> LBT004244\_009 para 26

**37.** Each local authority has a local authority designated officer (LADO) responsible for helping to ensure that any investigation concerning child sexual abuse, and other forms of abuse that concern individuals acting in a position of trust with children, is coordinated between various agencies, putting the interests of children first.<sup>692</sup> Religious organisations should be referring all allegations of abuse, including child sexual abuse, to the LADO if they involve their staff, religious leaders or volunteers (or to children’s social care in other cases). It would seem from the policies we have seen that some do mention the LADO but many do not, and levels of engagement with the local authority do vary.<sup>693</sup> While most local authorities reported that the Anglican and Catholic Churches had communication with the LADO, the record for other religious bodies was patchy. The reason for this is unclear, but the provision of professional child protection specialists in Anglican and Roman Catholic Dioceses may be a contributing factor.<sup>694</sup>

**38.** As noted in Part E, not all religious organisations and settings have adequate policies providing contact details of the LADO and making clear the circumstances in which reports will be made. Ms Jasvinder Sanghera, Independent Chair of the Leeds Safeguarding Children Partnership, noted that there is within some religious communities a “nervousness” attached to involving outside agencies, and an impulse to deal with matters internally.<sup>695</sup> Mr Graham Tilby, Assistant Director for Safeguarding for Birmingham Children’s Trust, noted that while some larger faith communities have designated individuals with established relationships with the LADO, this is not the case with “*the very small churches or the independent Christian churches or mosques*”.<sup>696</sup> Although the LADO is well known to schools, social care settings and the NHS, many of those working in religious organisations seem to be unaware of the LADO or that reports could or should be made to them.

**39.** We also saw a degree of miscommunication and misunderstanding. Some religious organisations consider that statutory authorities do not understand them, would judge them and have acted in a heavy-handed way in the past.<sup>697</sup> Some of those representing local authorities recognised that previously they have at times lacked nuance and understanding of religious issues when undertaking their statutory duties. However, their overriding concern must be their statutory duty to protect children in each and every case. Those local authorities that gave evidence stressed the need for dialogue, communication, openness, discussion and debate, and recognised that this communication may not have been as effective as it should have been.<sup>698</sup>

**40.** Many local authorities recognised that children in their area may attend some form of supplementary schooling with a faith focus. Some provide specific advice and support to those who provide supplementary schools in a faith setting, by appointing an officer in the authority with that role.<sup>699</sup> Others have, for example, established ‘safe spaces’ where children can talk and receive counselling (working with a group of local mosques), and also provided training and toolkits to assist in the development of child protection policies for faith-based settings. Local authorities may also assist with the provision of DBS checks for staff and work with the National Resource Centre for Supplementary Education to

<sup>692</sup> Graham Tilby 14 May 2020 47/6-48/1

<sup>693</sup> Jasvinder Sanghera 14 May 2020 89/9-91/2; Graham Tilby 14 May 2020 91/3-92/19; Jim Gamble 11 August 2020 139/10-13

<sup>694</sup> Graham Tilby 14 May 2020 91/3-92/19

<sup>695</sup> Jasvinder Sanghera 14 May 2020 25/23-26/16; 90/7-91/2

<sup>696</sup> Graham Tilby 14 May 2020 91/3-92/15

<sup>697</sup> Jim Gamble 11 August 2020 140/14-141-7; Jehudah Baumgarten 12 August 2020 113/10-14; 116-13-117/17

<sup>698</sup> Jasvinder Sanghera 14 May 2020 23/17-24/18; Richard Baldwin 14 May 2020 67/2-13

<sup>699</sup> BFC000088\_007 para 35

establish a quality framework for supplementary education.<sup>700</sup> Tower Hamlets Council ran seminars for the East London Mosque and provided advice on improving safer recruitment processes. It also provided guidance for African evangelical churches and an African Families Service Coordinator.<sup>701</sup>

**41.** Some local authorities have relationships with voluntary action organisations that provide safeguarding training to smaller organisations, including faith organisations.<sup>702</sup>

**42.** Local authorities have very many pressing child protection priorities and, at present, work with religious organisations on prevention and training is likely to be less of a priority than undertaking statutory child protection work. The fact that the Department for Education has been providing additional monies for pilot schemes demonstrates a need for further resourcing in this area so that local authorities can provide comprehensive assistance, training and partnership working with religious organisations in their area.

### G.3: Internal quality assurance

**43.** In addition to the roles of central government and local authorities in the areas outlined above, we have seen examples of internal quality assurance within religious organisations and settings – that is, examples of auditing, inspections and reviews arranged by religious organisations themselves. Examples of such practices were rare within the organisations that we examined, and there was very limited evidence of religious umbrella bodies taking a lead in this respect.

#### Examples of voluntary inspection and oversight

**44.** The Salvation Army was one of the few religious organisations examined that has put in place self-arranged auditing mechanisms. Mr Dean Juster, Director of Safeguarding at The Salvation Army, explained that there are a range of processes in place for auditing the child protection practice of religious communities at the local level.<sup>703</sup>

**44.1.** With the introduction of a revised child protection policy and procedure in 2007, every Salvation Army church was mandated to carry out an annual Child Safety Audit. This is now named the Safeguarding Audit and is carried out every three years.<sup>704</sup> This audit is used to note shortfalls in compliance and devise an action plan – each audit is then reviewed by the organisation’s divisional (regional) and territorial (national) office, and the action plan is monitored.<sup>705</sup>

**44.2.** The Salvation Army has an Internal Audit Department, which is tasked with independently auditing policy compliance at all Salvation Army religious communities. Audits take place every three to four years, and findings and recommendations are made to the regional office.<sup>706</sup>

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<sup>700</sup> BFC000088; HAR000001; MCC000002

<sup>701</sup> LBT004244\_013 para 39

<sup>702</sup> HAR000001\_002

<sup>703</sup> SVA000048\_039 para 217

<sup>704</sup> SVA000048\_039 para 218

<sup>705</sup> SVA000048\_039 para 219

<sup>706</sup> SVA000048\_039 para 221

**44.3.** Since 2017, The Salvation Army has employed a full-time employee to conduct a systematic review of all safeguarding files. The work is ongoing and is in addition to file reviews undertaken by the Safeguarding Department in 2004, 2009, 2011 and 2017. As part of this review, the decision-making process of child protection cases is reviewed, and retrospective action is taken and cases reopened as necessary.<sup>707</sup>

**45.** In 2012, the Methodist Church in Great Britain undertook to review all past safeguarding cases in the Church dating from 1950 onwards. This past case review, which was titled *Courage, Cost and Hope*, was completed in 2015.<sup>708</sup> The review was completed by three independent safeguarding experts and three additional reviewers.<sup>709</sup> It produced 2,566 responses, which identified 1,885 past concerns, including cases of sexual, physical, emotional and domestic abuse, as well as cases of neglect relating to adults and children.<sup>710</sup> Mr Tim Carter, Director of Safeguarding, explained that, in each case, data were collected about the nature of the concern and the response at the time by the Methodist Church.<sup>711</sup> The possibility of continuing risk, pastoral support and interaction required with statutory agencies was also considered in every case and, where necessary, remedial action was taken to make a referral to statutory agencies, including the police, LADO or children's or adult services.<sup>712</sup> The report made 23 recommendations, and an implementation group was established in August 2015 to take these forward.<sup>713</sup>

**46.** These reviews recognise the needs for effective safeguarding oversight by the bodies themselves, and also that past safeguarding problems or failures need to be addressed and dealt with.

### The role of representative organisations and umbrella bodies

**47.** Representative organisations and umbrella bodies could play a useful role in providing oversight, support and guidance about child protection, but at present few of them do so. The Mosques and Imams National Advisory Board (MINAB) has over 500 members, the majority of which are institutions.<sup>714</sup> Mr Moin Azmi, Vice Chair of MINAB, noted that it is “not a regulator ... it doesn't have the capacity or the facilities to be able to do that”.<sup>715</sup>

**48.** The Union of Orthodox Hebrew Congregations (UOHC), a membership body for Charedi synagogues and households, does not impose any formal requirement on its member synagogues in relation to child protection policies or practices.<sup>716</sup> Rabbi Jehudah Baumgarten, who appeared on behalf of the UOHC, explained that “synagogues are autonomous”:<sup>717</sup>

*“Even if there are some things going on in the synagogue which may not be sort of the way the Union would like a synagogue to run, the Union would nevertheless not interfere with the running of the synagogue.”<sup>718</sup>*

<sup>707</sup> SVA000048\_040 para 222

<sup>708</sup> MST000152\_002 para 3.1

<sup>709</sup> MST000152\_003 para 3.8

<sup>710</sup> MST000152\_004 para 3.10

<sup>711</sup> MST000152\_004 para 3.11

<sup>712</sup> MST000152\_004 para 3.12

<sup>713</sup> MST000152\_005 para 3.16

<sup>714</sup> MNB000001\_001-002 paras 2, 6

<sup>715</sup> Moin Azmi 13 May 2020 16/15-23

<sup>716</sup> Jehudah Baumgarten 12 August 2020 93/20-95/2

<sup>717</sup> Jehudah Baumgarten 12 August 2020 94/23-95/2

<sup>718</sup> Jehudah Baumgarten 12 August 2020 95/18-96/12

**49.** Liberal Judaism is an umbrella body with 40 member synagogues and communities in the UK and Europe.<sup>719</sup> Until recently, it did not offer oversight of its members' child protection practices.<sup>720</sup> It has recently introduced a requirement for member organisations to have a safeguarding policy, and to send senior staff or volunteers on accredited training in order to qualify for membership of the organisation.<sup>721</sup>

## The role of charitable organisations and training providers

**50.** There are a range of charitable organisations and training providers that religious organisations and settings can draw on in arranging their own forms of inspection, auditing and oversight.

**51.** Thirtyone:eight is a Christian safeguarding charity that provides a range of services to its members, including assistance with vetting and barring, training, a helpline, policy support and consultancy.<sup>722</sup> Mr Justin Humphreys, its Chief Executive Officer (Safeguarding), noted that one area of work that continues to be in demand is its audit and review work:

*"The methodology for undertaking audits has evolved over the years we have been undertaking such work. In broad terms, the methodology utilises a consistent standards-based framework ... which would ordinarily lead to an assessment to be made against each of the ten standards and their constituent elements (using 'Met', 'Partially Met', 'Not Met', or 'Not Applicable')."*<sup>723</sup>

Despite this, the number of religious organisations requesting some form of audit or review is limited. Since 2012, thirtyone:eight has undertaken 29 assignments. Mr Humphreys noted that *"the ability of organisations, groups and denominations to self-regulate would appear to be very inconsistent"*.<sup>724</sup>

**52.** Faith Associates was created in 2004 to assist faith organisations to develop proper governance models.<sup>725</sup> It works primarily with the Muslim community but also with other faiths.<sup>726</sup> Mr Shaukat Warraich, Chief Executive Officer, explained that Faith Associates is sometimes invited to carry out organisational audits for religious organisations and settings:

*"We are generally invited to come in to do the audit, and one of the aspects of the audit is what child protection systems, what safeguarding systems, are in place, and does the organisation's employees and volunteers and any people that are working regularly within that institution, have they had safeguarding training?"*<sup>727</sup>

Mr Warraich observed that *"nearly 90 per cent of the time, they have not had child protection training"*.<sup>728</sup> As part of the audit, Faith Associates carries out face-to-face interviews, visits premises, reviews practices and spends time within mosques.<sup>729</sup> Having conducted such audits, Faith Associates produces an audit report.

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<sup>719</sup> LIJ000002\_001 para 5

<sup>720</sup> Rebecca Fetterman 12 May 2020 6/8-13

<sup>721</sup> LIJ000002\_002 para 7

<sup>722</sup> THO000076\_001 para 3

<sup>723</sup> THO000076\_011 para 8e

<sup>724</sup> THO000076\_035-036 para 25.8

<sup>725</sup> Shaukat Warraich 13 May 2020 3/21-4/18

<sup>726</sup> Shaukat Warraich 13 May 2020 3/21-4/18

<sup>727</sup> Shaukat Warraich 13 May 2020 52/3-8

<sup>728</sup> Shaukat Warraich 13 May 2020 52/12-14

<sup>729</sup> INQ005160\_004 para 16

**53.** As part of this work, Faith Associates has developed an accreditation scheme for mosques and madrasahs.<sup>730</sup> Under the Beacon Mosque Programme, mosques are accredited within a quality framework “according to categories such as governance, safeguarding practices and service delivery”.<sup>731</sup> In the case of madrasahs, Faith Associates has developed a National Association of Madrassah, with a three-level accreditation process: bronze, silver and gold.<sup>732</sup>

**54.** SFI is another organisation that carries out audits of religious organisations and settings. Its organisational audit “assesses the overall strengths and weakness of the faith centres policies, procedures, governance structures, business model and capacity to handle various risks”.<sup>733</sup> These audits, which SFI describes as ‘health-checks’, involve an organisation answering a series of questions that are set out in a ‘Faith Institutions Basic Checklist’.<sup>734</sup> The health-check contains questions about safeguarding and child protection, including whether the organisation has:

- developed written child protection and safeguarding policies;
- appointed a designated safeguarding officer; and
- carried out DBS checks for all trustees, staff and volunteers who are in contact with children and vulnerable adults.<sup>735</sup>

The health-check is self-assessed and none of the questions are mandatory.<sup>736</sup> The process relies on organisations filling out information within the health-check accurately.<sup>737</sup> Mr Natan Levy, Head of Operations, explained that, in order to avoid the check becoming a tick-box exercise, SFI prefers it if one of its consultants is in the room while representatives from an organisation are completing the check:

*“Because you can answer these questions ‘Yes’, ‘Yes’, ‘Yes’, but it’s really important that we feel there’s an expert from our side, the SFI consultant, who is saying, ‘Can we see your child protection policy? Where is it? It’s not simply enough just to have it. We want to take a look at it, how dated it is, when’s the last time the trustees saw it and signed it’.”*<sup>738</sup>

Mr Levy explained that the questions in the health-check are intended to be a “launch pad towards deeper conversations. We are not trying here to catch them out”.<sup>739</sup> Information from health-checks is not shared by SFI with any third parties.<sup>740</sup>

**55.** SFI also assists organisations to create bespoke action plans to strengthen policies and training “in core areas of safeguarding, security, governance, funding, ... and other areas of need”.<sup>741</sup> As of November 2019, SFI had a network of 654 faith centres.<sup>742</sup> Of these, 446 had completed an organisational health-check, and of these, 272 had implemented their bespoke action plan.<sup>743</sup>

<sup>730</sup> INQ005160\_003-004 paras 12–13

<sup>731</sup> INQ005160\_003 para 12

<sup>732</sup> INQ005160\_003-004 para 13

<sup>733</sup> SFI000001\_002-003 para 5

<sup>734</sup> SFI000002

<sup>735</sup> SFI000002\_017-019

<sup>736</sup> SFI000001\_002-003 para 5

<sup>737</sup> Natan Levy 12 May 2020 108/19-109/3

<sup>738</sup> Natan Levy 12 May 2020 111/11-112/10

<sup>739</sup> Natan Levy 12 May 2020 112/4-10

<sup>740</sup> SFI000001\_002-003 para 5

<sup>741</sup> SFI000001\_003 para 6

<sup>742</sup> SFI000001\_003 para 7

<sup>743</sup> SFI000001\_003 para 7

**56.** Voluntary auditing initiatives, such as those developed by Faith Associates and SFI, are undoubtedly helping to raise child protection standards within religious organisations and settings. Their voluntary nature means that there is no compulsion for the organisations to comply with any recommendations.

### Views of organisations about the need for further oversight of child protection in religious organisations

**57.** In the course of this investigation, a range of views were expressed about different ways in which oversight of religious organisations and settings could be changed. Victims and survivors, other voluntary organisations, local authorities, Ofsted, the Charity Commission and a number of religious organisations told us that some registration or regulation was required – very few organisations were happy with the current situation.<sup>744</sup> At present, the system is a patchwork of influence – rather than standards and enforcement – by a number of bodies without any central coordination. No agency is able to register, monitor or examine basic child protection practices within religious organisations and settings. While there is disagreement about how such oversight should work, there is a significant body of evidence from this investigation that some form of standard-setting and oversight is required. A number of different models were suggested.

#### *Regulation by a central government body*

**58.** The first possible model for standard-setting and oversight would involve registration of religious organisations, potentially alongside other voluntary organisations, with a central government body.

**59.** There were a range of views about what the appropriate central government body would be, with most witnesses considering that it should either be the Department for Education or Ofsted.<sup>745</sup> The Charity Commission did not consider that it would be the appropriate body to become a registrar or inspector for the regulation of child protection arrangements within religious organisations, or to undertake a broader safeguarding regulatory function beyond its current role.<sup>746</sup> Mr Grenville explained that its role is a broad one relating to general trustee duties and that not all faith organisations are charities:

*“if the objective is to improve outcomes for children and make environments safer for children, the framework should be linked to the activity and the risk, not to the status of the organisation ... there are other organisations or agencies out there who are already established in some shape or form to regulate children’s services, and surely the refinement of any regulatory framework is easier to do with those organisations than it is with us.”<sup>747</sup>*

**60.** The role of local authorities is unclear in this model – in particular, whether there should be some form of registration with local authorities too. Mr Richard Baldwin, Director of Children’s Services for Tower Hamlets Council, considered that local authorities would need to have a role in any registration scheme:

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<sup>744</sup> INQ005155

<sup>745</sup> See, for example, Jasvinder Sanghera 14 May 2020 100/4-102/25 and Jane Booth 11 August 2020 152/8-20; Annex 4 sets out the views of every organisation that provided written evidence to this investigation and provided an answer to their view as to future regulation.

<sup>746</sup> CYC000440\_047 para 236

<sup>747</sup> Harvey Grenville 14 August 2020 77/23-78/21

*"I would certainly see a role for the local authority ... local authorities know their communities, they engage with their communities, and that's a good start."*<sup>748</sup>

Ms Sanghera agreed that *"There has to be a role with the local authority"*.<sup>749</sup> Mr Tilby was of the same view:

*"if you have too far of a distance between a regulatory body nationally and the local relationships, I don't think you take people with you to ... build that trust and actually get better safeguarding in place. So I think you have got to use the local authority, the local partnerships we are building, and actually ... do the work with them to engage these faith settings."*<sup>750</sup>

Mr Tilby suggested one possible type of relationship between a national body and local authorities was:

*"a national body of some kind that sets some national standards for safeguarding across all the faith sectors and then maybe to commission ... some accredited organisations ... who are reputable, accredited, who understand safeguarding, in the faith setting who can actually then enforce those standards and work with the local authority, in partnership with the local authority and safeguarding partnerships, to engage those communities."*<sup>751</sup>

**61.** Mr Emrys Jones, Operations Director for the Evangelical Alliance, expressed the view that a system of registration and inspection of religious settings that provides for those under 18 could be *"deeply problematic"*. First, the nature of such settings varies widely. Second, in the view of the Evangelical Alliance, a system that treats religious organisations and settings differently from other civil groups would appear to be discriminatory. Third, there were concerns that such a scheme would become a *"de facto requirement to register with the state to practice one's faith"*, which it was said might give rise to human rights concerns.<sup>752</sup> The UOHC and the Jehovah's Witnesses agreed with these sentiments.<sup>753</sup> Other organisations were concerned that any regulatory scheme would be too significant a burden on small, volunteer-led organisations.<sup>754</sup>

### *A hybrid scheme*

**62.** A second possible model was proposed by Ofsted. Ms Amanda Spielman, Chief Inspector for Ofsted, suggested that one approach may be a two-layer model, which builds on the fact that:

*"in so many out-of-school activities of various kinds, there are already umbrella organisations that often do run some kind of affiliate model that are helping individual settings with training, with model policies and advice"*.<sup>755</sup>

<sup>748</sup> Richard Baldwin 14 May 2020 96/23-97/8

<sup>749</sup> Jasvinder Sanghera 14 May 2020 101/1-102/6

<sup>750</sup> Graham Tilby 14 May 2020 108/3-10

<sup>751</sup> Graham Tilby 14 May 2020 105/20-108/10

<sup>752</sup> EVA000001\_014 para 58

<sup>753</sup> Emrys Jones 20 May 2020 138/18-20

<sup>754</sup> See the evidence of the Religious Society of Friends in Britain (Quakers): QUA000001\_023-024 paras 101-103

<sup>755</sup> Amanda Spielman 21 May 2020 129/19-130/13



For example, in the field of sport, Sport England requires that sporting bodies that wish to receive funding from them have appropriate safeguarding policies and procedures. National Governing Bodies of sport and Active Partnerships have an additional requirement to sign up to and be compliant with the standards set out in the National Society for the Prevention of Cruelty to Children's (NSPCC's) Child Protection in Sport Unit.<sup>756</sup>

**63.** Under such a regime, out-of-school settings would be:

*"required to register ... with an umbrella body, an appropriate umbrella body, which could be in their faith or activity space ... but umbrella bodies themselves are accredited by a central government agency and that agency also acts as a direct regulator only of the settings for whom there is no accredited umbrella body or who have been unable to sustain their membership because they have shown that they're not willing to sign up to the expectations of the umbrella body."*<sup>757</sup>

Ms Spielman's view was that either Ofsted or the Department for Education would be "the obvious places" to act as regulator given "where ... expertise in safeguarding and child protection sits. It's harder to see it sitting logically in other parts of government at the centre".<sup>758</sup>

**64.** This model could be effective in bodies that already promote an 'association' model, such as the United Synagogue, or where there is a hierarchical or central body, such as the Jehovah's Witnesses. It would not be so effective with other bodies with more autonomous structures.

**64.1.** There are some organisations where membership of an affiliate body can bring significant benefits to being part of a larger religious whole – for example, the United Synagogue, the Baptist Church, the Society of Friends and the Methodist Church. Religious organisations are often predicated on being individual, autonomous and without hierarchy, chains of command or formal links with wider bodies.

**64.2.** Even when an umbrella body exists, whether or not they have any position on or role in child protection varies. There would need to be a significant change in current umbrella bodies in order to expand their remit.

### *Self-regulation by religious organisations*

**65.** A third model explored during this investigation was whether religious organisations should regulate themselves, either by self-regulation or by other religious bodies. This was the model favoured by some religious organisations, for one of three reasons:

- the size or nature of the organisation meant that it lacked the people, money or time to participate in external regulation;
- the need had not been shown as to why it was proportionate or necessary to identify any form of regulation; and
- it would compromise religious freedom for any form of external registration or monitoring to take place.

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<sup>756</sup> STE000001\_002 paras 4–6

<sup>757</sup> Amanda Spielman 21 May 2020 129/19-130/13

<sup>758</sup> Amanda Spielman 21 May 2020 136/24-137/18

**66.** Mr Jones suggested that if auditing of religious organisations was to be recommended by the Inquiry, each religious organisation should be able to:

*“choose an auditor who understood their needs. This would be similar to choosing an accountant or auditor who understood the financial needs of the organisation.”<sup>759</sup>*

Developing this idea, Mr Peter Lynas, the UK director of the Evangelical Alliance, noted that:

*“you will have some organisations who work with thousands, tens of thousands, of children right across the UK. They will need a different auditor than a small church that has 20 people, and so, why not get a range of auditors in the same way as financial companies – large ones use a large auditor, smaller ones may use a local auditor, but those auditors are obliged legally to hit certain thresholds.”<sup>760</sup>*

**67.** The Charity Commission was of the view that self-regulation of safeguarding would be inadvisable:

*“due to the inherent weakness which can arise in managing conflicts of interest or loyalty and the complexity of safeguarding itself ... the regulation of safeguarding, adult or child protection is best managed by an independent body or bodies, experienced in safeguarding but alive to spiritual context and who are able to hold organisations to account for their safeguarding management and practice.”<sup>761</sup>*

## G.4: Mandatory reporting

**68.** The Inquiry also heard a range of views about mandatory reporting of child sexual abuse. There was a diversity of views among organisations about who should be subject to the duty to report and the threshold for reporting (suspicions of abuse, allegations of abuse or some higher threshold), and to whom reports ought to be made. There was nonetheless broad support for some form of mandatory reporting among religious organisations and also the other institutions and organisations that contributed to this investigation.

**69.** A number of organisations were in favour of some form of mandatory reporting.

**69.1.** The Evangelical Alliance was of the view that concealment of child sexual abuse following an admission or an internal disciplinary finding ought to be a criminal offence, but that this ought to be the case *“across all sectors including community groups, sporting organisations, educational settings etc”*.<sup>762</sup> In relation to mandatory reporting of allegations or suspicions of child sexual abuse, the Evangelical Alliance noted that the position was more complex: *“The reporting of suspicions to the statutory authorities is a more fraught area as suspicions are by definition much more subjective”*.<sup>763</sup>

<sup>759</sup> EVA000001\_014 para 59

<sup>760</sup> Peter Lynas 20 May 2020 139/17-141/16

<sup>761</sup> CYC000440\_046 para 231

<sup>762</sup> EVA000001\_016 para 65

<sup>763</sup> EVA000001\_016 para 64

**69.2.** The Triratna Buddhist Order and Community was supportive of the view that it ought to be compulsory for those in positions of responsibility to report allegations, suspicions and disclosures of abuse to the external authorities.<sup>764</sup> It noted, however, that there is at present no agreement within the organisation about what should be done in cases of formal confessions:

*“This is because many believe in the sanctity of the confessional; that serious misconduct disclosed in the context of formal confession need not be reported ... There is a particular challenge where a person confesses to viewing indecent images of children, given that the seriousness of this non-contact offence is underestimated ... Rather than referring to the police all those confessing to viewing indecent images of children, it would be helpful to be able to refer such a person for psychological assessment by an external body, which body would then determine whether to refer the person for psychological treatment or report directly to the police.”<sup>765</sup>*

**69.3.** Ms Rebecca Fetterman, Director of Youth and Designated Safeguarding Lead at Liberal Judaism, considered that it should be mandatory for religious leaders or those in positions of authority to refer allegations or suspicions of child abuse to statutory authorities, and that concealment of such should be a criminal offence. Ms Fetterman noted that *“We would go further and say that this should apply to all staff and volunteers if child abuse is to be tackled properly and consistently”*.<sup>766</sup>

**69.4.** The Muslim Council of Britain agreed that it should be compulsory for those in positions of responsibility in religious communities to refer allegations or suspicions of child sexual abuse to statutory authorities. They also agreed that concealment where admissions of abuse have been made, or where there have been internal disciplinary findings, should be a criminal offence. The Council pointed out that:

*“In the context of the Muslim community ... there is a complication in that anyone can appoint themselves as an ‘Imam’ ... so long as they can justify to the audience their claim. Whilst some institutions will certainly insist on certain religious qualifications in self-appointed institutions this is more difficult to regulate.”<sup>767</sup>*

**70.** Other organisations were opposed to the idea of creating a criminalising failure to report.

**70.1.** The Salvation Army did *“not support a view that the concealment of abuse if an admission has been made and/or if there have been internal disciplinary findings of such should be a criminal offence”*.<sup>768</sup>

**70.2.** The preference of the Church of Jesus Christ of Latter-day Saints was:

*“to work co-operatively with local safeguarding partners (the local authority, the clinical commissioning group and the police) to keep children safe. It is the experience of the Church, anecdotally, working with children in jurisdictions around the world, that where reporting to the authorities by the bishop or stake president,*

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<sup>764</sup> TBO000001\_016 para 30

<sup>765</sup> TBO000001\_016 para 30b-c

<sup>766</sup> LIJ000002\_011 para 63

<sup>767</sup> MCB000001\_020 para 30

<sup>768</sup> SVA000048\_045 para 267

*is mandated, then the incidence of disclosure to the bishop or stake president, by the victim, the victim's family or the perpetrator, is negatively impacted, or put another way, the ability of the Church to protect and promote the welfare of children including identifying children at risk, is reduced, as disclosure of abuse to the Church is curtailed by the victim, or the victim's family or the perpetrator, for fear of immediate disclosure of the abuse to the authorities."*<sup>769</sup>

**70.3.** The Federation of Synagogues echoed this concern:

*"we fear that requiring religious leaders to report these matters will have the unintended consequence of deterring complainants, victims and survivors from disclosing them to their religious leaders. If someone is not yet ready to go to the authorities, but needs to confide in their Rabbi, they will be reluctant to do so if they know the Rabbi is required by law to report their conversation. This closes off a route to pastoral care for the victim. It also means that the Rabbi may remain unaware of the situation in their community and will thus be unable to take measures to prevent the perpetrator from continuing to abuse, or to bring them to justice."*<sup>770</sup>

**71.** Mandatory reporting is not an issue confined to religious organisations. It has arisen in other investigations and is a matter on which the Inquiry has held a number of seminars. It is a subject that will form part of the Inquiry's final report.

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<sup>769</sup> CJC000001\_013-014 para 76

<sup>770</sup> FOS000001\_018 para 124



Part H

# Conclusions and recommendations

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# Conclusions and recommendations

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## H.1: Conclusions

### Introduction

1. The Inquiry has heard evidence of children being abused or put at risk of harm in religious organisations and settings on numerous occasions. At present, there is either no or very limited oversight and assurance of child protection in religious organisations.
2. There is significant diversity in size, character, structure and resources of religious organisations. It is possible to have sensitive and nuanced oversight that recognises the particular natures of these organisations but prioritises the protection of children. Some local authorities have been unable to take steps when they considered that a religious organisation was not keeping children safe.
3. Adequate child protection policies and procedures are essential in ensuring that children are protected against sexual abuse perpetrated by individuals connected with religious organisations and settings.
4. Strong child protection practices in such settings can make an important contribution to identifying familial abuse. It is well established that most child sexual abuse takes place within the family context.<sup>771</sup> Given that members of the same family will tend to be part of the same religious community, religious organisations and settings should be somewhere where signs of abuse are spotted and recognised.

### Reporting and responding to abuse

5. There is presently no requirement on the part of the police to collect statistics at a national level in England and Wales as to the number of convictions or allegations relating to child sexual abuse in religious organisations and settings. There is no way of knowing the true scale of such abuse. There is, however, likely to be a significant under-reporting of child sexual abuse in religious organisations and settings.
6. There are a number of factors that may impede the effective reporting and management of allegations of child sexual abuse.

**6.1. Victim-blaming, shame and honour:** Within some religious organisations, victims are blamed for their abuse; it may be suggested that the abuse took place because of the victim's behaviour. As a result, those who have experienced child sexual abuse sometimes feel ashamed and may be led to believe that the abuse was in some way their fault. This can make it difficult to report the abuse. These dynamics are not limited to religions or religious organisations but in some

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<sup>771</sup> *Protecting children from harm: A critical assessment of child sexual abuse in the family network in England and priorities for action*, Children's Commissioner, November 2015.

organisations the imperative not to speak is bound up with notions of honour, with consequences for the victim's ability to marry, for their family and for the honour of their community.

**6.2. Approaches to discussions of sex, sexuality and sexual abuse:** In some languages, the words required to report sexual abuse – such as words for rape, sexual abuse or sexual organs – do not exist. In some communities, sex is not discussed at all or is discussed very narrowly. For some conservative religious organisations, sex outside marriage and same-sex relationships are considered to be morally wrong. Sexual violence against men is considered shameful and taboo within some communities, given their attitudes and approaches to sexual orientation, and it is therefore even more difficult to report.

**6.3. The use of religious texts and beliefs:** In some cases, those who perpetrate child sexual abuse take advantage of a victim's faith to facilitate their abuse. We heard examples of perpetrators misusing theological texts or beliefs, positions of authority in a religious organisation, the name of God, or threats of spiritual or religious consequences to justify abuse or prevent its disclosure.

**6.4. Gender disparity:** Many religious organisations only recognise men as religious leaders in their theology and practice. Gender imbalance exists in many such organisations, so that trustees, volunteers and administrators are often all or mostly male. Having only men in positions of power, and only men to whom abuse can be reported within an organisation, makes it less likely that women and children will report abuse. Power structures within a number of religious communities can still make women subservient to men, and they are less able to report their abuse as a result. Women in some communities would find it extremely difficult to talk to men (particularly outside of marriage or close family relationships) about abuse, sex or their bodies and feelings.

**6.5. Abuse of power by religious leaders:** Across all faiths, religious leaders have significant power and influence. Children are often taught to show such figures deference and respect. Those in positions of leadership often act as advisers, confidantes, guides and helpers. Religious leaders can abuse their positions of trust. Excessive respect or veneration of leaders within religious communities may result in a feeling that they can act with impunity, and may also contribute to a victim being reluctant to report abuse.

**6.6. Distrust of external agencies:** A fear of interference in religious or cultural practices may lead to a reluctance to report abuse, as might concern about prejudices, including Islamophobia or antisemitism. Minority religious and racial communities are sometimes frightened of the backlash that may accompany the reporting of abuse.

**6.7. Fear of external reporting and reputational damage:** There remain religious or culturally sanctioned views or practices about disclosure that reporting a fellow member of the religion is a betrayal of the community and contrary to religious law. Religious organisations can also prioritise their reputation above the needs of victims of abuse, and so discourage external reporting.



**6.8. Managing allegations internally:** Some organisations (particularly those that consider that the outside world may misunderstand their religious beliefs and that it is not aligned with their values) promote internal reporting, rather than disclosure to state bodies. The religious institution may then decide not to send a report to the police, may encourage mediation or resolution through religious leaders, or may block appropriate reporting.

**6.9. Forgiveness:** In some religious settings, the concept of forgiveness can be misused both to put pressure on victims not to report their abuse and to justify failures by religious leaders or organisations to take appropriate action in relation to allegations that have been made. This not only fails the victims but can put other children at risk.

## The management of child protection within religious organisations

### *Policies and procedures*

**7.** Religious believers can find it difficult to accept that members of their congregation or religious leaders could perpetrate abuse. As a result, some consider that it is not necessary to have specific child protection procedures or to adhere strictly to them.

**8.** There is significant variation in religious organisations in both their understanding of child sexual abuse and their implementation of adequate organisational processes and procedures. Some organisations have a clear understanding of these issues, with practices, procedures and policies that, if implemented, should keep children safe. Others appear to have none. Policies that do exist may not be disseminated or widely known. Even when religious organisations have clear processes, they may not always be followed. Since this investigation was launched, a number of organisations have initiated reviews or changes to their internal processes.

**9.** All voluntary bodies are required to have regard to *Working Together to Safeguard Children*. While this guidance is addressed to all faith-based organisations in England that work with children, there is no legal obligation on them to follow it. There are limitations to this guidance – it is insufficiently detailed about minimum requirements for voluntary bodies, including religious organisations. Nonetheless, the voluntary sector, including religious organisations and settings, would be more effectively protecting children if organisations followed this guidance. There is inconsistent understanding of and compliance with this guidance. This is despite there being a number of sources of advice and assistance available to religious organisations from charitable organisations, statutory bodies and local authorities. It is not acceptable for any religious organisation that provides services to children to have insufficient knowledge and understanding of child protection.

**10.** Child protection policies and procedures should be ‘victim focussed’. They should clearly identify the need for support for victims and should contain guidance on the provision of apologies and reparations. Religious organisations and settings should ensure that those working within an organisation are clear about the barriers to disclosure by victims and should take active steps to try to overcome such barriers by changing their practices and their culture, where appropriate. The policies of a religious organisation or setting should contain adequate provisions relating to whistleblowing. Care should be taken that, within any policies or procedures, the perpetrator’s needs do not outweigh those of the victim, and there should not be an assumption or a requirement that a victim must forgive the abuser.

**11.** While a child protection policy is a basic requirement for keeping children safe in religious organisations and settings, there are still examples of policies existing primarily for compliance purposes.

**12.** The Charity Commission requires every religious organisation or setting that is registered as a charity and works with children to have a clear child protection policy in place. This policy should:

- set out basic standards;
- be, as a matter of best practice, periodically audited by an external agency, or at the very least, regularly updated to reflect the latest guidance and recommended practice; and
- be easily accessible to all members of the organisation.

However, the Charity Commission does not review policies to ensure that they are adequate or comply with these expectations.

**13.** The experience of the London Borough of Hackney shows that, even when attempts have been made to use the legislation, and voluntary organisations have been asked to be 'relevant agencies' under the Children and Social Work Act 2017, the local authority does not have the power to compel them to act in particular ways. There should be adequate guidance for these organisations about the minimum standards and expectations that should be in place.

### *Training*

**14.** Staff and volunteers should receive training that includes basic information about child sexual abuse, how to recognise it and what to do in the event of a disclosure. However, in a number of organisations that we looked at, current levels of training are inadequate. Several had only just begun to implement training requirements. In some, training is not provided to all those who need it. It was often not compulsory for those who worked with children and not always refreshed regularly. Training organisations identified gaps in the provision of specialist training for those operating in key child protection roles.

**15.** Those engaged with children and young people should be required to attend regular child protection training of an agreed standard that is specific to their roles and responsibilities. This applies equally to volunteers or paid workers and leaders and trustees, although it may be more difficult to organise for a volunteer workforce who may have limited time or other responsibilities. While an understanding of the context (in this case a faith group) is necessary, this should not be the only focus of training. Training centred on religious texts alone is not a substitute for child protection training and it is very unlikely to keep children safe.

### *Safer recruitment*

**16.** In this investigation, there was varied evidence of safer recruitment practices, in particular among many organisations running supplementary schools or offering activities with children run by volunteers. At the most basic level, a number of organisations did not carry out the vetting and barring checks required by the Disclosure and Barring Service (DBS) for all those working in a 'regulated activity'.

**17.** There are also many roles and responsibilities within a religious organisation that do not amount to ‘regulated activity’ but that involve regular contact with children. The relevant legislation is complex, with eligibility requiring consideration of the nature, frequency and intensity of contact with children. Guidance has been provided by the DBS, the Charity Commission and the Department for Education, but the legislative definition of ‘regulated activity’ is still difficult for religious organisations to understand and apply, since it is primarily directed at education, health and social care institutions.

**18.** Safer recruitment has arisen in a number of the Inquiry’s investigations and we shall return to vetting and barring in the Inquiry’s final report.

### *Child protection leads*

**19.** Effective child protection within a religious organisation or setting requires a designated person – a child protection lead – to deal with concerns and suspicions of abuse. That person should also be responsible for promoting awareness of child protection issues. It is good practice for child protection leads to have adequate and sufficient training, to be of sufficient seniority in the organisation that their advice is followed by others, and to be given sufficient time to undertake their role. A trustee, director or senior person, or someone with sufficient standing within the organisation, should exercise oversight of child protection.

### *Internal processes for auditing, inspection and oversight*

**20.** There is no requirement at present for any religious organisation to audit or oversee its constituent bodies in respect of child welfare and child protection. The Charity Commission is not an inspection body and does not currently have the capacity to act as one.

### *The role of those in leadership positions*

**21.** Those in leadership positions provide direction to the organisation and are vital in stressing the importance of child protection and generating changes – by their actions as well as their words. There is still a lack of understanding by some trustees of charities about their safeguarding responsibility. This was despite there being safeguarding guidance, issued by the Charity Commission, that makes these responsibilities clear.

**22.** A robust culture of child protection is developed by those in leadership positions providing strong examples of good awareness and understanding, and acting decisively to ensure that child protection failures are challenged and steps are taken to learn lessons. We saw some good examples in this investigation – such as the clear communication by the Chief Rabbi of the United Synagogue of his abhorrence of child protection failures, and his repeated public communication about this to the press and public – but there is more to be done in every faith.

### *Internal disciplinary processes*

**23.** A number of religious organisations and settings use some form of internal disciplinary process in relation to those against whom allegations of abuse have been made. This may involve determining whether such an individual may remain a participating member of a congregation or community.

**24.** Internal investigatory or disciplinary processes should not be used as a substitute for reporting to external authorities. It is not acceptable for any internal disciplinary process to stand as the sole adjudicative tool for determining whether abuse has taken place. Such processes cannot provide justice or redress for a victim, nor are they the appropriate means to consider risk to others.

**25.** The Jehovah's Witnesses are one of few religious organisations which have an internal disciplinary process which can lead to the expulsion of members. The internal disciplinary processes of the Jehovah's Witnesses continue to use a rule of corroborative evidence known outside the community as 'the two-witness rule', whereby in the absence of a confession the evidence of two material witnesses is required to establish an allegation, which can then lead to disfellowship for the purposes of internal discipline. The rule is not intended to be a safeguarding measure. Nevertheless, it has no place in any response to child sexual abuse and fails to reflect the reality that by its very nature child sexual abuse is most often perpetrated in the absence of witnesses. The rule's capacity to cause harm to victims and survivors of child sexual abuse is clear. We have received first-hand evidence of this harm. As it presently operates, the Jehovah's Witnesses internal disciplinary process for disfellowshipping members bears no relationship to how sexual crime happens. The continuing use of this rule shows a disregard of the seriousness of the crimes involved and their impact on individuals. It also lacks compassion for the victim, and serves to protect the perpetrator.

### *Support for victims of abuse*

**26.** Few religious organisations provided any form of professional or support services for those who were abused, or offered any systematic access to counselling or therapeutic support. The services that were offered were ad hoc and very much dependent on access to local support services. It would be helpful for religious organisations to be aware, for example, of counselling and support services available nationally or in their local area, or for these to be developed. For organisations that are members of umbrella bodies, or where there are sufficient financial resources, there should be development of counselling services, alongside pastoral care, from those with adequate training and expertise in this area.

**27.** The provision of spiritual care and pastoral support by religious leaders is important. However, this does not replace the provision of therapeutic services and these therapeutic services are often not offered by religious organisations. Those in leadership positions within religious organisations and settings should have an adequate understanding of the nature of therapeutic support.

**28.** The experience of some victim and survivor groups who gave evidence is that many religious organisations do not use or approach them for help and support in managing issues around child protection. There seem to be limited examples of a shared approach with victims on, for example, the development of relevant policies and procedures. This reinforces the strongly held perspective that some faith leaders are not listening or willing to learn from victims' experiences, which should be seen as essential. Despite the long experience of some victim and survivor groups, and their valuable insights into providing better care and support, they perceive that they are ignored or belittled as 'difficult' or 'confrontational'. Survivors may shout to be heard because they have been marginalised and excluded.

### *Risk assessment of those who offend*

**29.** Forgiveness is central to the teachings and practices of many religions. However, care must be taken to avoid creating a culture in which the encouragement of forgiveness results in safety concerns and the assessment of risk to others being overlooked.

**30.** There are still religious organisations that have no process of risk assessment for convicted or accused sexual offenders who wish to continue in their religious practice in communal settings. To keep children safe, religious organisations and settings need some form of mechanism for assessing risk (even if that is deferred to the police or the probation service) where they have congregants who have been convicted or accused of sexual offending. In the gravest of cases, this may involve exclusion from a particular place of worship or specific arrangements for attendance being made. Information-sharing between religious organisations (both of the same denomination or faith, and of other denominations and faiths) about sexual offenders is essential where it is known that they have moved to another area and may seek to worship at another institution.

### *Oversight of the sector by governmental bodies*

**31.** The Charity Commission has a number of different responsibilities and obligations and its ability, given its resources, to run an auditing or inspection service is limited. It cannot and does not monitor the policies, practices and procedures of each individual charity in the way that an inspectorate would. It has built its capacity over the past 15 years to focus on child protection issues, but can only examine or investigate regulatory concerns about serious harm to children if reports are made to it. Not all charities have understood or used the system of reporting of 'serious incidents' consistently or at all in the past, and the Charity Commission told us that many still do not file reports when they should.<sup>772</sup> As a result, the Charity Commission often relies on information in the media or from complaints from the public.

**32.** The current powers of local authorities and other public bodies are limited – exacerbated by the significant reduction in their budgets over the past decade. Some local authorities have sought to use powers under health and safety or fire legislation. This is unlikely to be adequate for child protection purposes.

**33.** Ofsted does not have sufficient powers in relation to unregulated schools, in which it estimated that 500,000 children are receiving education every year (the same size as the independent school sector). It has only limited power to investigate and close down these institutions if it suspects that they are operating as an unregistered school. If they are operating as a supplementary setting, it has no powers in respect of them. Similarly, we received evidence that the Charity Commission does not have the capacity or expertise to act as an inspectorate or investigator of child protection issues. It has what it considers to be minimum standards (such as an annual return, which would confirm that a child protection policy exists), but these are not the subject of any extensive compliance activity. As a result, the level of compliance with those minimum standards is not adequately monitored. The Department for Education has indicated that Ofsted's powers need to be widened in relation to unregistered schools.

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<sup>772</sup> [CYC000440\\_016-017](#)

**34.** Non-statutory guidance – such as the guidance on out-of-school settings issued in October 2020 by the Department for Education – is helpful, but is unlikely to be seen by less mainstream organisations, and may result in a checklist approach to child protection and the giving of false reassurance.

**35.** There was a broad measure of support for oversight of child protection by a body external to the religious organisation. It is possible to design standards to be applicable to all settings while respecting their religious and ethical beliefs.

## **H.2: Matters to be explored further by the Inquiry**

**36.** The Inquiry will return to a number of issues that emerged during this investigation, including but not limited to:

- mandatory reporting;
- vetting and barring;
- regulation of the voluntary sector in respect of religious organisations and settings; and
- introducing primary legislation to provide that voluntary settings adhere to basic child protection standards.

We anticipate these issues will be addressed in our final report.

## H.3: Recommendations

The Chair and Panel make the following recommendations, which arise directly from this investigation.

Religious organisations and the government should publish responses to these recommendations, including the timetable involved, within six months of the publication of this report.

### Recommendation 1: Child protection policy, procedures and training

All religious organisations should have a child protection policy and supporting procedures, which should include advice and guidance on responding to disclosures of abuse and the needs of victims and survivors. The policy and procedures should be updated regularly, with professional child protection advice, and all organisations should have regular compulsory training for those in leadership positions and those who work with children and young people.

### Recommendation 2: Legislation on the definition of full-time education and unregistered educational institutions providing full-time education

The government should introduce legislation to:

- change the definition of full-time education, and to bring any setting that is the pupil's primary place of education within the scope of the definition of a registered educational setting; and
- provide the Office for Standards in Education, Children's Services and Skills (Ofsted) with sufficient powers to examine the quality of child protection when it undertakes inspections of suspected unregistered institutions.

# Annexes

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# Annex 1

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## Overview of process and evidence obtained by the Inquiry

### 1. Definition of scope

The child protection in religious organisations and settings investigation was a thematic investigation into the nature and adequacy of current child protection policies, practices and procedures in religious organisations and settings within England and Wales.

The scope of the investigation was as follows:

- “2.1. The management of child protection within religious organisations and/or settings, including:
  - 2.1.1. Training, and the understanding of child sexual abuse;
  - 2.1.2. Policies and procedures;
  - 2.1.3. Vetting and barring and regulated activity as identified in the Safeguarding Vulnerable Groups Act 2006 and the Protection of Freedoms Act 2012;
  - 2.1.4. The arrangements in place to respond to allegations of child sexual abuse, including the provision of pastoral support;
  - 2.1.5. Internal processes for auditing, inspection or oversight of the child protection practices and procedures.*
- 2.2. The existing statutory framework for the protection of children from abuse, and its application to religious organisations or settings.*
- 2.3. The existing framework for auditing, inspection or oversight of the practices and procedures by either state or non state institutions.*
- 2.4. Whether there needs to be additional and/or different practices, processes or oversight (whether by way of internal or external oversight by a non state or state body) to ensure that children are protected from child sexual abuse within religious organisations or settings.”<sup>773</sup>*

### 2. Core participants and legal representatives

#### Counsel to this investigation:

Fiona Scolding QC

Nikita McNeill

Olinga Tahzib

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<sup>773</sup> Child protection in religious organisations and settings: Definition of scope

**Core participants:****Victim and survivor groups and individuals**

<b>Ex-JW Advocates Opposing Crimes Against Children</b>	
Solicitor	Alan Collins, Hugh James
<b>Dr Lisa Oakley (Chair of the National Working Group on Child Abuse Linked to Faith and Belief)</b>	
Solicitor	Richard Scorer, Slater & Gordon
<b>Ms Yasmin Rehman (Chief Executive Officer of JUNO Women's Aid)</b>	
Solicitor	Richard Scorer, Slater & Gordon
<b>Ms Sadia Hameed (Director of Gloucestershire Sisters)</b>	
Solicitor	Richard Scorer, Slater & Gordon
<b>Mr (James) Lloyd Evans (Campaigner and advocate. Founder of JWsurvey.org)</b>	
Solicitor	Richard Scorer, Slater & Gordon
<b>Migdal Emunah</b>	
Solicitor	Richard Scorer, Slater & Gordon
<b>Southall Black Sisters</b>	
Solicitor	Richard Scorer, Slater & Gordon
<b>Kol v'Oz</b>	
Solicitor	Dr Ann Olivarius, AO Advocates

**Institutions and organisations**

<b>Home Office</b>	
Counsel	Nick Griffin QC, Amelia Walker
Solicitor	Daniel Rapport, Government Legal Department
<b>Ofsted</b>	
Counsel	Sarah Hannett QC, Alice de Coverley
Solicitor	Beth Forrester, Ofsted Legal Services
<b>Charity Commission</b>	
Counsel	Saara Idelbi
Solicitor	Felix Rechtman, Charity Commission Legal Department
<b>Pagan Federation</b>	
<i>Not legally represented</i>	
<b>United Reformed Church</b>	
<i>Not legally represented</i>	
<b>Baptist Union of Great Britain</b>	
Counsel	Ijeoma Omambala QC
Solicitor	Caroline Sanderson, BUGB Legal Services

<b>Christian Congregation of Jehovah's Witnesses (CCJW)</b>	
Counsel	Shane Brady
Solicitor	Simon Achonu, CCJW Legal Department
<b>Evangelical Alliance</b>	
Solicitor	David Smellie, Farrer & Co
<b>United Synagogue</b>	
Counsel	Alan Payne QC
<b>Liberal Judaism</b>	
Solicitor	Paula Jefferson, BLM
<b>Union of Orthodox Hebrew Congregations</b>	
Solicitor	Paula Jefferson, BLM
<b>Reform Judaism</b>	
<i>Not legally represented</i>	
<b>Interfaith Alliance UK</b>	
Solicitor	Richard Scorer, Slater & Gordon
<b>Thirtyone:eight</b>	
<i>Not legally represented</i>	
<b>Shema Koli</b>	
Counsel	Adam Gersch
<b>Methodist Church of Great Britain</b>	
Solicitor	Maria Strauss, Farrer & Co

### 3. Evidence received by the Inquiry

<b>Number of witness statements obtained:</b>
181
<b>Organisations and individuals to which requests for documentation or witness statements were sent:</b>
Abuse Never Becomes Us UK
Mr Andrew Haigh
Reverend Andrew Webster
Asian Women's Resource Centre
Bahá'í Community of the UK
BAPS Shri Swaminarayan Mandir
BAPS Swaminarayan Sanstha
Baptist Union of Great Britain
Birmingham LSCB
Black Women's Rape Action Project
Bradford Council for Mosques

Bradford LSCB
British Muslim Forum
Buddhist Society
Cardiff LSCB
Central Jamia Mosque, referred to as 'Ghamkol Sharif'
Chabad Lubavitch UK
Channel 4
Charity Commission
Child Safeguarding Practice Review Panel
Church of Scientology
Churches Together in Britain and Ireland
Crown Prosecution Service
Department for Digital, Culture, Media & Sport
Department for Education
Disclosure and Barring Service
Druid Network
East London Mosque
Evangelical Alliance
Ex-JW Advocates Opposing Crimes Against Children
Faith Associates
Faith Workers' Branch of Unite the Union
Faiths Forum for London
General Assembly of Unitarian and Free Christian Churches
Green Lane Masjid and Community Centre
Gurdwara Sri Guru Singh Sabha Southall
Guru Nanak Gurdwara Smethwick
Hackney Council
Harrow Council
Haven - The Survivors Network
Hindu Council UK
Hindu Forum of Britain
Home Office
Inter Faith Network for the UK
Interfaith Alliance UK
Interfaith Council for Wales
Islamic Centre of England
Islamic Cultural Centre

Jain Network
Mr James Lloyd Evans
Jamiat Ulama-e-Britain
Jehovah's Witnesses
Jesus Fellowship Survivors Association
Karma Nirvana
Professor Keith Brown
Kol v'Oz
Kurdish and Middle Eastern Women's Organisation
Leeds LSCB
Liberal Judaism
Dr Lisa Oakley
Liverpool LSCB
Local Government Association
London Borough of Tower Hamlets
London Boroughs Faiths Network
Manchester Beth Din
Manchester LSCB
Masorti Judaism
Methodist Church in Britain
Migdal Emunah
Minister and Clergy Sexual Abuse Survivors (MACSAS)
Ministry of Housing, Communities and Local Government (MHCLG)
Ministry of Justice
Miriam Kliers
Muslim Council of Britain
Muslim Council of Wales
Muslim Women's Network UK
Nahamu
National Council of Hindu Temples UK
National Police Chiefs' Council
National Resource Centre for Supplementary Education
Network of Sikh Organisations
Northamptonshire Police
NSPCC
Ofsted
Pagan Federation

PR-A1
PR-A2
PR-A3
PR-A4
PR-A5
PR-A6
PR-A7
PR-A8
PR-A9
PR-A10
PR-X1
PR-X2
PR-X3
Quaker Committee for Christian and Interfaith Relations
Reform Judaism
Religious Society of Friends in Britain (Quakers)
Reshet
Ms Sadia Hameed
Safer Sikhs Partnership
Salvation Army
She Can Consultancy Ltd
Shema Koli
Shree Hindu Temple & Community Centre
Sikh Women's Action Network
Southall Black Sisters
Sri Lankan Sangha Sabha of GB
Strengthening Faith Institutions
The Association of Directors of Children's Services Ltd
The Children's Commissioner for England
The Children's Society
The Church of Jesus Christ of Latter-day Saints
The Council of African and Afro-Caribbean Churches
The Edward Cadbury Centre for the Public Understanding of Religion
The Faith & Belief Forum
The Federation of Synagogues
The Interlink Foundation
The Mosques and Imams National Advisory Board (MINAB)

The Network of Buddhist Organisations
The Rt Hon Viscount Younger of Leckie, Parliamentary Under Secretary of State, Minister for Faith and Communities (Lords)
The S&P Sephardi Community
The Spiritualists' National Union
The Welsh Assembly
Thirtyone:eight
Triratna Buddhist Order and Community
Union of Orthodox Hebrew Congregations
United Reformed Church
United Synagogue
Victims' Voices UK
Vishwa Hindu Parishad (UK)
West Midlands Police
World Ahlul-Bayt Islamic League
World Zoroastrian Organisation
Ms Yasmin Rehman

#### 4. Disclosure of documents

**Total number of pages disclosed: 32,822**

#### 5. Public hearings including preliminary hearings

Preliminary hearings	
1	23 July 2019
2	14 January 2020
Public hearings	
Day 1	16 March 2020
Days 2-11 (heard virtually due to COVID-19 pandemic)	11 May 2020 to 22 May 2020
Days 12-16 (heard virtually due to COVID-19 pandemic)	10 August 2020 to 14 August 2020

#### 6. List of witnesses

Forename	Surname	Title	Called/read	Hearing day
PR-A10			Called	Day 1 16 March 2020
Goldsobel	Yehudis	Ms	Called	Day 2 11 May 2020
Marsh	Shelley	Ms	Called	Day 2 11 May 2020

Forename	Surname	Title	Called/read	Hearing day
Fetterman	Rebecca	Ms	Called	Day 3 12 May 2020
Adatia	Shital	Mr	Called	Day 3 12 May 2020
Levy	Natan	Mr	Called	Day 3 12 May 2020
Azmi	Moin	Mr	Called	Day 4 13 May 2020
Warraich	Shaukat	Mr	Called	Day 4 13 May 2020
Hussain	Kamran	Mr	Called	Day 4 13 May 2020
Khan	Dilowar	Mr	Called	Day 4 13 May 2020
Al-Dubyan	Ahmad	Dr	Called	Day 4 13 May 2020
Sanghera	Jasvinder	Ms	Called	Day 5 14 May 2020
Baldwin	Richard	Mr	Called	Day 5 14 May 2020
Tilby	Graham	Mr	Called	Day 5 14 May 2020
Knott	David	Mr	Called	Day 5 14 May 2020
Patel	Pragna	Ms	Called	Day 6 15 May 2020
Rattu	Natasha	Ms	Called	Day 6 15 May 2020
Hameed	Sadia	Ms	Called	Day 6 15 May 2020
Singh Gill	Harmeet	Mr	Called	Day 6 15 May 2020
Singh Basi	Jatinder	Mr	Called	Day 6 15 May 2020
Humphreys	Justin	Mr	Called	Day 7 18 May 2020
Oakley	Lisa	Dr	Called	Day 7 18 May 2020
Stone	Rachel	Ms	Called	Day 7 18 May 2020
Hirst	Sally	Ms	Called	Day 8 19 May 2020
Juster	Dean	Mr	Called	Day 8 19 May 2020



Forename	Surname	Title	Called/read	Hearing day
Noyes	Phillip	Mr	Called	Day 9 20 May 2020
McMullen	Christian	Mr	Called	Day 9 20 May 2020
Lynas	Peter	Mr	Called	Day 9 20 May 2020
Marchant	Claire	Ms	Read	Day 9 20 May 2020
Miller	Chris	Mr	Read	Day 9 20 May 2020
Reddy	Steve	Mr	Read	Day 9 20 May 2020
Byrne	Yvonne	Ms	Read	Day 9 20 May 2020
Smith	Suzanne	Ms	Read	Day 9 20 May 2020
Frith	Emily	Ms	Read	Day 9 20 May 2020
Heaney	Albert	Mr	Read	Day 9 20 May 2020
Fewkes	Richard	Mr	Read	Day 9 20 May 2020
Davies	Andrew	Dr	Read	Day 9 20 May 2020
Vassie	Pascale	Ms	Read	Day 9 20 May 2020
Srinivasan	Vanajah	Ms	Read	Day 9 20 May 2020
O'Mara	Patrick	Mr	Read	Day 9 20 May 2020
Saglani	Sejal	Professor	Read	Day 9 20 May 2020
Hustler	Jonathan	Reverend Dr	Read	Day 9 20 May 2020
Carter	Tim	Mr	Read	Day 9 20 May 2020
Stygal	Michael	Mr	Read	Day 9 20 May 2020
Parker	Paul	Mr	Read	Day 9 20 May 2020
Angius	Massimo	Mr	Read	Day 9 20 May 2020
Ford	Andrew	Mr	Read	Day 9 20 May 2020

Forename	Surname	Title	Called/read	Hearing day
Athanasίου	Ioannis	Mr	Read	Day 9 20 May 2020
Sharma	Vinaya	Mr	Read	Day 9 20 May 2020
Slade	Elizabeth	Ms	Read	Day 9 20 May 2020
Karim	Zulfiqar Ali	Mr	Read	Day 9 20 May 2020
Kashyap	Rajnish	Mr	Read	Day 9 20 May 2020
Ahmed	Maswood	Mr	Read	Day 9 20 May 2020
Onyuku-Opukiri	Fidelia	Ms	Read	Day 9 20 May 2020
Abiola	Olu	Dr	Read	Day 9 20 May 2020
Hackney	Juliet	Ms	Read	Day 9 20 May 2020
Hopper	Catherine	Ms	Called	Day 10 21 May 2020
Spielman	Amanda	Ms	Called	Day 10 21 May 2020
Gould	Matthew	Mr	Called	Day 11 22 May 2020
Brown	Keith	Professor	Called	Day 11 22 May 2020
PR-A5			Called	Day 12 10 August 2020
Davies	Sarah	Ms	Called	Day 12 10 August 2020
Corbett	Duncan	Mr	Called	Day 12 10 August 2020
Evans	Lloyd	Mr	Called	Day 12 10 August 2020
Gillies	Paul	Mr	Called	Day 12 10 August 2020 and Day 13 11 August 2020
Booth	Jane	Ms	Called	Day 13 11 August 2020
Gamble	Jim	Mr	Called	Day 13 11 August 2020
Wilson	Steven	Dr	Called	Day 14 12 August 2020

Forename	Surname	Title	Called/read	Hearing day
Baumgarten	Jehudah	Rabbi	Called	Day 14 12 August 2020
Akthar	Nazmin	Ms	Called	Day 15 13 August 2020
Greaves	Daniel	Mr	Called	Day 15 13 August 2020
Dixon	Kate	Ms	Called	Day 15 13 August 2020
Sofer	Yehoshua Aharon	Rabbi	Read	Day 15 13 August 2020
Lazarus	Avi	Rabbi	Read	Day 15 13 August 2020
Caton	Sarah	Ms	Read	Day 15 13 August 2020
Hobman	Penelope	Ms	Read	Day 15 13 August 2020
Kaur Kooner	Narinder	Ms	Read	Day 15 13 August 2020
Grenville	Harvey	Mr	Called	Day 16 14 August 2020
PR-H6			Read	Day 16 14 August 2020
PR-H7			Read	Day 16 14 August 2020
PR-H9			Read	Day 16 14 August 2020
PR-H10 and PR-H11			Read	Day 16 14 August 2020
PR-H12			Read	Day 16 14 August 2020
PR-H13			Read	Day 16 14 August 2020
Kakokota	Francis	Mr	Read	Day 16 14 August 2020
Butler	Daniel	Mr	Read	Day 16 14 August 2020
Snelman	Philip	Mr	Read	Day 16 14 August 2020
PR-X1			Read	Day 16 14 August 2020
PR-X2			Read	Day 16 14 August 2020
PR-X3			Read	Day 16 14 August 2020

## 7. Restriction orders

On 7 February 2020, the Chair issued a restriction order under section 19 of the Inquiries Act 2005 granting anonymity to the witnesses known as PR-X1, PR-X2 and PR-X3.<sup>774</sup> The order covered protection of: *“their identification and the identification of any individuals to whom they refer in any document, oral evidence, transcript of proceedings, as well as the Inquiry’s investigation and Final Reports”*, to any core participant, the public or the press. For the avoidance of doubt, this means that these individuals’ true identities will not be revealed to the Jehovah’s Witnesses or its legal representatives. The order prohibited the publication and disclosure of these individuals’ identities, and extended to material that identifies or tends to identify PR-X1, PR-X2 and PR-X3’s names, images, addresses and telephone numbers.

On 11 March 2020 and 16 July 2020, the Chair issued a restriction order under section 19 of the Inquiries Act 2005 to prohibit the disclosure or publication of the name of any individual whose identity had been redacted or ciphered by the Inquiry, and any information redacted as irrelevant and sensitive, in connection with this investigation, and referred to during the course of evidence adduced during the Inquiry’s proceedings.<sup>775</sup>

## 8. Broadcasting

The Chair directed that the proceedings would be broadcast, as has occurred in respect of public hearings in other investigations.

## 9. Redactions and ciphering

Some material obtained for this investigation was redacted, and where appropriate, ciphers were applied, in accordance with Version 3 of the Inquiry’s Protocol on the Redaction of Documents (the Protocol).<sup>776</sup> This meant that (in accordance with Annex A of the Protocol), for example, absent specific consent to the contrary, the identities of complainants and victims and survivors of child sexual abuse and other children were redacted – and if the Inquiry considered that their identity appeared to be sufficiently relevant to the investigation, a cipher was applied.

Pursuant to the Protocol, the identities of individuals convicted of child sexual abuse (including those who have accepted a police caution for offences related to child sexual abuse) were not generally redacted unless the naming of the individual would risk the identification of their victim, in which case a cipher would be applied.

The Protocol also addresses the position in respect of individuals accused, but not convicted, of child sexual abuse or other physical abuse against a child, and provides that their identities should be redacted and a cipher applied. However, where the allegations against an individual are so widely known that redaction would serve no meaningful purpose (for example, when the individual’s name has been published in the regulated media in connection with allegations of abuse), the Protocol provides that the Inquiry may decide not to redact their identity.

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<sup>774</sup> Restriction order 7 February 2020

<sup>775</sup> Restriction order 11 March 2020; Restriction order 16 July 2020

<sup>776</sup> Inquiry Protocol on the Redaction of Documents (Version 3)

Finally, the Protocol recognises that, whilst the Inquiry does not distinguish as a matter of course between individuals who are known or believed to be deceased and those who are or are believed to be alive, the Inquiry may take the fact that an individual is deceased into account when considering whether or not to apply redactions in a particular instance.

The Protocol anticipates that it may be necessary for core participants to be aware of the identity of individuals whose identity has been redacted and in respect of whom a cipher has been applied, if the same is relevant to their interest in the investigation.

## 10. Warning letters

Rule 13 of the Inquiry Rules 2006 provides:

- “(1) The chairman may send a warning letter to any person –*
- a. he considers may be, or who has been, subject to criticism in the inquiry proceedings; or*
  - b. about whom criticism may be inferred from evidence that has been given during the inquiry proceedings; or*
  - c. who may be subject to criticism in the report, or any interim report.*
- (2) The recipient of a warning letter may disclose it to his recognised legal representative.*
- (3) The inquiry panel must not include any explicit or significant criticism of a person in the report, or in any interim report, unless –*
- a. the chairman has sent that person a warning letter; and*
  - b. the person has been given a reasonable opportunity to respond to the warning letter.”*

In accordance with rule 13, warning letters were sent as appropriate to those who were covered by the provisions of rule 13, and the Chair and Panel considered the responses to those letters before finalising the report.

# Annex 2

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## Glossary

Abuse Never Becomes Us UK	A charity set up to provide holistic support, resources and advocacy on behalf of Tamil people affected by childhood sexual abuse.
All-Party Parliamentary Group (APPG) on Safeguarding in Faith Settings	All-Party Parliamentary Groups (APPGs) are informal, cross-party interest groups of MPs and peers interested in a particular issue. The APPG on Safeguarding in Faith Settings was established in September 2018. The aims of the group are to increase awareness of issues relating to safeguarding within faith settings, and to provide an opportunity for the faith community to inform safeguarding discourse, share best practice, and work together to create safer places.
Antisemitism	Antisemitism is a certain perception of Jews, which may be expressed as hatred towards Jews. Rhetorical and physical manifestations of antisemitism are directed towards Jewish or non-Jewish individuals and/or their property, towards Jewish community institutions and religious facilities. <sup>777</sup>
Asian Women's Resource Centre	A voluntary sector grassroots organisation providing services for all women in need, from all ethnicities and backgrounds, who are or have been experiencing domestic abuse.
Ayatollah	Islamic scholar, appointed Leader of a Shi'a Muslim community.
Bahá'í	A monotheistic religion founded in the 19th century as a development of Babism (a messianic sect of Shi'a Islam).
Bahá'í Community of the UK	The English branch of the Bahá'í community, providing guidance and oversight to Bahá'í living in the UK and organising communal worship and other community activities.
BAPS Shri Swaminarayan Mandir	A centre housing a Hindu temple, exhibitions about Hinduism, a cultural centre, restaurant, IT centre and a school. More commonly known as Neasden Temple.
Baptist Union of Great Britain	An umbrella body for Baptist Churches with approximately 1,945 churches affiliated to it
Baptists	Members of a Protestant Christian denomination advocating baptism of believers by total immersion. Worship services are normally led by Baptist Ministers (who undergo theological training).
Beth Din	A Jewish court of law, typically composed of three rabbinic judges, responsible for adjudicating on matters of Jewish religious law and the settlement of civil disputes between Jewish individuals. Rabbis chosen for this role will have particular skills in understanding Jewish religious laws, known as the Halacha.
Board of Deputies of British Jews	An umbrella body of a wide range of Jewish traditions, including community and religious Jewish organisations, to reflect voices of the British Jewish community. Provides advocacy, engagement and support services.
Bradford Council for Mosques	A non-profit organisation working on developing the relationships between mosques, the Muslim community in Bradford and society at large.

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<sup>777</sup> Taken from the International Holocaust Remembrance Alliance working definition of antisemitism; the United Kingdom adopted this definition on 12 December 2016.

Branch Office/ Britain Branch Office/Central Branch Office/ Bethel (Jehovah's Witnesses)	The central office and administrative hub for the UK and Eire branch of the Jehovah's Witnesses, or a branch office operated by the corporations and organisations associated with the Jehovah's Witnesses. Staffed by elders (who are all volunteers) who provide various services, including advice to other elders about all aspects of the running of their congregation.
Buddhism	A religion based on the teachings of the Buddha ('Awakened One'/'Enlightened One').
Chabad Lubavitch UK	Jewish organisation which provides religious and outreach activities for all Jewish people. It is a grouping of Charedi Judaism which came from Eastern Europe and the Ukraine in the 18th century.
Charedi community/ Chadarim (Judaism)	Followers of Orthodox Judaism who strictly adhere to Jewish law (Halacha) and traditions. There are several different traditions of Charedi Judaism.
Charities Act 2011	The most recent Act of Parliament governing how charities can operate in England and Wales.
Charity Commission	A public body which regulates and registers charities in England and Wales. Responsible for maintaining an accurate and up-to-date register of charities. It also provides some oversight of those who are registered to administer charities (known as trustees). It can take steps to dismiss individuals from being trustees of charities if they act contrary to their duties.
Chief Rabbi of United Hebrew Congregations of the Commonwealth	Lead Rabbi of the United Synagogue, which represents the Orthodox community of the United Kingdom, and various other Orthodox communities located in the Commonwealth. The current incumbent is Rabbi Ephraim Mirvis.
Child	A person under the age of 18.
Child protection (see Safeguarding)	Activity to protect children who are suffering or are likely to suffer significant harm.
Child sexual abuse	Forcing or enticing a child or young person to take part in sexual activities. The activities may involve physical contact and non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse, including via the internet. Child sexual abuse includes child sexual exploitation.
Child sexual exploitation	A form of child sexual abuse. It involves exploitative situations, contexts and relationships, such as where a child receives something as a result of them performing sexual activities and/or another or others performing sexual activities on them. Child sexual exploitation can occur through the use of technology without the child's immediate recognition; for example, being persuaded to post sexual images on the internet/mobile phones without immediate payment or gain.
Children Act 1989	An Act of Parliament which allocated duties to local authorities, courts, parents and other agencies in the United Kingdom to ensure children are protected and their welfare is promoted.
Children Act 2004	An Act of Parliament which imposed duties on statutory bodies to safeguard and promote the welfare of children and cooperate with each other, and to set up local safeguarding children boards. It also created the Children's Commissioner of England and Wales.

Children and Social Work Act 2017	An Act of Parliament which created local safeguarding children partnerships, which enshrined joint and equal responsibility to the clinical commissioning groups, police authorities and local authorities to oversee these partnerships, which are to supervise safeguarding arrangements in the geographic areas which they serve.
Children's Commissioner for England/ Children's Commissioner for Wales	<p>A statutory office, independent from the government. Responsible for the promotion and protection of children, and for giving children the opportunity to have their voices heard.</p> <p>The Children's Commissioner for Wales has the power to deal with complaints made by individual children.</p> <p>Both Commissioners can investigate and report on general concerns relating to children.</p>
Children's Services	Officials and members of a local authority charged with responsibility for providing services in respect of social care and education, as set out under statute and guidance. Includes powers to investigate allegations that children have been harmed and provides the local authority designated officer (LADO), who coordinates and advises on allegations of abuse made against adults working with children.
Christianity	An Abrahamic Trinitarian religion based on the person and teachings of Jesus Christ.
Church	A building used for public Christian worship, and the name of a group engaging in collective worship in Christianity.
Church of England and Anglican Church	<p>The Church of England, part of the Anglican Communion, is the established church within England (with the Queen as its Supreme Governor).</p> <p>The Anglican Church is a worldwide communion of churches which have similar theological understandings and choose to have the Archbishop of Canterbury as their 'first amongst equals'.</p>
The Church of Jesus Christ of Latter-day Saints	Religion founded by Joseph Smith in the United States in 1830. The term 'Mormon', often used to refer to members of this Church, comes from the Book of Mormon, the holy book of the religion.
Church of Scientology	A spiritual movement and religious system which grew out of the ideas and practices advocated by Lafayette Ronald Hubbard (1911–1986) through graded courses of study and training.
Churches Together in Britain and Ireland	An umbrella body of a number of Christian organisations which works on ecumenical (interdenominational) issues. It works closely with Action for Churches Together in Scotland, CYTUN (Churches Together in Wales), Churches Together in England and the Irish Council of Churches.
Circuit (Methodism)	A group of Methodist churches served by a team of ministers. A minister will have pastoral charge of one or more churches, but will preach and lead worship in different local churches in the circuit. The circuit is led by the superintendent minister who presides over both lay and ordained ministers and provides oversight of the area.
Circuit overseer (Jehovah's Witnesses)	An elder of the Jehovah's Witnesses who has spiritual responsibility for and provides guidance to a group of about 20 congregations. The circuit overseer is responsible for appointing elders and ministerial servants to individual congregations.



Clergy	<p>Those who are ordained for religious duties, especially in the Christian Church. Ordination means to be set apart from lay people, ie to be consecrated, by way of religious ceremony, which then enables them to perform some religious rites not open to be performed (in some Christian denominations) by lay people.</p> <p>The term is also applied to non-Christian religious leaders who are ordained in England and Wales as 'shorthand' for a religious leader.</p>
Clinical commissioning group	The body which organises and commissions the provision of national health services (both community, hospital and general practice) in a particular geographic area.
Congregation	A group of people of any faith assembled for religious worship. In some faith traditions, it is used for a group which forms a religious community.
The Council of African and Afro-Caribbean Churches	A grouping of Evangelical churches serving the African and Afro-Caribbean communities in the United Kingdom.
Dayan (plural: Dayanim) (Judaism)	A religious judge in a rabbinic court (Beth Din).
Denomination	An autonomous branch of Protestant Christianity.
Department for Digital, Culture, Media & Sport	Government department, led by a Secretary of State, with policy and fiscal responsibility for the Charity Commission. Also produces policy about volunteers, including advice on safeguarding for voluntary and charitable groups. Has responsibility for policy on charities in England and Wales.
Department for Education	Government department, led by a Secretary of State, with policy responsibility for all education provided by the state from nursery to university within England. Also has policy and responsibility for social care relating to children and young people, youth work and youth workers, and a role in the provision of guidance for voluntary bodies about out-of-school settings in England.
Designated safeguarding lead (DSL)	Person responsible at both a strategic level within an organisation and on a day-to-day basis for dealing with child protection concerns. The role of the designated safeguarding lead was specified in the Children Act 2004 to ensure that every organisation had a 'named person' for protecting children and young people. <i>Working Together to Safeguard Children</i> , the statutory guidance issued by the Department for Education, suggests that all voluntary organisations should appoint someone to this role.
Disclosure and Barring Service (DBS)	An executive non-departmental body, sponsored by the Home Office, which helps employers make safer recruitment decisions by processing DBS checks. Also makes decisions about whether people should be placed on the barred list, preventing them from engaging in regulated activity. Replaced the Criminal Records Bureau and the Independent Safeguarding Authority.
Disclosure and Barring Service (DBS) checks	Checks of an individual's criminal record, intelligence about them not amounting to a crime, and whether or not they have been barred from working with children or vulnerable adults. Carried out by the DBS on behalf of an employer or organisation. There are different levels of checks depending on the role applied for.
Disfellowshipping (Jehovah's Witnesses)	Disciplinary process undertaken within the Jehovah's Witnesses. If a judicial committee (a body of elders of the Congregation to which the particular individual belongs) decides that a baptised Witness has committed a serious sin and is unrepentant, the person is disfellowshipped.

Druid Network	A charity which provides information and a network for those who wish to practice Druidry as a modern, living religion.
Druidry	A spiritual and religious movement which promotes Pagan religion. A Pagan, for this report, means someone who worships the earth or nature.
East London Mosque	The largest mosque in the United Kingdom, incorporating the London Muslim Centre and the Maryam Centre.
Ecclesiastical	Relating to the Christian church or its clergy.
Ecumenical	An umbrella body of a number of Christian churches to promote unity and the common good.  Can also be used to mean a number of different faith groups working together.
Edward Cadbury Centre for the Public Understanding of Religion	Research centre based at the University of Birmingham, established in 2014 to provide and enhance public understanding of religion on a regional, national and international level through strategic interdisciplinary research. Its research explores the significance of religious belief and practice for public and professional life, working with faith communities and public policy-makers.
Elder	<ol style="list-style-type: none"> <li>1. In the Jehovah's Witnesses, a senior, male member who has religious leadership responsibilities, including presiding over religious services, leading Bible study and attending to the spiritual needs of a congregation or congregations.</li> <li>2. In Protestant churches and sects, a lay person who may undertake administrative or religious tasks, including leading religious worship.</li> <li>3. Religious or community leaders in some Christian traditions.</li> </ol>
European Convention on Human Rights	A convention of the Council of Europe to protect human rights, political and fundamental freedoms in Europe, created in 1951.
Evangelical	<ol style="list-style-type: none"> <li>1. Something of, or according to, the teaching of the gospels and religion in Christianity.</li> <li>2. A member of the evangelical tradition within the Christian church. Evangelicals can be found in nearly every Protestant Christian denomination but particularly within the Reformed, Baptist, Methodist, Pentecostal and Charismatic churches.</li> </ol>
The Evangelical Alliance	The oldest and largest evangelical unity movement in the UK. Represents individuals and organisations from the evangelical tradition.
Ex-JW Advocates Opposing Crimes Against Children	An advocacy group of former members of the Jehovah's Witnesses; made up of survivors of childhood sexual abuse within the Jehovah's Witnesses, former elders of the Jehovah's Witnesses with deep knowledge of practices adopted by bodies of elders at congregations across the UK, and former member advocates who assist survivors across the UK.
Faith Associates	Consultancy set up in 2004 to meet the needs of ethnic minority, faith-based communities. Provides research, training, advice and guidance to support and influence the challenges faced by these communities.
Faiths Forum for London	An umbrella body of a number of major faiths (Bahá'í, Buddhist, Christian, Hindu, Sikh, Jain, Jewish, Muslim, Zoroastrian) to promote ecumenical understanding and joint working and to promote relationships between faith groups and wider society.
Faith literacy	The ability to understand and engage effectively with religious and spiritual beliefs and understand how those may affect the actions, beliefs and values of individuals and groups.

Faith Workers' Branch of Unite the Union	A branch of Unite the Union, open to all employees and office holders of any faith organisation, that campaigns on behalf of faith workers and runs a large network of Union representatives who have been trained to support members through difficult times.
Fatwa	Advisory opinion issued by an Islamic legal scholar as to a particular point of interpretation of Islamic law.
The Federation of Synagogues	An umbrella body of synagogues, representing the Orthodox Jewish tradition.
The General Assembly of Unitarian and Free Christian Churches	An umbrella body for Unitarian, Free Christians and other liberal religious congregations in the UK and Ireland. Unitarians are an open faith community celebrating diverse beliefs.
Granthi	A lay person within the Sikh tradition who acts as a custodian and ceremonial reader of the Sri Guru Granth Sahib, the Holy Book in Sikhism.
Green Lane Masjid and Community Centre	A mosque and community centre based in Birmingham linked to the Ahl-i-Hadith Salafi movement. One of the largest mosques in England.
Gurdwara	A Sikh place of worship, literally 'the Guru's Door'.
Gurdwara Sri Guru Singh Sabha, Southall	The largest gurdwara organisation outside of India, based in Southall, West London. Provides communal worship, a community centre and a range of religious, cultural and educational facilities.
Guru Nanak Gurdwara, Smethwick	A large gurdwara in Smethwick, West Midlands. Provides communal worship, a community centre and educational, cultural and social activities.
Halacha/Halakhah	Jewish religious laws.
Harmful sexual behaviour	Sexual activity between two children or young people of the same or similar age which is harmful or developmentally inappropriate.
Hasidism	A mystical Jewish movement from the 18th century founded in Poland. A form of Charedi Judaism whose adherents observe strict religious laws about all aspects of their life.
Haven - The Survivors Network	A charity providing support to children and adults who have been subject to sexual and domestic abuse.
Hindu Council UK	A faith organisation representing various Hindu communities and Hindus from different parts of the world settled in the UK. Its main purpose is to give UK Hindus an effective voice on government policy, and to undertake interfaith work.
The Hindu Forum of Britain	The largest umbrella body for British Hindus, with more than 420 member organisations from around the country. It acts as a conduit to policymakers and government, supports projects and community activities for Hindu communities, and undertakes interfaith activity.
Hinduism	The third largest world religion. Originated in India and based on the Vedic texts. Encompasses a diverse system of thought marked by a range of philosophies, cosmological systems, shared textual sources, mythology and rituals.

Home Office	Government department that is responsible for policing and crime. In this context, the body which sponsors the Disclosure and Barring Service (DBS) and leads government policy on recruitment checks and barring services. Also produced a cross-departmental strategy for tackling sexual abuse.
House mosque	Place of communal prayers in Islam in someone's house. Many mosques began in the UK by people gathering together in their homes to pray.
Human Rights Act 1998	An Act of Parliament which enshrined the European Convention on Human Rights into British law so that individuals could bring claims alleging breach of those rights in UK courts.
Imam	<p>In the Sunni Muslim tradition:</p> <ol style="list-style-type: none"> <li>1. A person who leads prayers in the mosque and often gives a sermon during prayers on a Friday. Most often someone who is appointed by the congregation to do so and who has undertaken theological study. They can also provide religious guidance and act as leaders of the Muslim community.</li> <li>2. A recognised religious scholar or authority in Islamic law.</li> <li>3. A central figure in an Islamic movement.</li> </ol> <p>In the Shi'a Muslim tradition:</p> <ol style="list-style-type: none"> <li>1. Someone who participates fully in the acts of God alone, and is a leader of the community.</li> <li>2. There were 'Twelve Imams' considered to be appointed by God (all of whom lived between the 7th and 9th centuries).</li> </ol>
Independent school	<p>A school that is not maintained by a local authority or is not a non-maintained special school, and at which full-time education is provided:</p> <p>(a) for five or more pupils of compulsory school age; or</p> <p>(b) for at least one pupil of that age who is either</p> <ol style="list-style-type: none"> <li>1) looked after by a local authority (as defined under section 22 of the Children Act 1989); or</li> <li>2) has an education, health and care plan (EHCP) as defined in the Children and Families Act 2014.</li> </ol>
Inter Faith Network for the UK	A charity to promote interfaith understanding and work between communities.
Interfaith Council for Wales	A Welsh Government initiative to promote interfaith activities.
The Interlink Foundation	Membership organisation that provides services to Jewish organisations, including advice and guidance on child protection. Member organisations are predominantly from the Charedi community in England and Wales.
Islam	The religion of Muslims, a monotheistic faith regarded as revealed through Muhammad as the Prophet of Allah.
Islamic Cultural Centre and London Central Mosque	The Islamic Cultural Centre provides education, cultural and social services to the Islamic community of the London Central Mosque and London.

Islamophobia	Islamophobia is rooted in racism and is a type of racism which targets expressions of Muslimness or perceived Muslimness. <sup>778</sup>
Jain Network	Non-profit organisation that aims to bring awareness of Jainism to the Western world. It provides facilities, resources and services to Jains and the wider community.
Jainism	A non-theistic religion founded in India.
Jehovah's Witnesses	Non-trinitarian Christian denomination with millenarian beliefs founded in 1870 in the United States. Jehovah's Witnesses are directed by the Governing Body of Jehovah's Witnesses, a group of elders in the USA that establishes doctrines based on the Bible.
Jesus Fellowship Church	An evangelical Protestant sect formerly known as the Jesus Army, now closed. At its peak in the early 2000s, the Jesus Army had about 2,500 members.
Jesus Fellowship Survivors Association	A group for people who were abused during their time in the Jesus Army/ Jesus Fellowship Church.
Jewish Leadership Council	An umbrella body coordinating Jewish charitable organisations and initiatives.
Judaism	The monotheistic religion of the Jewish people, which has a number of traditions.
Judicial Committee/ Ecclesiastical Judicial Committee (Jehovah's Witnesses)	An ecclesiastical judicial committee, which usually comprises three elders of the congregation or circuit. Formed if a member of the Jehovah's Witnesses is accused of sinful behaviours. Determines if the individual has acted in breach of Jehovah's witness law and practice, and if the committee determines that the accused is not 'scripturally repentant', they will be disfellowshipped (ie expelled).
Karma Nirvana	Charity supporting victims of honour-based abuse and forced marriage.
Kingdom Hall	A house of worship used by Jehovah's Witnesses for their religious services.
Kol v'Oz/VoiCSA	An Israel-based international organisation working to stop child sexual abuse in the global Jewish community. Its work covers three broad areas: advocacy, awareness and empowerment.
Lashon Hara	A derogatory or damaging statement against an individual who is also Jewish (Hebrew: 'Evil tongue'), differing from defamation in that it refers to truthful speech rather than false.
Liberal Judaism	A branch of reform Judaism founded in the 19th century and seeking to practise Judaism through modern practices and customs.
Local authority designated officer (LADO)	An officer in each local authority children's social care service to whom allegations or concerns about the protection of children are reported where they involve allegations made against adults working with children.
Local safeguarding children partnership (LSCP)	Joint arrangements to be put in place under the Children and Social Work Act 2017 to organise and oversee safeguarding in a geographic area between the clinical commissioning group, the police authority and the local authority.

<sup>778</sup> There is not an agreed UN definition of such. This is the definition given by the APPG on Islamophobia published in 2017, called *Islamophobia Defined: the inquiry into a working definition of Islamophobia*, which has been further explained by a Muslim Council of Britain report, *Defining Islamophobia: a contemporary understanding of how expressions of Muslimness are targeted*, published in 2021.

Madrasah/ madrassah/ madrasa/ madrassa	Arabic term for any institution of education, particularly primary or secondary, and for places of Islamic instruction.
Manchester Beth Din	The largest Jewish court of law in the North West of England. Also known as Badatz Manchester.
Masorti Judaism	A Jewish movement seeking to integrate conservative Judaism with modern ideas of science and scholarship.
Mesirah	The action by which one Jew reports the conduct of another Jew to a non-rabbinic authority in a manner and under circumstances forbidden by rabbinic law.
Methodism	A group of related denominations of Protestant Christianity inspired by the teachings of the Wesley brothers and George Whitefield.
Methodist Church in Britain	The umbrella body representing most strands of Methodism in Great Britain and the mother church to Methodists worldwide. Has approximately 173,000 members in Great Britain and is the fourth largest Christian group in Britain.
Methodist Insurance Company	Insurer of the Methodist Church and associated organisations, including the churches and the governing body known as the Methodist Conference.
Migdal Emunah	A charity providing a support service for victims of sexual abuse and their families across all denominations of the Jewish community.
Mikveh	A bath used for the purpose of ritual immersion in Judaism to achieve ritual purity.
Minister and Clergy Sexual Abuse Survivors (MACSAS)	A support group for women and men from Christian backgrounds who have been sexually abused by ministers or clergy, as children or as adults.
Ministerial servant (Jehovah's Witnesses)	A ministerial servant is someone chosen by a regional elder (who has significant experience of being an elder) to assist the elders to run the congregation. Ministerial servants assist the elders, and are appointed because of their standing within the congregation and their ethics, integrity and leadership skills.
Ministry of Housing, Communities and Local Government	Government department which has a policy role in liaising with faith organisations and provides policy guidance on developing community cohesion. Has commissioned reports and issued guidance about countering extremism within the community in England.
Ministry of Justice	Government department which has responsibility for drafting legislation about criminal, family and civil justice, the court system and prisons.
Moiser	A Jewish term for someone who informs on another Jew to secular authorities. Centuries of persecution and unfairness mean that there is Jewish learning and tradition that a Jew should not be reported to secular authorities for fear of those authorities' response to the Jewish community.
Monotheistic	A religion which has one godhead.
Mosque	A Muslim place of congregational prayers and worship.
The Mosques and Imams National Advisory Board (MINAB)	An advisory body for good governance in mosques and for improving the performance of imams and Islamic teachers through a process of self-regulation based on agreed standards. Works with all the major Muslim traditions and schools of thought.

Mufti	An Islamic legal scholar.
Muslim Council of Britain	The UK's largest national Muslim umbrella body, with over 500 members, including mosques, schools, charitable associations and professional networks.
Muslim Council of Wales	An umbrella body and affiliate of the Muslim Council of Britain, set up to serve the needs of the Muslim community across Wales.
Muslim Women's Network UK	The only national Muslim women's organisation in Britain. A small national charity working to improve social justice and equality for Muslim women and girls. It provides advice, counselling, education, support and training.
National Council of Hindu Temples	Hindu umbrella body linking over 200 Hindu temples and faith organisations and working with them for the benefit of the Hindu community across the UK.
National Police Chiefs' Council (NPCC)	Coordinating body for police forces in the UK to help coordination of operations, and to ensure the implementation of national standards and to develop joint national approaches on aspects of policing.
National Resource Centre for Supplementary Education (NRCSE)	A national strategic and support organisation for community-led supplementary schools and the wider supplementary education sector across England.  NRCSE also provides a nationally recognised quality assurance scheme targeting providers of out-of-school education – the NRCSE Quality Mark. <sup>779</sup> This is designed to develop practical teaching skills and understanding of child protection. Nearly 500 schools have qualified for the Quality Mark. <sup>780</sup> In order to obtain it, schools must show that they can create an effective learning environment, and can select and support staff and volunteers. <sup>781</sup> This includes having to meet relevant child protection standards.
National Safeguarding Children's Board (Wales)	National board responsible for coordination and organisation of regional safeguarding boards which oversee arrangements in respect of child protection in geographic areas of Wales.
National Society for the Prevention of Cruelty to Children (NSPCC)	National charity devoted to the prevention of abuse in childhood and the protection of children who have been abused. Has provided resources, consultancy, training and advice for religious organisations
National Working Group on Child Abuse Linked to Faith and Belief	Coordinating grouping of voluntary bodies, charities, policing and central and local government, alongside academics to devise a joint response to children at risk of abuse linked to faith and belief. Devised a national action plan for various statutory and voluntary agencies.
The Network of Buddhist Organisations	Network promoting fellowship and dialogue between UK Buddhists, cooperation in matters of common interest and work with Buddhist and like-minded organisations, such as the European Buddhist Union and Inter Faith Network for the UK.
Nonconformist	Term generally applied in England and Wales to all Protestants who are not Anglicans, including those who have seceded from Anglicanism (Methodists), and also to independent groups such as the Quakers and the Salvation Army.
Non-trinitarian	A form of Christianity which rejects the doctrine of the Trinity, ie that God consists of three persons who are co-eternal and united in one being or essence.

<sup>779</sup> NRC000008\_001-002

<sup>780</sup> NRC000008\_002

<sup>781</sup> BFC000102\_001

Ofsted	The Office for Standards in Education, Children's Services and Skills, a non-ministerial government department which inspects a range of educational, social care and child care institutions in England. Its counterparts in Wales are Estyn (for education) and Care Inspectorate Wales (for social care).
Operation Hydrant	A coordination hub to deliver the national policing response to, and oversight and coordination of, non-recent child sexual abuse investigations concerning persons of public prominence, or in relation to those offences which took place within institutional settings.
Ordain	To officially make someone a priest or other religious leader, in a religious ceremony.
Orthodox Jewish communities	Communities complying with traditional Jewish beliefs and practices. Adherents are committed to Torah law (Halacha) and its derived laws and traditions.
Out-of-school settings/ supplementary schooling	A setting for supplementary education which is not regulated in a comparable way to full-time education settings. Such settings are not required to register with any authority, and are able to operate so long as they comply with relevant legislation, including health and safety law.
Pagan Federation	An umbrella body providing support to Pagan groups, and information on Pagan beliefs to the media, official bodies and the wider community.
Paganism	A polytheistic or pantheistic nature-worshipping religion.
Paramourncy principle	The principle that when making decisions about children, their interests are paramount. Section 1(1) of the Children Act 1989.
Pentecostal churches	Christian movements across denominations emphasising baptism in the Holy Spirit, evidenced by 'speaking in tongues', prophecy, healing and exorcism.
Pir	A Sufi spiritual guide whose job is to instruct disciples on the Sufi path through lessons and guidance.
Polytheistic	Worshipping a number of different godheads as part of religious belief.
Qur'an	The Islamic sacred book, believed to be the word of God as dictated to Muhammad by the archangel Gabriel.
Rabbi	<ol style="list-style-type: none"> <li>1. A Jewish scholar or teacher.</li> <li>2. A Jewish ordained religious leader.</li> <li>3. An elder or person of influence within the Jewish community who does not have any formal religious qualifications – a term of respect for their seniority.</li> </ol>
Rabbinate	The position or tenure of office of a Rabbi or collective Rabbis.
Reform Judaism	National umbrella body of 41 autonomous synagogue communities which seeks to practice Judaism in the light of 21st-century principles and practices.



Regulated activity	<p>Activities from which a person may be barred. These activities include teaching, training, instructing, caring for or supervising children if the person is unsupervised, or providing advice or guidance on physical, emotional or educational well-being, or driving a vehicle only for children (and anyone supervising or caring for them). Set out in schedule 4 to the Safeguarding Vulnerable Groups Act 2006.</p> <p>It also includes work for a limited range of specific places with the opportunity for contact with children (such as hospitals, schools, care homes), excluding work done by supervised volunteers. This is only regulated activity if done regularly, but some activities are always regulated regardless of frequency: personal care (ie toileting, bathing a child) or health care.</p> <p>Someone working in regulated activity is eligible for an enhanced Disclosure and Barring Service (DBS) certificate with a check of the relevant barred list.</p>
Relevant agencies	<p>In England, local safeguarding children partnerships have powers under regulations issued under the Children and Social Work Act 2017 to place a duty on 'relevant agencies' (including charities, schools and representative organisations of religions for their schools) to cooperate if asked to do so as part of the local safeguarding arrangements.</p>
Religious	<p>Having a religious belief and/or practising those beliefs.</p>
Religious Society of Friends in Britain (Quakers)	<p>A member of the Religious Society of Friends, a Christian movement. Central to the Quakers' belief is the doctrine of the 'Inner Light', or sense of Christ's direct working in the soul. This has led them to reject both formal ministry and all set forms of worship.</p>
Religious studies	<p>The study of religion or religions as an academic discipline.</p>
Reshet	<p>An organisation set up by the Jewish Leadership Council in order to support Jewish youth work throughout the UK. Provides advice, training and guidance.</p>
Roman Catholic Church	<p>The second largest Christian denomination in England and Wales, with approximately 3.8 million Catholic adults.</p>
Safeguarding	<p>A term used by statutory bodies and others involved in child protection, coming from section 10 of the Children Act 2004 and section 17 of the Children Act 1989, meaning to both protect children but also to take active steps to prevent them from coming to harm. See Part A for further information.</p>
Salvation Army	<p>A worldwide evangelical Christian church and registered charity. Particularly known for the practical support it provides to the homeless and those subject to human trafficking.</p>
Scriptural	<p>From or connected with the Bible or other holy book.</p>
Section 11 Audit	<p>Questionnaire or information request from a local authority sent to schools, voluntary organisations and religious groups to ask them about their safeguarding arrangements and practices. Taken from s11 of the Children Act 2004 which empowers various organisations to ensure that their functions and any services provided by them are discharged having regard to the need to safeguard and promote the welfare of children.</p>
Section 15 Regulatory Advice	<p>Advice given by the Charity Commission, called s15 as the Commission has power under s15 of the Charities Act 2011 to issue such advice on the charity's compliance with the law. The provision of such advice usually involves the Charity Commission asking the organisation to comply with an action plan to improve aspects of their functioning.</p>
Secular	<p>Not connected with spiritual or religious matters.</p>

Serious incident reporting	A requirement by charity trustees to report to the Charity Commission adverse events which result in or risk significant harm to a charity's beneficiaries, staff, volunteers or others who come into contact with the charity through its work. <sup>782</sup> Reports should also be made if there has been harm to a charity's work or reputation (child protection failures or complaints are seen as causing harm to the beneficiaries, staff or others, and to their reputation and work).
The Service Department/ Service Desk (Jehovah's Witnesses)	The Service Department is a department within the Britain Branch Office, which is the national headquarters of the Jehovah's Witnesses. <sup>783</sup> The Service Department provides guidance to congregation elders on implementing the child safeguarding policy of the Jehovah's Witnesses. <sup>784</sup>
Sharia	Religious law forming part of Islamic tradition.
Sharia councils/ tribunals	Bodies made up of Islamic legal scholars/imams which make decisions about Islamic practices and/or make decisions about aspects of daily life between Muslims.
Sharia marriage	Informal common name for a marriage conducted by an imam under Islamic law but which is not recognised as a marriage in English law.
Sheikh/Sheik/ Sheyikh and other transliterations	Honorific title in Arabic language. Commonly used to refer to a Muslim religious scholar.
Shema Koli	A confidential, anonymous helpline, counselling and support service for people in the Jewish community (primarily within the Charedi community) who have experienced or been affected by abuse of any kind.
Shi'a	A member of the Shi'a branch of Islam. One of the two main branches of Islam.
Shree Hindu Temple and Community Centre	Hindu temple and community centre providing community and religious activities, education and training, arts, culture and sport in Leicester.
Sikh Women's Action Network (SWAN)	Women-led organisation providing training and support on issues of gender and domestic abuse in the West Midlands.
Sikhism	A monotheistic religion founded in Punjab, India in the 15th century by Guru Nanak.
Social Care Institute for Excellence (SCIE)	Charity providing consultancy, guidance, advice and support to organisations on issues related to social care.
Social Services and Well-being (Wales) Act 2014	Act of the Welsh government which establishes the requirement for a national independent safeguarding board and regional safeguarding boards made up of representatives from local authorities, local health boards, the police and others.
Southall Black Sisters (SBS)	A not-for-profit secular organisation established in 1979 to meet the needs of Black (Asian and African-Caribbean) women. It undertakes campaigning, provides advice, support and education in respect of gender-related violence, and works to develop women's rights in society.

<sup>782</sup> CYC000447\_002-004

<sup>783</sup> CJW000062; CJW000052\_003 paras 8, 9

<sup>784</sup> CJW000052\_003 para 9

Spent convictions	Criminal records which have reached the defined time as set out in the Rehabilitation of Offenders Act 1974. Spent convictions will not appear on a basic Disclosure and Barring Service (DBS) criminal record check.
Spiritual or faith healers	A person who seeks to cure or heal by means other than conventional medical treatment or other physical methods, using religious or spiritual beliefs as the basis for healing.
Statutory inquiry (Charity Commission)	A statutory inquiry enables the Charity Commission to formally investigate matters of regulatory concern, for example by compelling the production of documentation or information from within a charity, and to use protective powers for the benefit of the charity, its beneficiaries, assets or reputation.
Strengthening Faith Institutions (SFI)	Non-governmental organisation made up of facilitators of various faiths who provide 'health checks' and education to religious groupings unaffiliated with major religious umbrella bodies, typically in urban areas of England.
Sufism	A branch of Islam emphasising mysticism and an inward search for God. It uses particular rituals, practices, doctrines and institutions, such as dancing and singing, which are uncommon or forbidden in other parts of Islamic worship.
Sunday school	A class held on Sundays in the Christian tradition, typically to teach children.
Sunnī	A member of one of the two main branches of Islam, the branch which consists of the majority of Islam's adherents.
Synagogue/shul	The building where a Jewish assembly or congregation meets for religious worship and instruction.
The S&P Sephardi Community	Sephardis are members or descendants of the Jews who lived in Spain and Portugal until their mass expulsion from those countries in the last decades of the 15th century.
Temple	A building devoted to the worship of a god or gods.
Third sector	Shorthand for voluntary organisations, charities or not-for-profit social enterprises.
Thirtyone:eight (formerly Churches' Child Protection Advisory Service (CCPAS))	An independent non-denominational Christian child protection charity providing training and consultancy about safeguarding practices.
Torah	The first part of the Jewish bible. Torah refers to the five books of Moses.
Triratna Buddhist Order and Community	The Triratna Buddhist Order and Community was founded in the UK and is now a worldwide movement of people who engage with the Buddha's teachings in the conditions of the modern world.
Trustee	Person appointed to a charity who has financial and operational responsibility for the running of the charity and owes duties in law.
Umbrella body	An organisation which controls or organises the activities of an association of institutions (in this context, religious institutions) which work together formally to coordinate activities or share resources and information.
Union of Orthodox Hebrew Congregations (UOHC)	An umbrella body of Charedi Jewish communities in London whose stated mission is to protect traditional Judaism.
United Reformed Church in the UK	Protestant reformed denomination of Christianity, created from the merging of various nonconformist denominations in the 1970s in the UK.

The United Synagogue	The largest synagogue movement in Europe. Comprises local communities supported by a central office, representing what it calls 'mainstream, Orthodox Judaism'.
Unregistered school	A school in England which is not registered with the Secretary of State for Education. Schools only have to be registered if they provide full-time education, ie over 18 hours a week.
Unspent convictions	Records which have not yet reached the defined time as set out in the Rehabilitation of Offenders Act 1974. Unspent convictions will appear on a basic Disclosure and Barring Service (DBS) criminal record check.
Vetting and Barring checks	A check carried out by the Disclosure and Barring Service (DBS) of an individual's criminal record. Employers can ask to see a DBS certificate to ensure that they are recruiting suitable people into their organisation.
Voluntary, Community and Social Enterprise (VCSE)	Voluntary, charity, social enterprise organisations.
Watch Tower Bible and Tract Society of Britain (Jehovah's Witnesses)	A charity operated by the Jehovah's Witnesses.
<i>The Watchtower</i> (Jehovah's Witnesses)	Religious text published by the Jehovah's Witnesses. The May 2019 edition "explained and expanded on" the Jehovah's Witnesses' worldwide child protection policy. <sup>785</sup> It is studied and read by congregation members during group study.
<i>Working Together to Safeguard Children (Working Together Under the Children Act 2004/Safe From Harm)</i>	Statutory guidance issued by the Department for Education to statutory bodies about how to assess and deal with safeguarding issues. Includes some limited advice about the role of religious organisations.
World Ahlul-Bayt Islamic League	A registered charity and worldwide organisation of Ulama (scholars) for the advancement of the Islamic Sh'ia religion.
Yeshiva/ yeshivot/ heshivos	A Jewish educational institution (single sex) which focusses on the study of religious texts, primarily the Talmud and the Torah, and Jewish Law (Halacha). In the context of this report, yeshiva refers primarily to all-male educational institutions for boys and young men, from 13 to early adulthood, organised and run by members of the Charedi community to educate them in religious law and religious studies alone.
Zoroastrianism	One of the world's oldest known living religions, developed about 3,500 years ago from ancient Indo-Iranian religion.

# Annex 3

## Schedule of policies and procedures from religious organisations

Organisation	Child protection policies	Brief overview of overall structure and child protection structure	External audits	Training	Disclosure and Barring Service (DBS) checks
Bahá'í Community of the UK <sup>786</sup>	A range of policies, regularly updated.	There is a Community Care Team (CCT) at the national level. There is also a National Office of Safeguarding Children (OSC) that ensures all those who work with children obey the latest legal requirements and that children are afforded proper safeguards.	Not addressed in witness statement.	Training carried out but not systematic and not regular.	Everyone working with children in the community must have a valid and clear enhanced DBS disclosure if they have 'substantial access' to a child.
BAPS Shri Swaminarayan Mandir (BAPS) <sup>787</sup>	BAPS has a Child Safeguarding Policy and a Child Safeguarding Procedure. Both were formally introduced in January 2012 and are reviewed annually. Last reviewed in July 2019.  In the summer there are residential courses/camps at Neasden Mandir. There is an Overnight Stay Policy for children, which must be adhered to.  Prior to children being taken to external events, volunteers are required to carry out a risk assessment and submit a duly completed risk assessment form to the Compliance Officer and senior management for approval.	BAPS has two named Designated Safeguarding Officers (DSOs). Not clear what other structures there are, if any.	BAPS states that it regularly reviews its child protection practices and procedures but does not commission or carry out external or internal audits or inspections.	The volunteers who teach in the children's assemblies undergo compulsory child protection training annually provided by BAPS's in-house child safeguarding leads.  BAPS has two designated volunteers who oversee safeguarding: Prof Saglani (trained to Level 3) and Mr Krit Wadia (trained to Level 1).  Training is delivered face to face. It is free. The DSOs have attended courses that allow them to deliver basic child protection training, which is paid for by BAPS. The training has been taking place for the last five years.  Over the last 18 months, BAPS has been working with the NSPCC's 'Safeguarding in Communities' team. The team has delivered training for BAPS's volunteer workers who lead the children's activities. This has allowed specific concerns raised by the volunteers to be addressed. The NSPCC provided two half-days' training in October and November 2018.	BAPS holds weekly religious assemblies for children aged six and older. Children attend without their parents/legal guardians. The volunteers who teach in the children's assemblies are enhanced DBS checked, including barred list checked.  Volunteers who are involved in delivering children's activities undergo a DBS check. A record of the check is maintained centrally.

Organisation	Child protection policies	Brief overview of overall structure and child protection structure	External audits	Training	Disclosure and Barring Service (DBS) checks
Baptist Union of Great Britain (BUGB) <sup>788</sup>	<p>BUGB has a suite of policies – see para 5.</p> <p>The Child Protection Policy is ‘Safe to Grow’. BUGB has a model safeguarding policy and procedures for churches.</p> <p>BUGB is doing work on a ‘safeguarding covenant’ between BUGB organisations.</p>	<p><b>Local</b> Each church has the responsibility to put in place safeguarding policies, structures, procedures and working practices that it believes to be legally compliant and to make sure that a safeguarding trustee and Designated Person for Safeguarding (DPS) are appointed and equipped to carry out their responsibilities.</p> <p>In the majority of churches, the church safeguarding policy will be based on the model published by the National Safeguarding Team (NST) with any appropriate local adjustments or additions. A church is required to have a safeguarding policy in place or to be committed to adopting an up-to-date safeguarding policy as part of its application to join BUGB.</p> <p>Each local church should appoint a Safeguarding Trustee (deacon) who oversees safeguarding provision and two people as DPS.</p> <p><b>Baptist Colleges</b> These prepare men and women for ministry. Each Baptist College will appoint a Safeguarding Trustee.</p> <p><b>Regional</b> At the regional level there are 13 Regional Associations. These are regional groups of Baptist Churches. Each Regional Association will appoint a Safeguarding Trustee.</p> <p><b>National</b> There is a National Safeguarding Team working on behalf of all BUGB member organisations. This is overseen by the BUGB Trustee Board safeguarding sub-committee. There is also a National Safeguarding Contacts Group (NSCG) made up of the Association Safeguarding Leads and those who train safeguarding trainers.</p>	Not addressed in witness statement.	<p>BUGB has offered safeguarding training tailored for its churches since 1994, when its child protection policy was first published. The latest versions of Levels 1, 2 and 3 training were designed in 2016 and rolled out in 2017.</p> <p>Local churches are responsible for:</p> <ul style="list-style-type: none"> <li>providing Level 1 training to the whole congregation;</li> <li>ensuring leaders receive BUGB Levels 2 and 3 safeguarding training;</li> <li>ensuring all workers and volunteers who work with children, youth or adults at risk receive at least BUGB Level 2 training on a regular basis.</li> </ul> <p>Regional associations are responsible for:</p> <ul style="list-style-type: none"> <li>ensuring regional ministers, other staff where appropriate and trustees complete BUGB Levels 2 and 3 training;</li> <li>providing regular BUGB Levels 2 and 3 training sessions around the region for all church personnel.</li> </ul> <p>Baptist Colleges will:</p> <ul style="list-style-type: none"> <li>ensure Ministers in Training receive BUGB safeguarding training Levels 2 and 3 in the first year of ministerial training.</li> </ul> <p>National Safeguarding Team will:</p> <ul style="list-style-type: none"> <li>offer training, development and support for Association and College team.</li> </ul> <p>Ministers who don't attend training are warned that failing to complete it will lead to the removal of their accreditation. Where a minister fails to complete Levels 2 or 3, they will lose their accreditation. Only happened on one occasion to date.</p>	<p>DBS checks are required for all ministers and leaders in the churches. BUGB organises and pays for the provision of a DBS checking service for all member churches. The service is provided by Due Diligence Checking Ltd. Previously a similar service was provided by the Churches Advisory Service. Each church appoints one or more DBS verifiers.</p> <p>Blemished disclosures for accredited ministers and workers are referred to the NST, which will liaise with the Ministries Team about suitability and carry out risk assessments as necessary.</p> <p>All accredited ministers and workers are required to have up-to-date DBS checks to attend safeguarding training programmes as a condition of their ongoing accreditation.</p> <p>While unaccredited ministers and pastors are not under the jurisdiction of BUGB's accreditation system, each church is required to carry out DBS checks for its minister, pastor and leaders.</p> <p>All potential appointees to Trustee Board roles need to be DBS checked.</p>

Child protection in religious organisations and settings: Investigation Report

Organisation	Child protection policies	Brief overview of overall structure and child protection structure	External audits	Training	Disclosure and Barring Service (DBS) checks
Chabad Lubavitch UK (CL) <sup>789</sup>	Yes. It was developed in conjunction with the NSPCC in 2015 and was last comprehensively reviewed in 2018.	CL has five directors (trustees). These trustees take ultimate responsibility for CL's adoption and adherence to robust safeguarding and child protection policies and practices. There is a National Safeguarding Lead.  There is also a Council of Management (known as the Hanhollah), which consists of Rabbinic trustees of CL and Shlichim (Rabbis who run Chabad Houses) from within and outside CL. Its purpose is to ensure that both the charity and other independent parts of the CL movement in the UK act consistently and to address various operational and regulatory issues facing the charity from time to time – including adopting robust child protection policies and procedures.	Depends on the policy – schools and other regulated institutions operated by the charity have to review their policies in accordance with the requirements laid down by law and the relevant regulatory authorities.	The three Rabbi trustees undertake safeguarding training.  NSPCC trainers have provided training for Shlichim – most recently in July 2019.  CL has initiated a process for recording centrally which Shlichim have undertaken training and when. For those who do not comply, there are a number of sanctions. Those in employment with CL could be disciplined in accordance with the disciplinary procedures set out in the Staff & Shlichim Handbook.	Yes.
Christian Congregation of Jehovah's Witnesses (JW) <sup>790</sup>	Yes.  For several decades, the child safeguarding policy was outlined in various issues of <i>Watchtower</i> . In 2011 the policy was summarised in a single document for use in the UK and Ireland. That policy was reviewed annually until 2017.  In 2018 the JW published a worldwide child safeguarding policy, <i>Scripturally Based Position</i> . That policy is explained and expanded on in <i>Watchtower</i> May 2019. The policy is supplemented by various guidance documents.	International: Governing Body of JW.  National: Branch Office (BO) of JW. Two departments of BO help elders respond to allegations of child sexual abuse:  (a) the Service Department: guidance to elders on implementing safeguarding policy;  (b) the Legal Department: provides legal advice to BO and elders.  Circuit: Grouping of approximately 20 congregations. Overseen by circuit overseer (aka travelling overseer).  Congregation: Spiritual needs met by a body of elders. Elders are assisted by ministerial servants.	Not addressed in witness statement.	Before elders are appointed to serve on a Branch Committee, they have to attend training. It is a Branch Committee member who oversees the Service Department. He ensures elders are trained to deal with child safeguarding.  Every five years all circuit overseers worldwide attend a four-week training course that includes training in pastoral support.  Every three years all elders attend the Kingdom Ministry School one-day course, which includes safeguarding. Every five years there is a five-day course, School for Congregation Elders.	The JW do not provide or sponsor any regulated activity that separates children from their parents and thus DBS checks are not permitted by the applicable legislation.

Organisation	Child protection policies	Brief overview of overall structure and child protection structure	External audits	Training	Disclosure and Barring Service (DBS) checks
The Church of Jesus Christ of Latter-day Saints (CJCLDS) <sup>791</sup>	Yes: there are policies at both a national and local level.	<p>Since 2002, CJCLDS has operated a free and confidential helpline for bishops and stake presidents of CJCLDS in England and Wales. The helpline is available 24 hours per day, 7 days per week. The helpline is operated by external solicitors, engaged by CJCLDS to answer questions and provide instruction about how to assist victims, comply with local laws for reporting abuse and protect against further abuse.</p> <p>The bishop has responsibility at the local level for oversight of child protection in the ward. The stake president has oversight of child protection in the stake. The Europe Area Presidency has responsibility for oversight at the national level.</p>	<p>CJCLDS has not in the past 10 years commissioned any external audits or inspections of its child protection policies. Auditing, inspecting, revising and updating of child protection policies is undertaken at Headquarter level, under the direction of the First Presidency and the Quorum of the Twelve Apostles.</p>	<p>CJCLDS has a large number of training materials, which are generally available to local leaders and members. CJCLDS also has a website specifically dedicated to the topic of abuse that is constantly updated.</p> <p>Training on policies and procedures begins with CJCLDS leaders. These leaders receive training at general conferences in the USA each year. The Europe Area Presidency of the Church meets with and provides training to stake presidents in England and Wales in an annual training meeting. Area Seventies meet with and provide training to stake presidents in training meetings held quarterly. Stake presidents meet with and provide training to bishops at least monthly. Stake presidents and bishops meet with and provide training in stake and ward leadership meetings at least monthly. Stake and ward leaders meet and train in their respective presidency and leadership meetings as required.</p> <p>CJCLDS has a mandatory training programme for all who work with children. This takes place online. It requires members to login individually using a username and password. Participation can therefore be tracked. The training will become compulsory for members working in England and Wales in 2-3 months' time.</p> <p>For those who do not work directly with children, they are invited by CJCLDS to undertake child protection training, but on a voluntary basis.</p>	<p>CJCLDS does not routinely undertake DBS checking because it is not mandated in law and because it considers that its clear, robust and well-managed policies, procedures and arrangements for safeguarding children minimise the risk of abuse and protect children and youth. CJCLDS is considering how it can more fully make use of these checks.</p> <p>CJCLDS does undertake ad hoc DBS checking, eg DBS checking was undertaken for all members who worked directly with youth of CJCLDS during the August 2019 'For the Strength of Youth' conference.</p>



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Organisation	Child protection policies	Brief overview of overall structure and child protection structure	External audits	Training	Disclosure and Barring Service (DBS) checks
Church of Scientology (CS) <sup>792</sup>	Yes, there are a range of policies.	The worldwide CS comprises thousands of Churches, Missions and Groups. They all recognise the ecclesiastical authority of the mother church, CS International, which is based in California.  CS churches in England are staffed exclusively by volunteers, many of whom are members of a religious order. Overall management of CS in England is carried out from East Grinstead, but each individual Church also exercises a certain amount of autonomy and has its own head and executive council.  All members of staff (and all Scientologists) have responsibility in relation to safeguarding. All are required to provide a written report to the Ethics Department of their local Church should they notice anything wrong, even if it is just matters that lead to a suspicion. Written reports may be preceded by a verbal report in cases of emergency. Depending on the seriousness of the matter, reports may be passed up to senior Ethics personnel and further escalated to the legal officer and the head of the local Church. Reports may then be shared with East Grinstead, including Massimo Angius – the person with overall responsibility.	No.	All staff are trained in CS policies and procedures as well as others that would help to safeguard children.  CS has a constant programme of training staff and re-training staff where any weaknesses in their knowledge or skills is noticed. It is the policy that all staff spend at least 12.5 hours per week on training and development.	Before a person can become a volunteer staff member, a detailed review of their background is carried out, including any criminal history and their ethical record. DBS checks are carried out if they are likely to be involved with children.  Trustees and staff who have worked closely with children have had checks since approximately 2002. CS has a target to do DBS checks on all staff.  CS uses Atlantic Data Ltd for DBS checking.
The Council of African and Afro-Caribbean Churches UK (CACC) <sup>793</sup>	CACC does not have a safeguarding policy of its own, but the individual member denominations are encouraged to have one.	CACC has 33 member denominations, which are autonomous. It does not admit individual persons as members.  CACC encourages its members to put in place safeguarding policies and to have officers-in-charge. It advises them to connect with thirtyone:eight (31:8). The implementation of policies is the responsibility of individual denominations and their branches.  CACC does not have a safeguarding officer in place. Every member church puts their own officers in place. CACC cannot have such officers as it would mean imposing on member denominations and it would be very difficult to serve all of the churches from one place. Besides this, an officer would be a full-time paid role, which CACC cannot afford.	CACC has not commissioned any external audits. CACC does not know if members have commissioned any audits.	CACC, as an umbrella body, organises group training for its member churches on safeguarding for vulnerable adults, youth and children. The training is provided by 31:8. The training is delivered using booklets and audiovisual technology. 31:8 charges CACC and CACC spreads the cost among the participants.  The training is compulsory but it is not forced on people: CACC just advertises and gives notice of the training. It is operated on a first-come first-served basis because there is always a limit to the number that can be trained at a particular time.	Vetting and barring is carried out by member churches.

<sup>792</sup> COS000001

<sup>793</sup> CAC000003; CAC000004

Organisation	Child protection policies	Brief overview of overall structure and child protection structure	External audits	Training	Disclosure and Barring Service (DBS) checks
<b>Council for Mosques (Bradford) (CFM)</b> <sup>794</sup>	No. As CFM does not directly work with children, it has no policies in place in respect of safeguarding.  CFM is not involved in the administration of child protection policies in its member organisations and is unable to provide information about this.	CFM is an unincorporated association. It is led by an elected executive committee of volunteers, which meets monthly to discuss matters of importance to the CFM and the Muslim community in Bradford. It has no authority to compel representatives of member organisations to attend meetings or to direct member organisations to take any particular action. CFM has no employees or staff of its own and all of its activities are carried out on a voluntary basis.  CFM has no formal role in receiving and processing safeguarding/child protection complaints. It does not involve itself in specific allegations made against member organisations or individuals within those organisations.  In relation to child safeguarding generally, CFM signposts member organisations to Bradford Council Children Services and the Bradford Safeguarding Children Board (BSCB) to obtain advice and support.	CFM has not commissioned any external audits or inspections of child protection practices and procedures. CFM does not have an internal process in place to audit or inspect the child protection practices and procedures of its member organisations and does not have the resources or funding available to undertake this.	CFM does not provide any training to its volunteers or to its member organisations in regard to child sexual abuse and has no qualified staff or resources to provide this. CFM does, however, signpost member organisations to Bradford Council Children Services, the BSCB and other relevant authorities for training.	CFM does not directly work with children and as such does not have a system of vetting and barring in respect of its own members.  CFM is involved in signposting member organisations to the appropriate authorities and information to enable them to put in place appropriate child protection provisions, including vetting and barring.
<b>The Druid Network (DN)</b> <sup>795</sup>	No child protection policy and no child protection officer. DN does not directly engage with children. DN is an internet-based organisation.	See previous column: no safeguarding structure.	Not addressed in witness statement.	Not addressed in witness statement.	Not addressed in witness statement.
<b>East London Mosque</b> <sup>796</sup>	Yes, there is an institution-wide safeguarding policy, which covers child protection and has details of procedures for dealing with child abuse. It is reviewed annually.  The first child protection policy and procedures were introduced in September 2002. This became part of a broader policy of 'Safeguarding Children and Vulnerable Adults' from 2015.	Not addressed in witness statement.	Not addressed in witness statement.	All staff in the full-time schools have Level 2 safeguarding training, while the senior leadership team members have Level 3 training.  There is safeguarding awareness training for staff (including imams) who are not in regulated contact with children. In 2017, safeguarding awareness training was given to 51 staff members and project leaders, including all members of the senior management team, delivered by the London Borough of Tower Hamlets Children's Services.	Imams would only be DBS checked if they had a role involving dealing directly with children. Most of its imams are DBS checked. Currently, none of the imams are involved in the education services for children, for which dedicated staff are employed.  Staff in regulated contact with children (ie who are with children without the presence of any other suitably qualified adult) are DBS checked.  All trustees have enhanced DBS checks, renewed every three years as good practice.

794 CFM000001

795 DRU000001

796 ELM000020; ELM000024

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Organisation	Child protection policies	Brief overview of overall structure and child protection structure	External audits	Training	Disclosure and Barring Service (DBS) checks
Evangelical Alliance (EA) <sup>797</sup>	Only since 2018, when the Charity Commission (CC) adopted a broader definition of safeguarding. But it is an umbrella body and doesn't work directly with children or young people.	Not addressed in witness statement. EA is an umbrella body that doesn't work directly with children or young people.	EA does not conduct audits of its members.  EA has not commissioned external audits or inspections of child protection practices or procedures. Its member churches may have done so, but EA would not be informed of this.	EA runs conferences for members that sometimes include a safeguarding element. It is unclear whether attendance at the conferences is mandatory.	EA does not undertake any regulated activities in respect to the Safeguarding Vulnerable Groups Act 2006 (SVGA). It has no systems in place or experience of vetting and barring.
The Federation of Synagogues (FoS) <sup>798</sup>	Yes. FoS produces a Policies Handbook for synagogues that is distributed to constituent members. The most recent edition is from February 2017. These policies are compulsory unless the synagogues devise their own.	FoS member synagogues fall into two categories: constituent and affiliate synagogues. Constituent synagogues are in reality each a branch of the same charitable entity. Affiliate synagogues all exist and operate as their own legal entity and are merely linked to FoS to allow their members to become members of FoS Burial Society if they so wish.  FoS is headed by seven trustees. These are elected by FoS's Council for a one-year term.  FoS trustees are ultimately responsible in respect of child protection. There are named persons at the Head Office and at each synagogue who have been trained in safeguarding. The Child Protection Officer (CPO) is the designated named person within FoS with lead responsibility for child protection. The Deputy Child Protection Officer (DCPO) is similarly defined as the alternate designated named person within FoS with responsibility for child protection.  Each synagogue has an appointed and trained Designated Safeguarding Lead (DSL) who oversees and is the point of liaison for all matters of child protection. The appointments of DSLs within constituent member synagogues took place over the summer of 2019.  FoS does not currently have an internal process in place for auditing or inspecting child protection practices at a local level. There will be greater oversight now that DSLs have received training.	FoS has not commissioned any external audits or inspections of child protection practices in the last 10 years.	The current Child Protection Officer (CPO), the Deputy CPO and the FoS's Chief Executive have received one day's training from the Social Care Institute for Excellence (SCIE). The training took place in groups of trainees from across the UK Jewish community in summer 2017 and spring 2018. Reshet facilitated the training.  Ten DSLs from constituent member synagogues received one-day safeguarding training from SCIE at FoS's Head Office on 24 November 2019. FoS plans to run refresher training for DSLs annually.  FoS has given compulsory safeguarding awareness training to 14 Rabbis and 16 Rebbetzins. This is approximately 70% of community Rabbis and 80% of community Rebbetzins. Reshet delivered the training.  FoS pays for all the training and provides it at no cost to the participants. Currently there is no formal internal disciplinary procedure for failing to attend these training sessions.	All rabbinic appointments must undergo a DBS check prior to appointment.  According to FoS policy, all staff and volunteers who work directly with children should complete a DBS application form.  DBS checks are carried out by Swift Check (a DBS checking service) and administered by the DCPO, who is also the Human Resources and Communities Manager. FoS renews DBS checks every three years.

<sup>797</sup> EVA000001: EVA000001

<sup>798</sup> FOS000001

Organisation	Child protection policies	Brief overview of overall structure and child protection structure	External audits	Training	Disclosure and Barring Service (DBS) checks
General Assembly of Unitarian and Free Christian Churches (GAUFCC) <sup>799</sup>	Yes: Safe and Sound.	GAUFCC operates solely at a national level. Regional and local Unitarian congregations and associations operate independently.  To support child protection, GAUFCC employs a part-time Safeguarding Officer (0.1 FTE). The role involves providing safeguarding support across the denomination and not solely child protection. The Officer is required to have a knowledge of safeguarding matters but there is not a specific type or level of safeguarding training that has been specified in the job description to date.	No.	GAUFCC does not offer safeguarding training to volunteers directly.  Volunteers at residential events will have received child protection training. As many of GAUFCC's volunteers are teachers or are involved in educating school-age children, GAUFCC asks to see a training certificate issued by their employer within the past three years. If they have not received any training, GAUFCC asks them either to attend relevant training within their local area or complete an online training course by either 31:8 or the NSPCC. GAUFCC pays all costs associated with the training.  GAUFCC signposts member groups to 31:8, as it has limited capacity to deliver training directly. Outside of its own programming, it cannot make child protection training compulsory as each member group is independent of GAUFCC.	Volunteer leaders assist with GAUFCC's youth activities. All applicants undergo a DBS check before participating as a volunteer leader. To support the Lead Recruiter with this process, GAUFCC uses 31:8 DBS checking service.
Green Lane Masjid and Community Centre (GLMCC) <sup>800</sup>	Yes, introduced in November 2014.  Separate policy for Madrasah, which was introduced in 2017.	GLMCC is administered at a local level. It is not part of any local, regional or national structures that can exercise authority or control over any of the practices at the centre.  GLMCC has four trustees. These, together with the general manager, the management team and the imams, hold responsibility for the management of the religious community. They also have appointed Safeguarding Leads.  The Safeguarding Leads are responsible for the whole of GLMCC. The individuals are paid and there is a minimum expectation in terms of hours.	No.	Yes. Imams and members of staff and volunteers dealing with children are required to undergo training.  There is online safeguarding training that is compulsory for all staff. This is run by EDUCARE. The content is Levels 1 and 2 and is free for participants. The training system has been in place for 12 months. It is compulsory, though there are no sanctions currently in place for failure to attend the training. GLMCC's leads are further trained to the level they require: their last training was an offsite two-day training course for safeguarding leads.  There is no special training for those delivering collective worship. The training is the same as the training received by staff. Imams at the mosque are not directly involved in any children's activities. One of the imams and some staff are currently undergoing voluntary faith leadership training at the University of Birmingham, which covers child protection. GLMCC is trialling this as a potential course for other key staff and imams.	Remunerated faith leaders at GLMCC (imams) lead collective worship. They are required to pass a DBS check.  All members of staff and volunteers dealing with children are required to complete a DBS check.  The following are required to undergo a DBS check: <ul style="list-style-type: none"> <li>all staff and volunteers at the Madrasah;</li> <li>all staff and volunteers involved with the Budding Believers Club;</li> <li>all adults leading sessions at the Sports Clubs;</li> <li>all scout leaders.</li> </ul>

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Organisation	Child protection policies	Brief overview of overall structure and child protection structure	External audits	Training	Disclosure and Barring Service (DBS) checks
Gurdwara Sri Guru Singh Sabha Southall (GSGSS) <sup>801</sup>	The policies and procedures have been customised for GSGSS.	GSGSS is administered and controlled by an elected management committee of 21. It is elected by the membership every three years. The management committee appoints office bearers from among themselves. The management committee is responsible for day-to-day running along with paid staff.  There is one appointed Safeguarding Officer who can interact with the child protection services via Ealing local council and national child protection agencies. The Safeguarding Officer is appointed by the senior trustees.	An external review of the GSGSS's policies has been conducted as part of the training update programme in October 2019. GSGSS is currently awaiting the report before considering its findings.	GSGSS has run three Level 1 safeguarding for adults and children training days for its staff, the most recent of which was on 1 October 2019. A Level 2 officer and lead training course was scheduled for February 2020. The external consultant used to provide the training has a background as a local safeguarding core trainer who specialised in safeguarding development in faith settings.  Every year, GSGSS invites the police's safeguarding team to deliver educational talks to youth and parents at GSGSS. Adult and Child Level 1 safeguarding training is offered for all those who may come into contact with children. The training, which is free, is delivered by an independent safeguarding consultant. Failure to attend the training would be picked up by the Office Manager and passed to the Safeguarding Officer.  Approximately 60 individuals attended the Level 1 Safeguarding for Children and Adults training in late 2019. The training was delivered and certificates provided by an external safeguarding consultant. The group was a mix of staff and volunteers who may come into contact with children or vulnerable adults. The training is compulsory for those who run a regulated activity. There is a Level 2 training programme scheduled for regulated activity contact staff and volunteers.	All trustees are required to take a DBS check before they are eligible to stand in elections. This condition is codified in GSGSS's governing document.  DBS checks of all committee members are stored in the GSGSS office.

Organisation	Child protection policies	Brief overview of overall structure and child protection structure	External audits	Training	Disclosure and Barring Service (DBS) checks
Guru Nanak Gurdwara Smethwick (NGGS) <sup>802</sup>	<p>Yes. NGGS has bespoke policies in place. It has a full child protection policy and a general safeguarding policy that trustees, staff and volunteers are obliged to follow.</p> <p>The policies are available to anyone who attends NGGS. They can be viewed by trustees and volunteers on the intranet and they are available in hard copy in the public information office.</p>	<p>There is no hierarchical system of clergy at NGGS as Sikhism promotes equality. Granthis have deep knowledge of the Sikh religion but they are not responsible for running the organisation. It is the board of trustees who are collectively responsible for the governance and day-to-day running of NGGS and for its management, operations and finances.</p> <p>In the board of trustees there are various positions of responsibility. There is a President, General Secretary, Management Committee and Congregation Board. The President is responsible for all aspects of running NGGS and has assistance from the General Secretary and other trustees. The Education Secretary is the trustee safeguarding lead with responsibility for child protection.</p> <p>NGGS employs an office manager and part of their role is to act as a Child Protection Designated Officer (CPDO).</p>	<p>Not addressed in witness statement.</p>	<p>Any trustee who comes into contact with children as part of their trustee role is required to have basic level safeguarding training. If trustees do not have a role that involves contact with children, safeguarding training is not mandatory for them, but NGGS encourages it and makes the option to attend available to them.</p> <p>NGGS runs safeguarding training for trustees that covers safeguarding for children and vulnerable adults. It uses external trainers who deliver training using NGGS lecture theatres. The training is paid for by NGGS and is free for participants. In the past, NGGS has used the company Tutor Care to source trainers. The training session in February 2020 was to be delivered by a member of the local council.</p> <p>Safeguarding training takes place annually or biannually, depending on demand and need. Each session is usually attended by approximately 12 people. All new trustees are encouraged to attend and are encouraged to go to refresher sessions if they feel they require it.</p> <p>Volunteers who work with or around children are encouraged to attend the safeguarding training. It is neither compulsory nor possible for everyone to attend. A lot of volunteers are illiterate and from the older generation, which means that organised training is not suitable for them. NGGS tries to raise awareness of safeguarding issues with them in its own way through discussions. The Granthis are not required to undergo compulsory training. Often they do not speak English, only Punjabi, so the training is not fit for them. It would be possible to offer child protection training in Punjabi. This would require finding someone who is both accredited to deliver child protection training and competent to deliver it in Punjabi. This has not been looked into in detail.</p> <p>NGGS is currently working on designing and implementing online safeguarding training courses, which it hopes to make available to trustees, staff and volunteers in the near future.</p> <p>In order to be a CPDO, the office manager has to undergo a series of training sessions.</p> <p>In January 2020, NGGS hosted two sessions about child online safety in conjunction with the NSPCC.</p>	<p>Services at NGGS are led by volunteer Granthis. The Granthis are not currently DBS checked. NGGS is in the process of applying for DBS checks for them via uCheck.</p> <p>New trustees may be subject to a DBS background check.</p> <p>NGGS's security guards are DBS checked.</p>

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Organisation	Child protection policies	Brief overview of overall structure and child protection structure	External audits	Training	Disclosure and Barring Service (DBS) checks
Hindu Council UK (HCUK) <sup>803</sup>	Not addressed in witness statement.	HCUK is not directly involved with safeguarding and child protection issues but will support individual temples, families, schools or other religious organisations when approached. HCUK recommends that each individual temple has a robust child protection and safeguarding policy in places like schools and educational institutions.	Not addressed in witness statement.	Not addressed in witness statement.	Not addressed in witness statement.
Islamic Cultural Centre and London Central Mosque (ICC and LCM) <sup>804</sup>	<p>London Central Mosque School (LCMS), which is operated by the ICC, has a child protection policy in place. ICC does not have a child protection policy in place.</p> <p>At the time of making the statement, ICC was in the process of introducing, among others, the following policies with the assistance of its solicitors: safeguarding policy regarding child protection; child sexual abuse reporting policy; code of conduct regarding behaviour around children.</p>	<p>There are 25 trustees of the charity responsible for ICC and LCM.</p> <p>LCMS has designated safeguarding personnel, whose contact details are available to all students and parents via the noticeboard at LCMS.</p> <p>More generally, any incidents involving child abuse are to be reported to the Director General of the ICC and LCM. The matter would be investigated internally and reported to the police and LADO.</p>	<p>The National Resource Centre for Supplementary Education (NRCSE) supports the work carried out at LCMS. The NRCSE is instructed to carry out an audit of LCMS. It is provided with copies of policies that are in place and asked to check and review them. Once assessed, NRCSE provides a quality mark. This is carried out every academic year.</p>	<p>Due to the fact that ICC operates a school, it holds regular training sessions relating to child protection via the Child Protection Company. The most recent session took place on 5 January 2020.</p> <p>Following the last training exercise, all staff were required to complete a test to assess their understanding of the training given. Any staff members who failed the test would have had to take the training again. All staff passed on the first attempt with an average rating of 70%.</p> <p>Training is also provided annually to all staff members and volunteers in connection with safeguarding against child sexual abuse. Individuals who fail to attend are subject to an internal investigation and disciplinary action. Staff are also provided with access to online training courses via the Child Protection Company and are also obliged to take part in face-to-face training sessions.</p> <p>All staff employed as part of LCMS are required to take part in the training, for which they receive a certificate on successful completion. The requirement to take part in this training is made clear to all joining staff during and after the interview process. Records are kept in connection with the training undertaken by staff. Staff who refuse to partake in the training provided are subject to disciplinary action. Records of training are kept by the Head Teacher of the school. The records include up-to-date contact details for the individuals, a signature as confirmation of the training taken, along with a recent photograph.</p> <p>The ICC is currently in the process of increasing the number of training sessions held per year. The ICC is also considering preparing an update email or newsletter that would be circulated to staff on a quarterly basis to raise awareness and highlight any changes in legislation while providing updates released by government bodies.</p>	<p>In addition to the trustees there are 41 ICC employees and 12 volunteers, all of whom are subject to DBS checks.</p> <p>As with all employees and volunteers, imams are subject to enhanced DBS checks.</p>

<sup>803</sup> HCUK000001

<sup>804</sup> ILM000001

Organisation	Child protection policies	Brief overview of overall structure and child protection structure	External audits	Training	Disclosure and Barring Service (DBS) checks
<p><b>Liberal Judaism (LJ)</b><sup>805</sup></p>	<p>LJ has some specific issues relating to vetting and barring with overseas volunteers. The current law in Israel is that it is not legal to ask a woman to be vetted and this means that LJ cannot get DBS checks for female Israeli staff on tour. LJ is working with other diaspora organisations to pressure the Israeli government to change the policy.</p> <p>LJ finds the definition of regulated activity to be unclear and unhelpful when it relates to youth workers. LJ would like a change in the law to reflect that youth work offers opportunities for privileged access to young people. LJ considers that anyone with pastoral or spiritual authority should be subject to vetting checks, with no exceptions, regardless of the current boundaries of regulated activity.</p>	<p>LJ is a company limited by guarantee and is a registered charity.</p>	<p>LJ believes that the Charity Commission has the potential to regulate practice within the religious charity sector by offering support to check policies and procedures. LJ's perception of the current situation is that more funding and expertise is required.</p>	<p>LJ would find common training materials, resources, policies and procedures helpful. LJ would also support a common qualification for all leaders in faith settings, which should consider the variety of environments</p> <ul style="list-style-type: none"> <li>– from one-to-one tuition to large religious schools</li> <li>– and be renewable every three years. There should be compulsory training for all staff and volunteers in religious settings.</li> </ul>	<p>LJ believes that it should be mandatory for religious leaders or those in positions of authority to refer allegations or suspicions of child abuse to statutory authorities and that concealment of such should be a criminal offence. LJ would go further and say that this should apply to all staff and volunteers if child abuse is to be tackled properly and consistently.</p>
<p><b>Manchester Beth Din (MBD)</b><sup>806</sup></p>	<p>Not addressed in witness statement.</p>	<p>Beth Din is a Jewish court of law. Certain activities require a forum of three Dayanim [religious judges]. In addition, local Rabbonim are often called on to assist the Dayanim, especially in matters relating to the carrying out of the Get [divorce] procedure.</p> <p>MBD does not rule or hold hearings on any matters pertaining to child protection or child sexual abuse.</p>	<p>Not addressed in witness statement.</p>	<p>MBD does not deal with cases of child protection and child sexual abuse, so there is no specific training regarding this subject.</p>	<p>Not addressed in witness statement.</p>

<sup>805</sup> LJ0000002; LJ0000020

<sup>806</sup> MBD0000001



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Organisation	Child protection policies	Brief overview of overall structure and child protection structure	External audits	Training	Disclosure and Barring Service (DBS) checks
Masorti Judaism (MJ) <sup>807</sup>	<p>MJ has a full range of safeguarding policies and procedures, which are reviewed annually by staff, outside experts and MJ's trustees.</p> <p>MJ first introduced safeguarding and child protection policies in the 1980s. For at least the last 10 years, the policies have been revised on an annual basis. The policies are designed to regulate MJ's directly managed youth activities and are not intended to regulate activities within MJ's independent member communities. However, MJ does make these policies available to communities on request for information and as a resource.</p>	<p><b>Basic structure of organisation</b> The membership of MJ includes nine constituent synagogues and a number of associate communities. Each community and synagogue is an independent, locally run group. MJ requires each member community to have an adequate safeguarding policy in place; MJ is yet to define what constitutes an 'adequate policy' and is currently engaged in a project to draw up guidelines on this.</p> <p><b>Safeguarding structure in local communities/synagogues</b> Child protection within local communities is usually handled by synagogue staff or trustees. Each local community has its own arrangements. Local communities are lay-led and are run by a board of trustees/company directors and by volunteers. The trustees have ultimate responsibility for child protection. In larger synagogues this is usually delegated to members of staff. Rabbis do not generally have specific child protection responsibilities.</p> <p>As an umbrella body, MJ's role has been advisory rather than regulatory. While MJ requires each member community to have a policy in place, it has not conducted any form of review or audit as to the nature of each community's provision.</p> <p><b>Safeguarding structure within MJ itself</b> MJ also operates its own youth work programmes and activities. In respect of these activities, overall responsibility for safeguarding is held by the trustees of MJ, who delegate operational responsibility to the deputy chief executive and to the youth director. The deputy chief executive, Rachel Sklan, is also MJ's DSL. Day-to-day responsibility for safeguarding sits with the youth director, Lucy Cohen. Both posts are full-time paid positions. The youth director is line-managed by the deputy chief executive, who in turn is supervised by the chief executive.</p> <p>Noam = the youth movement of MJ. There is a DSL (MJ's youth director) for Noam, with oversight by Noam's deputy chief executive.</p>	<p>Yes, to review safeguarding policies and procedures.</p> <p>MJ has not commissioned any external audits of child protection practices or procedures in the last 10 years.</p>	<p>There is a range of practice among the member communities. Larger synagogues generally provide safeguarding training to staff, whereas smaller groups are less likely to.</p> <p>Several synagogues send staff and volunteers to training provided by outside organisations such as Reshet.</p> <p>There is no particular training for faith leaders.</p> <p>As regards staff/volunteers who run MJ's directly operated child and youth provision (Noam): all staff and volunteers employed directly by MJ to work with young people are required to attend safeguarding training. The training is compulsory for all staff and volunteers and is free. MJ has been running this kind of training for over 20 years. Since 2017, approximately 350 individuals have participated in this training.</p>	<p>Each local Masorti community has its own arrangements for recruitment and DBS checks. These are not supervised centrally.</p> <p>In terms of MJ's own arrangements: all MJ staff members and volunteers whose role involves access to young people as well as MJ trustees are DBS checked when they take on their role and then every three years. This includes Noam – DBS checking is part of all staff and volunteer recruitment.</p>

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<p>The Methodist Church in Great Britain (MCGB)<sup>808</sup></p>	<p>Yes. MCGB has a suite of safeguarding policy and procedural documents. There are appendices to the national policy that contain template policies for churches, Circuits and Districts. Each church, Circuit and District is obliged to have a policy that reflects the template.</p> <p>The Director of Safeguarding is responsible for proposing an annual action plan to the Safeguarding Committee, which includes developments in policies and procedures. In September 2018, the post of Safeguarding Policy and Development Officer was created in the CST.</p>	<p><b>Church, Circuit and District level:</b> Within each church, Circuit and District, there will be at least one person who is a safeguarding officer, who is responsible for leading and coordinating specific aspects of safeguarding.</p> <p><b>Church:</b> Overall responsibility for safeguarding in churches resides with the Church Council, which must appoint a safeguarding officer. This officer will liaise with Circuit and District Safeguarding Officers.</p> <p><b>Circuit:</b> The Circuit Meeting holds overall responsibility for safeguarding in the Circuit, including for the appointment of its Safeguarding Officer. The Superintendent Minister and the Circuit Safeguarding Officer work together to oversee the implementation of safeguarding policies, procedures and training requirements in churches within the Circuit.</p> <p><b>District:</b> At a District level, the District Chair and the District Policy Committee provide support and oversight for all ministers in implementing safeguarding policies and procedures in churches and Circuits. They must ensure that there is a structure to manage safeguarding concerns within the District. The District Safeguarding Officer (DSO) is employed by the District and plays a lead role in the promotion, practice and oversight of safeguarding across the District.</p> <p><b>Structure at a Connexional level:</b> There is a Connexional Safeguarding Team (CST) that oversees safeguarding at a Connexional level. In September 2018, Casework Supervisors operate at the Connexional level and supervise the work of DSOs.</p> <p>The CST is managed by the Director of Safeguarding, who reports to the Secretary of Conference and is accountable to the Safeguarding Committee. There may be up to 18 members of the Safeguarding Committee, of whom at least 10 must have relevant professional safeguarding experience.</p>	<p>Yes. MCGB commissioned an external audit of safeguarding practice in one case, although this was not a case that involved allegations of child sexual abuse. This was due to concerns arising via sources who did not feel able to support any process of complaint and it was considered that an audit would identify issues of safeguarding practice that might have contributed to the way the case was handled. CCPAS (now 31:8) was commissioned to audit the MCGB's practice.</p> <p>MCGB had a significant Past Cases Review (PCR), which took three years to complete and was completed by three independent safeguarding experts and three additional reviewers.</p>	<p>Yes. MCGB offers free safeguarding training with Foundation and Advanced Modules for those working directly with young people and those in representative roles. There are compulsory attendance requirements for each course for key groups.</p> <p>A full list of required attendees at each level is set out in policy. Failure to observe its provisions is a breach of the Methodist discipline. Each case of breach would be considered in order to reach resolution. A number of formal steps of increasing severity would be taken if the matter could not be resolved.</p> <p>Between 2017 and 2019, 42 people initially refused to attend training, most commonly pastoral visitors: 56% decided to undertake training following contact with a safeguarding officer/local minister; 23% decided to stand down from their role rather than undertake training; 16% were removed from their role. Of the remaining 5%, one was being followed up and one has undertaken training following adjustments to the delivery to facilitate their needs.</p> <p>Training is coordinated and overseen by the DSOs. They work in partnership with experienced trainers from the Methodist Learning Network to deliver the Advanced Module.</p> <p>The Foundation Module is delivered at Circuit level by volunteer trainers. All trainers are required to have attended specific training. Since July 2017, approximately 21,900 staff, volunteers and ministers have been trained in the Foundation Module. The course was originally created in consultation with the NSPCC.</p> <p>The Advanced Module was created to focus on those who might be required to take a leadership role in responding to safeguarding issues. The course is coordinated by DSOs. Since July 2017, 4,900 people have attended the Advanced Module.</p>	<p>Yes. All those required to undertake DBS checks must renew their applications every five years.</p> <p>All DBS checks for MCGB are undertaken by an independent company called Due Diligence Checking (DDC). Almost 12,000 DBS checks were processed in the last 12 months by the DDC for MCGB; 1.6% of applicants included some form of blemish or additional information, many of which were not linked to child sexual abuse.</p>

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<p><b>Muslim Council of Britain (MCB)</b><sup>809</sup></p>	<p>Yes. MCB has a 'Child and Vulnerable Adult Protection Policy'.</p> <p>MCB does not play any role in the development of child protection policies and procedures for its member organisations.</p>	<p>MCB is an umbrella body. MCB has trained and qualified DSOs who also act as advisers on safeguarding matters if required.</p>	<p>No.</p>	<p>The MCB does not provide any specific training to its members on safeguarding matters.</p>	<p>Routine DBS checks take place where relevant.</p>
<p><b>The Network of Buddhist Organisations (NBO)</b><sup>810</sup></p>	<p>Yes. NBO did adopt safeguarding policies for child protection in 2017, which were adapted from Triratna's policies.</p>	<p>Not addressed in witness statement.</p>	<p>No.</p>	<p>NBO arranged training for its member organisations in safeguarding children. The training was delivered by 31:8 in December 2018. It was basic-level training.</p>	<p>As NBO does not work with children it does not have a vetting and barring procedure in place.</p>
<p><b>Pagan Federation (PF)</b><sup>811</sup></p>	<p>Yes.</p>	<p>PF has a Committee that provides direction and guidance and is responsible for its activities. One of the members of the Committee is a Community Support Officer. There are Community Support Team managers who are under the general direction of the Community Support Officer. One of these managers is a Children and Families Officer. At present the Children and Families Officer is the internal safeguarding lead for children and young people. The Community Support Officer is the external and overall safeguarding lead.</p>	<p>Not addressed in witness statement.</p>	<p>PF is in the process of developing training opportunities for its officers on safeguarding. Under the anticipated system, the line manager of a newly appointed volunteer is responsible for taking them through key policies, including the safeguarding policy.</p> <p>PF is also developing basic online training for all volunteers to cover safeguarding of children, young people and vulnerable adults. PF's two safeguarding leads are expected to keep up to date with legal requirements and best practice and feed this into training provided to other volunteers. To facilitate this, externally provided training and CPD will be made available to them.</p>	<p>At present PF does not ask for DBS checks, partly because of the cost and partly because of the current range of activities.</p> <p>Vetting is difficult – PF has found it difficult to obtain DBS checks through the Federation, the DBS service suggesting that individuals should apply for their own DBS checks, regardless of their volunteer status.</p> <p>In positions such as hospital and prison ministry, it is an expectation that officers reveal any convictions. PF is moving towards a position where all officers are expected to disclose any criminal convictions. Currently, in many cases of events where children and young people are likely to attend, PF frequently has at least one of the event organisers who is employed in a field requiring a DBS check for working with young people in their professional lives.</p>

<sup>809</sup> MCB000001

<sup>810</sup> NBO000001

<sup>811</sup> PGF000002

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Reform Judaism (RJ) <sup>812</sup>	Yes. It was written by RJ's DSL and reviewed by its Chief Operating Officer and a solicitor. It is updated every three years or when required if legislation changes.	<p>RJ is a membership organisation to which Reform Synagogues (not individuals) affiliate through membership fees.</p> <p>Each Reform Synagogue is independent and autonomous. Each synagogue completes an annual return to RJ, which includes a requirement to confirm they have a Safeguarding Policy and a DSL. There is no authority or enforcement structure as each synagogue is an autonomous entity.</p> <p>RJ's DSL is its Wellbeing and Inclusion Manager. This is a full-time paid post, working flexible hours to respond to needs. She has an enhanced DBS check, Level 3 Safeguarding Training via SCIE and is managed by the Chief Operating Officer and Senior Rabbi.</p> <p>RJ includes RSY-Netzer – Reform Synagogue Youth – RJ's youth organisation, which offers residential day camps for children aged 5–17 led by young leaders aged 17–23.</p>	No.	<p><b>Training for synagogues</b> RJ offers its synagogues:</p> <ul style="list-style-type: none"> <li>i) access to online Safeguarding Training Level 2;</li> <li>ii) development sessions for DSLs in Reform Synagogues, who are also advised to complete the Local Authority training for this role;</li> <li>iii) awareness-raising sessions for trustees in order that they are aware of what safeguarding is and what their responsibilities as trustees are – these are led by the DSLs of RJ and Liberal Judaism jointly.</li> </ul> <p>This training is optional.</p> <p><b>Rabbinic training</b> Rabbinic training is provided by Leo Baeck College, an independent institution. RJ provides Level 1 Safeguarding training to Rabbis annually.</p> <p><b>Training within RJ</b> RJ has a Trustee Board consisting of members of Reform Synagogues, who are strongly encouraged to attend Trustee Safeguarding sessions in-house.</p> <p>RJ's DSL has completed Level 3 DSL Safeguarding Training via SCIE. She completes DSL training every three years.</p> <p><b>RSY-Netzer:</b> Welfare Officers are required to undergo safeguarding training; without this they cannot work at events. All leaders undertake Level 1 Safeguarding Training as part of their initial leadership training and they require an annual update for this. Most leaders attend in person; those unable to do so complete Educare's L2 Safeguarding Young People e-learning.</p>	<p>All leaders at RSY-Netzer camps have an enhanced DBS check every three years. Welfare Officers are also required to have an enhanced DBS check.</p> <p>Those who lead RSY-Netzer activities in individual Reform Synagogue Youth Groups also have enhanced DBS checks.</p> <p>Staff and volunteers of RJ are required to have DBS checks in accordance with National Guidelines.</p> <p>RJ's DBS checks are carried out via u-Check.</p>

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Religious Society of Friends in Britain <sup>813</sup> (Quakers)	<p>The British Yearly Meeting (BYM) has a safeguarding policy. It is not clear how many of the area meetings have a policy. Some are attached to the statement.</p> <p>Current version of BYM policies: Safeguarding Policy (June 2017); Safeguarding Procedures (March 2019).</p> <p>Not clear when previous policies were last updated.</p>	<p>Both at the national level and at the area level, Area meetings are (mostly) registered charities in their own right and legally responsible for their own safeguarding arrangements.</p> <p>At the national level, the Quaker Life Central Committee is the committee with responsibility for safeguarding.</p>	<p>In most cases, oversight is internal. Internal BYM policies rests with the trustees.</p> <p>In area meetings, oversight rests with trustees but is sometimes delegated to the area meeting safeguarding coordinator. Practice varies.</p> <p>In 2018, the BYM commissioned an external audit of its safeguarding practices, partly in response to concerns raised by a staff member. In late spring 2019, BYM commissioned an external audit of its historic safeguarding records. The work is ongoing.</p> <p>There is no regular pattern of external audit nationally or at the area level.</p>	<p>At BYM level: JNC qualification is mandatory for certain roles.</p> <p>BYM organises a non-mandatory biannual conference for area meeting safeguarding coordinators.</p> <p>Local meetings: Volunteers are not required to undertake any training.</p>	<p>DBS checks are carried out on those who directly support children's activities/ are involved in regulated activity but not routinely on elders, overseers and clerks who don't meet these criteria. DBS checking is administered by an external organisation, Due Diligence Checking (DDC).</p>

<sup>813</sup> QUA000001; QUA000014; QUA000021

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Salvation Army (SA) <sup>814</sup>	'Safe & Sound'. Each SA Church is required to adhere to the policy. See para 116 for list of policies.	Hierarchical structure. <b>Local:</b> Each local Church has a Commanding Officer (CO) who is its head. They are the safeguarding lead for the Church. Volunteer local officers may be appointed to assist. <b>Regional:</b> The Divisional Commander (DC) is the safeguarding lead for the region. They will appoint a number of Area Safeguarding Advisers (ASAs) to assist. Direction, training and support for the ASAs are given by the Safeguarding Department (the territorial, ie national, HQ) <b>National:</b> Director of Safeguarding (Dean Juster) leads a team of staff – Safeguarding Department.	There are internal audits. There is an Internal Audit Department. Safeguarding Audit of every SA Church carried out every three years. In 2011 an external inspection of the SA UK Territory child protection policies, processes, practices and procedures was voluntarily commissioned. It was carried out by Praesidium Inc, a US-based risk-management company.	Yes, mostly mandatory. Divisional Youth Specialist (paid youth worker) will assist in providing child protection training. Safeguarding Department writes and provides child protection training for all personnel. The CO is required to facilitate the safeguarding Level 1 training course 'Safe & Sound for Everyone' for all members of the congregation.	Yes. SA has assessed all of its role and job descriptions for whether the criteria are met for a DBS check and the level of check required. Local Officers are checked prior to appointment. All staff and volunteers at events are required to have a DBS check.
Shree Hindu Temple and Community Centre (SHTCC) <sup>815</sup>	Yes, there are various policies which were last updated in November 2019. Unclear when first created.	There is a management committee consisting of three trustees, six office bearers and a committee of up to 11 members and a further five co-members who are elected and appointed at the AGM. An officer responsible for child protection and safeguarding, ie a DSO, is not currently in place. Any concerns are referred to the SHTCC Office. Currently no system in place for recording disclosures, concerns or allegations of child sexual abuse/child abuse, or managing any such concerns and allegations.	No.	No formal training relating to child protection or child sexual abuse has taken place at the SHTCC. There are informal arrangements that include verbal instruction to refer to the team leader if any concerns or allegations arise.	It appears not. DBS checks are in the process of being updated for all SHTCC staff, Office Bearers and Committee Members.

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The S&P Sephardi Community (S&PSC) <sup>816</sup>	<p>Yes. In September 2017, a child protection and safeguarding policy was implemented by S&amp;PSC following a review with Reshet.</p> <p>The revised Safeguarding Children policy was produced in November 2019 and is available on the community website. All staff and lay leaders have been made aware of the policy, which they have been encouraged to read and understand.</p>	<p>The community is a three-synagogue model that is managed through a central office responsible for the back-end office processes. There are three Rabbis who preside over the three synagogues and who are responsible for the ecclesiastical services and pastoral care of their own local community, in addition to a Senior Rabbi who serves across all three communities.</p> <p>There are nine corporate trustees who have overall accountability for the charity. They are elected according to a defined set of rules. The responsibility for day-to-day operations and running of the charity is delegated to the Chief Executive. The Chief Executive works closely with and is line-managed by the President of the Board.</p> <p>A nominated trustee from the Board of Trustees is the safeguarding link trustee. He has overall accountability for overseeing and ensuring child protection and safeguarding policies and processes are in place in the charity.</p> <p>The Chief Operating Officer, who joined in November 2018, is the deputy DSL. He is responsible for ensuring that all members of staff who work with or who come into contact with children on a regular basis are appropriately recruited and adequately trained.</p> <p>At the Sunday school, the Rabbi who oversees the school is the DSL.</p>	Not addressed in witness statement.	<p>The nominated safeguarding trustee is in the process of receiving safeguarding training using the NSPCC child protection for school governors online course.</p> <p>In November 2015 all S&amp;PSC Rabbis were invited to a seminar on child protection. This was an interactive session attended not just by Rabbis and lay leaders but also Barnet's dedicated team of social workers and police officers to explain the role of the statutory authorities and the charity's interaction with them. All Rabbis from S&amp;PSC attended the training day.</p> <p>In September 2017, following discussions with Reshet, safeguarding training was delivered for key members of the volunteer community who had regular contact with children. The course was provided and delivered by SCIE. The training was also attended by the Rabbi who has overall responsibility for the Sunday school. A further course on Vulnerable Adults was also provided a week later.</p> <p>The Chief Operating Officer is the deputy DSL. He completed training in the NSPCC Child Protection for Schools and NSPCC Safe Recruitment in Education online courses in November 2019.</p> <p>At the Sunday schools, the Rabbi who oversees the school is the DSL. He completed training in 2017 and November 2019. All teachers at the Sunday school have mandatory training on safeguarding children as part of their induction process. All new teachers would be expected to attend the course. Failure to attend the course would be a disciplinary offence unless there were reasonable grounds. Staff would not be allowed to commence work until the training was completed.</p> <p>All Dayanim (judges in the Sephardi Beth Din) were to have completed training in 'an introduction to child protection' (NSPCC online) by December 2019.</p>	<p>All those working in the Sunday school have enhanced DBS checks prior to employment.</p> <p>Whether a new faith leader is employed or a new member of staff, if the role meets the criteria for an Enhanced DBS, the individual would be subject to a check.</p>

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Triratna Buddhist Order and Community (TBOC) <sup>817</sup>	<p>Yes. Published first model safeguarding policies for the protection of children and adults in 2015.</p> <p>In 2015, every centre and retreat centre in the UK was advised to adopt its own policies. As far as is known, nearly 100% compliance was achieved.</p> <p>TBOC's model policies for 2019 are available on their main web platform.</p>	<p>Formal, centralised safeguarding work began in TBOC in 2015, though some individual TBOC charities already had policies in place before that time.</p> <p>In 2015, every centre and retreat centre in the UK was advised to appoint its own safeguarding officer. As far as is known, nearly 100% compliance was achieved. Some large centres appointed two safeguarding officers.</p> <p>From 2016, TBOC employed a central safeguarding officer with responsibility for maintaining TBOC's policies and other guidance. This central safeguarding officer is employed by the TBOC Chairs' Assembly, a charity run by the chairs of all of TBOC's centres and retreat centres in Europe.</p> <p>In 2017, she was joined by a member of the Order who is very senior in the probation service and who works as a voluntary adviser.</p> <p>The central TBOC safeguarding team provides the safeguarding officers and chairs of centres/retreat centres with advice, model policies and guidance documents.</p> <p>The TBOC safeguarding team is part of the TBOC Ethics Kula, which meets several times a year, online and in person, to discuss key cases and policy and where necessary to oversee any disciplinary proceedings. The Ethics Kula includes two members of the body that oversees TBOC's ordinations and overall spiritual direction: the College of Public Preceptors. This ensures that safeguarding is kept on the agenda at the highest level.</p> <p>The safeguarding team is autonomous to the extent that it will report concerns to the police independent of others' thoughts on the matter.</p>	<p>TBOC's safeguarding, including child protection provision, is just four years old and TBOC is still in the setting-up phase.</p> <p>In May 2019, TBOC approached SCIE, asking them to:</p> <ol style="list-style-type: none"> <li>review its safeguarding procedures and policies overall;</li> <li>conduct a Serious Case Review of TBOC's handling of a particular case;</li> <li>advise on the introduction of an external reporting service.</li> </ol> <p>TBOC was to talk further with SCIE in October 2019.</p>	<p>Training is offered regularly, and is strongly recommended, to all safeguarding officers, trustees and others who run centres. It is not compulsory.</p> <p>In 2016, TBOC's safeguarding officer put on two national training days for TBOC safeguarding officers and trustees: one on child protection and one on safeguarding adults, with a trainer from 31:8.</p> <p>Many TBOC safeguarding officers and trustees have attended training days put on by the Network of Buddhist Organisations UK using the same trainer from 31:8.</p> <p>All TBOC safeguarding officers have been sent details of low-cost online child protection training provided by the NSPCC.</p> <p>TBOC's central safeguarding officer ran free training sessions with six leadership groups within TBOC during 2018.</p>	<p>Guidance is given as follows:</p> <p><i>"Where members of TBOC work with children, paid or as volunteers, regularly or on a one-off event, they must have an enhanced DBS check and this is applied for by the relevant charity ..."</i></p>
Union of Orthodox Hebrew Congregations (UOHC) <sup>818</sup>	<p>Not being a provider of services for children, UOHC has not in the past had a child protection policy.</p>	<p>Not addressed in witness statement.</p>	No.	<p>UOHC does not operate synagogues or appoint congregational rabbis. Thus UOHC does not provide child protection training to rabbis.</p> <p>Interlink Foundation has been active in the last decade in promoting strong safeguarding practice in community settings and UOHC has supported its work.</p>	<p>UOHC provides a DBS check facility whereby the UOHC assists community organisations to carry out DBS checks on staff and volunteers.</p>

817 TBO000001

818 OHC000001; OHC000007; OHC000009



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<p><b>United Reformed Church (URC)</b><sup>819</sup></p>	<p>Yes. There are currently three main documents that provide detailed guidance on URC's child protection and safeguarding adults and signpost people to further resources, specialised information and support.</p> <p>This is being replaced by the next edition of URC's safeguarding policy, <i>Good Practice 5: Safeguarding for Children and Adults at Risk</i>. This will constitute the only safeguarding policy and guidance document for all levels of URC and combine best practice on all forms of abuse and practices of safeguarding.</p>	<p>URC has a conciliar structure: authority and governance is administered through the councils of the URC. These are the local church and elders meeting (local level), synods (regional in England and one in Wales) and General Assembly (the denomination's key decision-making body). The General Assembly meets biannually (annually after 2020) and acts through its executive body, Mission Council.</p> <p>At the local level, responsibility for child protection and safeguarding in general rests with each local church and its elders, who need to ensure that safeguarding coordinators are appointed as the designated safeguarding people for the whole congregation. Local churches also appoint a Church Safeguarding Coordinator (CSC) and a deputy if possible.</p> <p>At Synod level, there are Synod Safeguarding Officers (SSO). SSOs are responsible for overseeing all aspects of safeguarding in the Synod, maintaining a register of local CSCs, organising and delivering safeguarding training across the Synod and monitoring how local churches are organising safeguarding by asking them to fill in annual church returns.</p> <p>When a child protection concern or issue occurs, the SSO is the first point of contact for all local churches in the Synod. The SSO liaises directly with the CSC to establish the full facts and ensure that a URC Incident Reporting Form is completed. The role of the SSO is to guide and advise the CSC.</p> <p>At the denominational level, the Safeguarding Advisory Group (SAG) is the main safeguarding advisory body of URC. Its role is to oversee the development and implementation of safeguarding policies across the whole denomination. The Synod Safeguarding Practice Group (SSPG) meets three times per annum and comprises all SSOs and establishes and implements good practice standards for safeguarding and protection of people throughout the Synods of the URC.</p>	<p>Not addressed in witness statement.</p>	<p>31:8 has provided training for local CSCs and ministers trustees.</p> <p>Those candidates accepted for ordination with a view to eventual ministry within URC undergo training. At the beginning of their training, the candidates must undertake safeguarding training before starting any placements.</p> <p>There is a requirement for SSOs to be professionally qualified or qualified by experience in safeguarding children and adults at risk. SSOs normally hold a relevant qualification, have extensive experience in similar or relevant fields of work or are level 3 (or above) trained in child protection and safeguarding. They are required to keep current in legislative and good practice and renew their training every three years.</p> <p>From 1994 onwards, URC created a range of safeguarding awareness and training materials. Training is available for Ministry of Word and Sacraments students (MWSs), Church-Related Community Workers (CRCWs), lay preachers, elders, children and youth workers, safeguarding coordinators and anyone engaged with children and young people in local church activities.</p> <p>Safeguarding training is delivered in two programmes:</p> <ul style="list-style-type: none"> <li>(i) Safer Sacred Space and (ii) Basic Safeguarding Training. Both are free to all participants.</li> <li>i) In 2015, Mission Council agreed that the first mandatory training for MWSs and CRCWs was Safer Sacred Space. Since then, Safer Sacred Space has been the only compulsory training that is focussed on safe boundaries and includes safeguarding awareness. Failure to attend Safer Sacred Space training is a disciplinary offence. Since 2017, 120 MWSs and CRCWs have attended initial or refresher training.</li> <li>ii) Basic Safeguarding Training is run by synods. It may be delivered by the SSO or by a separate trainer. In 2018, Mission Council, in alignment with the recommendations of the PCR report, agreed that safeguarding training is mandatory for MSWs and CRCWs and those working with children and young people. Since 2017, 2,793 individuals in England and Wales have attended URC's safeguarding training.</li> </ul> <p>Child protection and safeguarding training is not compulsory for elders or lay people responsible for delivering collective worship or having pastoral authority over others.</p>	<p>Those candidates accepted for ordination with a view to eventual ministry within URC are subject to a DBS check when they begin their training. A further check is made before their first appointment and at five-yearly intervals thereafter.</p> <p>Those who are seeking to appoint individuals to work with children – whether at local, synod or denominational level – are required to request a DBS check of the appropriate kind. URC administrators DBS checks through the umbrella body Due Diligence Checking Ltd (DDC). The eligibility for a DBS check for URC job roles has recently been reassessed to conform to current legislation.</p> <p>DBS checks are carried out for all paid staff and volunteers involved in working with young people, including MWSs, CRCWs, children's and youth workers. DBS checks are also carried out for all those who want to become ministers in the Church. All students are checked before they start training.</p>

Organisation	Child protection policies	Brief overview of overall structure and child protection structure	External audits	Training	Disclosure and Barring Service (DBS) checks
United Reformed Church (URC) - continued				URC is currently developing the framework of safeguarding training across the denomination to ensure a standardised approach to training and development for all those engaged with children in the life of URC.	
United Synagogue (US) <sup>820</sup>	<p>Policies in place.</p> <p>National level: The Board of US Trustees appoints various different sub-committees. These are allocated responsibility for specific areas. There is no child protection or safeguarding sub-committee. There is a designated Child Protection Trustee whom the professional staff inform and involve in any difficult or challenging child protection cases, as needed.</p> <p>Responsibility for all child protection matters is taken centrally by the Centre [the US administrative centre] and as such all ultimate decisions are made by the Centre. Within the Centre there is a Safeguarding Team that comprises a Child Protection Officer, a Head of Safeguarding and three other named individuals. The Child Protection Officer is the designated named person for safeguarding children and young people within the organisation and has lead responsibility at a strategic level. The Head of Safeguarding acts as a source of advice, support and expertise to all representatives on matters of safeguarding and takes lead responsibility on all reported concerns and child protection referrals. There is also a Child Protection Coordinator who deals with vetting and training staff. That person also records attendance at training and makes checks as to the watching of the video and reading of the policy by employees/volunteers.</p> <p>Local level: On a local level, there are Community Safeguarding Coordinators (CSCs) who are tasked with being US's 'eyes and ears' in the community and with dealing with any safeguarding concerns within the community.</p>	<p>Not addressed in witness statement.</p>	<p>Every US Trustee who is elected undertakes an induction process, which includes exploring issues of safeguarding, watching a child protection video and reading the child protection policy.</p> <p>Approximately four times each year, Child Protection Awareness training sessions are convened. This training has been mandatory since November 2015 for all employees who interact with children. It is delivered by Education Child Protection, a specialist training company. Attendance once every three years at one of the training sessions is compulsory for all US employees who may require any level of DBS check. The Centre Safeguarding Team attends this training every three years.</p> <p>DSL/Advanced training is provided for those in 'The Centre' staff child protection team. Each of these employees is required to repeat this training every two years.</p> <p>Should a member of staff not cooperate with the requirement to have a DBS check or not attend the required training, it is a disciplinary offence. They would be suspended without pay until such time as they have rectified the situation.</p>	<p>US aims that all volunteers whose role involves unsupervised contact with children will be subjected to a DBS check. US acts on the basis that the correct criterion for a DBS check is a person who might have unsupervised contact with a child.</p> <p>All those who are recruited to senior positions in US, including all Rabbis and any employees and volunteers who have contact with children, are subject to DBS checks and required to attend the training.</p> <p>Employment of staff: US uses a service provided by GBG Online Disclosures, which is a criminal record-checking provider. In partnership with GBG, a list of US job titles requiring DBS checks was compiled and the level of check required for each role – basic or enhanced – was identified. All employees of US are employed centrally; DBS checks are carried out in relation to all individuals who are offered employment by US in one of the roles identified in the list.</p> <p>Volunteers There are volunteers who help with either central (Centre) or local (individual synagogue-led) initiatives. For local initiatives, the Centre relies on the individual synagogues to inform them of who the volunteers are and what their roles entail. All volunteers whose roles require it (as identified by GBG) are subject to a DBS check.</p>	

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Organisation	Child protection policies	Brief overview of overall structure and child protection structure	External audits	Training	Disclosure and Barring Service (DBS) checks
Vishwa Hindu Parishad UK (VHP) <sup>821</sup>	All branches have safeguarding policies in place. The policies are at a local level.	<p>The VHP has branches all around England. Each branch has a Local Management Committee, which reports to the Central Working Committee and the Board of Trustees.</p> <p>Each branch has one person in charge in relation to child protection. If there were any allegations of complaints, this would be reported to the person in charge.</p>	Not addressed in witness statement.	<p>The volunteers at VHP are not specifically trained. Training differs in each branch. Each branch offers local Council training to any volunteers who would like training or any further training. Training is not compulsory as the staff at VHP are all volunteers. Any training that is offered is free.</p> <p>Three years ago VHP invited the National Hindu Welfare Association to talk to parents and teenagers to raise awareness on grooming. This will be repeated as and when awareness is needed.</p>	<p>It is recommended that all staff are DBS certified, especially those who interact with children.</p> <p>All volunteers who interact with children are DBS certified.</p>

# Annex 4

## Schedule of evidence from religious organisations about external regulation

Organisation	Experience of the disclosure and barring regime	Charity Commission (CC) registration	Charity Commission (CC) and possible regulation	Common standards and common training	Mandatory reporting	Statutory guidance documents	Regulation of out-of-school settings
Bahá'í Community of the UK	<p>Challenges in ensuring vetting and barring of all who work with children:</p> <ul style="list-style-type: none"> <li>Some think that the DBS checks they have from their professional role are sufficient, and further checks are not required.</li> <li>It is difficult to be aware of every under 18 activity that is taking place in local communities.</li> <li>Individuals not renewing their DBS certificate on time.</li> </ul> <p>Definition of 'regulated activity' is sufficiently clear to know who should be checked and on what basis.</p>	National Spiritual Assembly of the Bahá'ís of the UK is registered as a charity.	It should be mandatory that religions have in place certain minimum standards and/or have certain practices and policies.	<p>It would be helpful to have access to a set of common training materials and model policies – especially a model set of questions and answers dealing with common child protection issues.</p> <p>Auditing would be best done by a non-religious body.</p>	Agree that there ought to be mandatory reporting. Bahá'í policy states that allegations should be reported to the police.	Not stated – though parts of <i>Working Together to Safeguard Children (Working Together)</i> are written into the safeguarding policy.	<p>Agree that in the interest of safeguarding and child protection there should be registration of those religious settings that provide religious instruction for those under the age of 18.</p> <p>The voluntary code is "very <i>comprehensive and the content and advice clearly set out and accessible</i>". The proposals seem to be very adequate and the Bahá'í community of the UK would not have any concerns or objections to the introduction of the Department for Education's (DfE) code.</p>
BAPS Shri Swaminarayan Mandir (BAPS)	Not addressed in witness statement.	BAPS is a registered charity.	BAPS has had no interaction with the CC. It has not been the subject of any compliance action and it has not referred any matters to the CC in relation to child protection issues.  Views on CC/regulation are not addressed in witness statement.	Not addressed in witness statement.	Not addressed in witness statement.	Not addressed in witness statement.	Not addressed in witness statement.

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Organisation	Experience of the disclosure and barring regime	Charity Commission (CC) registration	Charity Commission (CC) and possible regulation	Common standards and common training	Mandatory reporting	Statutory guidance documents	Regulation of out-of-school settings
<p><b>Baptist Union of Great Britain (BUGB)</b></p>	<p>Ongoing challenge to ensure that all those who should be checked are submitting to a DBS check.</p> <p>Common messages from churches who do not want to check their workers and volunteers are:</p> <ul style="list-style-type: none"> <li>• a sense that requiring a DBS check is doubting someone's integrity or trustworthiness;</li> <li>• a worry about the disclosure of old offences that are not relevant to their suitability to work with children (eg petty theft offences);</li> <li>• unfamiliarity with up-to-date safeguarding requirements and practices;</li> <li>• a desire to keep doing things 'the old way'.</li> </ul> <p>Current definition of 'regulated activity' is sufficiently clear. Need for greater clarity as regards to whether it is necessary for checks to be done on all church trustees. Does not find the current DBS checking system to be onerous and has valued the move to an efficient online checking system.</p>	<p>BUGB is an unincorporated association that is registered with the CC.</p> <p>BUGB is in the process of changing its legal structure and transferring its assets, liabilities, etc to a Charitable Organisation (CIO), which will be a registered charity.</p> <p>BUGB is an umbrella body. Each local Baptist church is autonomous and is a separate charity in law. Around 1,400 of the Baptist member churches are exempt from registration with the CC.</p>	<p>Do not wish to make any comment about the effectiveness of the CC in regulating religious communities. Have not had sufficient contact with the CC to be able to come to an informed view.</p> <p>Considers that the current arrangements for regulation of child protection in religious organisations and settings are adequate, with one exception: the need to extend the position of trust legislation to cover the work of ministers, other paid church workers, and volunteers who hold positions of authority. Distinction drawn between (i) ministers and paid workers in positions of authority and (ii) unpaid workers and volunteers in positions of authority.</p> <p>The position of trust legislation should be extended to cover the work of all ministers and paid church workers who hold positions of authority or leadership.</p> <p>Regarding registration and inspection service, whilst the rationale for this is understood, BUGB thinks that the necessary bureaucracy of such a service would prevent many churches from starting new children and youth programmes. It would mean that many existing activities would cease.</p>	<p>BUGB has a suite of training materials. They are happy to share these with other organisations if it will help them move forward in their safeguarding practices.</p> <p>Many smaller religious organisations do not have the money or resources to carry out work developing safeguarding materials. BUGB sees the value of the availability of a 'default' training programme and materials. However, BUGB would not want to replace its own bespoke training and materials with a generic set. BUGB has worked hard to tailor its materials and training to fit the way that Baptist churches operate and to work in line with Baptist church governance arrangements.</p> <p>Regarding common policies, procedures and information, BUGB sees that there would be real value in models and templates specifically constructed for use in religious organisations and settings. However, these are used to design them in such a way that they can be tailored and shaped to fit the particular organisation in question.</p>	<p>Agree with mandatory reporting and that concealment of abuse is a criminal offence if admission has been made/if there are internal disciplinary findings. BUGB's own disciplinary code for accredited ministers makes it clear that failure to report/concealing abuse will lead to removal of accreditation.</p>	<p>BUGB continues to find <i>Working Together</i> and <i>Keeping children safe in education</i> to be helpful guidance on good practice and safer recruitment.</p>	<p>Supports a voluntary code in respect of child protection in out-of-school settings that provide tuition in someone's religious faith.</p> <p>The draft version of the voluntary code is helpful and well written in terms of supporting those in smaller organisations. The main sections are already covered in BUGB's own safeguarding guides, and BUGB would be happy to support the extension of this voluntary code to religious organisations.</p>

Organisation	Experience of the disclosure and barring regime	Charity Commission (CC) registration	Charity Commission (CC) and possible regulation	Common standards and common training	Mandatory reporting	Statutory guidance documents	Regulation of out-of-school settings
Baptist Union of Great Britain (BUGB) - <i>continued</i>			Strongly supports the extension of the current positions of trust definitions to include accredited ministers and other paid workers in churches whose roles involve working with children and young persons.	Regarding common qualification, it would be helpful to have a set of qualifications that are suitable for those who take on senior national or regional responsibilities for safeguarding in their religious organisations.  Regarding minimum standards, these would be helpful. There are already standards that apply in terms of statute and in guidance from the CC.			

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Organisation	Experience of the disclosure and barring regime	Charity Commission (CC) registration	Charity Commission (CC) and possible regulation	Common standards and common training	Mandatory reporting	Statutory guidance documents	Regulation of out-of-school settings
Chabad Lubavitch UK (CL)	<p>Within the wider charity sector, not just within CL, there is a tendency to err on the side of caution and seek DBS checks in any case where it is felt that they might be needed. Less well understood and less frequently used is the Update Service. The concern is that a DBS check, unless it is updated and can be checked in real time online by an employer, is just a snapshot of a person's fitness for a role at a given time and can become outdated. It would be better if it was always possible to see updated records as a matter of course.</p>	<p>CL is a registered charity.</p>	<p>It is recognised that the CC is known to be under-resourced and is already responsible for every aspect of charity regulation, from registration to ongoing governance.</p>	<p>It is not clear how uniform or standardised a set of training materials could be for religious organisations that, even in the case of CL, operate across so many different spheres. A one-size-fits-all approach would not be effective, even if targeted at religious organisations, and paradoxically may lead to organisations adopting policies and practices that are less well suited to their particular circumstances than currently. That said, there are common themes that could be the subject of broad guidelines and workshops.</p> <p>Religious organisations should be subject to the same minimum standards as any other organisation. There does not seem to be a lack of regulation, but it is important that what currently exists is made applicable and relevant to the different ways in which organisations of all types engage with children and child protection.</p>	<p>Not addressed as part of witness statement.</p>	<p>It would be helpful to have workshops that make these documents less daunting for religious organisations. These sessions could be run by organisations like the NSPCC, Reshet and Interlink. Funding should be made available to such organisations.</p>	<p>The DfE consultation makes important recommendations for promoting an understanding of child protection issues. CL has already implemented these recommendations by adopting safeguarding policies, recruitment, vetting and training regimes – but it welcomes the extension of this best practice to other out-of-school settings where children may be at risk.</p> <p>The size and scope of such guidelines, taken together with the existing statutory guidelines, can be overbearing and inaccessible to exactly the kinds of small and less well-resourced organisations that need them the most. Thus facilities should exist for locally organised and affordable workshops and training.</p> <p>These should relate not simply to the training required for designated safeguarding leads (DSLs) or frontline staff but also for management/trustees to understand which regulations apply to them and what they must and should do as a matter of best practice.</p>

Organisation	Experience of the disclosure and barring regime	Charity Commission (CC) registration	Charity Commission (CC) and possible regulation	Common standards and common training	Mandatory reporting	Statutory guidance documents	Regulation of out-of-school settings
Christian Congregation of Jehovah's Witnesses (JW)	The current definition of 'regulated activity' in the Safeguarding Vulnerable Groups Act (SVGA) 2006 is sufficiently clear.	Yes.	<p>In the past 10 years JW has made 24 serious incident reports to the CC. In some cases, the CC initially replied demanding information and threatening action against the congregation charity, but when the charity replied and provided the requested information there was no response for many months or years. <i>"This unfortunate delay by the [CC] has the effect of stigmatising the congregation charity and trustees, leaving them in a position of perpetual uncertainty"</i>.</p> <p>JW is critical of the two statutory inquiries. Regarding Watch Tower Bible (WTB) inquiry: states that internal memos circulated within the CC described the inquiry as a 'fishing' exercise or a 'look-see' inquiry. Allegedly premises on unidentified complaints, which have never been disclosed to WTB. During the inquiry, the CC sought to investigate a broad range of non-inquiry issues. Inquiry process has been spasmodic. WTB received no substantive correspondence from the CC for nearly one year from October 2018 to September 2019.</p>	<p>JW does not consider that a 'common qualification' for all faith leaders related to 'child protection within a religious organisation' would be necessary for elders in the congregations given that congregations do not provide any activities that separate children from their parents.</p> <p>JW believes that congregation elders must meet the ecclesiastical qualifications set out in the Bible. Sufficient training is provided to elders in the child safeguarding policy, commensurate with their congregation role. JW would carefully consider any common set of training materials, model policies or question and answer sheets that the inquiry may recommend.</p> <p>JW does not provide services that separate children from their parents and is therefore unable to comment meaningfully on mandatory minimum standards, practices and policies and on the question of compulsory training for volunteers providing such services.</p>	JW defers to the Inquiry's expertise on this question and will comply with any mandatory reporting law.	JW does not provide services that separate children from their parents and is therefore unable to comment meaningfully on the current statutory guidance documents.	JW does not provide services that separate children from their parents and is therefore unable to comment meaningfully on the DfE code.



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Organisation	Experience of the disclosure and barring regime	Charity Commission (CC) registration	Charity Commission (CC) and possible regulation	Common standards and common training	Mandatory reporting	Statutory guidance documents	Regulation of out-of-school settings
Christian Congregation of Jehovah's Witnesses (JW) – <i>continued</i>			<p>There have been five different lead investigators on the inquiry.</p> <p>There are serious questions regarding whether CC is well suited to dealing with child safeguarding issues. Issues with the WTB inquiry:</p> <ul style="list-style-type: none"> <li>i) CC has never disclosed the specific allegations against WTB;</li> <li>ii) no allegations have been brought against the trustees themselves or members of WTB regarding safeguarding;</li> <li>iii) the inquiry has consumed an inordinate amount of charitable time and resources; and</li> <li>iv) inordinate length of inquiry has caused and continues to cause reputational damage.</li> </ul>				

Organisation	Experience of the disclosure and barring regime	Charity Commission (CC) registration	Charity Commission (CC) and possible regulation	Common standards and common training	Mandatory reporting	Statutory guidance documents	Regulation of out-of-school settings
The Church of Jesus Christ of Latter-day Saints (CJCLDS)	Not addressed in witness statement.	Yes – CJCLDS is a registered charity.	CJCLDS is supportive of the role and approach of the CC in dealing with safeguarding issues in charities. The CC is clear in its declared aim, shared by CJCLDS, to make sure that charities that work with or provide services to vulnerable beneficiaries comply with their legal duties, and take reasonable steps to protect them from harm and minimise the risk of abuse.	CJCLDS would welcome the opportunity to explore with other religious organisations in England and Wales common sets of training materials, model sets of policies and the like, provided that any model procedure or uniform child protection policies, procedures and training are consistent with the theologies, practices and procedures of the individual faiths by whom they are adopted and applied. Given the breadth of religions, it may be that agreed training materials etc are available for use by religious organisations on a voluntary rather than a mandatory basis.	CJCLDS will implement and follow any compulsory requirement on it to refer allegations or suspicions of child sexual abuse to statutory authorities. The preference of CJCLDS would be to work cooperatively with local safeguarding partners to keep children safe. It is the experience of CJCLDS, anecdotally, working with children in jurisdictions around the world, that where reporting to the authorities by the bishop or stake president is mandated, then the incidence of disclosure to the bishop or stake president by the victim/the perpetrator family/the perpetrator is negatively impacted, ie the ability of CJCLDS to protect and promote the welfare of children, including identifying children at risk, is reduced as disclosure of abuse to CJCLDS is curtailed for fear of immediate disclosure to the authorities.	The guidance in <i>Working Together</i> 2018 is welcomed by CJCLDS, in particular the guidance on information-sharing with the designated officer and making referrals to children's social care or the police.	Not addressed in witness statement.

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Organisation	Experience of the disclosure and barring regime	Charity Commission (CC) registration	Charity Commission (CC) and possible regulation	Common standards and common training	Mandatory reporting	Statutory guidance documents	Regulation of out-of-school settings
Church of Scientology (CS)	Not addressed in witness statement.	CS Religious Education College Inc is a charity registered with the Australian Charities and Not-for-profits Charity Commission (ABN). It owns and is responsible for Churches of Scientology in England.  CS does not fall under the remit of the CC for England and Wales.	Not addressed in witness statement.	CS would welcome some common materials and some common training requirements, provided these were not too heavy handed.  It is important that children themselves receive some education on what adult behaviour is unacceptable and have a safe way of reporting this. This would best be done through schools rather than religious organisations.	Not addressed in witness statement.	Not addressed in witness statement.	Not addressed in witness statement.

Organisation	Experience of the disclosure and barring regime	Charity Commission (CC) registration	Charity Commission (CC) and possible regulation	Common standards and common training	Mandatory reporting	Statutory guidance documents	Regulation of out-of-school settings
The Council of African and Afro-Caribbean Churches UK (CACC)	<p>'Regulated activity' should be simply listed. Churches are not lawyers. Law quotes do not help understanding. All should be vetted for the safety of the communities.</p> <p>The speed of the process is an issue. One application took three months – it is not clear why.</p>	<p>CACC is not yet registered – it is in the process of doing so.</p> <p>Members are normally registered charities or companies limited by guarantee.</p>	<p>CACC does not think that the CC understands the spiritual aspect of religious organisations, especially churches.</p> <p>CACC has never seen the CC as regulators of child protection in the Church. However, the fact that the CC makes CACC produce and think about a safeguarding policy is a good thing.</p> <p>CACC believes that the CC only regulates its money and properties, which sometimes upsets CACC.</p> <p>CACC does not know what regulatory oversight is provided by the CC, apart from the CC making sure that a policy is in place.</p> <p>CACC considers that a body that is religious in nature – a body ecumenical enough to understand other traditions in a religious environment – should be set up to audit and inspect when necessary.</p>	<p>The main barrier to training is financial. It would help if training could be sponsored.</p> <p>Religious organisations are already inundated with registrations and inspections. CACC does not want any more additions.</p> <p>The Church needs to be trained in auditing and inspection. Many are very ignorant of what is required, apart from being referred to a website to read laws and regulations. Training sessions carefully planned for the ministers and officers in charge would help. Then, if and when inspectors or auditors were sent periodically, CACC would be ready because it would already know what is required of it.</p> <p>CACC would certainly appreciate not only a common set of training materials but also practical training for all religious organisations and settings on identifying and preventing child sexual abuse. A model set of policies on managing child protection and dealing with allegations would be greatly helpful and highly appreciated.</p>	<p>It should not be mandatory to report on the basis of an allegation or suspicion. If an allegation has been proved and admitted then it must be mandatory to report it. It should then be a criminal offence to conceal the matter and the evidence.</p>	<p>Good and helpful, though quite elaborate.</p>	<p>CACC does not have the experience to advise on the DfE Code.</p>

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Organisation	Experience of the disclosure and barring regime	Charity Commission (CC) registration	Charity Commission (CC) and possible regulation	Common standards and common training	Mandatory reporting	Statutory guidance documents	Regulation of out-of-school settings
The Council of African and Afro-Caribbean Churches UK (CACC) – <i>continued</i>				<p>A model question and answer sheet dealing with common issues in respect of child protection (eg data protection, information-sharing) would also be very helpful. A common qualification for all faith leaders to undertake on child protection within a religious organisation and that should incorporate all the requirements mentioned above would be helpful and appreciated.</p> <p>As regards minimum standards, CACC already has the Bible, which binds it to a very high standard in all that it does. The only standard that would make sense would be going through all the training and acquiring the certificate needed, which will certify a person's ability to do the work required of him or her.</p>			

Organisation	Experience of the disclosure and barring regime	Charity Commission (CC) registration	Charity Commission (CC) and possible regulation	Common standards and common training	Mandatory reporting	Statutory guidance documents	Regulation of out-of-school settings
<b>Council for Mosques (Bradford) (CFM)</b>	<p>Challenges arise from the voluntary nature of member organisations and the impact this has on consistency and quality of resources available to member organisations. There is varied understanding, approach and practice among member organisations towards safeguarding requirements.</p> <p>CFM does not feel it is best placed to comment on the appropriateness of the current system of vetting and barring in respect of its member organisations.</p>	No. But one of its delivery arms, Khidmat Centres, is a registered charity. Its other delivery arm, CFM (Bereavement Services), is in the process of being registered with the CC.	CFM does not feel it can comment on this given the absence of interaction between CFM and the CC in connection with child protection issues.	<p>There are already a number of mandatory checks and standards in respect of child protection and safeguarding that apply to the CFM's member organisations. The CFM has no oversight role in respect of its member organisations. In practice, it seems sensible to ensure that CFM's member organisations that provide services to and interact with children are subject to the same standards as other organisations in this situation.</p> <p>Institutions intended to provide facilities and services to the public should be subject to meeting minimum standards prior to being operational. It would be a good idea to try to find common standards that can be introduced for these institutions. This may help CFM's member organisations due to the voluntary nature of how they are run and staffed. If more members of the wider Islamic community are familiar with these standards in the context of their jobs, it may make these standards and responsibilities easier when they are required to follow them in a voluntary role at their mosque.</p>	CFM cannot see why there should not be compulsory obligations to refer allegations or suspicions to the relevant authorities, provided those referrals are handled with the appropriate confidence.	CFM feels unable to comment.	CFM feels unable to comment.

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Organisation	Experience of the disclosure and barring regime	Charity Commission (CC) registration	Charity Commission (CC) and possible regulation	Common standards and common training	Mandatory reporting	Statutory guidance documents	Regulation of out-of-school settings
The Druid Network (DN)	Anyone with unsupervised access to children within any organisation should/ must have an enhanced DBS check, with supervision by a person holding a current enhanced DBS certificate.	Yes, in September 2010 DN was registered as a charity.	An independent inspecting/auditing body would be able to hold religious communities and their leaders to account if registration was to be put in place and become law. This body should include those with experience of child protection issues and may include members of various religious beliefs. If such a body was to be developed, training would be needed for consistency and policies put in place to deal with all eventualities.	In the general interest and for consistency, it would be beneficial to all religious communities to have access to formal training, as regards child protection, with emphasis on being able to recognise signs of abuse in all its forms, and have a knowledge of how to elicit the information while making the child feel safe and how to report such information. Clear guidelines should be formulated to reflect this.	Concealment of allegations of abuse should be made a criminal offence.	Not addressed in witness statement.	Not addressed in witness statement.

Organisation	Experience of the disclosure and barring regime	Charity Commission (CC) registration	Charity Commission (CC) and possible regulation	Common standards and common training	Mandatory reporting	Statutory guidance documents	Regulation of out-of-school settings
Evangelical Alliance (EA)	<p>EA is generally supportive of the current system of vetting and barring. The current system is not particularly onerous, and the portability of DBS checks is helpful. The main issue is the lack of definition relating to who should be checked and at what level.</p> <p>EA considers that the term 'regulated activity' is not sufficiently clear. The guidance seems to have been designed with workplace and educational settings in mind.</p> <p>EA is supportive of the idea that there should be checks on the minister or staff members ultimately responsible for a regulated activity.</p>	EA is registered as a charity.	<p>In EA's view, the CC is as well placed as any statutory body to understand the nature of religious organisations, and is reasonably effective in this role.</p> <p>In EA's view, the CC is currently well respected and broadly commands the trust and confidence of EA's evangelical constituency members.</p> <p>Difficult for EA to make a categorical assessment of specific strengths/weaknesses of CC as a regulator in relation to child protection arrangements. However, a number of members have mentioned to the EA experiences of delayed response time and lack of support from the CC when contacted.</p> <p>The CC would benefit from better funding to enable it to discharge its current obligations with greater efficiency.</p> <p>Charities are already under significant regulatory burden and requirements on trustees increase year on year. Rather than introduce more codes, public resources would be better invested in properly resourcing the CC to provide helpful,</p>	<p>The focus should be on the nature of the work rather than on the religious settings. It is difficult to see how compulsory policies, qualifications or training could sufficiently reflect the diversity of roles within faith-based organisations.</p> <p>The EA has sought to work with the Ministry of Housing, Communities and Local Government on a package of training for faith leaders that includes child protection. EA raised the concern that 'faith leader' is a broad term and that there is a wide variety of roles of responsibility within faith groups.</p> <p>In light of the diversity of faith communities in the UK, a common set of policies, training and qualifications may be difficult to establish and coordinate. There may be merit in considering core modules that are applicable to all settings, and specific modules that relate to education, sporting or religious settings.</p>	<p>EA would be supportive in principle of moves towards mandatory reporting of allegations, but would have concerns as to how this is practically defined and applied across all aspects of civil society. Do not believe that religious leaders should be treated any differently in this regard from other leaders.</p> <p>Regarding mandatory reporting of suspicions of abuse, this is a more fraught area as suspicions are by definition more subjective. EA would be supportive of clearer guidance for all volunteers and staff as to how to respond to suspicions.</p> <p>Concealment of child sexual abuse following an admission or an internal disciplinary finding should be a criminal offence. There are practical concerns in defining who would be covered by this offence.</p>	<p><i>Working Together</i> lays a strong foundation from which all organisations can together work to safeguard children.</p> <p>While not directly applicable to charities and/or religious organisations, <i>Keeping children safe in education</i> sets out important best practice, particularly in the area of safer recruitment.</p>	<p>System of registration and inspection of religious settings that provides for those under 18 could be deeply problematic:</p> <ul style="list-style-type: none"> <li>i) Nature of religious organisations and settings vary widely.</li> <li>ii) Discriminatory to treat religious organisations and other civil groups differently.</li> <li>iii) Would become a de facto requirement to register with the state to practise one's faith.</li> </ul> <p>Definition of 'setting' within the Code was unclear. Core problem with the Code as currently drafted is that it fails to distinguish between how large/small settings fulfil their obligations.</p> <p>Code conflates issues of child protection with contested issues like extremism/fake news. These terms should be removed.</p> <p>Not in favour of a mandatory code.</p>



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Organisation	Experience of the disclosure and barring regime	Charity Commission (CC) registration	Charity Commission (CC) and possible regulation	Common standards and common training	Mandatory reporting	Statutory guidance documents	Regulation of out-of-school settings
Evangelical Alliance (EA) - <i>continued</i>			<p>tailored, specific guidance on charities' existing legal obligations and how trustees should comply, and in clarifying the current DBS regime.</p> <p>There should be consistent and equal treatment by the state of all charities and civil society organisations. Religious organisations should be subject to the same standards and rules as all other groups in civil society.</p> <p>EA does not think that auditing or inspection by an external body is a good idea.</p> <p>EA has not seen evidence that a further statutory regulator would necessarily enhance compliance with existing law. Rather, EA is concerned that it might add unnecessary costs and bureaucracy without increasing effectiveness.</p>				

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The Federation of Synagogues (FoS)	<p>The key challenge in vetting and barring is that FoS is unable to vet people running activities involving children, because they do not do it frequently enough – eg someone who runs a children's service every morning for less than an hour does not meet the threshold for regulated activity, even if they do it all year round. In such cases, FoS encourages synagogues to take other measures, eg ensuring parents of the children or other adults are present, and making sure doors, windows and blinds are open so others can see and hear what is happening.</p> <p>The definition of 'regulated activity' in relation to children is sufficiently clear for FoS to know who should be checked and on what basis.</p> <p>Those who have pastoral authority over members of a religious organisation should be required to be vetted even if they do not fulfil the requirements of regulated activity. The current system of checking is not excessively onerous on FoS. It may be more problematic for religious organisations that carry out more children's activities. FoS would be happier if the definition of regulated</p>	<p>FoS is a registered charity.</p>	<p>It is difficult to comment on the CC's effectiveness as a regulator of child protection as FoS has had no contact with it on this issue.</p> <p>Registration and inspection of religious settings might help enforce good child protection practice in some cases. Effective safeguarding is more likely to be achieved through supporting religious communities in their efforts to educate their members (particularly staff, volunteers and parents) by raising awareness and encouraging responsibility. The results of efforts achieved through collaborative working with the community, rather than through an attempt to impose this from the outside, will be most effective in achieving lasting change in community attitudes and practices.</p> <p>It is difficult to envisage what type of external auditing or inspection body would be best placed to succeed. A close understanding of and sensitivity to the particular institutions and communities being</p>	<p>FoS would find general training materials on identifying and preventing child sexual abuse, model policies and Q&amp;A sheets to be useful. Updates as to best practice progress would also be helpful. Ideally they would come in a format that religious communities could modify to accommodate their specific cultural sensitivities.</p> <p>A common qualification for all faith leaders may be of some use. It should not be mandatory as it would not be necessary for faith leaders whose congregations do not include children. If such a qualification became available, resourcing for the training would be helpful. There will likely be content that is common to all faiths, probably the more practical parts such as implementation. There might not be many specifically religious issues that apply across all faiths.</p> <p>All staff working in religious organisations should be made aware of their organisation's safeguarding policies, and how to apply these policies in their roles.</p>	<p>There is an obvious imperative to encourage everyone – not just religious leaders – to refer suspicions and allegations of child sexual abuse to statutory authorities. FoS fears that requiring religious leaders to report these matters will have the unintended consequence of deterring complainants, victims and survivors from disclosing them to their religious leaders. If someone is not yet ready to go to the authorities, but needs to confide in their Rabbi, they will be reluctant to do so if they know the Rabbi is required by law to report their conversation. This closes off a route to pastoral care for the victim. It also means that the Rabbi may remain unaware of the situation in their community and will thus be unable to take measures to prevent the perpetrator from continuing to abuse, or to bring them to justice.</p>	<p>FoS has not used <i>Working Together or Keeping children safe in education</i>.</p> <p><i>Working Together</i> is extensive; a shorter summary document would be more useful to an organisation like FoS.</p>	<p>The DfE's proposed voluntary code for child protection in out-of-school settings, which includes those providing religious and cultural tuition, is a useful tool to help educate people in providing services for children in out-of-school settings in the basics of child protection.</p> <p>The code should not be compulsory. Some small-scale tuition providers will find the advice an effective guide but may not have the resources to implement the code fully.</p>

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The Federation of Synagogues (FoS) – <i>continued</i>	activity was altered so that people working regularly with children for fewer hours could be vetted.		<p>inspected would be crucial, so this suggests a body of a religious nature. Even for the relatively modest numbers in the UK Jewish community, it would be difficult to set up such a body that would be accepted by the range of institutions with their various religious and cultural traditions and practices.</p> <p>Many religious organisations are registered charities and have mandatory standards, policies and practices. It is worth considering whether all religious organisations should be subject to these, regardless of charitable status.</p>	<p>Those who work with children and young people and those in positions of authority should have more detailed training.</p> <p>This should apply to volunteers as well as staff. Those working with children should be trained in how to recognise signs of child sexual abuse, how to respond to issues that may be raised and who to report them to.</p>	FoS would be against making concealment a criminal offence for religious leaders.		

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General Assembly of Unitarian and Free Christian Churches (GAUFCC)	GAUFCC faces little in the way of challenge when it comes to DBS checks. There is capacity to manage the process (in the form of the Lead Recruiter). The support offered by thirtyone:eight is very good. Potential volunteers understand the need to carry out DBS checks.  Within the wider membership, issues arise when safeguarding leads are not sufficiently informed of best practice and the need for DBS checks. Some safeguarding leads are uncomfortable asking volunteers to undergo checks, especially when there is a longstanding relationship with the volunteer. Some see the process as bureaucratic and may be intimidated by the official systems/process. It can generally be seen as an onerous step and is not typically framed in a way that motivates people to do it.  GAUFCC recommends that the term 'regulated activity' could be defined simply as 'any activity which involves supporting children and vulnerable adults'. It is easier to understand. All those who meet the definition should be subject to vetting checks – clear and simple for volunteer safeguarding leads to understand.	Yes, since 1967.  Most members have excepted status.	GAUFCC has had no interactions with the CC in relation to child protection. It thus feels unable to comment on the effectiveness of the organisation as a regulator on child protection issues.  In principle, the GAUFCC is open to the idea of religious settings being inspected in relation to best practice in protecting those under 18 from child sexual abuse.  Ideally, GAUFCC would like any regulation to be carried out by a body independent of any particular faith/religious/spiritual group. That body should have a good understanding of faith communities more generally and the particular challenges they face.	GAUFCC sees upstream investment in education and training on child protection matters for religious organisations as a greater priority than setting up an inspection regime. Many religious organisations are heavily dependent on volunteers who may not know what child protection best practice looks like.  GAUFCC would be highly supportive of, and welcome, any additional training in relation to child protection. GAUFCC feels that its members would benefit from such training. Ideally these training programmes would go beyond simply informing on best practice in relation to child protection but also include information on safeguarding vulnerable adults. It would be important not just to think about training materials but also how such training would be implemented.  GAUFCC is not opposed in principle to the idea of minimum standards. For many small congregations additional standards may feel onerous to the volunteers running them, and if the processes involved in meeting the standards are not simple and streamlined,	Not addressed in witness statement	<i>Working Together and Keeping children safe in education</i> are useful starting points in adopting best practice in keeping children safe. However, the documents are very long and understanding them requires the reader to be competent. A more useful approach would be to produce a number of short videos that could be viewed online.  The voluntary safeguarding code of practice is a much better document in that it is shorter and easier to understand. Again, it would be useful to have an online video library of some kind with quick guides on the various areas discussed in the document. It would also be useful to have model documents that users could download and adapt according to their needs.	See previous column.

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General Assembly of Unitarian and Free Christian Churches (GAUFCC) – <i>continued</i>	Face-to-face provision may help guide volunteers through the DBS process. There is an assumption that safeguarding leads have the literacy/IT levels to access DBS. This is not always the case.			<p>it may mean they cannot manage the additional workload. It may help if funds are made available to help organisations improve their policies and procedures.</p> <p>GAUFCC considers that those working in religious organisations or settings should only be required to undergo some form of compulsory child protection training if their roles involve them working with children. General awareness training may be helpful for all, however.</p>			
Green Lane Masjid and Community Centre (GLMCC)	Not addressed in witness statement.	Yes – GLMCC is a company limited by guarantee and is registered with the CC.	<p>There could always be improvements in respect of regulation of child protection within religious organisations. This needs to be balanced to ensure we do not create endless bureaucracy and paperwork that does not better the situation and that puts undue strain on faith institutes, particularly small organisations that already find it hard to operate with limited resources.</p>	<p>GLMCC would find the following useful:</p> <ul style="list-style-type: none"> <li>• A common set of training materials for all religious organisations and settings on identifying and preventing child sexual abuse.</li> <li>• A model set of policies on managing child protection and dealing with allegations.</li> <li>• Some form of compulsory training for those working with children, with clarity around who should be checked and on what basis. The training could also act as a form of vetting individuals.</li> </ul>	<p>It should be compulsory for religious leaders/ those in positions of responsibility in religious communities to refer allegations or suspicions of child sexual abuse to statutory authorities, and concealment of such abuse should be a criminal offence.</p>	<p>The content of <i>Working Together and Keeping children safe in education</i> should provide adequate guidance concerning the duties and responsibilities of religious organisations.</p>	<p>The content of the DfE consultation on managing out-of-school settings and its proposal regarding the introduction of a voluntary code for such settings seem quite comprehensive.</p>

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Guru Nanak Gurdwara Smethwick (GNGS)	Not addressed in witness statement.	Yes, since October 2013.	Not addressed in witness statement.	<p>Trustees working within a religious organisation or setting with children should be required to undergo compulsory safeguarding training. It would be beneficial for organisations to roll out sessions in different languages if required.</p> <p>A common set of training materials for religious organisations on identifying and preventing child sexual abuse would be helpful to GNGS. A model set of policies on managing child protection and dealing with allegations, together with a model set of Q&amp;A sheets dealing with common issues in respect of child protection, could also be a good idea and would likely be a useful reference point for GNGS in the event that it was faced with allegations.</p> <p>A model set of policies may not suit the mould of all religious organisations. Different religious organisations are governed in different ways. Some are hierarchical. Even across the same faiths, different organisations may operate differently.</p>	Not addressed in witness statement.	Not addressed in witness statement.	<p>The DfE's proposal to introduce a voluntary code for out-of-school settings is a good idea. The introduction of such a code would provide organisations with reference material for how to operate in accordance with best practice to ensure that children who participate in activities in out-of-school settings do so in a place that is safe for them. At the same time, it would not be overly cumbersome and would allow flexibility for organisations to implement their own child protection practices in a way that complements their belief system.</p>

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Islamic Cultural Centre and London Central Mosque (ICC and LCM)	Enhanced DBS checks should be available as a minimum to those with access to children and vulnerable individuals.	ICC and LCM are registered as a charity with the CC as the LCM (Algame) Fund.	<p>The CC's role as the registrar and regulator is to ensure that registered charities have charitable aims that are for the public benefit. The CC is not a regulator in terms of religion itself or how faith is taught. As such the CC cannot make subjective or value judgements as to the truth or worth of religion or religious belief. Nor can it regulate how centres are run.</p> <p>As far as ICC is aware, the CC as a regulator does not have any measures or procedures in place to monitor any issues relating to child sexual abuse. This is most likely due to lack of resources available.</p>	<p>Given the limited resources available to the organisation it would be helpful if there was a common set of training materials available for all religious organisations and settings on identifying and preventing child sexual abuse. Once in place, compliance should be mandatory. An effective way of monitoring compliance would be for there to be spot checks.</p> <p>In addition to a set of training materials it would be helpful if a model set of policies was provided in relation to managing child protection and dealing with any allegations made. It is important that all individuals with access to children and vulnerable individuals should have the necessary training to avoid any situation where allegations of abuse can arise.</p> <p>There is no reason why a certain minimum standard should not be in place on a mandatory basis.</p> <p>All religious organisations would benefit from a common set of training materials on identifying and preventing child sexual abuse.</p>	Not addressed in witness statement.	<i>Working Together and Keeping children safe in education</i> provide some helpful advice to religious organisations.	Not addressed in witness statement.

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Liberal Judaism (LJ)	<p>LJ has some specific issues relating to vetting and barring with overseas volunteers. The current law in Israel is that it is not legal to ask a woman to be vetted and this means that we cannot get DBS checks for female Israeli staff on tour. LJ is working with other diaspora organisations to pressure the Israeli government to change the policy.</p> <p>LJ finds the definition of regulated activity to be unclear and unhelpful when it relates to youth workers. LJ would like a change in the law to reflect that youth work offers opportunities for privileged access to young people. LJ considers that anyone with pastoral or spiritual authority should be subject to vetting checks, with no exceptions, regardless of the current boundaries of regulated activity.</p>	LJ is a company limited by guarantee and is a registered charity.	LJ believes that the CC has the potential to regulate practice within the religious charity sector by offering support to check policies and procedures. LJ's perception of the current situation is that more funding and expertise is required.	<p>LJ would find common training materials, resources, policies and procedures helpful. LJ would also support a common qualification for all leaders in faith settings, which should consider the variety of environments</p> <ul style="list-style-type: none"> <li>- from one-to-one tuition to large religious schools</li> <li>- and be renewable every three years. There should be compulsory training for all staff and volunteers in religious settings.</li> </ul>	LJ believes that it should be mandatory for religious leaders or those in positions of authority to refer allegations or suspicions of child abuse to statutory authorities and that concealment of such should be a criminal offence. LJ would go further and say that this should apply to all staff and volunteers if child abuse is to be tackled properly and consistently.	Not addressed in witness statement.	LJ supports the idea of a registration system for religious settings, organised by a governmental body. LJ would also support the introduction of a code relating to child protection. LJ believes that the role of this body should be to offer guidance and support and to keep best practice current.



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Masorti Judaism (MJ)	<p>Two key challenges regarding DBS checks:</p> <ul style="list-style-type: none"> <li>Smaller, less formally constituted communities struggle with the administrative burden. MJ aims to address this challenge in the future by offering these small communities a vetting service through MJ.</li> <li>MJ does not have a centralised information-sharing system to prevent individuals barred by one synagogue being taken on by another. MJ plans to resolve this by setting up appropriate information-sharing processes in the context of a movement-wide safeguarding policy.</li> </ul> <p>MJ does not have concerns over the current system of vetting and barring, and considers it to be suitable for the needs of religious organisations. The definition of regulated activity seems to be sufficiently clear. People who have pastoral authority over members of a religious organisation should be the subject of vetting checks, even if they do not fulfil the requirements of 'regulated activity'.</p>	<p>MJ is a registered charity and a company limited by guarantee. Registered since 2006.</p>	<p>MJ has not had any interaction with the CC in relation to child protection. Given this, MJ is not in a position to comment on whether the CC has an understanding of religious organisations and settings, the CC's strengths and weaknesses as a regulator, or whether the oversight provided by the CC in respect of child protection is sufficient. It is important that the CC has a good understanding of the religious settings it regulates.</p> <p>Child protection within the faith sector currently seems to be under-regulated. Some form of registration and light-touch inspection would be helpful. Any regulatory scheme needs to take account of the following:</p> <ol style="list-style-type: none"> <li>It should be attuned to the wide variation in size of religious organisations and, in consequence, the widely varying levels of resources they are able to devote to safeguarding. In particular, any regulatory regime should be careful not to impose unmanageable administrative burdens on smaller, volunteer-led organisations.</li> </ol>	<p>MJ would find the following useful, so long as they were relevant to the specific organisational culture of MJ's communities:</p> <ul style="list-style-type: none"> <li>a common set of training materials for all religious organisations and settings on identifying and preventing child sexual abuse;</li> <li>a model set of policies on managing child protection and dealing with allegations;</li> <li>a model set of Q&amp;A sheets dealing with common issues in respect of child protection;</li> <li>a common qualification for all faith leaders to undertake on child protection within a religious organisation.</li> </ul> <p>MJ agrees that religious organisations should be subject to certain minimum standards and certain mandatory practices and policies. MJ considers these should be: a light-touch framework that should relate to basic rules for how young people should be treated within religious settings; procedures for dealing with and reporting allegations of child abuse; recruiting, vetting and barring of staff; record keeping and information sharing; and training of staff and volunteers.</p>	<p>MJ considers that it should be compulsory for religious leaders or those in positions of responsibility in religious communities to refer allegations or suspicions of child sexual abuse to statutory authorities. MJ has not taken a position on whether failure to report should be made a criminal offence.</p>	<p><i>Working Together</i> is not suitable for voluntary and religious organisations – the vast majority of the document relates to statutory organisations and presents information at a level of technical detail that is unlikely to be of use to practitioners in the voluntary and religious sector, particularly within smaller organisations.</p> <p>The document <i>Keeping children safe in education</i> is, despite being intended for the education sector, a far more useful guide for voluntary and religious organisations. We would find a reworked version of the document specifically aimed at voluntary and religious organisations very useful.</p>	<p>MJ agrees that there needs to be a code in respect of child protection in out-of-school settings, and believes that the current proposals in the DfE consultation are adequate. In line with MJ's position that some form of appropriate regulation and inspection regime should be introduced, it seems reasonable that such a code should be compulsory and should form the standards against which any inspection ought to be carried out.</p>

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Masorti Judaism (MJ) - <i>continued</i>			2. Whether any proposed auditing or inspecting body is internal or external to the religious community, it needs to have a thorough understanding of the nuanced, culturally specific factors relevant not only to faith groups overall but to particular subsections of these faith communities. This will require deep, thorough partnership with representatives of the faiths being audited and inspected.	Those working with young people in religious organisations/settings should be required to undergo some form of mandatory training. This should relate minimally to basic rules for how young people should be treated within religious organisations and settings, and procedures for dealing with and reporting allegations of child sexual abuse. There should be the option to carry out this training internally or choose an external training organisation that understands the needs and cultural context of the trainees.			

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The Methodist Church in Great Britain (MCGB)	<p>There are a number of challenges MCGB faces in relation to DBS checks:</p> <ul style="list-style-type: none"> <li>Looking back over past behaviour can appear to run contrary to the theology of forgiveness, which may prove challenging for some in local churches.</li> <li>Given the volume of checks required, it is challenging to ensure consistent and legitimate decision-making is applied, both to the level of check and the risk assessment of any circumstances.</li> <li>The majority of DBS applications are completed not by HR specialists but by ministers or volunteers who complete the online application and verify documents. Despite the guidance issued by both Due Diligence Checking Ltd (DDC) and the DBS, it is a complex process and not ideally suited to the volume of applications required by an organisation that relies so heavily on volunteers.</li> <li>Anxiety about information-sharing: some employers are anxious about passing on DBS certificates, even with the consent of the applicant – especially post General Data Protection Regulation (GDPR).</li> </ul>	Yes.	<p>MCGB's current safeguarding training and its procedures give it confidence that work with children is well organised and supervised. MCGB would not resist external inspection but it would support the implementation of a system that is proportionate to the diversity of children's provision and that recognises the small size and scale of activities, often run by volunteers.</p> <p>A regulatory framework might be helpful in developing and improving safeguarding across religious organisations. It might help provide a focus for audit work and permit improved cooperation between statutory and non-statutory organisations through an understanding of common standards and expectations. Any regulatory framework should be built on a foundation of assisting and encouraging religious organisations to develop their practice with due regard to the size of the organisation and its resources, in terms of expectations and the time frame to implement changes.</p>	<p>MCGB does not consider that a common set of training materials across faith groups would enhance current training provision. While much of MCGB's training would be similar to other religious and non-religious organisations working with children, the advantage of its bespoke training is that it references the Methodist structures and governance arrangements. This helps to set the context within which children's work is undertaken and how concerns can be raised.</p> <p>MCGB's current provision of Foundation and Advanced training might be a good model for other faith organisations, with content appropriately adapted.</p> <p>As regards common training, consideration could be given to subjects that go beyond familiar forms of abuse, eg online bullying and grooming, mental health in young people, the Prevent agenda, female genital mutilation (FGM), the impact of gang membership, contextual safeguarding, peer-on-peer abuse, child sexual exploitation, LGBTQ+ safeguarding concerns, county lines drug dealing, and modern slavery and human trafficking.</p>		<p><i>Working Together:</i> MCGB safeguarding policy makes direct reference to <i>Working Together</i>.</p> <p>There is a more extensive entry about voluntary organisations in the faith community in <i>Working Together 2018</i> than there was in the previous version. However, voluntary organisations are still a secondary focus in the guidance in comparison with statutory agencies, in terms of responsibilities and involvement.</p> <p><i>Working Together 2018</i> requires those who work with children and families to report suspected abuse to the local authority. This guidance is highly valued by safeguarding officers within the church. It provides a requirement for appropriate arrangements to be put in place in voluntary, charity and faith-based organisations.</p>	<p>In July 2019, those involved in youth work in MCGB were invited to participate in a consultation regarding the DfE Code.</p> <ul style="list-style-type: none"> <li>82% of respondents were in favour of the introduction of a voluntary code.</li> <li>86% of respondents were positive about the scope of issues covered in the draft. Opinions were divided on whether the code should be compulsory.</li> <li>34% were fully supportive and identified that this would raise standards.</li> <li>46% were very concerned about the impact of a compulsory code, worrying that small, voluntary groups would be the hardest hit.</li> </ul>

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<p>The Methodist Church in Great Britain (MCGB) – <i>continued</i></p>	<ul style="list-style-type: none"> <li>There are sometimes concerns about the scope of 'regulated activity' and the application of the DBS requirements. It would be helpful if the frequency criteria were removed from the test, and a similar approach was applied as in place for vulnerable adult checks.</li> <li>Some safeguarding officers feel strongly that those who direct and manage safeguarding operations should also be subject to the highest levels of checks. Under current regulations, in most cases this is not possible as they do not have sufficient direct contact with those in vulnerable groups.</li> <li>While there are provisions for checks for certain roles, such as trustees of children's charities or governors, these do not seem to envisage faith charities or multi-charity organisations where some of the smaller charities may or may not be engaging with children.</li> <li>There is a need for greater clarity regarding a variety of terms, eg 'supervision' and 'day-to-day management'. What is the proximity of supervision envisaged for regulated activity: in sight throughout the day, occasional oversight during a day, or line</li> </ul>		<p>Any inspection regime should be focussed on encouraging learning and providing developmental feedback rather than fear of excessive sanction and public shaming as a first response. Further consultation would be appropriate before introducing any regulatory framework.</p>	<p>Free online resources could be provided to all churches in some key areas by subject experts. Support could be provided to develop more accessible training options via digital platforms. An accreditation process for faith organisation training to accompany required standards might encourage participation through professional recognition of skills development.</p> <p>Any proposal for a common qualification for faith leaders would need to have clear parameters about the level of study and what type of children's work was being envisaged. Requiring those who are already skilled and trained to undertake an additional general qualification may be hard to justify. A leadership qualification could be focussed towards organisational risk management and decision-making related to safeguarding incidents.</p> <p>MCGB has procedural and policy standards in the following areas and would suggest these might be useful minimum standards for other faith organisations:</p> <ul style="list-style-type: none"> <li>i) safer recruitment for staff and volunteers;</li> <li>ii) training;</li> </ul>		<p>However, as regards the role of MCGB when working in partnership with statutory agencies, the guidance states that they "can be asked to cooperate with local arrangements". This results in some districts having extensive involvement and effective interaction with multi-agency public protection arrangements (MAPPAs), but it can vary significantly from district to district. There needs to be a recognition of the growing professional nature of safeguarding within religious environments, particularly in the management of those who present a risk and an expectation that agencies will work with those from faith groups as equal partners.</p> <p><i>Keeping children safe in education</i>: Valuable source of practical guidance. The document is written in an accessible and easy-to-understand style and provides guidance that is not included in other documents,</p>	

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The Methodist Church in Great Britain (MCGB) – <i>continued</i>	<p>management oversight with daily reporting at a distance?</p> <ul style="list-style-type: none"> <li>Churches are places of safety and those in roles such as caretakers or key holders may be viewed as trustworthy. It would be prudent to consider whether checks for all caretakers, key holders or staff who work alone on church premises should be required to be subject to enhanced checks.</li> <li>The use of the update service is limited due to unfamiliarity and limitations in the terms of use. It should be possible to request lesser checks or limit the check to one workforce where the previous certificate covered both. It would also be helpful if the costs of sign up for the update service were reconsidered or an opt-out by exception, rather than opt-in.</li> <li>While processing is usually prompt by DBS, where there are delays, the 60-day waiting period prior to escalation is very lengthy.</li> </ul>			<ul style="list-style-type: none"> <li>iii) supervision and oversight;</li> <li>iv) effective responses to allegations of child sexual abuse;</li> <li>v) risk assessment and management of those who pose a risk within churches; and</li> <li>vi) promotion and development of safeguarding culture within MCGB.</li> </ul> <p>Q&amp;A sheets dealing with common issues may be useful but consideration should be given to using material that is already available.</p>		<p>such as extensive safer recruitment information, advice on safeguarding themes applicable to children and young people, and guidance on homestays and trips away, for example.</p>	

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Muslim Council of Britain (MCB)	No challenges identified in the witness statement.	No. It is not a requirement for affiliates of the MCB to be registered charities, but many are.	The regulatory oversight provided by the CC in respect of child protection is sufficient.  The MCB feels that supplementary schools that work with children in the community in providing religious classes, eg Qur'an evening/weekend classes, need to be regulated. There should be a requirement that they undertake training in child protection, including issues of child sexual abuse. This may be managed through local authorities or by a designated body. There should be a register of all organisations providing organised classes in the community that is accessible to the public.  Religious organisations that can understand the activities of the organisations concerned will be able to work better with them. Thus MCB considers that the organisation should be religious in nature. MCB has the potential to undertake the role so long as funding is available.	MCB believes that carefully produced material that is sensitive in nature and presented in a culturally respectful manner will be beneficial to the community.  Regarding minimum standards, the MCB considers that the minimum standards ought to be DBS checks and the completion of a course that addresses issues of safeguarding and child protection in a position of trust.	MCB believes that it should be compulsory for religious leaders or those in positions of responsibility in religious communities to refer allegations or suspicions of child sexual abuse to statutory authorities, and concealment of such abuse, if an admission has been made/ if there have been internal disciplinary findings, should be a criminal offence.  In the context of the Muslim community, there is a complication in that anyone can appoint themselves as an imam so long as they can justify to the audience their claim. While some institutions will insist on certain religious qualifications, in self-appointed institutions this is more difficult to regulate.	MCB is familiar with the documents. It does not recommend any changes.	MCB believes that, due to the informal nature of these settings, it will be difficult to regulate. Nevertheless, there needs to be a voluntary code in respect of child protection in out-of-school settings that provide tuition. MCB thinks it best to leave it non-compulsory.

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Organisation	Experience of the disclosure and barring regime	Charity Commission (CC) registration	Charity Commission (CC) and possible regulation	Common standards and common training	Mandatory reporting	Statutory guidance documents	Regulation of out-of-school settings
Pagan Federation (PF)	<p>The current system of vetting is clear once understood, but could be better explained and easier to understand on a first reading. PF would support extending vetting checks to those with pastoral authority, even if they are not engaged in regulated activity, although care would be needed with the definition.</p> <p>The current £25 fee for a basic DBS check for volunteers can hit small organisations and their less well-off volunteers hard, particularly if they include their chain of line management or pastoral responsibility as well as those who actually work with children, young people and vulnerable adults.</p>	No, although they wish to hold themselves to the standards required of one. PF have not had dealings with the CC as regards child protection.	<p>PF would be very concerned about regulation of small religious groups or family life beyond general statutory powers to intervene to protect children, young people and vulnerable adults. Regulating families and small groups of friends in this way is difficult, may conflict with human rights law, and carries the risk of victimisation by selective enforcement.</p> <p>PF would also be concerned if legislation or regulation was brought into force in a way that discouraged religious bodies from providing appropriate support to 16–17-year-olds, partly because of the impact on their freedom of religion but also because it could make them more isolated and vulnerable to emotional abuse.</p> <p>PF would support more regulation and guidance for organisations that run residential or other after-school activities for children. In principle, religious settings that provide youth services or religious instruction for those under 18 should register and be subject to inspection by an external body.</p>	<p>In parts of sub-Saharan Africa and other places the term 'witchcraft' has connotations of malevolent sorcery and children suspected of being witches are often tortured or killed. This can spill over into the UK where it is often reported as 'child abuse linked to witchcraft', which can trigger folk memories of the satanic ritual abuse moral panics of 30 years ago.</p> <p>A document from the DfE dated 2012 contains the title 'National action plan to tackle child abuse linked to faith or belief' and contains phrases like 'abuse linked to witchcraft'. It would help the Pagan community if phrases similar to this in official documents were replaced by something closer to 'abuse caused by fear of witchcraft', which would not point suspicion at the Pagan community.</p> <p>PF would find a common set of training materials on identifying and preventing child sexual abuse to be useful and beneficial, as would a model set of policies and information sheets. A common qualification for faith leaders covering child protection would strengthen interfaith dialogue and offer a framework that enabled faith communities to apply best practice in ways appropriate to the nature of the work and activities carried out by each respective community.</p>	<p>PF feels it would be better if those making the allegations or expressing the suspicions referred them to statutory authorities, while accepting that children may need support in doing so, and it is entirely proper for that support to be provided by those in positions of responsibility. Obstructing that process of referral could properly be made a criminal offence. Concealment of an admission or internal disciplinary findings could again properly be made an offence, although care would be needed with the definition.</p>	<p>PF has no issues with <i>Working Together or Keeping children safe in education</i>.</p>	<p>The proposed code appears to be adequate. It should be made compulsory and should extend to religious faith and related cultural or linguistic tuition.</p>

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Pagan Federation (PF) – <i>continued</i>			That body should be independent and, while being sympathetic to religion, it should not be affiliated to any religion.	There should be a mandatory requirement for religious organisations to have a safeguarding policy covering children and young people, with clear guidance on the steps to take if there are concerns and an equally clear decision process and record retention policy, which should be available for independent inspection and audit. Clear guidance on the impact of GDPR and other data protection laws on keeping and retaining records would be beneficial.  Compulsory training on child protection for those working in religious organisations would be a good idea, provided there are adequate independent safeguards around its quality.			



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Organisation	Experience of the disclosure and barring regime	Charity Commission (CC) registration	Charity Commission (CC) and possible regulation	Common standards and common training	Mandatory reporting	Statutory guidance documents	Regulation of out-of-school settings
Reform Judaism (RJ)	The current definitions of 'frequency' and 'intensity' regarding DBS checks limit who can be checked, and there may be people with pastoral roles or other 'regulated activity' with children who are ineligible for a check. Similarly 'specified establishments' does not apply and again limits who can be checked. Increased flexibility on this would be welcomed.	RJ is a registered charity.	Due to the limited interactions RJ has had with the CC, it does not know if the CC understands the varying nature of infrastructure organisations within faith communities and their relationships with their communities.	<p>RJ would welcome access to common resources for faith and other organisations in order to provide a basis for best practice across faith-based organisations, including training materials, model policies and answers to common questions.</p> <p>Model resources would provide a strong basis for ensuring best practice, and organisations should understand that these models need to be adapted to meet local standards and have ownership over local practices and procedures.</p> <p>RJ would welcome a common qualification for faith leaders, incorporating a solid understanding of safeguarding and abuse, statutory procedures, their role within faith organisations and how to meet the challenges of working within faith communities. Widening the training to lay and professional leaders within communities would be beneficial. Accreditation would be welcomed to ensure consistency. It is important that the system is affordable to ensure even small organisations can access it. Accredited training for DSLs would be welcome. An accredited Train the Trainer programme would be helpful.</p>	Not addressed in witness statement.	Not addressed in witness statement.	The draft Code provides clear and appropriate guidance for RJ and for synagogues, and RJ would welcome its introduction and dissemination.

Organisation	Experience of the disclosure and barring regime	Charity Commission (CC) registration	Charity Commission (CC) and possible regulation	Common standards and common training	Mandatory reporting	Statutory guidance documents	Regulation of out-of-school settings
Religious Society of Friends (Quakers) in Britain	<p>It is a challenge to decide on eligibility of roles for DBS in some cases. Advice from the DBS and the CC has conflicted at times – particularly on the need for checking trustees. The online eligibility tool provided by the DBS is only adequate to answer very basic cases.</p> <p>Challenging to decide what qualifies as 'regulated activity'. Sometimes volunteers work with children only once a month and thus do not meet the threshold for a check – this is a potential failing of the system.</p> <p>Checks are not sufficiently regular – an offence may not be picked up until rechecking three years later.</p> <p>In summary, "the current rules feel overly complicated and lack clarity, possibly leading to incorrect checks being made".</p>	<p>Britain Yearly Meeting (BYM) – yes, since 2009.</p> <p>Area meetings: of the 70 area meetings, 49 are registered charities; 21 are exempted because of their low income.</p>	<p>BYM has no routine interaction with the CC and the CC does not place any special requirements on it. Once a year, it has to complete an annual return, which includes confirmation that it has a safeguarding policy.</p> <p>Author of statement's personal views:</p> <p>The CC's approach to regulation is onerous and burdensome for small charities. Increase in burden of compliance makes it less likely that trustees can focus on most important issues, eg safeguarding. The CC's approach tends to be punitive rather than supportive. The CC's determination in its recent guidance on safeguarding to broaden its definition to 'protecting people from harm' (rather than 'children and vulnerable adults from abuse') dilutes the important focus on child abuse/abuse of vulnerable adults. The CC's guidance sometimes uses</p>	<p>Author of statement's personal views:</p> <p>Do not feel additional minimum standards would be appropriate for religious organisations.</p> <p>Religious organisations should be held to the same standards as other organisations working with children.</p> <p>Diversity of religious organisations would make it difficult to provide a common set of training materials. Would be hard to produce anything that goes beyond high-level materials already available elsewhere. Model set of Q&amp;As dealing with common issues: data protection; information-sharing etc would be very helpful.</p> <p>Common faith qualification unlikely to be appropriate. Requirement for mandatory training is a good idea in principle, but needs to take into account voluntary nature of many roles and be sufficiently tailored to the context to be meaningful.</p>	<p>Author of statement's personal views:</p> <p>No objection to mandatory reporting: "I would have no objection to making it compulsory for religious leaders to disclose allegations".</p>	<p>Author of statement's personal views:</p> <p>Comprehensive statutory documents, eg <i>Working Together</i>, are good, but also needed are short accessible guides, eg for volunteers who only work with children occasionally.</p>	<p>Regarding DfE document on out-of-school settings: it covers areas beyond safeguarding, eg broader Health &amp; Safety matters. While these are important, it is unhelpful to confuse them with safeguarding. It would be difficult to make the Code compulsory – there may be a lack of clarity regarding when each requirement should be applied.</p>

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Religious Society of Friends (Quakers) in Britain – <i>continued</i>			terminology that is not clearly defined, eg ‘position of trust’. Regarding registration of non-residential activities: this would be disproportionate – could lead to it taking place outside regulated settings/being withdrawn altogether.				
Salvation Army (SA)	SA considers that the definition of ‘regulated activity’ is sufficiently clear.	The Salvation Army (Central Funds) Trust is registered as a charity.	SA has a good relationship with the CC with respect to the sharing of information. SA regards it as important that the CC has an understanding of the nature of the SA. Those SA personnel who interact with the CC consider that the CC is able to ask pertinent questions in order to effectively carry out its work. SA does not consider that religious organisations or settings should be subject to auditing or inspection by external bodies.	SA does not consider that a common set of safeguarding materials would be beneficial. SA has a comprehensive training suite. The opinion of the Safeguarding Lead is that materials and training should be bespoke and refer to unique governance structures and settings in order to reach the highest standards. SA would welcome a common quality assurance tool to assist with policy review and a model set of guidance to be considered and incorporated into child protection training, policy and processes. SA does not consider a common qualification for faith leaders is necessary. SA would support a common quality assessment framework to be applied to training elements.	SA does not support the view that the concealment of abuse if an admission has been made and/or if there have been internal disciplinary findings of such should be a criminal offence.	<i>Working Together:</i> the six paragraphs afforded to the voluntary community and social enterprise (VCSE) faith-based organisations and private-sector organisations appear to be written for the reference of statutory authority personnel. <i>Keeping children safe in education:</i> the SA considers that safeguarding leads should be familiar with this publication and considers the requirement to implement the safeguarding practice within policy, procedure and processes pertinent to the particular setting.	SA does not consider it necessary for there to be independent registration and inspection of its settings that provide youth services and religious instruction. SA does not consider there is a need to make the DfE code compulsory.

Organisation	Experience of the disclosure and barring regime	Charity Commission (CC) registration	Charity Commission (CC) and possible regulation	Common standards and common training	Mandatory reporting	Statutory guidance documents	Regulation of out-of-school settings
The S&P Sephardi Community (S&PSC)	Current statutory processes are incompatible with general community/faith settings that are outside of standard education, eg schools. One cannot easily apply for an enhanced DBS check, for example, unless one works in a regulated setting. Therefore, for the general staff in S&PSC who are not in direct contact with children, there is no provision for applying the Enhanced DBS check using the strict criteria currently used for registration.	Yes.	All organisations in which lay leaders, volunteers and/or faith leaders have access to children should be overseen by a statutory body that is able to ensure children are adequately protected and that, when allegations are made or a suspicion of wrongdoing is detected, the victims are listened to and treated with the seriousness that the allegations deserve.	Currently there are dozens of Jewish faith organisations. It would make sense to have a common approach to child protection and safeguarding with a common set of policies and processes and training materials, and even training sessions would be well received if there is a partnership approach. To be able to collaborate at a senior level to share concerns or good practice can only be a more efficient and effective way to operate.  From S&PSC perspective, the community would benefit from a common set of training materials and policies. If a qualification was developed that was bespoke to faith leaders and a prerequisite for taking up a post, that would be very welcome.  Jewish religious organisations, like other faith organisations, are diverse, uncoordinated and operate separately, with different standards, processes and approaches to dealing with allegations of child sexual abuse. There must be a set of minimum standards, which should be mandatory and subject to checks in the same way Ofsted perform their checks on schools.	The stigma and taboo attached to reporting allegations of child sexual abuse is definitely a problem in some elements of the wider community and other faith groups and absolutely must be addressed.  The greatest challenge facing the wider Jewish community is not just the existing umbrella bodies, which still require improvement, but also the unregulated, unmonitored independent settings, and the more extreme religious settings in which there could be a misperception that it is wrong to disclose potential allegations to the authorities because of a misguided interpretation of Jewish law.	Not addressed in witness statement.	Not addressed in witness statement.

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The S&P Sephardi Community (S&PSC) – <i>continued</i>				Perhaps the CEOs of all existing religious organisations, many of whom sit on the Jewish Leadership Council (JLC) CEO forum, could form part of a partnership task force in collaboration with local authorities to ensure common standards are being implemented and training is being delivered, and possibly even operate as independent ‘inspectors’ of other institutions to support the work of the local authority in a similar model to Ofsted and their relationship with Pikuach.			

Organisation	Experience of the disclosure and barring regime	Charity Commission (CC) registration	Charity Commission (CC) and possible regulation	Common standards and common training	Mandatory reporting	Statutory guidance documents	Regulation of out-of-school settings
Triratna Buddhist Order and Community (TBOC)	<p>The centres that TBOC advises are very unclear as to who needs DBS checks and it is not easy to get clear information.</p> <p>TBOC encounters the problem that far too few members of the Order, or those training for ordination, are eligible for DBS checks:</p> <ul style="list-style-type: none"> <li>• Since membership of the Order does not in itself involve working with children, members of the Order in general are not eligible for enhanced DBS checks.</li> <li>• As the ordination training course does not include work with children, those training for ordination are not eligible for enhanced DBS checks. This means that TBOC has no way of screening ordinands.</li> <li>• Although all are eligible for basic DBS checks, these are irrelevant to working with children as they do not include a check of the barred list.</li> </ul> <p>All Order members, and those training for ordination, should be eligible for DBS checks which check for sexual/violent crime, even if they are not necessarily going to be working with children.</p>	<p>TBOC is not constituted as a single organisation. It consists of a number of trusts, centres and retreat centres, most of which are registered charities. These were founded at many different times, from 1967 to the present day.</p>	<p>The law on position of trust should be extended to refer specifically to religious leaders, priests and teachers.</p> <p>External and regular auditing by a Buddhist or multi-faith external body could be very helpful. At present, the only option is to engage an external body such as the Social Care Institute for Excellence (SCIE), which is expensive/not tailored to a Buddhist group. Also, because it is not routine, when engaged it can give the impression that the organisation has a big problem.</p> <p>All religious charities/ places of worship should be recommended to have one or more safeguarding officers and a safeguarding trustee.</p>	<p>Common standards, training materials and model policies and qualifications could be helpful if drawn up by specialists, including Buddhists. Thirtyone:eight provides all these things but they are tailored to Christian needs and there is no parallel Buddhist body. Such standards would need to allow for the enormous variations between Buddhist traditions.</p> <p>TBOC would welcome a programme whereby Buddhists of various traditions could be trained to provide professional safeguarding training (child sexual abuse and adult) and deliver it to Buddhists in traditions other than their own.</p> <p>TBOC would welcome compulsory child protection training for those training for ordination in TBOC, and for any ordained person who teaches under the auspices of a TBOC charity. It would be impracticable to institute compulsory training for all those working in TBOC organisations or settings, as there are so many – working in so many ways – ranging from volunteers</p>	<p>It should be compulsory for TBOC leaders/those in positions of authority to report allegations, suspicions, disclosures or confessions of child sexual abuse to the TBOC safeguarding team, and for the team to report the matter to the external authorities.</p> <p>However:</p> <ul style="list-style-type: none"> <li>• The welfare of the child must come first and there must be provision for protecting their identity.</li> <li>• TBOC's safeguarding team reports all confessions, disclosures and suspicions to the police. But there is no agreement presently among the Order members more generally regarding what should be done when someone makes a formal confession regarding child sexual abuse – this is because many believe in the sanctity of the confessional.</li> </ul>	<p><i>Working Together and Keeping children safe in education</i> are the basis for all TBOC's safeguarding policies, practices, processes and advice.</p>	<p>The voluntary draft code is a useful checklist but needs to be rewritten to make it more directly relevant to faith groups. TBOC is not sure how useful it would be to make it compulsory – or what that would mean – given that TBOC already has safeguarding policies that cover the same material.</p>

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<p>Triratna Buddhist Order and Community (TBOC) – <i>continued</i></p>	<p>TBOC observes that many people, particularly newcomers, can look up those who are ordained, and that simply being ordained tends to give others who are much less experienced the impression that one is totally trustworthy in every respect. This is wide open to misuse by a few.</p> <p>Currently, the CC expects that everyone who is eligible for a DBS check will actually have one. So if all Order members are made eligible, the CC will have to allow for the fact that some of them do not actually need to have one, ie if they have no public or teaching role.</p> <p>All religious leaders and teachers, priests, ministers, etc should be eligible for enhanced DBS checks whether or not they are working with children, but only expected to have them if they have public or teaching roles.</p>			<p>who clean Buddhist centres to those who are trustees.</p>	<ul style="list-style-type: none"> <li>There is a particular challenge where someone confesses to viewing indecent images of children, given the seriousness of this non-contact offence is underestimated and the criminal justice system does not yet offer a range of responses that discriminate between a one-off user and a habitual user. Rather than referring such cases straight to the police, it would be helpful to refer those confessing to viewing such images for psychological assessment by an external body that could then recommend either psychological treatment or referral to the police, eg the Swedish model.</li> <li>There would be value in exploring how people who have a sexual interest in children, but who have not acted on it, can seek confidential support/therapy/ guidance, eg the Dunkelfeld Project in Germany.</li> </ul>		

Organisation	Experience of the disclosure and barring regime	Charity Commission (CC) registration	Charity Commission (CC) and possible regulation	Common standards and common training	Mandatory reporting	Statutory guidance documents	Regulation of out-of-school settings
Union of Orthodox Hebrew Congregations (UOHC)	Not addressed in witness statement.	The UOHC is a company limited by guarantee and registered as a charity in October 2014.	<p>UOHC does not believe that regulation necessarily equates with compliance. Regulations could result in:</p> <ul style="list-style-type: none"> <li>• some provisions being driven out of existence because regulation is too daunting or costly for the organisers;</li> <li>• some provision continuing to exist but finding ways of escaping regulation, for example avoiding regulatory thresholds;</li> <li>• some provision evading the eye of the regulator and operating beneath the radar; it becomes much more difficult to engage such provision.</li> </ul> <p>The above are potential unintended consequences of regulation that is enacted without willingness of participants. That is why UOHC advocates a 'supportive approach' that persuades community settings of the importance of safeguarding. UOHC notes that, without 'buy in', regulation can be very perfunctory – paper-based compliance that has little meaningful impact on real safety.</p>	UOHC is not clear what benefit may arise to community settings by registration and a set of policies, resources or training specifically aimed at religious settings. Religious groups vary so greatly that UOHC questions the feasibility or usefulness of common standards. A wide range of resources already exists and communities can work with and adapt these resources to meet specific needs.	Not addressed in witness statement.	Not addressed in witness statement.	Not addressed in witness statement.



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Union of Orthodox Hebrew Congregations (UOHC) – <i>continued</i>			UOHC believes that a supportive approach towards communities will be more productive than regulation.  Unable to comment on the role of the CC in regulation of child protection in religious settings.				
United Reformed Church (URC)	<p>The main challenges faced by URC in ensuring vetting and barring are within some of the local churches:</p> <ul style="list-style-type: none"> <li>This includes a reluctance to increase bureaucracy for those who are volunteering their time, and a genuine belief among some that 'those horrible things could not happen here'.</li> <li>There is a tendency in some places to allow the familiarity of knowing a person for a considerable period of time to blind the congregation to potential risk.</li> <li>A desire in a community to forgive and to encourage new beginnings can increase risks if it thereby ignores the possibility of future offence or harm.</li> <li>Another challenge is the belief that undertaking a DBS check is sufficient to establish whether someone is 'safe' to work with children.</li> </ul>	<p>Yes, URC Trust is a registered charity. It was registered in 2009.</p> <p>Not every local congregation is a registered charity, but a large number of them are. All synods in England and Wales are registered charities.</p>	<p>URC considers that the current arrangements in respect of the regulation of child protection in religious organisations and settings are adequate.</p> <p>URC would be in favour of self-regulative arrangements, backed up by an audit framework from an external independent body. That would allow the Safeguarding Advisory Group (SAG) to review URC's practices at a denominational level on a regular basis in alignment with URC's updated safeguarding policy. The reason URC argues for a denominational approach reflects the diversity of practice at the synod level and the limited resources at the local church level.</p> <p>It is important that the framework on which URC evaluates its child protection practices</p>	<p>URC cannot comment on what other religious organisations should adhere to. But URC believes that some basic standards can enable each religious community to get child protection and safeguarding work right.</p> <p>An independent body (see previous column) could be a source of information sheets, procedures, training and awareness-raising material regarding identifying and preventing child sexual abuse tailored to the particularities of the religious settings. A common set of training materials for all religious organisations and settings could be valuable if they are workable and provide specific standards across all denominations, and encourage local churches and faith communities to pay more attention to child protection.</p> <p>A common qualification on child protection for all</p>	<p>URC considers it should be compulsory for religious leaders or those in positions of responsibility in religious communities to refer allegations or suspicions of child sexual abuse to statutory authorities.</p> <p>URC considers that concealment of child sexual abuse should be a criminal offence if an admission has been made and/or if there have been internal disciplinary findings of such abuse having taken place.</p> <p>URC is supporting a change in legislation relating to 'positions of trust' within the Sexual Offences Act 2003 to extend the definition of positions of trust and include religious leaders and children's and youth workers.</p>	<p>Statutory guidance documents provide guidance on the duties and responsibilities of URC.</p> <p><i>Keeping children safe in education</i> does not apply directly to URC.</p> <p>It does apply to the 13 schools associated with URC, which are state-funded or independent schools subject to relevant regulatory authorities. URC expects that schools have regard to it when carrying out their duties to safeguard and promote the welfare of their students. As a denomination, URC has paid attention to the statutory guidance for schools and colleges because it contains useful information in</p>	<p>The proposals set out in the DfE consultation in respect of child protection are adequate. The code is both clear and helpful. URC did not identify anything in the code that was missing or needs major adaptation. URC liked the clear indications of what needs to be done in the summary of each section. It was a useful document for school support officers, children's social care and local churches in general to take advice in setting up and reviewing their safeguarding policies, practices and arrangements, including health and safety and governance.</p> <p>URC considers that the voluntary safeguarding code of practice should not be compulsory. URC is positive in using and making this code available in its churches, once the final document is available, and providing them with further guidance on how they can integrate the code in their particular settings.</p>

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United Reformed Church (URC) - <i>continued</i>	<p>As regards the current system of vetting and barring:</p> <ul style="list-style-type: none"> <li>URC considers that the definition of 'regulated activity' is clear and helpful in setting up safer recruitment as well as vetting, disclosure and barring checks and arrangements.</li> <li>In the religious context of the URC community, there are only some concerns about checking those few people who might not meet the threshold for carrying out a regulated activity, or who would have no direct engagement with children but are perceived as being in a position of trust and responsibility by members of the public. URC would therefore favour a system that enables each religious organisation to require people in certain roles to be the subject of vetting checks, even if they do not fulfil the requirements of 'regulated activity'.</li> <li>URC does not consider the current system to be onerous.</li> </ul>	<p>Charity Commission (CC) registration</p>	<p>and procedures is robust and rigorous. It would be helpful if the auditing organisation understands the ethos and the structures of religious organisations and settings.</p>	<p>faith leaders within a religious organisation would be an incentive to raise their understanding of their duties and responsibilities to safeguard children in all activities that involve their spiritual development and education.</p> <p>As to whether the training should be compulsory, URC considers that each religious organisation should be able to decide on what is regarded as compulsory for their staff and volunteers with respect to their own organisational cultures, theologies, traditions and the roles and responsibilities that people are expected to carry out. URC considers the role and the potential of a role to engage in regulated activities with children (or adults at risk) as the key determinant on who is required to undergo compulsory training.</p> <p>All those working with children, as well as those responsible for their care, need to know how to work in a way that promotes the welfare of those children and reduces the likelihood of harm.</p>		<p>relation to eg dealing with sexual violence, harassment, unsupervised access and safer recruitment.</p> <p><i>Working Together 2018</i> sets out specific duties for faith-based organisations. URC's main safeguarding policy and guidance document draws extensively on <i>Working Together 2015</i>. The updated version follows the more recent guidance in <i>Working Together 2018</i>. URC's guidance clearly addresses inter-agency and multi-agency working, including the role of the faith sector in the protection of children. The guidance assumes that all faith-based organisations will be subject to charity law and regulated either by the CC or other 'principal' regulators. However, many faith-based organisations (eg small URC local congregations) might not be registered charities and have limited resources.</p>	

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Organisation	Experience of the disclosure and barring regime	Charity Commission (CC) registration	Charity Commission (CC) and possible regulation	Common standards and common training	Mandatory reporting	Statutory guidance documents	Regulation of out-of-school settings
United Reformed Church (URC) - continued				They also need to know how to respond effectively to concerns or allegations of abuse. It is important that safeguarding training emphasises the moral and legal commitments on people to act and protect children.		URC does not want to add more burden on its local churches.	
United Synagogue (US)	Given the varying roles of volunteers and the variety of tasks volunteers deal with, it is challenging to be sure that all those who do come into contact with children are DBS checked. One challenge is the fact that many volunteers will be substituted by another person at short notice on a temporary basis, and it is therefore difficult to monitor all those playing some volunteer role in the synagogue.	Yes – the US is registered with the CC.	Not addressed in witness statement. "With regard to future regulation and the state of the sector generally, we would like to defer until we have seen witness statements of other religious groups".	Not addressed in witness statement. "With regard to future regulation and the state of the sector generally, we would like to defer until we have seen witness statements of other religious groups".	Not addressed in witness statement. "With regard to future regulation and the state of the sector generally, we would like to defer until we have seen witness statements of other religious groups".	Not addressed in witness statement. "With regard to future regulation and the state of the sector generally, we would like to defer until we have seen witness statements of other religious groups".	Not addressed in witness statement. "With regard to future regulation and the state of the sector generally, we would like to defer until we have seen witness statements of other religious groups".
Vishwa Hindu Parishad UK (VHP)	The definition of regulated activity is sufficiently clear and enables the organisation to know who should be checked and on what basis. Those who have pastoral authority over members of a religious organisation should be the subject of vetting checks even if they do not fulfil the requirements of regulated activity. VHP does not consider that the current system of checking is excessively onerous on religious organisations and settings.	Yes. It was registered in 1972.	It is important that the CC has an understanding of the nature of religious organisations. As VHP has not had any cases of child protection with the CC, VHP is unable to comment on the CC.	VHP would find a common set of training materials for all religious organisations and settings on identifying and preventing child sexual abuse useful. Also useful would be a model set of policies on managing child protection and dealing with allegations. Also, a model set of questions and answer sheets dealing with common issues in respect of child protection would be useful to have. It would be difficult to make training compulsory as VHP's members are volunteers.	It should be compulsory for religious leaders or those in positions of responsibility in religious communities to refer allegations or suspicions of child sexual abuse to statutory authorities, and concealment of such abuse if an admission has been made or if there have been internal disciplinary findings should be a criminal offence.	The content and presentation of <i>Keeping children safe in education</i> and <i>Working Together</i> , in so far as they provide guidance concerning the duties and responsibilities of religious organisations, is very informative.	The current proposals set out in the DfE consultation in respect of child protection are adequate. The codes should be compulsory.

This report was originally published by the Inquiry in September 2021 and two typographical corrections were subsequently made to the original version. These errors have been corrected in the present version.

The following typographical correction was made to the original version of this report on 3 September 2021:

- Annex 1, entry for Kol V'Oz's solicitor corrected to 'Dr Ann Olivarius, AO Advocates'

The following typographical correction was made to the original version of this report on 6 September 2021:

- Part B para 15.4 was amended to read: "Their records showed that allegations concerning 67 individuals were reported to their Branch Office within the previous 10 years."





