



Review of Safeguarding arrangements and Ministry Culture at Lyonsdown Church

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Introduction

1. Christian Safeguarding Services (CSS) have been commissioned by Lyonsdown Church to conduct an independent review of the safeguarding arrangements and ministry culture¹ at the current Lyonsdown Church. The scope of this review is specific and is limited to the current Lyonsdown Church, however, without a broader understanding of the context and history, the review is unlikely to reach reliable conclusions or produce meaningful recommendations.
2. CSS are grateful to all those who have contributed to this review. We appreciate the time taken in doing so. We are also grateful to the Diocese of St Albans for their cooperation with the review.
3. The overall purpose of this review is to assess the effectiveness and appropriateness of the safeguarding arrangements and ministry culture at Lyonsdown Church and to recommend areas of development or improvement where these are identified. The review will not investigate past circumstances or concerns. So far as comments have been made by participants about past circumstances, this review does not attempt to evaluate whether or not those comments are well-founded, but instead takes them into account in its overall assessment of current arrangements. The focus of the review is the current safeguarding arrangements and ministry culture, and how Lyonsdown Church moves forward.
4. The views that have been shared have contributed to and informed the analysis and recommendations of this review. In order to protect anonymity while also providing transparency and accountability, this report is structured around the CSS Audit Tool². This format helps us to look systematically and thoroughly at the safeguarding arrangements and culture that are in place in a wide variety of organisations. The report structure does not, therefore, allow individual's concerns to be identified. The inclusion of particular content may be a reflection of information that has been provided, or the result of our examination and scrutiny of the church's systems, processes or culture, or a combination of the two.
5. Views expressed to the reviewers were varied, and often polarised. This report seeks to approach the task before us systematically, impartially, rigorously, and sensitively. The report does, however have a very specific focus and style, and is aimed at a number of audiences. It is probable that some contributors will feel that their views and perspectives have not been given sufficient prominence in this report. All the views expressed have been taken into account, but the structure of this report is driven by the audit tool and anonymity has been prioritised.

¹ In the context of this report, the review of "ministry culture" should be understood as a review of the *safeguarding aspects* of the ministry culture. It should not be taken to imply a broader comment on, for example, theological or biblical aspects etc.

² The CSS "How healthy and safe? Audit Tool" was developed by Phasic Ltd / CSS. It is based on relevant legislation and guidance, including "Working together to safeguard children", "Keeping children safe in education", The Charity Commission guidance for charities and trustees and other relevant legislation and guidance. The Audit tool can be accessed with a free account at [Audit Tool – "How Healthy & Safe Toolkit" | Christian Safeguarding Services \(theccss.co.uk\)](https://theccss.co.uk/Audit-Tool-How-Healthy-Safe-Toolkit).

6. The report is written with two main audiences and purposes in mind; the Church leadership, who have the responsibility to ensure that proportionate and compliant³ arrangements are in place, and any statutory agencies who have an interest or responsibility, including the Charity Commission.

³ Compliant here refers to legislation and national and local guidance. In particular, this refers to “working together to safeguard children,” Charity Commission’s guidance, and other relevant or helpful guidance such as “Keeping Children Safe in Education”.

Definitions and terminology

Adult is used to refer to a person who is at least 18 years of age; this being defined in law.

Adults at risk of abuse are defined in the Care Act (2014) and are “adults with care and support needs” (see below) who are also at risk of abuse and who, due to those support needs, are unable to protect themselves.

Adults with care and support needs are defined in the Care Act (2014) and are adults who require care and support with basic, everyday tasks such as washing, dressing, cooking for themselves, managing their finances, etc.

Church family is used throughout this report. The phrase is rooted in a biblical metaphor and should be understood in that way. The phrase “church family” refers to anyone who attends the activities at Lyonsdown Church on a regular basis.

Concern(s): as used throughout this report relate to claims that the organisational structure, processes, or culture are deficient or inadequate in some way or that legal or regulatory duties have not been met.

The raising of a concern does not indicate the veracity of that claim, but rather that the claim has been made. Such claims should be investigated impartially, and corrective action where required should be implemented.

Doctrines refers to the beliefs that the church holds. For the purpose of this report, “theology” and “doctrines” carry the same broad meaning.

Ecclesiology in the context of this report refers specifically to the church’s position on how church should be understood (from a biblical perspective), organised, and run. It therefore interacts with governance and organisational structure but relates more specifically to the biblical principles that drive the organisation and structure.

Holy Trinity Lyonsdown refers to the church prior to March 2021 which was part of the Church of England.

Lyonsdown Church refers to the church post March 2021 after leaving the Church of England.

The Lyonsdown Group refers to an informal group who have raised concerns about the culture and practice at Holy Trinity Lyonsdown and the now independent Lyonsdown Church. Some of those who comprise the group would describe themselves as a “survivor’s group.”

Theology refers to the beliefs that the church holds. In the context of this report, “theology” and doctrines carry the same meaning.

Universal safeguarding is the tier of safeguarding that falls below the statutory thresholds, and which can be referred to as the “general duty of care” the charity and the trustees have, to ensure that no

one who encounters the charity is harmed as a result of that contact. Individuals who fall into the universal territory have no additional needs.

Review background and context

7. Lyonsdown Church became an independent church in March 2021. In June 2022, the church received a letter from “The Lyonsdown Group⁴” which raised concerns about Holy Trinity Lyonsdown and the now independent Lyonsdown Church.
8. Many of these concerns raised in the letter of June 2022 were first formally addressed to the Diocese in 2015 and were dealt with in accordance with the Church of England’s policies and procedures at the time. Following completion of the Church of England (C of E) processes, the Lyonsdown Group expressed dissatisfaction to the Diocese about the scope, process, and outcome, and requested a comprehensive and publicly available learning review. Having taken legal advice, the Diocese confirmed to the Lyonsdown Group that this would not be possible under current legislation and safeguarding guidance. The Diocese did, however, agree to a confidential Learning Review. A reviewer with appropriate skills and experience was commissioned to conduct this review which was completed in August 2022.
9. Since Lyonsdown Church had already left the Church of England, the Diocese had no jurisdiction over, or responsibility for, Lyonsdown Church. The Diocese therefore informed the Local Authority of the work they had completed up to that point. Most of the concerns reported to the Diocese related to adults who do not meet the threshold for adults with care and support needs or adults at risk of abuse. One concern was raised which questioned the suitability and age appropriateness of some of the subject matter taught to younger children. None of the concerns raised meet criminal or statutory safeguarding thresholds.
10. The Lyonsdown Church trustees submitted a Serious Incident Report to the Charity Commission in July 2022.
11. In their letter to Lyonsdown Church in June 2022, the Lyonsdown Group repeated the request for a full independent and public review that investigated and addressed their concerns. CSS were approached for advice about how to proceed.
12. Lyonsdown Church and CSS are subject to the same legal restrictions as the Diocese. Currently, there is no legal basis upon which the request for a full, independent, and public review can be granted. To do so would be illegal and would leave any organisation involved open to legal action. Furthermore, such a review would have to be commissioned by the Diocese, since the concerns relate to a time when the church was part of the Church of England. This was explained to the Lyonsdown Group.
13. Although Lyonsdown Church is no longer part of the Church of England, and is now an Independent Evangelical Church, there is significant continuity. The current Pastor / Teacher had previously been on staff at Holy Trinity Lyonsdown, although he had been at another

⁴ “The Lyonsdown Group” is an informal group, consisting of individuals who have raised specific concerns about their experiences at Holy Trinity Lyonsdown Church.

church, which was not part of the Church of England, for a number of years, prior to his appointment to this current role. The remainder of the staff team were Holy Trinity Lyonsdown staff and continued in their roles when the church left the Church of England.

14. Following discussions with The Lyonsdown Group and Lyonsdown Church, it was agreed that the review would consider the views of past and present members of the church family. It was made clear that the review could not consider or draw conclusions about concerns that relate to the time when the church was part of the Church of England. The purpose of providing this opportunity to past members was to ensure that their insights and views were taken into account when considering the current culture and practice of Lyonsdown Church.
15. CSS communicated the scope and scale of the review to The Lyonsdown Group, explaining that it would only partially cover their request. As outlined in paragraph 11 above, it is not possible to conduct a public review of past circumstances, however, it is the aim of this review to consider whether Lyonsdown Church poses a safeguarding risk to children, young people, adults who have care and support needs or anyone else who encounters the church.

Scope of this review

16. Lyonsdown Church commissioned Christian Safeguarding Services to conduct this independent review of their safeguarding arrangements and ministry culture. Prior to the review, CSS met with representatives of The Lyonsdown Group, the Diocesan Safeguarding Advisor and the Local Authority and it was agreed that the focus of this review would be solely on the current Lyonsdown Church. Therefore, this review is not an investigation into the time when the church was Holy Trinity Lyonsdown as this remains the responsibility of the Diocese. The Diocese gave their full cooperation to CSS and have shared relevant documentation on a confidential basis and where necessary in the public interest to facilitate and support this review. This review is, however, a comprehensive review of Lyonsdown Church's safeguarding arrangements and culture.

Methodology

17. CSS were involved in helping Lyonsdown Church to formulate the scope of, and approach to, this review. Following initial discussions with the church leaders, CSS reviewed various documents and consulted with The Lyonsdown Group, statutory services, and the Diocese. From the information gathered, the approach to this review was developed and agreed.
- A questionnaire was developed collaboratively by Lyonsdown Church Trustees and CSS. This was made publicly available on the Lyonsdown Church website. Anyone who wished to contribute was able to do so without restriction and with the assurance of anonymity. Members of the church family were actively encouraged to participate. Within the scope of GDPR restrictions, the church contacted a number of former members for whom they still had contact details with a link to the questionnaire and encouraged them to make the review known to others who might wish to take part. The Lyonsdown Group also made their contacts aware of the review so that they too could participate. 88 people completed the questionnaire before the deadline. Of those 88:
 - 34 attended the church while it was part of the C of E and left before it became an independent church.
 - 2 respondents had never been members of the church family.
 - 52 are current attendees of Lyonsdown Church
 - A small number of people completed the questionnaire after the deadline. The qualitative data from these late submissions was taken into account for the review, but the quantitative data was not included in the analysis.
18. The questionnaire allowed individual respondents to answer as many (or as few) questions as they wished. It also provided the facility to answer the same question in different ways relating to different periods of time. Other documents could be uploaded, either in addition to or instead of answering the questions in the form. All respondents were given the option to request a one-to-one meeting with CSS to provide further information.
19. In addition to those who requested a one-to-one consultation, CSS also conducted:
- a. One-to-one interviews with all current members of church staff
 - b. Focus group meetings with:
 - i. The Church Trustees
 - ii. Members of the Executive Council
 - iii. Current Ministry Trainees
 - iv. Youth and children volunteer leaders
 - v. Small Group Leaders
20. CSS reviewed Lyonsdown Church's safeguarding policies and procedures, and other documents provided by a range of individuals.

21. The information from the review was collated and analysed using the framework of the CSS “How healthy and safe audit tool.” From this analysis, conclusions were drawn, and recommendations have been made.

Analysis, conclusions, and recommendations

Preliminary comments

22. Before turning to the analysis, it is important to recognise that the views expressed were highly polarised. When considering the responses to the questions, respondents can be divided into 2 groups:
 - a. Those who attended the church while it was part of the C of E and left before it became an independent church, (save for two instances where the respondents had never been part of the church family).
 - b. Those who currently attend Lyonsdown Church; many of whom attended while the church was part of the Church of England.
23. There is considerable polarisation of views between these two groups. In order to address this variety and polarisation of views, the reviewers have used the data collected to inform the audit. We have not attempted to establish the veracity of the concerns, since this is beyond the scope of the review. Rather, we have considered the measures that we would expect to be in place to manage each of the criteria and have compared these to the measures that are in place at Lyonsdown Church.
24. A further note of explanation may be helpful before proceeding. Some participants in the review, used the term “spiritual abuse” in relation to their concerns.
25. CSS tend not to use the term “spiritual abuse” for two main reasons. Firstly, it is not officially a category of abuse in the UK, and secondly, because the term is imprecise, requiring far greater nuance of understanding and expression.
26. The use of the term “spiritual abuse” amongst Christian churches and other faith-based organisations within the UK is very wide. When this is extended to the worldwide Christian community, this breadth of understanding and definition expands significantly. Once this is extended to include other formal religions, the range of definitions broadens still further. Extending the range of uses to include those who describe themselves as “spiritual but not religious,” and then still further to encompass the definitions provided by secular organisations with no religious affiliation, the definitions become so broad that without providing clarity about exactly which definition is being adopted, it is impossible to establish shared understanding and meaningful communication.
27. CSS suggest that a wide range of categories are included in the scope of what is referred to in the literature that is available. This would include:
 - a. Criminal offences
 - b. Civil offences
 - c. Regulatory breaches
 - d. Behaviour that is not illegal but which many would regard as abusive.

- e. Immoral behaviour
- f. Poor behaviour which is not acceptable but which many would not regard as abusive (this is behaviour that could result in church discipline)
- g. Unsanctified behaviour (which may not initially result in church discipline but which over time may be regarded as displaying unrepentance)
- h. Genuine mistakes (sometimes resulting from lack of competence)
- i. Misunderstandings
- j. Theological differences

In addition to these, there are also false, or malicious allegations.

28. CSS seek to address these challenges by describing behaviours and organisational characteristics rather than by labelling them in an imprecise way. It is our view that this approach is more useful to organisations in understanding what is being addressed and the changes that need to be made. Consideration of abusive behaviours that meet statutory thresholds are discussed using the established categories in UK legislation and guidance. When considering concerns that fall below statutory thresholds, we describe those concerns and their impact and relate these to best practice standards using the same established categories of abuse and other terms such as “power-dynamics,” “imbalance of power” or “misuse of authority” where appropriate.
29. This approach is not intended to minimise the existence or impact of the phenomenon described by the term “spiritual abuse.” Rather, it aims to provide greater clarity and precision of thought, analysis, and communication; this being essential if problematic features of culture and practice are to be effectively addressed.
30. Throughout this review, CSS have adopted this approach. Thus, although the term “spiritual abuse” is not used, the notion of harm that can occur within church settings is clearly in focus.
31. It must be noted here that the Church of England does recognise “spiritual abuse” as a category of abuse within its policies and procedures. It is therefore appropriate for this term to be used by the Church of England nationally and locally, in line with its own policies. Since Lyonsdown Church is no longer part of the Church of England, it must work to legislation, national and local guidance and procedures, Charity Commission guidance and regulations, and its own policies and procedures.

Leaving the Church of England and moving forward

32. In March 2021, Lyonsdown Church left the Church of England. This was the culmination of longstanding theological differences between the church and the Diocese. Since the arrival of a new vicar in the year 2000, the church had moved into a conservative evangelical theological position and had also seen significant growth numerically during this time. This movement was in the opposite direction to the general trend within the C of E, and in the Diocese; both of which were adopting increasingly liberal theological positions and practices. In 2004 the church’s

PCC took the unanimous decision to suspend payment of the Parish Share in protest against the theology and practice of the then Dean of St Albans. As a result of these significant theological differences with the Diocese, and the decision to suspend payment of the Parish Share, Holy Trinity Lyonsdown essentially became financially independent of the Diocese and the Church of England; neither contributing to, nor drawing on, Diocesan financial resources. This is a tension which all conservative evangelical churches within the Church of England have experienced for many years. The church considered various options, including alternative oversight from within the Church of England and leaving to become an independent church. The favoured option fluctuated during this time, however, following a period of careful and prayerful consideration of the options, the ultimate decision was taken to leave the C of E.

33. Varying views about this decision were expressed by participants in the review. The decision to leave coincided with the Covid pandemic, making accurate assessment more difficult, however, the leadership report that almost all the church family have continued to attend the church since it became independent. CSS found no evidence to suggest that this was anything other than the culmination of the ongoing theological differences.
34. During the time described in the previous 2 paragraphs, Lyonsdown Church was wrestling with questions that many conservative evangelical churches were having to face. Due to a combination of circumstances; some theological, and others more practical, the church seems to have increasingly seen itself as embattled and having to take a stand for theological truth in the face of error and heresy. That perspective is logically and historically coherent since the church was holding to traditional “Reformed⁵” theological and ethical positions that had been espoused by the Church of England over the centuries. However, views on this sense of embattlement and standing for the truth were highly polarised. Some valued what they saw as clear and biblically faithful ministry while others saw this stand as divisive and isolationist. During this time, the church’s Pastor / Teacher was a member of the South East Gospel Partnership Committee, chaired the 33-church North London Partnership, organised two multi-church missions and sponsored regular joint staff training with a local church.
35. Having left the Church of England and become an independent church, some of the theological and ethical tensions will have been relieved, since the church is no longer trying to function under the authority and within the constraints of the national church and a Diocese with which it disagrees theologically. The current Pastor / Teacher has experience of working in an independent evangelical church and has a clear vision for moving forward. The church wishes to join the Fellowship of Independent Evangelical Churches and continues to be involved with the local Gospel Partnership; both of which involve the church with a broader range of churches and provide exposure to different theological perspectives and church traditions. This is something that is being actively sought by the church. Recommendations for addressing this are included later in this document⁶.

⁵ Reformed is here used in the theological sense. The C of E was originally founded on protestant reformation principles which are reflected in the 39 Articles.

⁶ In particular, recommendations 1, 2, 3, 4, 6, 8, 11 & 12

36. At this point, it is essential that CSS respect the purpose and scope of this review. Leaving the Church of England does not, per-se indicate any level of safeguarding risk. Furthermore, it is possible, if not likely, that this decision will ease, rather than increasing or even perpetuating features that some participants in the review regarded as hurtful or damaging.
37. CSS must, however, clearly state that with one exception, which is addressed in paragraphs 106-110, the concerns that have been expressed to CSS, or which are contained in the documentation to which CSS have had access, do not relate to children or adults with care and support needs. None of the actions described would meet criminal thresholds or the criteria for statutory safeguarding.
38. Predominantly, the concerns that have been expressed relate to the general duty of care and the responsibility of trustees to take reasonable steps to ensure that no-one who comes into contact with the charity is harmed as a result of that contact. This could also be referred to as the universal tier of adult safeguarding. It relates to adults who have mental capacity and agency, and thus, have the right to make choices for themselves. The difficulty with this is that there is no clearly defined or accepted legal framework within which harm can be objectively measured. None of the concerns raised meet criminal or statutory safeguarding thresholds.
39. Some participants expressed suspicion of the motivation of the church leaders in leaving the Church of England. CSS did not find evidence to support those suspicions and concerns. The explanations offered by the church leaders were coherent and logical and accorded with CSS's own knowledge and experience with other conservative evangelical Church of England churches.
40. Some participants expressed concerns about *the way* that Lyonsdown Church left the Church of England, however, that falls outside the scope of this review.
41. Having left the C of E, Lyonsdown Church wishes to forge closer links with other like-minded evangelical churches. CSS believe that this will be beneficial to the church.
42. In the context of theological movement (which many evangelicals would regard as at best compromise, and at worst heresy) and cultural shifts within the broader UK culture that are rooted in a rejection of the broad Judeo/Christian worldview, evangelical churches are having to consider how they disagree and stand faithfully upon historically orthodox positions. It is not for CSS to make theological judgements, nor is it our place to tell churches how they should communicate with those with whom they disagree. In our experience, however, it is important that churches think through carefully the implications of their theological convictions and the impact of the way in which they express these. Scripture has much to say about standing firm in the truth, however, this must be balanced with the exhortations to speak truth in love and with gentleness, and the need to act with humility, care, and love. These issues are important for all churches and form a standard part of CSS's training for church leaders.
43. A broadened involvement with a wider range of like-minded churches will provide Lyonsdown Church with the opportunity to share learning and perspectives. The main Pastor / Teacher is involved with a number of such groupings both nationally and locally and has a clear vision for the future which includes further engagement with a wide range of evangelical churches.

Recommendation 1

CSS recommend that Lyonsdown Church leadership actively seek to engage with a range of historically orthodox churches and traditions, as opportunity allows, to compensate for the loss of the broader perspectives previously encountered through the diocese and the C of E.

CSS also recommend that the leadership consider the implications of their new context as an independent evangelical church. This should include, considering the implications and impact of their new governance and leadership structures, their theological positions, and the way in which these are communicated to the church family and more broadly.

Governance, leadership, and oversight of safeguarding

44. The governance, leadership and oversight of safeguarding is a vital theme in both Charity Commission guidance and safeguarding guidance. It is also a theme that is regularly referenced in learning reviews.
45. When Lyonsdown Church left the Church of England, it sought to replicate its governance structures as much as possible, to minimise disruption and provide some stability during a period of change and transition. This was already a highly disruptive time due to the Covid pandemic. The decision to leave the Church of England required Lyonsdown Church to move from the building and a new senior leader has also been appointed following the retirement of the previous Vicar. This desire to minimise disruption is understandable and indeed, would be expected.
46. A second factor also appears to have influenced decisions about the governance structures. In many independent evangelical churches, the structure adopted consists of Elders, who provide the spiritual leadership and have spiritual authority, supported by Deacons, who serve the church practically and pastorally⁷. In such churches, it is common for either the Elders, the Elders and Deacons, or a subset of each of these, to form the board of trustees. These models allow the church to harmonise biblical principles with Charity Commission guidance and legal requirements.
47. CSS recognise the logic of the decisions made by Lyonsdown Church when they left the Church of England and have no reason to question the genuineness of the explanations provided. It should be noted, however, that there is a discontinuity between the old and new governance structures. When the church became an independent church:

⁷ It should be noted that this description represents a significant generalisation and that a wide variety of approaches are seen within this broad, general framework.

- The former church wardens, deputy church warden and incoming Pastor / Teacher became the trustees.
 - A further trustee has also subsequently been appointed.
 - The PCC became the church Executive Council.
48. Under the old structure, the PCC were the trustees. By adopting the new structure, therefore, the legally accountable body was reduced in size, which also limited diversity and potentially narrowed the skill base and breadth of experience. This structure is legally compliant and, in some ways, is consistent with the Elder / Deacon model, however, it does introduce a discontinuity of approach and consolidates authority and responsibility within a small group. This has, however, provided a stable base for the transition from a Church of England church to an independent church and adequate governance and oversight to meet legal and regulatory requirements. As transitional arrangements, these are adequate, however, the church does need to address the fact that it no longer has support and oversight from the Church of England. The transition from a Church of England church to an independent church is a major change. On the whole, the transition is being effectively managed and in the interim, safeguarding practice continues to be strong where statutory thresholds are met. There is, however, work to do to develop safeguarding processes for adults who do not meet the criteria or thresholds for statutory safeguarding. The leadership are aware that further development is required and were already giving consideration to this matter.
49. From the responses to the review questionnaire, it was clear that among current members of the church family, there was a strong sense that leaving the Church of England had not been unnecessarily disruptive and their day-to-day experience of the church family was not significantly changed. It is a credit to the leadership that such a significant change had been managed with minimal disruption. However, it was also apparent that in general, across the church family there was little understanding of the church structure and how decisions are made. Few people were clear about who members of the Church Council were and what its function is. Leadership acknowledged that this was an area that needs to be addressed as there is a lack of clarity about its role and function.
50. Within independent evangelical churches, various models of governance have been established. One key distinction is between churches which are “congregational” and those which are often described as “Elder led.” The key distinction from a safeguarding perspective is that in a congregational structure, there is a formal membership, which makes key decisions, and which provides some degree of accountability to the church leadership, who are often appointed by the membership. The alternative “Elder led” model involves a smaller group of church leaders who appoint other leaders. In this structure, accountability is to the other leaders, within the church’s policy framework and the requirements established in the governing documents.
51. Both models are legally compliant, and in both cases the Charity Commission have oversight and provide ultimate accountability. They approve the charity registration and require all charities to operate in accordance with their governing documents, charity law, Charity Commission guidance, and their own internal policies and procedures.

52. At least theoretically, the congregational model provides greater accountability internally than the Elder led model, however, both models can provide effective oversight and accountability. Equally, neither model will guarantee effective oversight and accountability. It is therefore essential that the trustees establish clear processes through which they can be held accountable and can also provide accountability to the safeguarding officers, staff, and volunteers, and assure themselves of the effectiveness of the safeguarding arrangements. The safeguarding leads should provide regular updates to the trustees and safeguarding should be a standing item on trustee meeting agendas. Ultimately, the responsibility for the safeguarding arrangements rests with the trustees and while many of the practical aspects of safeguarding can be delegated the overall responsibility cannot.

Recommendation 2

CSS recommend that the governance and oversight of safeguarding is reviewed:

- a) To ensure that appropriate transparency and accountability are provided now that Diocesan oversight is no longer present.
- b) To provide greater focus on adults who do not meet the statutory definitions and thresholds.
- c) To ensure that appropriate focus is given to the safeguarding of staff and volunteers.

Safeguarding and related policies and procedures

53. Over recent years, two key drivers have shaped developments in safeguarding in the UK. The first is the Independent Inquiry into Child Sexual Abuse (IICSA). Increased awareness of past failure, coupled with an increasing focus on the importance of the early identification of low-level concerns and the importance of early intervention are shaping the approach to safeguarding children and helping to improve practice standards. The second was the increasing awareness of safeguarding adults. The consolidation of disparate legislation and guidance in the Care Act (2014), and the success of the “Me Too” movement globally, coupled with an increased profile and awareness of so called “spiritual abuse”⁸ have increased the awareness, not only of the statutory levels of safeguarding adults,⁹ but also of the universal tier. Charity Commission guidance has been revised substantially to reflect these changes.

⁸ See paragraphs 24-31 above

⁹ Description of the responsibilities of organisations to safeguard adults can be divided into 3 levels or tiers. Universal safeguarding is the responsibility which could be described as the general duty of care and relates to individuals and situations which do not meet the statutory thresholds. We regularly refer to this (including in the report as “sub-threshold safeguarding of adults. There are two further statutory levels; “adults with care and support needs” which involves consent-based care and support and “Adults at risk of abuse” (sometimes referred to as adults in need of protection) which involves the legal duty to protect those who due to their care and support needs are not able to protect themselves from abuse and / or neglect.

54. One of the challenges now faced by charities (including churches) is the absence of clear standards of conduct when supporting or working with adults who do not have additional care and support needs. It is, therefore, important that charities manage expectations and define standards for themselves, to provide clarity, structure, and a framework through which risk of harm can be objectively assessed and managed.
55. As a Church of England church, Holy Trinity Lyonsdown operated under the House of Bishops policies and guidance and the Diocesan procedures. Lyonsdown Church's current policies and procedures were based on templates provided by the Church of England. The Church of England policies are, of necessity, generic. They aim to address the needs of a wide range of churches. Inevitably, this results in something of a compromise. While Lyonsdown Church's policies and procedures are legally compliant, they would benefit from significant development given the size of the church and the range and scale of activity, to meet best practice standards.
56. The policies and procedures that are in place at Lyonsdown Church have been minimally updated, and the Safeguarding Lead identified the need to complete a more thorough update, however, the decision was taken to wait for the outcome of this review before completing a more extensive policy review and update. This is a reasonable approach in CSS's view. The policies and procedures do require substantial work, and it may be easier to develop a new policy than to try to adapt the existing one. This could be based on one of the template policies that exist, for example from CSS or Thirtyone:eight.
57. Once this review is finalised, the update to the policies and procedures should be prioritised by the church. The existing policies were written to fit into a broader framework which included national and diocesan policies and processes. Since these are no longer applicable to Lyonsdown Church, the policy needs to be substantially updated. Areas of policy that need to be addressed include:
 - a. Arrangements for the leadership, governance and oversight of safeguarding, the procedures should clearly establish how the trustees will assure themselves of the effectiveness of the safeguarding arrangements and how they will provide appropriate and proportionate oversight and accountability to those with safeguarding responsibilities.
 - b. The care of those who have suffered abuse or harm (whether historic or current), those who are living with the impact of trauma, and those who are experiencing poor mental health.
 - c. Procedures for managing ex-offenders, those who are on the sex offenders register and others who pose an actual or perceived risk to vulnerable people. This would include the use of risk assessments and formal contracts.
 - d. A more detailed description of safe recruitment processes for staff, the appointment of volunteers, and ongoing support for staff and volunteers, including appointments to roles which do not involve regulated activity.
 - e. How individual competence and organisational compliance are monitored on an ongoing basis.
 - f. How low-level safeguarding concerns will be handled.
 - g. How the interface between safeguarding and other processes such as Health and Safety and the provision of pastoral care will be managed.
 - h. How information sharing and confidentiality will be managed in line with legal duties and responsibilities, including clarity about data retention periods for the different classes of safeguarding data.
 - i. Safeguarding record keeping including standard documents and recording standards.

Recommendation 3

CSS recommend that Lyonsdown Church conduct a comprehensive review of their policies and procedures. Given the scale of the work required, it may be easier for the church to develop a new safeguarding policy based on a standard template (such as those provided by Christian Safeguarding Services or Thirtyone:eight).

This review should include all related policies including the online safety policy and the domestic abuse policy. This review should seek to identify and address any gaps in the policies that relate to safeguarding.

Once the review is complete, all policies should be reviewed at least annually.

Complaints, grievances, concerns about practice within the organisation, and allegations against staff or volunteers

58. Handling expressions of dissatisfaction¹⁰, whether by beneficiaries or anyone else who comes into contact with the charity, is an important theme in the Charity Commission guidance. All charities are expected by the Charity Commission to have a complaints policy that ensures that concerns or complaints are handled impartially. Lyonsdown Church needs to ensure that this is addressed so that concerns that are raised can be handled in a rigorous and impartial way. FIEC have a model policy¹¹ that can be downloaded and adapted to meet the needs of individual churches, and this would create a useful start point for such a policy. Our experience at CSS has been that some churches have wrestled with a biblical basis and justification for a complaints policy for genuine theological reasons.
59. It is of course possible to implement a complaints policy in a way that undermines key biblical principles¹², however, it is CSS's view that this can be done in a way that upholds the biblical principles and also meets the Charity Commission expectations. Such a policy allows the church to respond in a godly and caring way to concerns, helps to support, and uphold justice for all, helps ensure that authority and power are not misused, and also protects staff and volunteers against false allegations.
60. Adoption of a complaints policy is an important step; however, it needs to be supported by a positive culture that encourages the consideration of concerns that are identified or raised. A policy in itself will not suffice. This culture needs to ensure that concerns raised are heard, examined, and responded to in a proportionate and impartial way. The processes and culture are

¹⁰ The term "expressions of dissatisfaction" is simply used as a generic term to cover a wide range of concerns including complaints, allegations, grievances, concerns about organisational practice etc.

¹¹ The policy can be downloaded from the FIEC website: [A Template Church Complaints Policy - FIEC](#) and there is also a link to a podcast that FIEC produced on the same page which may also be useful.

¹² These key principles would include Matthew 18:15-20 which provides a model for handling challenging a peer who sins against us, 1 Corinthians 6:1-7 which encourages us not to take out lawsuits against brothers for the sake of the gospel, 1 Timothy 5:19 which tells us that we should not lightly accept an allegation against an elder without 2 or 3 witnesses, etc.

of particular importance now that the church is independent and so no longer has oversight from the Church of England.

Recommendation 4

CSS recommend that Lyonsdown Church develop their policies and procedures for handling expressions of dissatisfaction, whether complaints or whistleblowing. This should include concerns which do not meet statutory thresholds.

Recommendation 5

CSS recommend that Lyonsdown Church consider expanding their codes of conduct to cover all areas of ministry, so as to define clear expectations and standards.

Management of risks and interface with health and safety

61. Charity Commission guidance requires charities, and in particular trustees, to understand and manage risks associated with their activities. They must establish proportionate formal processes to identify and manage risk and must take reasonable steps to ensure that everyone who engages with the charity is protected from harm. Trustees should also monitor the effectiveness of the management of risk on an ongoing basis.
62. On the ground, Lyonsdown Church manage risk via an “Environment, health, and safety policy” and risk assessments for both the buildings and the activities. At the strategic level, risks are managed less formally and with less rigour. It is important for the trustees to identify and manage strategic level risks including risks around data and information (including confidentiality and information sharing,) finance, staffing, reputation, disaster recovery and organisational continuity etc. These more strategic level risks should be formally managed by the trustees via a risk register.

Recommendation 6

CSS recommend that the leadership consider how risk at the more strategic level (the risk register) could be more effectively analysed and managed to provide improved planning and preparedness and to protect the charity's beneficiaries, staff and volunteers and the church as an organisation.

Safer recruitment

63. Charities are required to take reasonable steps to ensure that those who act on their behalf are suitable for their roles and that they can competently discharge their duties. Safer recruitment processes are essential when appointing individuals to roles involving regulated activity. It is, however, important to also consider the suitability of those engaging in ministry but who are not involved in regulated activity.
64. Lyonsdown Church's safe recruitment processes for those who are involved in regulated activity with children and young people are proportionate and documented, meeting basic expected standards, although this could be strengthened further. The church does not engage in regulated activity with adults. The appointment of volunteers who are not involved in regulated activity is much more informal. Consideration is given to their suitability; however, it is not so formally structured or recorded.
65. Although the trustees and various other staff have, in the past, completed the Church of England leadership training, none of those involved in the recruitment of staff and appointment of volunteers have completed safe recruitment training.
66. The practice that is in place is not documented in sufficient detail within the policies and procedures. This should be addressed when the policies are reviewed.

Recommendation 7

CSS recommend that those involved in recruiting to roles involving regulated activity attend safer recruitment training.

Recommendation 8

Once safer recruitment training has been completed, CSS recommend that the recruitment processes for regulated activity should be reviewed to ensure that proportionate, role specific steps are taken to ensure that those appointed are suitable for the role and that they understand the expected standards of behaviour.

Recommendation 9

CSS recommend that the recruitment processes for non-regulated activity should be reviewed to ensure that proportionate, role specific steps are taken to ensure that those appointed are suitable for the role and that they understand the expected standards of behaviour.

Conduct and expectations

67. Having established robust recruitment and appointment processes, it is essential that systems are in place to provide ongoing oversight and support to staff and volunteers and to ensure that appropriate standards are maintained.
68. When addressing concerns that reach statutory thresholds, standards and processes are relatively clearly understood through guidance and custom and practice. When addressing sub-threshold concerns (particularly in relation to adults), there is far less clarity and objectivity which is challenging for practitioners and organisations. In the absence of clear standards of conduct from external sources, CSS suggest that churches establish clear standards through their policies, procedures, and codes of conduct.
69. Having established clear standards and expectations it is important that those standards are communicated, not only to staff and volunteers, but to everyone involved in that area of ministry and in particular, to the beneficiaries (and their parents / carers).
70. Once the standards have been set and clearly communicated, it is then important to establish a clear and impartial process by which, concerns that individuals, or indeed church practice are falling short of these standards, can be raised, and addressed.
71. Lyonsdown Church would benefit significantly from adopting this approach.

Recommendation 10

CSS recommend that Lyonsdown Church develop codes of conduct that establish appropriate standards of behaviour, supported by an effective process for handling complaints, concerns about practice, grievances etc. CSS can provide template documents for these.

Staff and volunteer competence

72. As described above, the appointment of staff and volunteers and establishing a framework that provides clear expectations and standards of conduct are both vitally important. It is also important that staff and volunteers are provided with proportionate and relevant support and oversight on an ongoing basis to ensure their wellbeing and to help them achieve the standards that have been set. Staff and volunteers who act on behalf of the church must be competent in their roles. Often, when problems and hurts arise within churches, these result, not from intent to cause harm (which would be dealt with under the safeguarding policy where appropriate), but rather due to lack of competence and awareness. Consequently, a focus on staff and volunteer competence is now an important aspect of church life. CSS have a safeguarding competency framework which may be helpful to the church. It can be downloaded from the CSS website¹³ with a free account.
73. Now that the church has left the Church of England, and so will no longer have access to the formal safeguarding training that they provide, it is important that the church consider how more formal training will be delivered. It would benefit the church to consider external training for trustees. There is no specific recommendation for trustees to formally refresh their training, although they do need to ensure that their knowledge is kept up to date. Formal training for the Safeguarding Lead and Deputy Safeguarding Lead is required every two years, as laid out in national guidance and local safeguarding procedures. Formal safeguarding training for staff and volunteers engaging in regulated activity should be refreshed every three years. In addition, everyone should complete a simple refresh / update activity on an annual basis. Lyonsdown church continues to provide annual update / refresh sessions for volunteers, and these fulfil the requirements of the annual activity. The formal training for staff and volunteers (which should be completed every three years) can be delivered internally, however, consideration needs to be given to how the formal training previously delivered through the Church of England will be replaced. CSS can provide this and also have a “Train the Trainer” package which may be helpful to the church if they wish to consider it. CSS also have a safeguarding competency framework which is downloadable from the website which may help the leadership to think through how to ensure that the necessary competence is achieved.

¹³ [Competency Framework | Christian Safeguarding Services \(theccs.co.uk\)](https://theccs.co.uk)

74. Competence is of course not restricted to an understanding of safeguarding. Consideration needs to be given to the range of skills, knowledge, experience, and attitudes that are required for a particular role. This would include an understanding of developmentally appropriate expectations, needs, and communication etc.
75. From conversation with the appropriate staff, it was evident that those involved in overseeing ministry to children and young people at Lyonsdown Church have a good level of competence. It was also clear from the discussion with volunteers involved in this area of work that they had a clear understanding of the policies and procedures, and that safeguarding practice on the ground is good. There was an awareness of what should be reported and the processes for doing so. An area of particular strength is the support available to children and young people who have additional needs that do not meet the threshold for children's social care involvement.
76. While the quality of safeguarding practice in relation to children and young people was good, this is to some extent achieved informally and appears to be driven by competent individuals in key roles rather than being embedded into the church's systems and processes. For example, the trustees do not receive information that would enable them to assure themselves of staff and volunteer competence and so little accountability is provided to the staff team. The training material that is used with volunteers is focused on practice but does not cover wider issues that can impact competence, such as the awareness of national and local themes and trends.
77. Paragraphs 68-72 above address setting high standards and expectations. The processes for assessing competence and supporting staff and volunteers to operate to the required standards should be strengthened once the standards have been defined within the policies, procedures, and codes of conduct. This would involve having clear role descriptions and person specifications that outline the key competencies. Such systems must be proportionate and focused so that they do not merely add a bureaucratic layer that does not add any value, however, greater formalisation would improve accountability and transparency and would support the trustees in their role.
78. The church does not engage in regulated activity with adults; however, they do engage with adults who have care and support needs and therefore at some points could find themselves having to deal with adults in need of protection.
79. Consideration of the need to protect and promote the wellbeing of adults who do not have additional care or support needs is also important. When the church was part of the Church of England, they were operating in a context where various national and diocesan policies and codes of conduct provided structure and standards. Recommendation 3 and 10 above will address this issue to a point, however, the church needs to consider how competence in implementing the agreed standards will be achieved. While this does not necessarily require formal training, it will require some form of internal training or awareness raising. This should include such themes as how to recognise and respond when statutory thresholds have not been met.

80. In addition to the care of adults with specific vulnerabilities or additional support needs, consideration needs to be given to the skills, competencies and attitudes that are required for all areas of ministry to adults who do not have such additional needs. The trustees have a duty to take reasonable steps to ensure that no one is harmed as a result of their contact with the church. When providing practical care and support, spiritual guidance, or counselling etc, an understanding of how to recognise and respond appropriately to issues such as domestic abuse, the impact of past abuse, trauma, or poor mental health etc. is a basic requirement. Clear assessment of competence within a framework that sets appropriate practice standards through policies, procedures and proportionate codes of conduct is vital if the church is to meet and maintain the standards that it has set for these areas of ministry and it is vital that the trustees monitor this on an ongoing basis to ensure that the agreed standards are not only achieved, but that they are maintained, reviewed and where necessary developed over time.
81. CSS do, however, wish to emphasize that Lyonsdown Church works hard to meet the needs of vulnerable people, including children and young people. There is evidence of good competence amongst staff and volunteers when working with these groups. It is the understanding of safeguarding adults who do not have additional needs and therefore competence and practice in this area that is less well developed.

Recommendation 11

CSS recommend that Lyonsdown Church develops a more formalised approach to the assessment and development of basic competencies, including safeguarding competencies to support the recommended improvements to the church's policies, procedures and codes of conduct.

Recommendation 12

CSS recommend that Lyonsdown Church reviews its record keeping in relation to staff and volunteer competence and then use that data to identify gaps and address challenges. CSS have a safeguarding competency framework which may be useful.

Recommendation 13

CSS recommend that Lyonsdown Church review their program of training and awareness raising to ensure that gaps left now that the Church of England training is no longer available to them are fully addressed.

Safeguarding systems and record keeping

82. In national and local safeguarding guidance, there has for some time been an increasing emphasis on the identification, monitoring and recording of low-level concerns¹⁴ and the ability of organisations to identify and monitor patterns and trends that may be emerging.
83. The safeguarding systems and record keeping processes at Lyonsdown Church are established and working, however, these are less formal and structured than CSS would expect. Record keeping does meet legal standards and records are stored securely, however, they are not structured in a way that supports effective safeguarding practice.
84. As previously mentioned, more formal role descriptions that identify required competencies and more comprehensive records of wider recruitment checks would be beneficial.
85. The recording of safeguarding concerns raised with the Safeguarding Officers is legally compliant, however, the record structure and methods of storage reflect an approach driven by “maintaining an audit trail” rather than by providing working documents that support the safeguarding activity. From the records maintained, it is not easy to identify trends and patterns over time or across family groups. A mixture of electronic and paper-based record keeping is used.

Recommendation 14

CSS recommend that Lyonsdown Church review their record keeping systems and processes to ensure that data is centrally stored, in a confidential and secure manner, but which is accessible to those who need to access them. The systems should aim to minimise duplication and standardise formats where possible.

Recommendation 15

CSS recommend that record structures be reviewed to improve ease of analysis, the monitoring of low-level concerns and the identification of patterns and trends.

¹⁴ For example, in “Keeping children safe in education 2023” this aspect of Safeguarding practice has been emphasised. This is important both in relation to concerns about children and concerns about staff and volunteers.

Culture and environment

86. A fundamental principle of safeguarding that has been recognised for many years is that within organisations, safeguarding arrangements should not be an “add on” to the organisation’s “main activities.” Rather, it should be a “golden thread” that runs through all that the organisation does, or to put it another way, it should be part of the DNA or fabric of the organisation. For churches, this means that their safeguarding arrangements should not be seen simply as a matter of legal compliance, but rather that it should be deeply rooted in relevant biblical principles and integrated thoroughly into the church’s structures, processes, and culture in a holistic and well-integrated manner.
87. When viewed in this way, safeguarding in churches is complex and can be challenging. It includes both child and adult safeguarding and spans the entire spectrum of safeguarding, from universal (i.e., the general duty of care), through consent-based support and care for those who have additional needs, to the legal duty to protect those who are unable to protect themselves from harm. Consequently, it is vital that safeguarding is led from the most senior level of the organisation, is embedded into all that we do, and is carefully monitored for effectiveness on an ongoing basis. Overlaps between different types of activities such as practical care and support, spiritual guidance, and counselling and safeguarding need to be clearly defined and understood.
88. While effective safeguarding systems and processes are important and play a vital role in the broad safeguarding arrangements, it is vital that these are supported by a positive culture of safeguarding. The culture of safeguarding children, young people, and vulnerable adults at Lyonsdown Church is strong and in fact, makes a significant contribution to minimising the impact of the issues raised above and addressed in the recommendations. There is a strong culture of protection for vulnerable people, of supporting those who have additional needs in an individualised and person-centred way, and of reporting and responding well to safeguarding concerns.
89. Arrangements for safeguarding those who do not have recognised vulnerabilities or additional support needs, including members of the church family, volunteers, and staff is less robust, although some progress has been made and should be recognised. This is not unusual in churches since historically, discussion of safeguarding children dates back to the 1990’s, safeguarding adults gained prominence in the early part of the last decade, while the inclusion of the more general duty of care into safeguarding discussion did not start to gain prominence until 2016-2018.
90. Lyonsdown Church is actively seeking to develop a greater culture of openness, transparency, and accountability, and more collaborative approaches to leadership and authority structures are in view. These will take time to work through. The change from a Church of England church to an independent church will in some ways make this easier, however, the fact that the church is no longer part of a broader structure reduces the level of oversight and accountability and so, it is important that careful consideration is given to how this openness, transparency and accountability will be achieved. It is, of course, better to consider this carefully and develop an approach that addresses the complexity and scope of the task. However, CSS wish to emphasise

that more can and should be done to strengthen the safeguarding of adults in the universal territory of safeguarding (i.e., those who do not have additional vulnerabilities or support needs). For example, the HR procedures have not been updated for a considerable time and require extensive update to meet expected standards; particularly in light of the fact that over more recent years, there has been significant development of thinking in this area which has been reflected in Charity Commission guidance since 2018.

91. Issues around culture are complex in a church context. Churches tend to emphasise the need for unity around key biblical doctrines and actively seek to break down barriers between different groups within the church family¹⁵. Simultaneously, however, churches have a strong sense of authority and church discipline is practiced within biblical frameworks where required. Over recent years, awareness of the risks associated with this combination of factors has grown, both due to the identification of past failures and a result of more careful reflection on biblical principles relating to leadership and the use of power and authority. Various useful resources are available to help churches to think through dynamics of power, the positive use of legitimate authority, and the importance of biblically faithful accountability and transparency that enhances rather than diminishes godly and biblical leadership, while protecting against misuses of power.
92. Information provided by participants in this review indicated that the “family” dynamic within Lyonsdown Church, which focuses on interpersonal relationships, is a very significant strength and something that is highly valued. A robust understanding of the risks associated with this and the need to manage these was identified by some church leaders, and greater focus and formalisation at the strategic and policy level would allow the management of these risks to be more thoroughly embedded into the church culture at every level.
93. Christian theology, as understood within a broad reformed / evangelical theological framework, is by nature counter cultural. It is expansive in its reach, affecting every area of daily life, and is both communal, and relational in nature. It involves personal growth that conforms to a biblical pattern of life, and the sharing of the gospel message with the broader society of which we are a part. For many people who engage with religious communities, these features are part of the attraction of these faith groups. These features are intrinsically neutral; neither good, nor bad. However, these features can be developed in different ways; some of which are positive and nurturing, while others are negative and harmful. In light of the diversity of the society in which we live and the changing values and sensitivities of the culture around us, CSS suggest that churches clearly articulate their beliefs and practices, set clear expectations through policy and codes of conduct, and have a clear process by which concerns can be raised if those standards are not being met. Adults who have capacity and agency can then make informed choices about their level of engagement with any particular church. Greater care does need to be taken, however, when children are involved since they may not have the same freedom and degree of choice, either due to their developmental stage or to family dynamics.

¹⁵ The use of the term “church family” in this report reflects a doctrinal position but also illustrates this point well. Churches tend to regard themselves as communities (family being a biblical and doctrinal metaphor) rather than as organisations or institutions.

94. Part of this increased openness and transparency involves actively seeking feedback from the church family about aspects of church life. It is good practice to do so using a variety of methods that allow those who may find it difficult to make their voice heard in a meeting, to still provide their views and insights.
95. When listening to feedback is embedded into the church culture, it provides invaluable insights to the leadership that benefit the whole church. There are occasions however where more significant differences and disagreements occur. Paragraphs 59-61 above address expressions of dissatisfaction from a process perspective, but it is important that churches create an environment where concerns, difficulties and disagreements can be handled well.
96. Scripture has a great deal to say about interpersonal relationships and these principles are important. Over recent years, there has been an increasing awareness of the impact of such disagreements on members of the church family. It is vital that leaders develop an open culture that welcomes expressions of concern or dissent. This of course does not mean that the church must agree with the view expressed, but rather that it should be listened to respectfully, considered carefully and responded to appropriately. Sometimes, these disagreements cannot be resolved, and members of the church family decide to move on. Church leaders need to be aware that this can be a vulnerable and even traumatic time for those involved. It is essential therefore that the culture of openness and transparency allows people to leave well. Managing conflict is often challenging and hurts on all sides of a dispute cannot always be avoided, however, it is important that churches take this on board and work hard to address the culture to provide openness and clarity, and to minimise hurt. Being able to “leave well” is a vital part of any church culture; particularly where this results from deeply held theological or ethical beliefs or values.

Recommendation 16

The leadership of Lyonsdown Church should consider how safeguarding (including safeguarding of those adults who do not have specific vulnerabilities) can be further embedded into the culture and life of the church. This will be supported by the more systematic aspects listed above but can also be enhanced through the teaching ministries of the church and by ensuring that explicit reference to the biblical values that shape this approach.

Recommendation 17

CSS recommend that Lyonsdown Church gives ongoing consideration to the church culture; particularly in relation to adults who do not have additional support needs. This should include opportunity for the church family to provide feedback to the leadership in a variety of formats.

Recommendation 18

CSS recommend that Lyonsdown Church leaders give ongoing consideration to the church culture and how disagreements and concerns can be raised and managed. Where disagreements cannot be resolved, principles around how the church will support individuals to leave well are also important.

Care of staff and volunteers

97. Although this theme has been touched upon at various points, it warrants a section of its own since it can be an area that is particularly challenging for churches. Fundamental to Christian belief is the notion of sacrificial service, particularly on the part of leaders. This is a doctrinal issue that must not be compromised; however, we must also recognise that we have a responsibility to care for and support our employees and volunteers. As charities, this is a clear duty of the trustees.
98. At Lyonsdown Church, the HR policies and procedures are considerably out of date and require significant update. This is something that the leadership are aware of, however, CSS suggest that this should be focused, not only around the legal requirements, but that the higher standards established in scripture involving care for one another should also shape our approach to how staff are treated. In addition to this, CSS suggest that the care of volunteers also needs to be considered.
99. As part of their review of HR processes, Lyonsdown Church should develop a range of policies and procedures including:
- Disciplinary Procedure
 - Grievance Procedure
 - Anti-Bullying and Anti-Harassment Policy
 - Whistleblowing Policy
 - Equality and Diversity Policy

Recommendation 19

CSS recommend that Lyonsdown Church conduct a comprehensive review and update of HR policies and procedures in relation to staff. This should include careful consideration of how ministry trainees will be supported and cared for.

Recommendation 20

CSS recommend that Lyonsdown Church conducts a comprehensive review and update of systems and processes for supporting volunteers and ensuring that their wellbeing is considered.

Recommendation 21

CSS recommend that Lyonsdown Church gives close consideration to the culture in relation to both staff and volunteers which considers expectations and support and enables volunteers and staff to raise concerns or challenges.

Implications of theology for practice

100. CSS are becoming increasingly aware of the need for all churches to consider carefully, areas of theology, ecclesiology and practice that impact on safeguarding. This is not about subjugating our theology to safeguarding legislation, but rather is driven by our deep conviction that scripture drives us to higher standards of care for the vulnerable and weak than legislation does.
101. We are, however, living in days when changing views and sensitivities are increasingly conflicting with biblical values and the broader Judeo/Christian worldview. It is therefore essential that churches consider not just the implications of our theology, ecclesiology, and ethics on our safeguarding, but also that we give careful consideration to how we articulate our beliefs; particularly where these are conflicting with prevailing values and attitudes or when communicating with children, young people or adults who may have particular sensitivities due, for example, to poor mental health, past or current abuse or trauma etc.
102. The balance between freedom of belief and the responsibility to protect those who engage with the charity is an important aspect of any church's work. Usually, this is less about *what* is said or done and more about *how* it is said and done. When dealing with adults who have mental capacity and agency, they have the right to choose whether to engage with a specific local church, however, care must still be taken, particularly when handling sensitive subjects or when individuals who are in more vulnerable states seek counsel or support, or when dealing with children and young people.
103. Now that awareness of the impact of theology on individuals is better understood, it is vital that church leaders and particularly those involved in teaching ministry give careful thought to how

some biblical content is taught. This must, of course, fully respect the fundamental right of freedom of belief, and this statement should not be used to attack orthodox theology. It is, however, important to think through the scope of wise and helpful biblical teaching on contending for truth and “speaking truth in love and with all gentleness”¹⁶.

104. Biblical teaching emphasises care for the weak and vulnerable and so, when safeguarding is approached from a biblical perspective, churches will be inspired to achieve the highest standards of care for all, including those who may be particularly vulnerable. For this reason, CSS recommend to all churches that they should view safeguarding, not *merely* as a matter of legal compliance, but also as a matter of biblical faithfulness.

Recommendation 22

CSS recommend that leaders at Lyonsdown Church build their approach to safeguarding upon biblical values and carefully consider the implications and impact of their organisational structure, ecclesiology, and theology upon safeguarding.

Specific concern relating to the suitability of material taught to children.

105. As mentioned in paragraph 38, one concern was raised that related to children and young people. This related to the suitability of some of the material that is taught to younger children. The examples provided related to the time prior to March 2021. This concern does not fit neatly into any of the themes that have been addressed above so it will be addressed here. This concern was discussed with those responsible for oversight of the teaching of children. These discussions centred on current practice.
106. Within Evangelical churches, there is an emphasis upon teaching the Bible as the authoritative Word of God. At Lyonsdown Church, the theme taught to the adults is covered with the children and young people (offset by 3 weeks). The aim is to provide an environment where families can learn together and can discuss ideas together.
107. The purpose of the 3-week offset is to allow the theme to be developed in appropriate ways for the different age groups. Those with oversight of the development of this teaching material demonstrated a sound understanding of age appropriateness and were aware of the need to ensure that the material was suitably adapted.

¹⁶ This statement draws specifically from biblical teachings in Ephesians 4:15 and 1 Peter 3:15, but many more passages should be considered.

108. Members of the church family were positive about this approach and indicated that sensitive material was handled in an age-appropriate way.

109. CSS conclude that there is a good awareness of age appropriateness amongst those who develop the teaching material for children and parents expressed only positive views about the way the children are taught. It is, of course, important to remember that in any religious community, parents desire to teach their children the beliefs and values that they themselves hold. Consequently, great care must be taken to be respectful of the child's views and wishes and to ensure that material taught is presented in an appropriate way. These matters are considered at Lyonsdown Church; however, this is done in an informal way. The recommendations in this report which seek to strengthen transparency and accountability will also help to ensure that any concerns about the age appropriateness of teaching can be identified and addressed.

Recommendation 23

CSS recommend that Lyonsdown Church leaders give careful consideration to the merit of formalising processes for ensuring that materials taught are presented in an age-appropriate way and that if concerns are raised, these are carefully considered.

Overall conclusions and final comments

110. Statutory level safeguarding practice at Lyonsdown Church is of a good standard and CSS have no concerns about the protection of vulnerable people or about the church's commitment to promoting their wellbeing. The church is meeting its legal and regulatory duties and is demonstrating both commitment to, and competence in safeguarding from the statutory and regulatory perspectives. However, the safeguarding arrangements tend towards the informal and many of the recommendations in this report suggest greater formalisation of the arrangements to provide greater structure and consistency.
111. Where concerns have been raised, these relate to safeguarding adults who do not have any additional support needs. None of these concerns reach any statutory thresholds, although the church has appropriately filed a Serious Incident Report with the Charity Commission. This relates to potential harm¹⁷ to adults who would not meet the threshold of adults with care and support needs, and where the potential harm is not of a criminal nature. When working in this "sub-threshold" arena, high levels of subjectivity and judgement are required due to the absence of a clear framework against which to make assessments. Employment and criminal law apply (where appropriate); however, these thresholds are high and the standards that would be expected by both the church itself and the Charity Commission should quite rightly set higher standards of care and support than merely meeting the legal duties.
112. CSS have therefore made recommendations that will seek to address this by defining expected standards within the church's own internal policies and procedures, supported by a clear process to address concerns that the church, or those acting on its behalf, are not meeting those standards. This recommendation is not specific to Lyonsdown Church. This is an approach that CSS recommend as a matter of course to all churches to address the challenges described here. We do, however, believe that adoption of an approach such as this will deliver significant benefit at Lyonsdown Church.
113. This report has made recommendations which will involve significant changes and it will take the leadership some time to consider how these should be addressed. It is therefore important to re-emphasise that the standard of safeguarding for vulnerable people is good at the church. Furthermore, it is our assessment that at the present time, there is sufficient awareness of sub-threshold safeguarding to ensure that the general duty of care is being met.
114. The changes that are recommended are necessary and will deliver significant improvements, and the importance of responding rigorously to them should not be underestimated, however, the risks should not be overemphasised either. As always in the world of safeguarding, proportionality is key.

¹⁷ CSS have used the term "potential harm" here because it is beyond the scope of this review to examine, or conclude upon, the concerns raised. The term is intended to be read as a neutral statement and should not be taken to imply a conclusion or carry any judgement, conclusion or implication.