Catholic Safeguarding Standards Agency

Religious of Mary Immaculate

Baseline Audit Report

July 2025

Contents

Catholic **Safeguarding Standards** Agency

1. Introduction

1.1 This report is a baseline audit of the safeguarding arrangements for the Religious of Mary Immaculate[1], also known as, and referred to in this report as, RMI. It is undertaken as part of the CSSA programme of baseline audits for Religious Life Groups (RLGs) in England and Wales.

1.2 Within the European Province of the RMI sits the Religious Community of RMI London Hostel. Five Sisters reside and work at the hostel which provides accommodation and a social and spiritual area for up to 67 unmarried female students and young professionals between the ages of 18 and 30 from all over the world. The minimum stay is for four weeks and the maximum is for two years with the majority of residents staying for approximately one year. Residents of all faiths and none are welcome at the hostel, where Mass is celebrated, and prayer groups, catechesis and English classes are also available. There are no elderly residents and although adults at risk are not excluded, the hostel has never accommodated anyone with a learning need or disability and would be very unlikely to do so in the future. The RMI employ ten people at the hostel and one of these people also completes some voluntary work there.

1.3 This audit covers the 12 month period preceding the audit week which took place in November 2024. It will cover the RMI activities in England and Wales only; namely the London Hostel, and not the wider RMI network.

1.4 The CSSA has devised a categorisation scheme for Religious Life Groups taking part in safeguarding audits. This categorises groups on a scale from *Level 1* (a small community with minimal outreach and no known safeguarding concerns), *Level 2* (a medium sized community with some outreach with vulnerable populations and/or providing some diocesan activities such as a Parish Priest) or *Level 3* (a large community and/or one with significant outreach with vulnerable

[1] The Religious of Mary Immaculate function under the charity name of *Trust Property Administered in Connection with the Religious of Mary Immaculate* with the registered charity number 238229.

populations and/or a disproportionately high number of open safeguarding cases). RMI have been assigned to a Level 1 audit.

1.5 The CSSA recognises the rich diversity of the Religious, and acknowledges that the Religious Life Groups within any particular category may vary significantly in terms of size, ministry and safeguarding practice. Consequently, CSSA analysts may use professional judgement to ensure that Religious Life Groups are graded against the national standards in such a way that reflects their uniqueness.

2. Methodology

2.1 The Superior of the RMI London Hostel was initially contacted by the CSSA Analyst via e-mail on the 14th August 2024 to notify of the intention to complete a safeguarding audit and the relevant audit documents were shared. Over further e-mail communications the level of the audit to take place was agreed as well as a date for the audit week and in-person visit

2.2 The Level 1 Self Assessment (an assessment tool which provides background information on the RMI's adherence to the eight individual National Safeguarding Standards[2]) and accompanying evidence was e-mailed to the CSSA by the Sister Superior for the RMI London Hostel on the 8th October 2024. Following the review of the Self Assessment and the supporting evidence provided, the CSSA analyst completed an in-person visit to the London Hostel in Southwell Gardens on the 13th November 2024.

2.3 During the in-person visit the CSSA Analyst had the opportunity to meet with and interview the Sister Superior who is also the Safeguarding Lead and a trustee, the Administrator, the Hostel Health and Safety Coordinator and a Sister. The following evidence has also been considered in the preparation of this report in reaching decisions regarding scoring for the individual safeguarding standards and the overall grade:

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[2] A description and full details of the Standards can be found on the CSSA website here

- RMI London Hostel Safeguarding Policy
- Grievance and Whistleblowing Policy
- Internet Policy
- Code of Conduct Agreement
- Code of Conduct Document
- Display posters
- RMI Hostel London Structure document dated 25th January 2024
- The Charity Commission website for the RMI[3]
- The RMI London hostel website[4]
- Liaison with the RLSS (Religious Lives Safeguarding Service)
- RMI London Hostel Guidelines
- Safeguarding PowerPoint presentation
- Safeguarding Incident Report Form

2.4 The evidence provided in both the self-assessment form and the in-person visit has been assessed against the Level 1 Maturity Matrix and ratings for each standard have been assigned (see Section 3 Audit Grading), together with an overall grade.

2.5 No case audit work has been undertaken during the course of this audit as there have been no safeguarding allegations or concerns reported involving RMI and hence there are no current or previous case files to pass comment on.

3. Audit grading

3.1 Safeguarding practice is graded in accordance with the CSSA Maturity Matrix for Level 1 Religious Life Groups. Each standard is graded on an ascending three point scale of *Not Met, Met with Recommendations* and *Met*. Grades for individual standards are combined in order to produce an overall grading for the Religious Life Group as an outcome of the audit. The audit draws on evidence generated from self-assessment, interviews and the supporting documentation as listed in paragraph 2.3.

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[3] The Charity Commission website page can be accessed here

[4] The website for the RMI London hostel can be accessed here

3.2 This report summarises the findings of the audit undertaken with RMI and their progress towards meeting the eight safeguarding standards. The overall grading for the Group is assessed as ***Met with Recommendations*** which comprises of eight separate standards; the grading for each individual standard of which is tabulated below.

Overall grading	**Met with Recommendations**
Standard 1 - Safeguarding is embedded in the Church body's leadership, governance, ministry and culture	Met with Recommendations
Standard 2 - Communicating the Church's safeguarding message	Met with Recommendations
Standard 3 - Engaging with and caring for those who report having been harmed	Met with Recommendations
Standard 4 - Effective management of allegations and concerns	Met with Recommendations
Standard 5 - Management and support of subjects of allegations and concerns (respondents)	Met
Standard 6 - Robust human resource management	Met
Standard 7 - Training and support for safeguarding	Met with Recommendations
Standard 8 - Quality assurance and continuous Improvement	Met with Recommendations

4. Audit findings against each standard

4.1 Standard 1 Safeguarding is embedded in the Church body's leadership, governance, ministry and culture

4.1.1 All those spoken with during the in-person visit at RMI talked passionately of the need to safeguard the vulnerable and relayed a positive culture in relation to safeguarding. RMI have a Safeguarding Policy which is tailored to the RMI London Hostel in England. The first version was provided as evidence for the safeguarding audit and is not dated but contains a version control table stipulating the document is to be reviewed annually by the trustees. The policy contains relevant, up-to-date information and this, in conjunction with the Code of Conduct Document, is considered to be of a good standard. Electronic copies of the policy are available and all employees, volunteers and members are required to sign and retain a copy of the Code of Conduct Agreement and are provided with a copy of the Code of Conduct Document. A hard copy of *Integrity in Ministry*[5] is also located in the hostel.

4.1.2 RMI has five trustees, all of whom are Sisters, who meet together as a group twice per year in-person and virtually and there are daily operational meetings at the hostel. The Sister Superior is the Safeguarding Lead and one of the trustees and is present at the hostel every day and so would be easily available to be informed of any safeguarding issue that occurs and would share concerns with the other trustees. The Superior advised that given there are no children or adults at risk within the hostel, safeguarding is not a standing agenda item at trustee meetings. If a child of adult at risk were to visit the hostel they must be in the care of an appropriate adult at all times. Finances and general operational issues are usually covered but safeguarding concerns would be raised if they were to arise. However, given that many of the young adult women come from other countries and stay at the hostel for a prolonged period, and in line with RMI's recognition of the need to

[5] *Integrity in Ministry* is a code of conduct for Religious engaged in ministry in the Catholic Church in England and Wales. It has been written for the guidance of those in ministry and for the information of those people with and among whom Religious exercise their ministry. A copy can be located here

be aware of their resident's mental health and emotional well-being, it appears this is a group of people who may be vulnerable at times. It is therefore a recommendation that safeguarding features as a standing agenda item at all trustee meetings to allow trustees to consider and raise concerns if needed. In interview the Superior asserted the importance of reporting concerns to the Sister Provincial for Europe and Africa and to the Charity Commission if necessary. The Provincial visits the community annually in person but has more frequent contact outside of visits.

4.1.3 There is no Safeguarding Action Plan in place. It is a requirement of the Safeguarding Standards that some form of plan is in situ to help drive safeguarding and provide assurance to trustees as mentioned in the Safeguarding Policy, so that appropriate action may be taken in the event of any shortcomings. The Safeguarding Lead should also track and report information back to trustees on crucial activities such as training and DBS checks for their assurance.

4.1.4 A zero tolerance approach to abuse is explicitly mentioned in the Code of Conduct Document for Sisters, employees and volunteers along with a list of some unacceptable behaviours. The principles of *Integrity in Ministry* make up the Code of Conduct Document. The Code of Conduct Document outlines the process for conflict resolution and subsequent investigations and who to go to if the complaint is regarding the Superior. However, there is also a standalone Grievance Policy and a Whistleblowing Policy.

4.1.5 A Full Guidelines document is provided in the welcome pack for all new residents of the RMI hostel which can also be found on the RMI website. The Full Guidelines outline expected behaviours and boundaries of residents and references the safeguarding policy and the assigned Safeguarding Lead for raising concerns with.

4.1.6 The RLSS have confirmed that the RMI are not members of the service.

4.1.7 The Safeguarding Policy contains a section on responsibilities which offers a comprehensive list of the responsibilities of trustees. However, no other key roles are listed here. As a minimum the Safeguarding Lead's role and responsibilities should also be described here.

Graded: Met with Recommendations

4.2 Standard 2 Communicating the Church's safeguarding message

4.2.1 The Safeguarding Lead at RMI is kept informed about developments in safeguarding practice by the CSSA and representatives from the group attend the CSSA webinar meetings when they are offered as confirmed by the RLSS. The RMI's lawyer is also reported to e-mail the Superior with changes or updates in law which are then disseminated to members, employees, and volunteers as appropriate.

4.2.2 The noticeboard in the hostel is considered to be an effective way of communicating messages to residents, employees, volunteers and members alike as it is clearly visible to all as they enter or leave the building. A poster advertising the Safeguarding Lead's role and contact details is on display on the noticeboard and in the accommodation area in the hostel as is the Safeguarding Policy Statement. There is also a poster on the reporting structure of the team at the hostel. Given that many of the residents of the hostel are from different countries it would be beneficial to consider publicising these posters in different languages for ease of understanding and accessibility.

4.2.3 There is no formal communications plan or strategy. It is acknowledged that the small size of the religious community, together with the absence of vulnerable groups it comes into contact with, may limit the need for a comprehensive communications strategy but some form of plan would help effectively target safeguarding communications and keep them effective. This could be an integral part of the Safeguarding Policy or within a Safeguarding Action Plan.

Graded: Met with Recommendations

4.3 Standard 3 Engaging with and caring for those who report having been harmed

4.3.1 The Safeguarding Lead's details are publicised on the noticeboard along with an invitation to speak to her with any safeguarding concerns and a Mental Health poster is on display in several locations around the hostel offering advice and giving details of support lines and services. These details are also e-mailed to the residents when they first arrive and updates can be issued as required. The Code of Conduct Document instructs that in the event of an allegation of abuse the complainant should be offered psychological support and therapy.

4.3.2 Although there are no current or previous concerns from which to draw evidence of responses to those reporting abuse, all RMI members, employees and volunteers have received training on how to respond appropriately and compassionately. During the in-person visit the CSSA Analyst heard from several employees and members and it was evident that should abuse be reported, time would be made to listen actively, records would be made on the Incident Report Form and subsequent action taken such as support and onward reporting. The Self Assessment indicates that a warm and caring environment where a victim feels safe to report abuse should be promoted, evidencing an understanding of the importance of providing a safe environment.

4.3.3 Forming links with other religious groups, or liaising with hostels within their own RMI worldwide Provinces, would offer RMI the opportunity to learn from other's experiences in terms of safeguarding and help to strengthen practice in relation to caring for complainants.

4.3.4 In order to better reach those who may wish to report abuse the RMI should feature its Safeguarding Policy Statement clearly on the website along with the contact details of the Safeguarding Lead. The RMI may also wish to publicise links to the Safe Spaces resource on their website to assist in supporting those who may have been abused.

Graded: Met with Recommendations

4.4 Standard 4 Effective management of allegations and concerns

4.4.1. An Incident Report Form has been developed in line with a policy mandating its use in the event of a disclosure of abuse. This form has never been needed and given the demographic of the residents and the close contact with Sisters and opportunity to make a disclosure if needed, this appears proportionate. The safeguarding policy describes the process for completion of the Incident Report Form, taking action and following up, and storing should it be required. Blank copies of the form are kept in the reception area and in other rooms for when a disclosure is made. Completed forms are to be passed to the Superior as the Safeguarding Lead and hard copies will be stored in a lockable cabinet in their office. RMI also have a password-protected cloud storage system for any sensitive electronic documents that need to be stored.

4.4.2 During interview the Superior was fully able to explain, as the policy mandates, what action would be taken should a report of abuse take place. The Incident Report Form would be completed as soon as possible following the disclosure and the trustees and the CSSA would be informed as well as the police and other statutory authorities if a crime has been reported. A sound understanding of the thresholds for statutory reporting was illustrated in interview.

4.4.3 RMI should consider what support they would look for in the event of an allegation being made or concern raised for one of their members. Although there are Sisters trained in safeguarding there is not sufficient evidence to suggest that an investigation could occur and a safeguarding management plan could be compiled and safely monitored without external support of some kind.

Graded: Met with Recommendations

4.5 Standard 5 Management and support of subjects of allegations and concerns (respondents)

4.5.1 The RMI have not signed up to the RLSS and so do not have that avenue of support should one of their members be accused of abuse. However, in the event of an allegation of abuse the Superior commented that they would approach the CSSA and/or the diocese for recommended independent assessors to contact. It is of note that these organisations may not be able to assist or support which could cause a delay and therefore RMI should seek additional external support sources. The Code of Conduct Document outlines that in the event of an allegation of abuse canonical processes must run independently to civil processes and that the advice of experts (a lawyer and a psychologist at a minimum) should be sought. The document states that care should be taken to offer psychological support to respondent and the Self Assessment describes a close relationship with the group's civil lawyer. The Safeguarding Policy makes clear the need to inform the CSSA of any allegations of abuse.

4.5.2 The Superior advises that emotional and financial support would be available from RMI to any members accused of abuse. However, as the hostel is also the home for the members that reside there, if alternative accommodation needed to be sourced then the closest alternative RMI premises for accommodation is in Paris but there are other options worldwide.

4.5.3 A Sister reported to the CSSA Analyst during the in-person visit that recent training has helped them understand the process for reporting a grievance or complaint regarding another Sister. The Superior was able to list various local sources of emotional support for any Sisters in need during times of investigation or allegation. They also assured that suitably trained members could be appointed as Welfare Support People if required.

Graded: Met

4.6 Standard 6 Robust human resource management

4.6.1 In total there are ten employees at RMI who work in the hostel booking team, the reception team and the cleaning team and there is an administrator, credit controller and community chef. One of the employees also volunteers with the reception team. None of the employees require a DBS certificate as they are not undertaking regulated activity, do not have any contact with children or adults at risk and there are no situations in which they are expected to have one-to-one contact with residents. All employees must provide two satisfactory references prior to commencing post and, upon appointment, undergo a thorough induction process which includes being provided with all relevant policies and procedures and signing to acknowledge receipt and understanding.

4.6.2 The five Sisters have DBS certificates that were all completed less than 3 years ago. The renewal dates for each are centrally recorded with the certificate. Digital records are stored securely by the Safeguarding Lead who is also the RMI Sister Superior and so in this manner the leadership has oversight of the DBS checks.

4.6.3 The same Priest visits the RMI hostel chapel each week to celebrate Mass and his Celebret and DBS has been seen. It is recommended that a record of the expected renewal date of both of these documents is made so that new copies can be seen when the time comes. All visitors to the hostel, including the Priest, must ring a bell at the entrance way and be electronically let into the building by reception where they are given a visitor's pass. All visitors are accompanied.

4.6.4 A new Sister joined the RMI community one year ago. The procedure for new members is to receive psychological assessment, a DBS check, undergo references, complete safeguarding and induction training and sign a Code of Conduct Agreement. New members receive one-to-one meetings with the Superior.

4.6.5 A Grievance Policy and a Whistleblowing Policy are both in place and available to those who may need to follow them. They outline appeals processes and escalation routes should the Sister Superior be the subject of a complaint.

Graded: Met

4.7 Standard 7 Training and support for safeguarding

4.7.1 A safeguarding training PowerPoint presentation was delivered to all employees, volunteers and Sisters on the 24th September 2024 and the expectation is that it will be refreshed and delivered annually to all. It outlines the types and signs of abuse and reporting responsibilities and covers the Code of Conduct and the Safeguarding Policy. It also includes safety measures such as not allowing residents to be alone in their rooms if a workman needs to enter and advice to Sisters and employees regarding keeping themselves safe. The training presentation was composed using sources from the CSSA policies and *Integrity in Ministry* and the CSSA Analyst assess this to be of a good standard for introducing the essentials of safeguarding.

4.7.2 An attendance record was taken and has been retained for the safeguarding training to all staff. There should now be oversight from trustees that training is again delivered the following year, that all employees, volunteers and members attend, and that any new joiners in the meantime are offered training.

4.7.3 In relation to the effectiveness of the annual safeguarding training provided, the presentation concludes with a question and answer session which enables attendees to have queries responded to. However, there is no other means of identifying if the training has been successful. Evaluation forms should be distributed following this training and follow-up conversations should occur in order to evaluate the quality and impact it has.

4.7.4 There is no evidence that leaders or trustees have completed any specialised safeguarding training. It would be beneficial for the Safeguarding Lead to attend a more robust level of safeguarding training and for trustees to have training.

Graded: Met with Recommendations

4.8 Standard 8 Quality Assurance and Continuous Improvement

4.8.1 It is acknowledged that RMI have not had any previous or current safeguarding concerns with which to reflect and draw learning from. The Superior asserts that should any learning occur, this would be shared with the Sisters, employees and volunteers as soon as practicable.

4.8.2 Despite considering themselves a low risk of safeguarding concerns given that there are no children or adult at risk members or residents in RMI, the Superior and others interviewed in the in-person visit have expressed a willingness to learn from any outcomes of this audit. RMI are encouraged to always consider potential risks specific to their circumstances in order to remain vigilant and review processes where appropriate.

4.8.3 *Integrity in Ministry* and the eight National Standards are referenced in polices, Code of Conduct and Guidelines and members and leaders understand the need to adhere to these principles. However, there is less of a focus from RMI on assessing the quality of their safeguarding arrangements. As referred to in 4.3.3, in the absence of limited learning opportunities from their own community, it would be worthwhile exploring alternative avenues and linking in with other groups in order to learn from others.

Graded: Met with Recommendations

5. Summary of overall findings

5.1. RMI have a Safeguarding Policy, a Safeguarding Policy Statement and a Code of Practice Document which set out robust safeguarding processes despite not catering for children or adults at risk or caring for elderly members. Self-assessment opportunities have been limited given the lack of safeguarding concerns and networking with communities with similar circumstances may help to offer learning. A Safeguarding Action Plan should be agreed to assist this process and drive the direction of safeguarding.

5.2 Although they have no previous or current experience of responding to disclosures, supporting those who suffer abuse, or those subject to allegations, RMI have demonstrated a positive safeguarding culture and a sound understanding of what to do should the need arise in future. However, it is apparent that the group would likely require support in managing a respondent of an allegation or a person of concern and to this end they should have external support available should they require it.

5.3 Safer recruitment processes and human resources management are robust with DBS checks and references taking place and records being up-to-date for the employees, existing members, new member, volunteers and visitors along with relevant policy in place to support them. The training programme could be strengthened and evaluated and the leaders/Safeguarding Lead should consider undertaking more specialised safeguarding training.

6. Recommendations

To support improvement, the following recommendations are made:

Within 3 months

- Include within the RMI website the Safeguarding Policy Statement, support resources accessible to complainants and the Safeguarding Lead's contact details.
- Safeguarding should feature as a standing agenda item at all trustee meetings to allow trustees to consider and raise concerns if needed.
- RMI should consider what external support they can attain for investigations, safeguarding management plans and risk assessments should they require them.
- The role description and responsibilities of the Safeguarding Lead and any other key safeguarding members deemed appropriate should be recorded in the responsibilities section of the Safeguarding Policy.

Within 6 months

- RMI should agree, implement and review a Safeguarding Action Plan to help drive safeguarding and offer assurances to trustees.
- RMI should develop a Communications Plan or include this within the Safeguarding Policy or Action Plan.
- Training should be tracked and trustees offered assurance of compliance.

Within 12 months

- The Safeguarding Lead should complete safeguarding training to a level commensurate with their role.
- Develop a means of measuring the effectiveness of training provided.
- In order to achieve continual development RMI should look to engage with other religious groups with similar circumstances so they can learn from other's safeguarding experiences.

7. Arrangements for follow-up

7.1 In line with the overall rating of *Met with Recommendations*, a reaudit for RMI should take place after a minimum two year period. Should any indications or factors come to light that suggest an increase in risk before this time a reaudit may take place sooner.