



Father Alan Howard Foster GRIFFIN (died 8 November 2020)

Response to the Robson Review

We are deeply saddened by the death of Fr Alan Griffin, who is missed by his friends and family, his fellow clergy, and former colleagues within the Diocese of London. We apologize wholeheartedly and unreservedly to his family and friends for the mistakes and shortcomings that contributed to what Fr Alan endured and to his death by suicide.

The Coroner's Regulation 28 notice, sent to the Archbishop of Canterbury, set out in stark terms the immediate train of events which led up to Fr Alan's death by suicide: careless talk, miscommunication, a failure to assess the basis of comments made about him, confused roles and responsibilities, and delay. From the outset, upon receiving the Coroner's notice, the Diocese of London has set out to ensure that lessons are learned. A review oversight group, which has included representatives of the Archbishop, the National Safeguarding Team, and the Diocese of London, has steered this work, with regular updates given to our trustees, the Diocesan Bishop's Council, and to the Diocesan Safeguarding Steering Group.¹ An external review by an independent safeguarding consultant, Chris Robson, was commissioned, which we received on the 26th of June 2022.

On behalf of the Diocese of London, we thank Chris Robson for his hard work on the review. We acknowledge that we made mistakes. We take responsibility for the ways in which individual actions, systemic failures, and the culture of our Church contributed to the distress which Fr Alan Griffin experienced around the time when he made a non-fatal suicide attempt in 2010 while he

¹ Members of the review oversight group were Richard Gough, Diocesan Secretary; Rt Revd Dr Joanne Woolway Grenfell, Bishop of Stepney; Rt Revd Tim Thornton on behalf of the Archbishop of Canterbury; Zena Marshall, Interim Director of Safeguarding for the Church of England; Tim Bishop, independent member of the Diocesan Safeguarding Steering Group (until March 2022, when his term of office ended), and Sarah McKimm, independent member of the Diocesan Safeguarding Steering Group (from March 2022).

was a Rector in the City of London, when he withdrew from the Church of England in 2011, and when he died by suicide in 2020.

We fully accept all the recommendations of the Robson Review. We also commit to looking beyond those recommendations to the bigger picture which allowed the scenario to arise: the poor systems which permitted an individual working for the Diocese to operate without effective supervision and to gather sensitive personal information about others over a period of years; and meant that no offer of pastoral support was made by the Diocese of London to a former colleague who was facing a potential safeguarding allegation and was experiencing illness, isolation, and vulnerability.²

We recognise that some current colleagues were placed in a difficult position, with inadequate processes and support, when issues came to light; under-resourced for the daily demands made of them, without clear practical guidance on some sensitive issues and without the necessary headspace for reflective practice. As we go forward, we need to understand better how guidance, training and resources can be developed to support our safeguarding, HR and senior clergy colleagues in their work. We are grateful to all those colleagues who have been part of strengthening safeguarding and other arrangements for the future.

Sexuality and culture

We note and take extremely seriously the charge in the Robson Review Report of homophobia within the Diocese of London and the Church of England. Such prejudice is completely unacceptable. Like other parts of the Church of England and the Anglican Communion, we live with differences of opinion about issues in sexuality, and we include among our number those who hold to the Church's traditional teaching that sexual intimacy should only be expressed within heterosexual marriage, as well as those who seek some degree of change from that position, and those who believe that anything less than a fully inclusive position is homophobic. These are important matters, about which the Church has not always found it easy to speak, and they need time for proper consideration and reflection. We are part of the Church of England's Living in Love and Faith learning and conversations which aim to create a space for healthy and open conversations to take place around these areas.

² This was in place from the Roman Catholic Diocese of Westminster.

However, the homophobia that the Robson Review Report points to encompasses more than the theological differences of opinion with which the Church of England is grappling. In the Diocese of London, as elsewhere, there is often a culture of secrecy which means that people's sexual orientation and behaviour cannot be openly acknowledged. This may leave those who are gay and in same-sex relationships in a position where they feel unsafe and vulnerable. A culture of hypocrisy also exists; whilst, at best, their relationships may be tolerated or even privately encouraged, LGBTQI+ people live with the insecurity of knowing that they may be vulnerable to complaints or accusations which their heterosexual colleagues would be unlikely to face, and that these may lead to disciplinary consequences. Although those with conservative views may also fear that their views are sometimes unwelcome, the personal cost to LGBTQI+ people within the institution of the Church of England of both a culture of secrecy and a culture of hypocrisy is enormous. We recognize that Fr Alan Griffin lived with the costs of secrecy and hypocrisy that existed during the time that he was a priest within the Church of England, that he continued to live with these costs even after he had joined the Roman Catholic Church, and that they contributed to his death.

Whatever decisions the Church of England may come to as a result of the Living in Love and Faith process, we recognize the vast culture change that needs to take place to enable LGBTQI+ people to live well and minister within the Church and to encounter a compassionate, positive, and inclusive response from those alongside whom they minister.

We are committed to playing our part in addressing this, working within and learning from the Church of England's Living in Love and Faith conversations. We are setting up an Advisory group for the Diocese to examine the impact of diocesan processes and practices on the pastoral care and sense of belonging of LGBTQI+ people and to make recommendations for change. The responsibility to bring about change is not theirs – responsibility lies with the senior leadership of the Diocese of London, and we regret and repent that this is only now beginning – but we are committed to listening to their voices and to inviting their recommendations for action that we hope will help the Diocese of London become a safer place for LGBTQI+ clergy.

Everyone can play a part in creating a healthier culture. The Robson Review Report recognizes that there is work to do to overcome a culture of mistrust between some clergy and some senior leadership, and we are committed to being part of this work. At the same time, there is a need for accountability, transparency, and a willingness to work collegially, rather than retreat into

perceived or actual theological differences.

Although we have set out in response to the Robson Review Report some specific actions that we have already taken or intend to take, we see the need for sustained culture change over time in this Diocese and across the Church of England to restore trust and to enable healthier attitudes, conversations and behaviours in relation to gender, sexuality, and church traditions.

Investing in the future

The Robson Review challenges us to reflect and improve. That work has already begun. Considerable changes have taken place in the Diocese of London both before and since the Coroner issued her Regulation 28 notice in July 2021. This is recognized in section 9 of the Robson Review. Creating a “safer church” is one of three priorities in our London 2030 Vision, with a strategic programme of improvement in place across the Diocese since 2020.

We have increased the resource in the Diocesan Safeguarding Team regularly over the last 5 years but decided in 2021, with the support of the Diocesan Bishop’s Council, that a step change in the resourcing of our safeguarding team was necessary to lay a sure foundation for future safeguarding practice. We have added depth to our team by appointing an experienced Head of Safeguarding and a Case Management Supervisor. These senior/oversight roles ensure appropriate triage, scrutiny and timely management of all referrals and cases. Team capacity has increased from 4.4 (2019) to 6.6 (2021) to 9.2 FTE (2022) across the whole safeguarding team. DSAs are now able to be more proactive and build better relationships with parish safeguarding officers in their designated Areas, while keeping on top of their day-to-day reactive caseloads. Feedback tells us that these developments are already being noticed and appreciated by parishes. The greater capacity is enabling more time for reflection, learning, and practice improvement across the team.

The costs of these staffing increases have been drawn from the General funds of the LDF and, although they do divert funds from other areas of mission and ministry, we believe that they are a necessary investment as we implement our Safer Churches strategy across the Diocese. We are committed to continuing to improve our learning and practice into the future, giving high priority to this, while recognising that we can only be becoming safer and can never assume that we have achieved a place of absolute safety.

Reflective safeguarding practice

The last year has been a time for recruitment of additional staff, reflection, training, and practice improvement. Whilst recognizing the need to make improvements, we are sensitive to a risk of unintended consequences arising from the circumstances of Fr Griffin's death, namely that colleagues might feel discouraged from exercising appropriate professional discernment when faced with a potential disclosure or from passing on potential safeguarding concerns to the appropriate professionals. We are also aware that colleagues who are most likely to receive reports of potential safeguarding allegations often work alone and in unsupported roles. Therefore, in our practice improvement, we are focussing on building a much stronger team approach in this area. We have provided training together for Bishops, Archdeacons, and safeguarding team members in relation to responding well to allegations, to using the Clergy Discipline Measure, and to understanding church and general law. We have restated our commitment to following the Church of England's key instruction to all office holders when dealing with allegations – to recognise, respond, record, and refer – and we are strengthening our systems, including the use of Safeguarding Case Management (Core) Groups, as prescribed by national guidance, to enable multi-disciplinary team support for and scrutiny of the management of all allegations.

Transparent data processing

The Data Protection Act 2018 and other legislation relating to personal data and rights such as the Human Rights Act 1998 provide a legal framework of checks and balances for the processing of personal information (data). Across the diocesan teams, we have invested time in training staff and clergy colleagues in relation to all aspects of data protection to ensure our processes for recording, storage, and sharing of personal information, particularly special category data, are proportionate and lawful. More information about how we handle data, including special category data, can be found on our website, in the privacy notice to clergy (Form 14).

In response both to what happened to Fr Alan, and to learning from the Church of England's Past Cases Review 2 (PCR2), we have thoroughly reviewed our policies around clergy HR files, and Bishops and their office staff have been trained in data handling. We have also updated our data

protection notices to be more transparent about what information we gather and how it is used.³

Responses to recommendations

The specific actions that we have taken in response to each of the Robson Review's recommendations are listed below. Further and overlapping work is being done in response to the Diocese's Past Cases Review 2, including detailed guidance on data and document management in Bishops' and Archdeacons' offices.

Recommendation 1 – *The Diocese of London should ensure that all staff who are employed by role holders including Bishops, Archdeacons and others who have a private office are the subject of safer recruitment. They should have job descriptions, terms of employment and all other employment rights and conditions afforded to those who are employed by the wider organisation. Their position should be known to the wider church community, and they should be recruited in an open and transparent manner. They should be aware of whom they are accountable to and have clear line of supervision and support.*

All those employed as staff in the Diocese of London, including Bishops', Archdeacons' and Area Office staff, are now subject to the LDF's recruitment policies. These follow the safer recruitment procedures contained in the House of Bishops Guidance.⁴ All employees have job descriptions, line management definitions, terms of employment and all other employment rights and conditions. They are subject to annual review and appraisal. There is a whistleblowing policy. It is no longer possible for any individual to be employed without going through a proper formal recruitment process and safer recruitment checks.

The Area Staff are all listed, with roles and contact details, on the Diocesan website. Any temporary staff, e.g., occasional hospitality assistants, taken on by Bishops in their capacity as corporation sole are subject to Church Commissioners contract/temporary workers regulations.

Recommendation 2 – *The Bishop of London should refer the issue detailed in*

³ See <https://www.london.anglican.org/kb/data-protection/>.

⁴ See <https://www.churchofengland.org/safeguarding/safeguarding-e-manual/safer-recruitment-and-people-management-guidance>.

recommendation 1 to the House of Bishops to seek assurance that National policy and guidance is being delivered in the key area of recruitment. The House of Bishops should consider reminding the wider Church of the need to be aware of and to use existing guidance.

The Church Commissioners have confirmed to us that their employment regulations for all Bishops' Offices now cover these matters. Safer recruitment procedures must be followed, and checks are made to ensure that appropriate documentation, terms of employment, and legal rights and conditions are in place. Staff in all Bishops' Offices cannot now be contracted or employed without the correct processes being followed.

Recommendation 3 – *Where information that has the potential to impact on safeguarding is known then it should be referred to the safeguarding team for assessment. Once this assessment is complete safeguarding protocol must be adhered to with appropriate meetings, planning and investigation being put in place. This should not be deviated from on the basis of an individual's position within the organisation.*

Document and information management in Bishops' offices and Area offices has been the subject of guidance in monthly training sessions (see further below). All are aware of the need to refer information that has the potential to impact on safeguarding to the Diocesan Safeguarding Team in accordance with national guidance. See

- *Practice Guidance: Responding to Safeguarding Concerns or Allegations that relate to Children, Young People and Vulnerable Adults, and*
- *Practice Guidance: Responding to, assessing and managing safeguarding concerns or allegations against church officers.*

Our referral template has been updated and DST staff, Bishops, Archdeacons, and Area office staff are reminded when making a referral that the latest version is available to them on the Diocese's Sharepoint and must be used. Any referral to the DST relating to a concern or allegation is now previewed/triaged by a safeguarding expert and allocated to a DSA, recorded appropriately either on the safeguarding database (if a safeguarding matter) or a case management tracker (if a conduct or other non-safeguarding matter). Next steps are actioned, including any referral to statutory agencies, with a consistent investigation process and supervision oversight. For safeguarding concerns relating to clergy or church officers, a Safeguarding Case Management (Core) Group is

convened, as prescribed by national guidance, and chaired by the Head of Safeguarding.

Recommendation 4 – *There should be guidance provided by the Diocese of London detailing when to refer matters to safeguarding professionals, including the DST. This should refer to and promote National Guidance that is already in existence. Any guidance should encourage referrals and dialogue with safeguarding professionals so appropriate advice can be sought. This is particularly important when considering conduct and discipline matters v safeguarding referrals.*

All who work and minister in the Diocese of London are subject to all Church of England policy and practice documents, approved by the House of Bishops.⁵ All clergy and employees must have due regard to this guidance. They are signposted to those web pages and to the Diocese’s own safeguarding webpages.⁶

As part of the Diocese of London’s Safer Churches programme of work, there is ongoing communication between safeguarding professionals, Parish/Church Safeguarding Officers (P/CSOs), and clergy colleagues in relation to all allegations and cases. Ongoing training, continuous professional development, and supervision are in place to embed safeguarding excellence across the diocese in accordance with national guidance. The objective is for DSAs, clergy, and PSOs to be well trained in spotting the signs of abuse, harm and neglect and responding positively, and for robust supervision to ensure that cases are handled appropriately.

The capacity of the DSAs is being developed in order to enable them to be more proactive in supporting parishes, including giving sustained support to those in the critical role of C/PSO and to support this objective.

Recommendation 5 – *The Diocese of London should now destroy all copies of the Two Cities Report retaining only one ‘master copy’ whilst litigation/complaints are considered by those named in it. Where any information is retained about an individual, other than in the master copy, that person should be informed of what information has been retained, where it is held and for what purpose. Each of the forty-two mentioned within the report*

⁵ See <https://www.churchofengland.org/safeguarding/policy-and-practice-guidance>.

⁶ See <https://safeguarding.london.anglican.org/>.

should receive a letter confirming the destruction of the report, details of information retained about them or confirmation that no information is retained.

In order to comply with this recommendation and recommendation 11 (see below), we are in the process of destroying all copies of the Two Cities Report, including those on the email server, except for one copy which is being retained securely by the Diocesan Registrar in line with our standard retention policy. No information about individuals whose source is solely the Two Cities Report is being kept on clergy files. A letter will now be sent to individuals as per the recommendation.

Recommendation 6 – *The Diocese of London and wider church should consider producing a means of delivering the following fundamental message. If any employee, volunteer or person otherwise associated with the Church of England discloses significant illness they should be offered support and help. Their disclosures should be dealt with discreetly and not disclosed without their express permission. People should guard against making ill-informed judgements and treat individuals with respect and compassion. Whilst the review acknowledges that these are values many people use daily it is important that lessons are learned from this case and these values are re-enforced.*

We absolutely agree that individuals should be treated with respect and compassion, and we will hold each other to account in putting respect and compassion at the heart of our pastoral response to those who need support and help. Practically, Area Deans, Archdeacons and Bishops are already routinely involved in supporting clergy who experience physical and mental health problems and will also often refer them to appropriate support agencies, as well as receiving fit notes, and arranging cover (with their consent). We have recently reviewed our policy on clergy wellbeing.⁷

There is a programme of monthly training session for Bishops' and Archdeacons' staff in which we will provide continuing and specific information on the lawful processing of special category data.

Recommendation 7 – *The Diocese of London and the wider church develops a training package that can be used to inform people of the impact language can have. This package*

⁷ See <https://www.london.anglican.org/clergy-wellbeing-support/>.

should inform the whole church community of how the language we use can have a negative impact on people's perception. This is particularly important to those who lead and guide us. In this case terms including 'rent boys' 'different man on his arm' and 'young man' invoke unjustified emotional responses from some. These examples can be used and developed into other areas where our language can have a disproportionate effect on others.

Such pejorative language is not in common use in the Diocese of London – and no one is aware of the use of these particular terms except in relation to this particular case. However, we acknowledge that the use of these terms was not challenged, that they were inappropriately repeated, and that the underlying prejudice signalled by these expressions also went unchallenged.

Online Equality, Diversity and Inclusion training is mandatory for all LDF employees – both existing staff and new joiners – and a record of completion is kept. We are updating our Unconscious Bias Training (UBT), and this will include material on the effect of language and the terms we use on others. We already make UBT available to parishes, particularly during clergy vacancies, and we will encourage more parishes to take part. All new clergy will receive UBT within a year of taking up any new appointment. We will also use this course as a refresher for all staff.

Recommendation 8 – *The Diocese of London and wider church should complete an audit of its current safeguarding professionals. This audit should include previous professional background and diversity characteristics including race, gender and sexual orientation. The results of this audit should shape future recruitment strategy.*

The newly appointed Head of Safeguarding (August 2021) has completed an audit of professional background and gender of the existing DST in relation to a programme of recruitment. With this recommendation in mind and balanced with our need to comply with the Equality Act, a DSA and Casework supervisor, four additional DSAs and an interim Safer Churches co-ordinator have since been recruited. The DST now has a balance of skills, with members coming from a wide range of professional backgrounds, including the probation service, social work, NSPCC, LADO services, the National Crime Agency and Policing. All also have significant safeguarding experience.

Furthermore, we are preparing a new audit of all LDF staff by race, gender, sexual orientation and disability etc (this was last done in 2018) which will be reported (in non-attributable form) to the Diocesan Bishop's Council. Our HR team is leading work on a diocesan recruitment policy and will consult the Racial Justice Priority and LGBTQI+ groups about this work.

Recommendation 9 – *The DST develops and publishes a threshold document for referrals. This document should include the guidance on information required to assess what action is required. Further policy and guidance documents should set out how investigations will be carried out. These should include details such as strategy discussions, referrals to other professional bodies, recording information and standards for investigation.*

The national guidance, *Responding to assessing and managing safeguarding concerns or allegations against church officers, 2017*, applies

'Where there is a concern or allegation that a church officer, has:

- Behaved in a way that has harmed a child, young person and/or vulnerable adult, or may have harmed a child, young person and/or vulnerable adult;
- Possibly committed a criminal offence against or related to a child, young person and/or vulnerable adult;
- Behaved towards a child, young person and/or vulnerable adult in a way that indicates they may pose a risk of harm to children, young people and/or vulnerable adults;' ⁸

These points are based on Working Together to Safeguard Children in its 2015 version. In addition, a further bullet point has more recently also been included in the 2018 update⁹:

- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

As part of the Diocese of London's Safer Churches practice improvement, the Head of Safeguarding is writing an investigation process standard operating procedure which will add detail to the relevant national guidance. This will ensure a consistent approach to investigations and will capture all considerations in the process. We will also use this

⁸ At page 7.

⁹ <https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

operating procedure to inform a training package for ‘accompaniers’ (termed a ‘link person’ in the national guidance¹⁰) who will in future be available to support staff and clergy who are respondents to safeguarding concerns and/or Complaints under the Clergy Discipline Measure (CDM). Having increased the capacity of the DST and having put in place better processes for case management and supervision, this piece of work is now beginning.

Recommendation 10 – *The Church of England issues guidance to safeguarding teams regarding minimum standards for information exchange. This should include ‘sign off’ by a suitable safeguarding lead. The Church of England should also support the development of Information Sharing Agreements with other professional bodies.*

The Church of England has just issued three documents: Church of England and Church in Wales Information Sharing Framework and Agreements, to which the Diocese of London is a signatory. These specifically cover safeguarding and HR matters within and between the Church of England, the Church in Wales and national church institutions. We will operate within that framework. We await further Information Sharing Agreement templates (ISAs) for information sharing with other churches and agencies, and in the meantime will take advice on any individual cases that arise. Training in working with data within these agreements is being prepared, and we await information from the National Church on the roll-out of that training.

Recommendation 11 – *The London Diocese should commission a GDPR expert to consider the legality of retaining information passed by the HOps. This should extend to the Two Cities report. Its conclusions should be considered in the training now offered to the DST and wider church community.*

As there is no intention to retain the Two Cities Report (except as provided in our response to Recommendation 5 above), we have no further data about which we need now to consult a GDPR expert.

The Bishops operate within the guidelines on retention set out in the House of Bishops

¹⁰ *Practice Guidance: Responding to, assessing and managing safeguarding concerns or allegations against church officers* at paragraph 1.5.

policy document *Personal Files Relating to the Clergy*.¹¹ We have recently reviewed our GDPR compliance and consider that we operate a policy that is legal and one that complies with national policy. Training on document management in Bishops' offices is being provided through monthly training sessions with Bishops' PAs.

We have signed an Information Sharing Agreement (ISA) with the Church of England. (See above, Recommendation 10).

The National Safeguarding Team is developing multi-agency Information Sharing Agreements (ISAs) and the Diocese of London is participating in the consultation for this piece of work with a small group of dioceses.

Recommendation 12 – *This review should be used to refresh safeguarding professionals' understanding of risk regarding disclosure. Whilst the interests of complainants, witnesses and other vulnerable parties should always be considered, this should not be done in isolation. The rights and welfare of those being investigated should also be considered. If decisions are made to withhold disclosure, then a detailed rationale should be recorded, and risk assessment completed.*

We recognise that people are entitled to know what information is being gathered about them and how it is being processed. Information can only lawfully be withheld when this is permitted by the Data Protection Act. The Head of Safeguarding now keeps a timeline of cases, in order to ensure that cases are dealt with in a timely manner and that those who are being investigated are kept informed about the nature of disclosures against them and progress on their case. On the rare occasions when a decision is made to withhold disclosure, for example on police advice during an investigation, then a detailed rationale will be recorded, and a risk assessment completed. We will also ensure staff data protection training equips them to recognise and respond to subject access requests, even when not labelled in those terms. See also our response to recommendation 16.

Recommendation 13 – *A review of how requests from Coroners are managed should take place. Experienced individuals should be identified to be a single point of contact and all*

¹¹ See <https://www.churchofengland.org/sites/default/files/2021-08/Personal%20Files%20Relating%20to%20Clergy%202021%20Edition.pdf>.

safeguarding staff to receive training on the coronial process, affording them the best opportunity to support inquests and those who are impacted by them.

The Head of Safeguarding, in consultation with HM Coroner's Services Manager, will deliver awareness training to the DST on a development day in July 2022. Any new requests should be owned by the Head of Safeguarding who has significant experience in the coronial process. Legal advice will also be taken at an early stage in relation to any such matters from appropriately qualified and experienced practitioners.

Recommendation 14 – *Both the DST and Roman Catholic safeguarding teams undertake a joint de-brief and reflective learning session regarding this case.*

The Head of Safeguarding for the Diocese of London is in contact with the Head of Safeguarding in the Roman Catholic Diocese of Westminster to establish a good working relationship for the future. The Roman Catholic Church is working on an independent lessons learned review that has yet to be completed. Once that review has been completed, it has been agreed that both teams will meet for a joint reflective session. From this reflective learning session, we will identify joint outcomes and commit to implementing them within the Diocese of London.

Discussions are also in place concerning information sharing between the Roman Catholic Church and the Church of England at both local and national level. Similarly, we will use information sharing agreements with other denominations, networks, and para-church organisations when these have been agreed by the Church of England, and we will take advice on any individual cases in the meantime.

Recommendation 15 – *The Diocese of London and the Church of England evaluates training given on anti-discriminatory practice. This should include unconscious bias. A mandatory training package should be developed and delivered to encourage non-discriminatory practice.*

In addition, as indicated above in response to Recommendation 7, we are developing our Unconscious Bias Training (UBT) package (which is delivered to clergy (office holders) and parishes), and we will include these matters within the framework. Equality, Diversity, and

Inclusion training already forms part of the LDF's compulsory online training for all new and existing employees, and our refreshed Unconscious Bias training will be delivered to all staff.

Recommendation 16 – *The Diocese of London considers the learning from the commission of the Two Cities Report. Learning should include exchange of information between decision makers and those affected. It should also highlight why decisions were made and at what seniority. This process should be aimed at rebuilding trust and ensuring that all involved understand the responsibilities individuals have in their day-to-day roles.*

We acknowledge the loss of trust that has been caused by individuals named in the Two Cities Report fearing that unfounded information about them had been inappropriately shared. We have made it absolutely clear to all staff that note taking needs to be factual, accurate, and proportionate, and that information about individuals must not be collated or shared inappropriately. If an allegation of safeguarding or other misconduct needs to be explored, then this should be done in the correct format, eg through a safeguarding referral form, and through the correct channels, with the support of the DST, HR, or the Diocesan Registrar as appropriate. Protocols for storing information on the diocesan safeguarding database and/or clergy blue files must be followed. Protocols for sharing information must be followed.

We know that we will need to make available individual pastoral conversations for those who have been angered and unsettled by the thought of information being inappropriately kept about them and who would like to speak further to us about this. The Bishop of London's chaplain is coordinating such pastoral support for any who continue to feel affected, and the Bishop of London herself is willing to meet any individual who has outstanding concerns.

In order to increase the transparency of all our roles and responsibilities, we have begun a communications exercise about the different roles and responsibilities that diocesan officer holders and employees fulfil. One of the aims of that work is to be clearer and to communicate more clearly about where responsibility and decision-making lie. By the end of 2022, we will have set up a learning and reflection session for and between the

diocesan senior staff, senior management group, and DST about decision making processes in the Diocese, based on this recommendation.

In relation to safeguarding specifically, we have set up training for senior staff and safeguarding colleagues in relation to safeguarding, CDM, and ecclesiastical law so that they are clearer about their own responsibilities and authority. The DST now sends out a regular newsletter introducing team members and highlighting aspects of their work; DSAs regularly attend Area meetings for their link Area and are proactive in building relationships with parish clergy.

Recommendation 17 – *All safeguarding investigations should include a risk assessment that considers the creation of a written plan for pastoral care for the person being investigated.*

Over the last year the Diocesan Safeguarding Team has developed a referral process and includes a new referral template. Upon receipt of the referral, the duty Safeguarding Advisor completes a risk assessment to consider the safety, needs and wellbeing of all persons involved; this is recorded on our safeguarding database as part of the investigation. If the concern or allegation relates to a member of the clergy or church officer then a Safeguarding Case Management Group (Core Group, SCMG) is convened in line with the Church of England's *Practice Guidance, responding to, assessing, and managing safeguarding concerns or allegations against church officers*. The SCMG is Chaired by the Head of Safeguarding. The agenda and minutes are focused on the identification and mitigation of identified risks. These will be recorded appropriately, and a pastoral care plan created and implemented, with clear ownership and timescales. The SCMG is consistently reviewed until closure.

Further work

Alongside the Robson Review the Diocese of London commissioned an independent management review to consider the actions of individuals who still work for the diocese. The management review, which was overseen by a steering group, has reported to the Bishop of London and the Diocesan Secretary and we are addressing the recommendations in line with our HR processes.

The management review and our actions to address the recommendations have been reviewed by the Chair of the Audit and Risk Committee.

In structuring our safeguarding team, its roles, and its oversight for the future, the Diocese of London will be responding to IICSA's recommendation that the Diocesan Safeguarding Adviser role should eventually be remodelled as one of Diocesan Safeguarding Officer.¹² This post holder will have the authority to make decisions independently of diocesan bishops and other senior colleagues in respect of key safeguarding tasks and may report directly and independently into the National Safeguarding Team.

We believe that further reflection and work are still needed, and should be led by the national Church, to develop practice guidance around clergy HR record keeping. In particular, the requirements of data protection law need to be better understood and implemented in relation to the processing of special category data, for example about a person's health, sex life, or sexual orientation. The complexity of – and potential contradiction between – paying due regard to these requirements whilst also managing the Church of England's current position on conduct expectations for clergy who may be in non-celibate same-sex relationships, including civil partnership or marriage, needs further exploration and guidance.

The Robson Review has focussed attention on the treatment within the Church of England of someone about whom allegations had been made. It has rightly raised questions of how natural justice is applied in such circumstances and how pastoral care is offered and received during any process of investigation. Detailed guidance already exists on how to support respondents, for example through the provision of a link person.¹³ Although in this case Fr Alan was no longer a Church of England office holder, this guidance should form the basis for a package of support which is offered to every respondent, whatever their situation.

As described above, the Diocese of London has already changed the way it triages allegations and supervises case management. It has also begun to recruit and train suitable people to be accompaniers, if requested, of those who find themselves the subject of a safeguarding or conduct investigation. There remains more to be done locally, and we also intend to seek conversation and collaboration with the National Safeguarding Team and other dioceses to improve practice and

¹² This will require a change in legislation.

¹³ See <https://www.churchofengland.org/sites/default/files/2017-12/Responding%20PG%20V2.pdf>.

guidance in this area.

Although we have made substantial improvements to our safeguarding service in the Diocese of London, we are aiming for further and ongoing improvement. With oversight from the Diocesan Bishop's Council, we intend in the next six to 12 months' time to ask the Diocesan Safeguarding Steering Group to design and commission a review of the quality of safeguarding service that is now being provided and to identify any outstanding areas of weakness. The Robson review is also prompting us to consider our organizational structures across the Diocese, with reference to decision making and accountability around and through our strategy, resource allocation, management, and governance work. We are seeking the opinion of the Diocesan Safeguarding Steering Group and the Diocesan Bishop's Council on this response and may make further modifications to our plan of work as a result of their input.

Everyone from the Diocese of London who has been involved in responding to the Robson Review -- including Bishops, Archdeacons, safeguarding, HR and admin colleagues -- is committed to ensuring that we learn lessons from the death of Fr Alan Griffin, as well as to following through the recommendations of our Past Cases Review 2 Report (which we also intend to make publicly available, in full). Working with our Director of HR and Safeguarding and our Head of Safeguarding, the Bishop of Stepney and an expert lay member of the Diocesan Safeguarding Steering Group will be accountable to the Diocesan Bishop's Council for the continuing progress of our response to this Review and the ongoing improvements to our safeguarding service, under the umbrella of our Safer Churches programme of work.¹⁴

The Rt Revd and Rt Hon Dame Sarah Mullally DBE, Bishop of London
The Rt Revd Dr Joanne Woolway Grenfell, Bishop of Stepney
Richard Gough, General Secretary, Diocese of London

4 July 2022

¹⁴ Suzie Long is Director of HR and Safeguarding; Martin Goodwin is Head of Safeguarding; the Rt Revd Dr Joanne Woolway Grenfell is the Bishop of Stepney, lead bishop for safeguarding on behalf of the Bishop of London; and Sarah McKimm is an independent lay member of the Diocesan Safeguarding Steering Group, a lawyer with expertise in education and professional regulation, safeguarding, safeguarding regulatory compliance, inspection and accountability.