

Sisters of the Cross and Passion

Baseline Audit Report
August 2025

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1. Introduction

1.1 This is a baseline audit of the safeguarding arrangements of the Sisters of The Cross and Passion. This audit has been undertaken as part of the CSSA's Baseline Audit phase of Religious Life Groups (RLGs).

1.2 The Sisters of the Cross and Passion is an international Roman Catholic religious congregation founded in England in 1852. Governed by the Congregational Leadership Team (CLT), with members based in the UK, USA, Chile, and Australia, the congregation is organised into individual areas and provinces. Within this global structure, St Paul's Province comprises of Sisters living in England, Northern Ireland, and the Republic of Ireland. The objectives of the Sisters of the Cross and Passion, as stated in the Constitution of the Sisters of the Cross and Passion, are "the relief of poverty, the provision of relief assistance and comfort to the sick, the provision of education and the advancement of the teachings of the Roman Catholic Church (or other such charitable purposes as are lawfully authorised from time to time by the constitutions of the Congregation) by such means as are suited to the time and place in which the provision is to be made".

1.3 The Sisters of The Cross and Passion oversee three key facilities in England and Wales: Elmleigh Convent, East Holme, and the Briery Retreat Centre. There are currently 26 Sisters across England with one Sister currently in active ministry. Elmleigh Convent is home to 11 Sisters and employs 14 staff members, including one manager, one bursar, seven carers, and five support staff (such as cleaners and cooks). Although Elmleigh Convent provides care, it is not registered with the Care Quality Commission (CQC¹). Currently, nine Sisters receive support and care from the staff. The Manager for Elmleigh described the Sisters as very independent and low dependency. East Holme, which is CQC registered, supports 14 Sisters (none of whom are in active ministry) and has a staff team of 25, comprising two managers, one bursar, nine carers, seven nurses, and six additional staff in roles such as catering and housekeeping. Additionally, one Sister resides in Blackpool and remains active in ministry, serving as a Trustee and volunteers as an English teacher for asylum seekers in Lytham and Blackpool, Lancashire. The Briery Retreat Centre,

¹ <https://www.cqc.org.uk/> the independent regulator of health and social care in England

also overseen by the Sisters also operates as a separate facility with its own staff and management, it provides hospitality and spiritual retreats. The Briery employs eight staff members and five volunteers. This includes two kitchen staff, one housekeeping staff member, and a team of casual kitchen, housekeeping, and serving staff. These employees and volunteers assist with the running of the retreat centre, helping to provide the hospitality and services that support the guests' experience.

1.4 . East Holme operates under its own safeguarding and staff recruitment policies, which are distinct from those of the Sisters of the Cross and Passion. These policies have been specifically developed to meet the requirements for Care Quality Commission (CQC) registration. Similarly, the Briery Retreat Centre follows its own set of policies, tailored to its role as a retreat centre, including independent procedures for safeguarding and recruitment.

1.5 This audit seeks to assess the effectiveness of current safeguarding arrangements by reviewing practice over the past twelve months. The Sisters of the Cross and Passion, St Paul's Province includes Sisters living across England, Northern Ireland, and the Republic of Ireland; however, this audit focuses solely on the activities, governance and operations of the Sisters residing in England and Wales. One of the communities, East Holme, is a care home registered with CQC and received an overall rating of 'Good' at its most recent inspection. As CQC-registered homes are subject to regular, independent regulatory oversight covering care standards, health and safety, staffing, and safeguarding, this audit does not assess these areas for such settings. Instead, the audit focuses on safeguarding practices outside the remit of CQC oversight, particularly where care is provided informally or in community-based living arrangements where no external regulation applies.

1.6 The Catholic Safeguarding Standards Agency (CSSA)² has categorised RLGs 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), to Level 3 (a large community and/or one with significant outreach with vulnerable populations and/or a disproportionately high number of open

² [Catholic Safeguarding Standards Agency](#)

safeguarding cases). The Sisters of The Cross and Passion have been assigned to a Level 2 audit.

1.7 The CSSA recognises the rich diversity of the Religious and acknowledges that the Religious Life Groups within any 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. Scope & Methodology

2.1 The CSSA analyst initially contacted the Provincial Leader on the 10 January 2025 to confirm a baseline audit for the week commencing the 7 April 2025. The Provincial Leader confirmed that the Operations manager would also assist with the audit process in an administration capacity as the Sisters had recently appointed a new lay safeguarding lead.

2.2 In advance of the formal audit week, the Sisters of The Cross and Passion were requested to complete a Level 2 audit self-assessment tool providing information on their adherence to the eight National Safeguarding Standards and progress in the overall implementation of said standards. The Sisters of The Cross and Passion were provided with the self-assessment tool and guidance on the 10 January 2025. The completion date for the self-assessment and supporting evidence was scheduled for the 10 March 2025.

2.3 On 7 February 2025, the CSSA analyst attended a Teams meeting with members of the Provincial Leadership team (including the Provincial Lead) and the operations manager to discuss the audit arrangements in further detail.

2.4 This baseline audit was undertaken following the submission of the self-assessment on 7 February 2025 and further evidence was reviewed by the auditor during a site visit to both Elmleigh Convent and The Briery on 8 March 2025.

2.5 Information from the self-assessment and supporting evidence provided by the Sisters of The Cross and Passion was reviewed by the CSSA analyst and this

evidence was assessed against the Level 2 Maturity Matrix to arrive at ratings for each standard and a combined overall grade.

2.6 The following methods were employed:

2.6.1 Interviews

- Interviews were conducted with key individuals and groups from the Sisters of The Cross and Passion on 8 March 2025:
 - Interview with the Operations Manager
 - Interview with the Care Home Manager for Elmleigh Convent
 - Interview with the Bursar for Elmleigh Convent (who also holds responsibility for DBS checks and training)
 - Interview with the Retreat Centre Manager from the Briery
 - The Sisters of The Cross and Passion Trustee Focus Group
 - Interview with the newly appointed safeguarding lead

2.6.2 Document Review

- Review of the following key documents additionally took place
 - Self-assessment form
 - Supplementary evidence (Listed at Appendix A)

2.7 Liaison has also taken place between analysts, the Religious Life Safeguarding Service³ (RLSS) and the Safeguarding Teams in the Diocese of Leeds regarding the Sisters of The Cross and Passion engagement with their Safeguarding expectations.

3. Audit Grading

3.1 Practice was assessed against the eight national safeguarding standards adopted by the Catholic Church in England and Wales⁴ and graded in accordance with the CSSA Maturity Matrix for Level 2 RLGs.

³ <https://religioussafeguarding.org/> – The RLSS is an independent team of safeguarding professionals offering safeguarding services to the Religious of the Catholic Church in England and Wales.

⁴ Full details of the eight standards and underpinning sub standards are available here: [The Eight National Safeguarding Standards \(catholicsafeguarding.org.uk\)](https://catholicsafeguarding.org.uk/)

3.2 Potential audit ratings against each standard, and the final overall ratings, are: Below Basic, Basic, Early Progress, Firm Progress, Results Being Achieved, Comprehensive Assurance and Exemplary.

3.3 The Sisters of The Cross and Passion have received an overall rating of Firm Progress.

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

4. Audit findings against each standard

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

Strengths

4.1.1 To support governance and operational transparency, the Sisters of the Cross and Passion have developed a CIO⁵ Structure Organogram, which illustrates a structured and tiered governance system across the UK, Northern Ireland, and the Republic of Ireland. At the top of this structure is the Board of four Trustees, which holds overall responsibility for strategic direction, legal compliance, and governance. The board is chaired by a Sister who also serves as the Provincial Lead, while another Trustee serves as the Congregational Lead, all Trustees are religious. One Trustee also serves on the Republic of Ireland Committee. The governance framework also shows a dedicated Safeguarding Group, with safeguarding leads for England and Wales, the Republic of Ireland, and Northern Ireland, ensuring adherence to safeguarding standards across all jurisdictions.

4.1.2 Beneath the Trustees, the operational leadership is headed by the operations manager, who is responsible for overseeing daily operations and financial management across all sites. The operations manager is supported by a Secretary, who provides administrative and executive assistance to ensure the strategic goals of the Trustees are effectively implemented. At the operational level, the Sisters of Cross and Passion have a network of care homes and retreat centres, each staffed by a manager and a bursar. The facilities in England, the Briery (a retreat centre), and Elmleigh Convent and East Holme (care homes), operate under site level teams who report directly to the operations manager and safeguarding lead, promoting consistency and oversight.

4.1.3 The Sisters also engage with a range of external advisers and service providers, covering legal services, financial auditing, investment management, and human resources support. This professional collaboration ensures the organisation

⁵ A CIO, or Charitable Incorporated Organisation, is a specific legal structure for charities in England and Wales.

maintains high standards of governance, regulatory compliance, and service quality across all its regions of operation.

4.1.4 The Sisters of The Cross and Passion safeguarding policy states that it applies to all religious, lay, voluntary or employee regardless of the role they undertake. However, it also states that each of the care homes and retreat centres within England and Wales have their own internal safeguarding policy which they should refer to on a daily basis.

4.1.5 The current Safeguarding Policy of the Sisters of The Cross and Passion was revised and ratified by the Trustees in February 2025. It reflects a strong commitment to the protection of children and vulnerable adults, and states “following on from the safeguarding reviews in 2020 we are committed to the One Church Approach to safeguarding by implementing the changes needed and ensuring we respond to victim/survivors promptly and compassionately”.

4.1.6 The policy outlines the specific safeguarding responsibilities assigned to key roles, including the Trustees, the Provincial/Superior, the safeguarding lead, and all other members of the organisation. Each group’s duties are detailed in relation to safeguarding governance, oversight, case management, and reporting obligations. A further section reinforces that all members, regardless of position, are responsible for understanding how to report concerns and their duty to disclose these concerns.

4.1.7 The policy sets out clear expectations by role for safeguarding training, along with a requirement for members and Trustees to attend annual refresher training. This policy does not discuss the training requirements for those who are employed through the Briery or in the provision of care at Elmleigh Convent.

4.1.8 The procedures for responding to safeguarding concerns are well documented. The policy outlines when and how concerns should be reported, distinguishing between emergency and non-emergency scenarios. It sets a clear requirement to escalate concerns to statutory authorities within 24 hours and includes procedures for working with individuals who may be at risk. The policy also states that “In accordance with Article 19 of Pope Francis’ Apostolic Letter, ‘Vos Estis Lux Mundi’, 7 May 2019, It is the policy of the Catholic Church in England and Wales, as agreed by the Bishops Conference, April 2020, to report to the statutory authorities, all allegations of abuse made against those working in the name of the

Church, regardless of whether the allegations or concerns relate to a person's behaviour in relation to their role within the Church or another setting".

4.1.9 The four Trustees meet monthly, and these meetings are formally minuted to ensure accountability and record-keeping. These meetings are held virtually to allow the attendance of all Trustees. Trustees indicated that if there were an immediate risk of harm to a child or adult, they would be notified by email without delay, and an exceptional Trustee meeting would be convened to address the situation. This would allow them to consider risk mitigation, reporting obligations, and the appropriate management of the incident in accordance with their safeguarding policy. The CSSA analyst was provided with the agendas from September 2024 until February 2025 and safeguarding was a standing item for all of these meetings. The Sisters have stated that safeguarding will remain on the agenda for all future Trustee meetings. Additionally, the Sisters of the Cross and Passion hold weekly internal meetings between employees and their managers, as well as weekly coordination meetings between the managers of the care homes and retreat centres and the operations manager to ensure effective communication and oversight. However, these additional meetings are not always minuted or documented and do not utilise a standing agenda. The manager of Elmleigh and operations manager stated that the meetings may contain safeguarding items including training opportunities, updates and concerns but safeguarding is not a standing agenda item.

4.1.10 The policy recognises the importance of secure, auditable record-keeping for all safeguarding concerns, with primary responsibility placed on the safeguarding lead and the RLSS. There is also the recognition that records may be used as evidence in criminal proceedings, civil cases or statutory or public inquiries. The policy includes safer recruitment guidance to ensure that all employees and volunteers undergo appropriate vetting, including DBS checks and appointments to roles will not be confirmed until satisfactory checks and references have been obtained. On appointment all employees are provided copies of the policies and procedures including the safeguarding policy and there is a requirement for those individuals to provide formal written confirmation of receipt.

4.1.11 The safeguarding lead began her role in February 2025, under a volunteer agreement. A comprehensive document stating the key responsibilities and person

specification was provided to the safeguarding lead prior to their appointment. The safeguarding lead has a wealth of relevant experience, with over 30 years of service in the Metropolitan Police, she has worked extensively in areas such as domestic abuse, vulnerable adults, drug dependency, homelessness, and minority communities. Her background includes trauma-informed practice as a family liaison officer and conducting investigations into police conduct, ensuring fairness and safeguarding standards. While her availability is flexible due to other responsibilities, she remains contactable when needed and works closely with the operations manager to share safeguarding and policy duties. However, the limited number of hours she can dedicate to the role, due to wider responsibilities, may present challenges around capacity and sustainability, particularly if safeguarding demands grow in complexity. Ongoing oversight and support from both the operations manager and the Trustees will be important to ensure that safeguarding remains robust, responsive, and well-resourced.

4.1.12 All sisters have been provided with a copy of Integrity in Ministry⁶ in November 2024 and this was last discussed with the Trustees in November 2024 at the Provincial Zoom meeting.

4.1.13 Within all interviews Sisters demonstrated an understanding of the need to address low level concerns and share information with the safeguarding lead and the RLSS, when necessary. The Sisters and safeguarding lead also recognised that on occasion statutory agency referrals may be made.

4.1.14 The Sisters of The Cross and Passion have entered into a formal agreement with the RLSS and CSSA, and they actively collaborated with the RLSS during the audit process. The operations manager stated she has recently engaged in meetings with the RLSS to discuss safeguarding practices for older adults within Religious Life Groups , particularly in care homes and community settings. These ongoing discussions reflect a proactive approach, and the operations manager expressed hope that this collaboration will strengthen safeguarding practices and

⁶ 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.

provide meaningful support for the Sisters in responding to the needs of older members in their care.

Areas for Development

4.1.15 The Sisters of The Cross and Passion have yet to develop a safeguarding implementation plan to support structured adherence to the eight National Safeguarding Standards in England and Wales. While they have informed the CSSA analyst that they intend to use the recommendations from this audit process to inform this plan, it should serve as a practical framework to structure safeguarding activity, clearly allocate responsibilities and resources, and provide a means for regularly monitoring and reviewing progress. It should be shared with and reviewed by the Trustees to ensure effective oversight and accountability.

4.1.16 The Briery Retreat Centre and East Holme currently operate under separate safeguarding policies tailored to their respective settings. At the Briery, the safeguarding policy applies to contracted staff and was developed independently by the centre manager without input from the congregation's safeguarding lead or operations manager. It also does not reference key contact information for the congregation's safeguarding lead, creating gaps in coordination and escalation procedures. At East Holme, the policy covers both staff and Sisters and is more comprehensive, but it too was created without wider consultation within the congregation, leading to similar inconsistencies. Rather than maintaining separate safeguarding policies, it is recommended that the congregation adopt a single, overarching safeguarding policy, with accompanying procedural documents tailored to each location. This would support greater consistency, accountability, and alignment with the congregation's safeguarding framework. The safeguarding lead and operations manager should be directly involved in this process to ensure appropriate oversight, improve communication, and guarantee that safeguarding concerns or allegations from all sites are escalated appropriately to the Trustees..

4.1.17 Individual risk assessments are completed as part of care plans in residential settings. However, there is no organisational risk register or overarching safeguarding risk assessment process in place. This means the broader safeguarding risks to the congregation and those they serve are not proactively identified or mitigated. This is particularly significant for the Elmleigh and Briery

facilities which do not benefit from the external oversight that the CQC registered East Holme does. Consideration should be given to the implementation of internal mechanisms to monitor the quality of care (at Elmleigh) and overall safeguarding standards.

4.1.18 The Sisters of the Cross and Passion should update their Safeguarding Policy to include reference to 2023 amendments to Pope Francis' Apostolic Letter, "Vos Estis Lux Mundi" 2023.

Graded: Firm Progress

4.2 Standard 2 Communicating the Church's Safeguarding Message

Strengths

4.2.1 The Sisters of The Cross and Passion safeguarding statement and contact information for the RLSS and the safeguarding lead was viewed by the analyst at the site visits for both Elmleigh and Briery. The buildings have limited public access and locked entry doors. The chapel at Elmleigh is accessed through the main building and is available to Sisters who wish to pray and participate in mass and other events.

4.2.2 The Sisters of the Cross and Passion currently have a website⁷ which includes the safeguarding statement and contact information for the safeguarding lead and the RLSS. Within their premises, they also promote the use of the RLSS leaflets which include safeguarding advice, the most recently distributed leaflet was the online and social media guidance for RLSS members. The Briery has a separate website⁸ which also includes a link to the Briery safeguarding policy.

4.2.3 The Sisters of The Cross and Passion stated that safeguarding communications are held through informal and regular channels such as one to

⁷ <https://www.crossandpassion.com/>

⁸ <https://www.briery.org.uk/>

one meetings between the operations manager and managers discussed in 4.1.2 which are held weekly. Discussions and information are also shared during mealtime and informal gatherings.

4.2.4 The Sisters declared within their self-assessment that they will ensure Catholic safeguarding updates and briefings are circulated to the Trustees by email and added to the meeting agenda to allow Trustees to consider any actions for the charity as a result

Areas for Development

4.2.5 The Sisters of The Cross and Passion do not have a communication plan. Therefore, information regarding how the Sisters will share their safeguarding messages internally and externally are not considered. The Sisters should develop a plan that describes how they will communicate their safeguarding messages, to whom and in what way. This may be part of an existing safeguarding policy or their safeguarding implementation plan. Additionally, this plan should be reviewed regularly to ensure effectiveness.

4.2.6 The Sisters of The Cross and Passion should provide documentation in a variety of formats to ensure accessibility for all members, as different individuals may have varying needs. This may include larger print, audio formats, or digital versions that can be easily read or heard, ensuring that all members can access important information regardless of their needs.

4.2.7 The Sisters of The Cross and Passion should explore the benefits of sharing key safeguarding documents and organisational information on their website. This could include newsletters, support agency details, complaints and whistleblowing policies, and other relevant safeguarding materials. Additionally, they should consider linking their website with the Briery Retreat Centre's site to ensure cohesion and shared access to appropriate policies. This approach would allow stakeholders, including the wider community, to easily access essential documents, contact information, and updates. It would also enable feedback on policies and experiences, strengthening engagement and trust

4.2.8 The Briery Retreat Centre website already includes a section containing its safeguarding policy. To strengthen alignment with the congregation's safeguarding framework, the Centre should consider adding the contact Sisters of the Cross and Passion audit report

information of the Sisters of the Cross and Passion's safeguarding lead within this section. Including a clear link to the Sisters' main website would also help ensure consistency and provide visitors with access to wider organisational resources.

Graded: Early Progress

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

Strengths

4.3.1 During the audit period, no allegations were made against any member of the Sisters of The Cross and Passion. However, the Manager of Elmleigh Convent and the manager at The Briery were able to discuss and provide evidence for low level safeguarding concerns that have been raised within the past 12 months. These concerns are detailed further in section 4.4.1, however, one concern specifically involved a disclosure of non-recent abuse which was brought to the Sisters through the RLSS. The manager was able to provide information on the lessons learnt from this disclosure and support was offered to the survivor.

4.3.2 The safeguarding notice board displayed in the premise provides a brief summary of the actions to take when a concern arises. It emphasises the importance of listening, gaining key contact information and informing the complainant that information will be shared with the safeguarding representative. It also notes that individuals receiving allegations should clarify they are not the person to offer help but will refer the matter to the Safeguarding Representative. The procedure also stresses the importance of not investigating allegations. All participants, from one to one interviews, stated they would listen attentively to any disclosure, document factual information, and share it with the safeguarding lead and Provincial Leader.

4.3.3 The safeguarding policy outlines the steps to be followed when a safeguarding issue arises, including referrals to safeguarding bodies such as the police, RLSS, CSSA, Local Authority Designated Officer (LADO), and the Crisis Team.

The policy ensures survivors are informed about the next steps in the process and provided with an indicative timescale.

4.3.4 During interviews, the Provincial, Trustees, operations manager and managers stated that they would meet any survivor who comes forward and recognise the importance of sharing information and working closely with the RLSS. The Trustees also confirmed that they can provide funding for survivor support services.

4.3.5 The safeguarding lead is suitably trained, from her previous role, to receive and respond to disclosures of harm and the Sisters and operations manager have established connections with the RLSS. The new safeguarding lead holds regular discussions with the Provincial Leader, operations manager, the previous religious safeguarding lead, to help them adapt to their new role and continue learning best practices in safeguarding.

Areas for Development

4.3.6 The current safeguarding policy would benefit from the inclusion of a clear commitment to supporting individuals who have experienced abuse. While safeguarding processes are outlined, there is limited reference to the specific support available to survivors. It is recommended that the policy be updated to explicitly state the organisation's commitment to survivors. Further operational detail on how this support is provided may be set out in accompanying procedures or guidance.

4.3.7 The self-assessment submitted by the Sisters states that they actively learn from safeguarding reviews and reports, such as those published by IICSA, and that they would take lessons from any concerns they receive. However, the CSSA analyst was not provided with any practical evidence to demonstrate how such learning has been embedded in practice. Going forward, the Sisters should ensure that learning from national reviews and internal safeguarding concerns is clearly documented and evidenced through changes in policy, training, or practice.

4.3.8 The Sisters have not yet engaged directly with survivors to inform future safeguarding practices. Leaders should consider how learning from direct engagement with survivors, or through Religious Life Groups with direct experience, can inform future safeguarding practice. This engagement could also provide an

opportunity for bespoke training focused on survivor interaction, improving the Sisters' ability to offer informed and compassionate support

4.3.9 Providing support information on the website and in communal areas would make it easier for survivors to access services confidentially and without barriers. Currently, there are no visible posters or materials promoting support agencies outside of the RLSS, and staff lack access to a central directory of relevant organisations. The Sisters should ensure that visible support materials are displayed, and a centralised list of approved support services is maintained and easily accessible.

4.3.10 The safeguarding policies for the Sisters of The Cross and Passion, Elmleigh, Briery and East Holme, all within England and Wales are developed separately. A more collaborative approach to policy development, involving both the safeguarding lead and operations manager, would enhance consistency and strengthen safeguarding practices across the congregation. The safeguarding policies should also include clearer guidance on signposting to support services, ensuring that staff can refer individuals to appropriate help promptly.

4.3.11 During interviews, employees and Sisters emphasised the importance of sharing concerns openly and demonstrated awareness of the policies and processes for reporting harm. There is visible guidance posted within community spaces about how to report harm affecting others, which supports awareness and encourages reporting. However, it would be beneficial to extend this guidance to explicitly include how to raise concerns regarding harm to oneself, ensuring that Sisters feel equally supported and safe to disclose personal care needs or safeguarding issues.

Graded: Firm Progress

4.4 Standard 4 Effective Management of Allegations and Concerns

Strengths

4.4.1 No allegations have been made against any member of the Sisters of The Cross and Passion. However, the RLSS made a request for information regarding a non-recent allegation against a teacher employed at a school previously owned by the Sisters. This teacher was not a member of the Sisters of the Cross and Passion, and the Sisters have worked with the RLSS to provide any necessary information. No other safeguarding allegations have been reported. The Trustees are aware of this request and have been informed that, should further action be required, they will be notified.

4.4.2 The Elmleigh Manager granted access to a single safeguarding file stored in a locked cabinet on-site. This file contained records of both health and safety and safeguarding issues reported at Elmleigh Convent. During the 12 month audit period, 20 incidents were documented. Most were low-level or minor incidents and required no further action. However, four concerns prompted further review or action. These included: an allegation of potential financial abuse (described as theft), two separate concerns of verbal aggression (one involving a carer and another a sister), and an incident involving an attempted break-in by a member of the public, which was reported to the police. All incidents, actions taken by senior staff, and outcomes were recorded and placed in the file. The manager and operations manager were able to clearly explain the thresholds and circumstances under which an allegation would need to be reported to statutory agencies. They demonstrated an understanding of when to escalate concerns, in line with safeguarding procedures and relevant legislation.

4.4.3 In interviews trustees demonstrated a clear understanding of their responsibilities to have oversight of allegations and concerns and of the importance of ensuring that such information is shared with them. They similarly recognised their responsibility to report serious incidents to the Charity Commission. Currently, the Sisters of The Cross and Passion do not have any open cases.

4.4.4 The Sisters are aware of their responsibility to support individuals who make disclosures and to listen to their concerns. They also understand the importance of referring any safeguarding concerns to the safeguarding lead.

Areas for Development

4.4.5 The safeguarding policy for the Sisters of the Cross and Passion states that the safeguarding lead assumes responsibility for managing any concerns and, if necessary, reports them to the RLSS. In practice, the safeguarding lead would manage allegations of abuse involving a member, in collaboration with the RLSS, while the relevant host organisation would take responsibility for allegations related to other external concerns. However, based on the evidence reviewed by the analyst, low-level concerns involving employees or matters relating to the care of the Sisters are typically managed by the facility managers. This variation in practice suggests that there may be a lack of clarity in the escalation for certain types of concerns, and it highlights the need for consistent reporting processes and oversight to ensure that all safeguarding matters, regardless of severity, are handled in accordance with the policy and subject to review.

4.4.6 Several low-level concerns were raised at Elmleigh Convent over the past 12 months, along with one concern at the Briery Retreat Centre. While these concerns were shared with the operations manager and former safeguarding lead, they were not consistently communicated to the Trustees. Moreover, the concerns were not documented in a standardised format but in various written forms. This approach may limit effective oversight, the identification of patterns, and delay appropriate escalation. While some learning was identified and discussed, it was not always formally documented or shared across the organisation. To address this, the safeguarding lead should implement a centralised log for all safeguarding concerns across all facilities and ensure that these concerns are recorded using a standardised format. Trustees should review this log regularly and formally document lessons learned, patterns identified, and emerging risks. This will strengthen safeguarding oversight, facilitate timely responses, and inform ongoing development of policies and practices.

4.4.7 The Sisters of The Cross and Passion should consider engaging stakeholders and other religious life groups to help quality assure their policies. This collaborative

approach would ensure that the policies align with best practice, reflect the values and needs of the broader community, and are continually improved through feedback from various perspectives.

4.4.8 The current Data Protection Policy does not specifically address how safeguarding information, particularly related to allegations or concerns of abuse, should be handled in compliance with legislation, and is primarily focused on employees and staff. The Safeguarding Policy states that all safeguarding case files should be managed by the safeguarding lead, who is responsible for ensuring accurate records are maintained. However, at present, all related documentation is stored in a locked filing cabinet in the manager's office at the site where the concern was raised. While the safeguarding policy outlines the recording and storage of safeguarding concerns, it lacks sufficient detail regarding the security measures in place to protect sensitive information and ensuring the confidentiality of case files. To address this, it is recommended that the Sisters of the Cross and Passion Safeguarding Policy be updated to include provisions on data protection and confidentiality specifically for safeguarding information. Alternatively, the current Data Protection Policy should be expanded to explicitly include safeguarding concerns, ensuring compliance with safeguarding regulations and the protection of sensitive data.

Graded: Firm Progress

4.5 Standard 5 Management and Support of Subjects of Allegations and Concerns (Respondents)

Strengths

4.5.1 The Sisters of The Cross and Passion have no experience of managing respondents and therefore there is no practice evidence available to assess how they would respond in such a situation. As a result, the assessment in this area is based on a review of policies, available evidence, and theoretical discussions during interviews.

4.5.2 The safeguarding policy outlines that when a person's conduct may impact their suitability to work with children or adults, the matter must be referred to the Local Authority Designated Officer (LADO) within 24 hours. It also notes that restrictions, such as temporary withdrawal from ministry, may be necessary while an investigation is ongoing. The policy references unacceptable behaviours and draws from *Vos Estis Lux Mundi* (2019), reinforcing its application in all relevant situations involving religious members, laypersons, volunteers, or staff.

4.5.3 The Sisters of The Cross and Passion have actively engaged with the RLSS through training, responding to enquiries, and seeking support in relation to the care of the Sisters. They acknowledged that, in the event of an allegation or disclosure, they would consult the RLSS for advice on appropriate actions and next steps. The Trustees confirmed that they would liaise with the RLSS to undertake any risk assessment and safety management plan in respect of any allegations made.

4.5.4 The Trustees showed a clear understanding of the need for confidentiality when managing allegations and recognised that respondents may require emotional, psychological, legal, or practical support. The Sisters stated they would liaise with the RLSS to ensure respondents are appropriately supported. Within their self-assessment the sisters also confirmed that they would identify a suitable person to act as a welfare support person, however there is no information regarding how this person would be appointed or trained to act in such a position.

4.5.5 Those in positions of leadership acknowledge that respondents may need to be stepped aside from ministry and indicated that, should such a situation arise, the respondent would receive ongoing support from the safeguarding lead, Trustees, and RLSS. Although alternative accommodation has not yet been required, Trustees confirmed that such support would be made available if needed.

4.5.6 The safeguarding lead brings experience from her previous roles involving vulnerable adults and children, and she will be attending additional safeguarding training facilitated by the RLSS. Her experience, along with support from the RLSS, will enable her to manage respondents effectively and ensure communication with statutory authorities takes place when required. As mentioned earlier, the Trustees will have oversight of any cases and have demonstrated in interviews their commitment to quality assuring their practices and improving policies and

procedures, when necessary, by considering lessons learned from any cases that may arise.

Areas for Development

4.5.7 The Sisters of The Cross and Passion Safeguarding Policy addresses key aspects of managing safeguarding allegations; however, it would benefit from further clarification regarding the types of support available to respondents during the process. While the Sisters demonstrated an understanding of the emotional, mental health, physical, and legal needs that a respondent may experience, including the importance of a welfare support person, this is not clearly articulated within the current safeguarding policy. Including additional practice guidance would ensure a consistent, fair, and transparent approach. This guidance should outline what support may be offered, the role of the RLSS, and how the wellbeing of the respondent will be balanced with safeguarding responsibilities.

4.5.8 The Sisters of The Cross and Passion should consider whether their policies and procedures would benefit from liaison with other Religious Life Groups that have had recent experience of supporting Respondents to ensure they are as effective as possible.

Graded: Firm Progress

4.6 Standard 6 Robust Human Resource Management

4.6.1 Within the Elmleigh Convent there are currently 11 sisters and within East Holme there are 14 Sisters. The care for Sisters provided is not outsourced to an external provider, the Sisters recruit and manage their own care staff, overseeing all aspects of care internally.

4.6.2 The Sisters of The Cross and Passion's Safeguarding Policy outlines clear safer recruitment procedures, including mandatory DBS checks for all relevant roles. No appointment is confirmed until a satisfactory DBS disclosure is received, and previous employment references have been verified as acceptable. The Sisters also stated that they adhere to RLSS guidance regarding recruitment practices and provided the RLSS document as evidence for this audit. All new employees,

including carers supporting the Sisters, receive a comprehensive employee handbook, introduced in January 2024. This handbook requires staff to confirm their agreement to all key organisational policies, including the safeguarding policy. It also provides detailed information about the recruitment process, such as issuing job descriptions, conducting structured inductions, and carrying out regular performance reviews.

4.6.3 The handbook specifies that any failure to maintain a valid DBS check during employment will result in termination, and that employees must disclose any new convictions throughout their employment. It also includes a social media policy, grievance procedure, and whistleblowing guidance. In addition, a separate whistleblowing policy was ratified in February 2025, setting out clear procedures for staff, volunteers, or Trustees who suspect that something unethical, illegal, or unsafe is occurring within the Religious Life Group.

4.6.4 The Sister involved in active ministry is subject to the safeguarding policies and procedures of the organisations in which she serves. Appropriate training and vetting, including DBS checks, for the Trustees are coordinated by the Religious Life Safeguarding Service (RLSS). The RLSS has confirmed that all eligible members of the community have undergone DBS checks within the past three years, with rechecks scheduled prior to the expiry of the three-year period.

4.6.5 All safeguarding documentation is secured separately at each facility. To enhance communication, a dedicated safeguarding email address has been established in February 2025. Additionally, a OneDrive system is being developed, with designated folders for finance, administration, human resources, and safeguarding (which includes information on training and DBS information). There are separate access permissions for Trustees, Sisters and the operations manager, Provincial Leader, and safeguarding lead have full access to these files to ensure appropriate oversight, secure information management, and continuity in safeguarding practices.

4.6.6 The safeguarding lead and operations manager stated that the most recent international arrival was for a final profession in July 2024. All new arrivals undergo the canonical formation process, in line with the community's religious practices. In accordance with the Sisters of The Cross and Passion's Safeguarding Policy, any

concerns arising during or after this process are reported promptly to the safeguarding lead and, where appropriate, to the RLSS or statutory agencies. However, the policy does not explicitly reference international arrivals.

4.6.7 The Sisters of The Cross and Passion's Complaints Policy, adopted in February 2025, is a general organisational policy, not specifically for safeguarding. It sets out a clear three-stage process: complaint/investigation (stage one), appeal to Trustees (stage two), and external assistance, if needed (stage three), with defined timelines and responsibilities to ensure fair and transparent handling. The policy distinguishes between concerns and complaints, encouraging early resolution, and includes provisions for confidentiality and whistleblowing, though anonymity cannot always be guaranteed, especially where safeguarding or legal duties apply. It explicitly states that safeguarding concerns are handled under a separate Safeguarding Policy. However, if someone is dissatisfied with how a safeguarding issue was managed, this policy provides a route for raising that concern. The policy is reviewed every three years by the Trustee Board, and all complaints are presented to the Board, supporting oversight, accountability, and continuous learning.

4.6.8 Within the Briery Retreat Centre, the manager stated that the recruitment process for volunteers and employees is structured and carefully considered, beginning with an initial meeting to outline expectations and levels of commitment. Candidates take part in a discernment process to evaluate their suitability for the role. All volunteers are required to complete relevant DBS checks, including basic checks, and staff receive appropriate training as part of their induction. The manager also stated that a recruitment policy is in place to guide this process, however this policy was requested but not provided during the audit process.

4.6.9 The Sisters of The Cross and Passion Trustees have routine oversight of recruitment processes including the recent appointment of the safeguarding lead. This also includes any recruitment within the Briery and East Holme.

Areas for Development

4.6.10 The Sisters should consider reviewing the overlap and consistency between the whistleblowing guidance in the employee handbook and the stand-alone whistleblowing policy to ensure clarity and cohesion across both documents.

4.6.11 As previously discussed, the Briery and East Holme operate under their own policies, separate from those of the Sisters of the Cross and Passion. Although the Briery Manager stated that a recruitment process is in place, no supporting documentation was provided to the analyst. To ensure consistency and accountability, it is recommended that the safeguarding lead has access to recruitment related information from all facilities, including the Briery and East Holme. Uploading this documentation to the central OneDrive system would support transparency, facilitate appropriate safeguarding oversight, and help align site-level processes within the wider congregation. It is also recommended that the Sisters of the Cross and Passion work collaboratively with all facilities to review and, where appropriate, align their recruitment policies and procedures. This would ensure coherence across sites and strengthen the overall safeguarding infrastructure.

4.6.12 The current complaints policy stage three, external assistance section, states “If both stages have been exhausted but a satisfactory resolution hasn’t been reached, the RLG may decide to seek external assistance. However, the RLG will only take this step if appropriate to do so, for example the complaint is of a serious nature or there is a valid conflict of interest.” In addition to this, the Catholic Safeguarding Standards Agency (CSSA) policy, *“Making a complaint to the Catholic Safeguarding Standards Agency (CSSA) about a diocese, eparchy or religious life group in England and Wales,”* outlines the CSSA’s role as the final stage for unresolved safeguarding complaints about Catholic dioceses, eparchies, and religious life groups. The Sisters of the Cross and Passion should therefore update their complaints policy to explicitly acknowledge the role of the CSSA and ensure that individuals are aware of their right to escalate safeguarding concerns to the CSSA for independent investigation after stage three of the complaints process.

4.6.13 To further improve the safeguarding policy in respect of recruitment, especially for those arriving from overseas, it would be beneficial to specify a clear process for conducting appropriate safeguarding checks. This should include obtaining references from previous roles, and checks from relevant religious or governmental bodies in the country of origin. This would ensure that all those joining from overseas meet the same safeguarding standards as current members.

4.6.14 The Sisters should consider publishing the complaints policy online to ensure it is easily accessible to their target audiences and the wider community. Additionally, the Sisters should establish a clear mechanism for receiving feedback on these policies, allowing for continuous improvement and ensuring that they meet the needs and expectations of those who may need to use them.

4.6.15 It has been noted that the management of DBS checks across the different groups (Sisters, carers, and Briery staff) is currently managed separately. The DBS checks for carers are maintained on a separate spreadsheet and are updated regularly, while the Sisters provide their certificates individually, but there is no central register to track this. The Briery Retreat Centre has its own DBS register, which is kept both electronically and in written form, but these records do not align or correlate with the other systems in place, therefore it is unclear whether DBS checks for all volunteers and employees at Briery have been renewed within expected timescales. To improve consistency, oversight, and safeguarding compliance, it is recommended that the Sisters of The Cross and Passion implement a centralised DBS tracking system on their proposed OneDrive platform, for all staff, volunteers, and carers across all facilities. This system would consolidate the various registers into one, ensuring that all DBS check statuses are monitored and easily accessible to leadership. The centralised system should include a register for the Sisters, Elmleigh carers, and Briery volunteers and employees, with clear tracking of expiry dates, recheck schedules, and confirmation of receipt of DBS certificates. By aligning the DBS processes across all groups and centralising the records, the Sisters will enhance safeguarding practices and ensure greater accountability and oversight.

4.6.16 The manager at Elmleigh maintains a DBS log for staff, which includes information on when each check is due for renewal. Several checks are currently in the process of being renewed, with some recorded as expiring in March 2025. However, a number of checks were originally completed in 2018 and 2019, meaning they are now overdue and should be updated promptly to remain compliant with safeguarding policies. To support clearer tracking, it is recommended that the log includes both the original DBS issue date and a clearly calculated renewal date based on a three-year cycle. Some entries currently appear to reflect the start of the renewal process rather than the original date, which can cause confusion and

increase the risk of oversight. Storing the log in a shared OneDrive folder would also support more consistent oversight by senior managers or Trustees and help ensure records remain accurate and up to date. This will support safeguarding compliance and contribute to maintaining a safe environment for those Sisters receiving care.

4.6.17 It is recommended that the Sisters of the Cross and Passion develop clear, recruitment guidance to ensure a consistent and safe approach across all settings, particularly as managers are often responsible for recruiting employees directly, such as at Elmleigh. Currently, there is no organisation-wide recruitment procedure in place, which may lead to inconsistencies and potential safeguarding risks. While Elmleigh has its own staff handbook stating that a person will be dismissed from their role if a relevant DBS check is not obtained, this standard is not consistently applied elsewhere. Guidance should clearly outline each step of the recruitment process, including pre-employment checks, roles and responsibilities, and escalation routes. It should also provide specific procedures for managing blemished DBS certificates, including a fair and transparent risk assessment process involving appropriate managers or safeguarding lead, and allowing candidates the opportunity to explain any disclosures. Establishing such guidance would support the process of safe recruitment.

Graded: Firm Progress

4.7 Standard 7 Training and Support for Safeguarding

4.7.1 The Sisters of the Cross and Passion Safeguarding Policy outlines defined training expectations for all members, tailored to individual roles within the community. Trustees are required to complete Trustee safeguarding training that covers their legal duties and responsibilities, in line with Charity Commission guidance. The Religious Superior (Provincial/Leader) must undertake Religious Life Group Lead Training (equivalent to Level 2), while the safeguarding lead is expected to complete safeguarding lead Training (equivalent to Level 3). Community members who engage with the public must complete Advanced Safeguarding Training (equivalent to Level 2), and those who do not have direct public contact are required to complete Basic Safeguarding Training (equivalent to Level 1), where

cognitive ability allows. Training includes guidance on handling disclosures, reporting concerns, and supporting individuals affected by abuse or neglect. All members are expected to complete annual refresher training, and certificates of training are held by the safeguarding lead.

4.7.2 Two of the Trustees currently living in England have undertaken the Trustee training in February 2025. However, there is no record of the current level of training undertaken by the two Trustees who currently reside in Ireland.

4.7.3 The Trustees stated that staff training is primarily overseen by managers and the operations manager at the operational level. The Trustees are not directly involved in day-to-day training management, but they stated that if any issues related to staff training arise, the operations manager should inform them. This ensures that the Trustees remain aware of any significant concerns or challenges related to training and can take appropriate action if necessary.

4.7.4 The Trustees and operations manager reported that they have not encountered any compliance issues requiring intervention to date. However, they confirmed that if non-compliance with safeguarding training expectations were to arise, appropriate action would be taken. In cases involving a Sister, the matter would be addressed through direct conversation, with Trustees reinforcing the importance of adhering to training requirements. For employees or carers, such non-compliance would be managed in accordance with established HR policies, and could potentially lead to disciplinary action, including dismissal, if necessary.

4.7.5 The RLSS has confirmed that the Sisters of The Cross and Passion have engaged with their services for queries and audit advice. The Religious safeguarding lead receives regular email updates from the RLSS regarding upcoming training opportunities, which are currently shared informally and formally with the community. To strengthen communication and confirm that safeguarding remains a priority, the Sisters should ensure their communication plan reflects how upcoming training will be discussed more formally.

Areas for Development

4.7.6 Training records for staff at Elmleigh, the Briery Retreat Centre and East Holme are currently held separately by their respective managers. While Care Homes maintain a training matrix for all staff and Trustees have access to these logs on-

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site, the lack of a centralised system limits overall oversight. To improve consistency and accountability, it is recommended that training data from all sites be brought together into a centralised tracking system accessible to Trustees and the safeguarding lead.

4.7.7 At Elmleigh, a structured training log is maintained for staff and carers, detailing the types of training undertaken and the dates these were last completed. Safeguarding Adults is included as a core module. However, the log does not specify the renewal requirements for training, which limits oversight of whether refresher training is being completed at appropriate intervals. Notably, one staff member who began employment in January 2025 has not yet completed safeguarding training, which should be addressed as a matter of urgency to ensure full compliance and consistency in safeguarding standards.

4.7.8 The Sisters of the Cross and Passion should maintain a training log, specifically for their members, to track training completion and ensure compliance with safeguarding requirements. The log should clearly record the type of training each individual has completed, along with the dates of completion and renewal. For retired Sisters with limited involvement, the log could indicate any refresher training required, while for those in active ministry or serving as Trustees, it should detail more comprehensive training. If a Sister is not eligible for specific training due to their role, this should be noted in the log. The log should be regularly updated to reflect ongoing training needs, ensuring that safeguarding training remains relevant to each individual's responsibilities. Clear timelines for renewal should also be included, ensuring that the training is up to date and appropriate for each role.

4.7.9 A comprehensive training needs analysis (TNA) has not yet been completed. While there is some initial identification of role-based expectations, a full TNA would involve a detailed assessment of the knowledge and skills, required of different roles within the organisation. This analysis will enable all Sisters, employees and volunteers to receive relevant and targeted safeguarding training. Once training is delivered, the Sisters should evaluate its effectiveness to measure impact, identify further needs, and make adjustments to maintain high standards of safeguarding practice.

4.7.10 The process for collecting and reviewing feedback on safeguarding training has not yet been fully established. Implementing a robust feedback mechanism is essential to gather insights from Sisters, staff, and other stakeholders about the effectiveness of current safeguarding training. This ongoing feedback will help identify any challenges or gaps in practice, inform improvements, and promote a culture of openness and continuous learning within the organisation.

Graded: Firm Progress

4.8 Standard 8 Quality Assurance and Continuous Improvement

Strengths

4.8.1 The Sisters of The Cross and Passion acknowledged the importance of engaging with Survivors of abuse and Trustees stated they would meet with any Survivors who came forward if the Survivor chose to do so.

4.8.2 The Sisters of The Cross and Passion intend to use the recommendations of this audit with a view to improving their Safeguarding practice and ensuring their adherence to the eight Safeguarding standards of the Catholic Church in England and Wales.

Areas for development

4.8.3 Safeguarding is included in the Trustee annual report to the Charity Commission. While the Trustee annual report provided in 2024 demonstrates a clear commitment to implementing safeguarding policies and procedures, there are several areas that could be enhanced for completeness and transparency. The report lacks details on any safeguarding concerns or incidents that may have arisen throughout the year, including actions taken and outcomes. Additionally, although safeguarding policy implementation is mentioned, there is no specific reference to an implementation plan that would enable Trustees to monitor compliance. Previous annual reports submitted to the CSSA analyst have followed the same format. An implementation plan would allow for clearer oversight by outlining safeguarding actions, assigning responsibilities, tracking training uptake for staff, Trustees, and volunteers, and ensuring that changes to procedures in

response to issues or feedback are followed through. Including and actively using an implementation plan would support a more structured and transparent approach to safeguarding across the organisation.

Graded: Early Progress

5. Summary of Overall Findings

5.1 The Sisters of The Cross and Passion in England and Wales comprise 26 Sisters, many of whom reside at the Elmleigh Convent or East Holme care communities. While their active ministry is decreasing due to age and infirmity, the Sisters have made meaningful progress in strengthening safeguarding practices to meet current needs. Site-specific safeguarding policies have been developed, including for East Holme and the Briery Retreat Centre. Both staff and Sisters actively participate in safeguarding training, with key modules such as *Safeguarding Adults* included. Safeguarding is now a standing item on the agenda for trustees' meetings, reflecting a strong commitment to accountability. These developments form part of a broader effort to improve coordination and consistency in safeguarding across their sites.

5.2 The primary focus should now be on strengthening cohesion and consistency in safeguarding practices across all locations operated by the Sisters of The Cross and Passion. This includes aligning all safeguarding policies with national safeguarding standards, clarifying the responsibilities of the safeguarding lead across all facilities, and improving the recording and oversight of safeguarding concerns and DBS checks. The Sisters are also encouraged to consult with survivors to inform safeguarding practice and to implement mechanisms for ongoing policy feedback and review. These steps will help embed a strong and sustainable safeguarding culture that promotes transparency, accountability, and continuous improvement across their work.

5.3 Many of the Sisters are no longer in active ministry, however the Sister who provides support to local organisations, is expected to comply with the basic safeguarding expectation placed upon her by the host organisation. However, as a

separate charity, they also have Safeguarding expectations placed upon them across the eight National Safeguarding Standards of the Catholic Church in England and Wales.

5.4 The Sisters of The Cross and Passion have demonstrated that their current practice exceeds minimum Safeguarding practice. They have been rated as achieving Firm Progress against six of the standards and as early progress against the remaining two standards. This gives an overall rating of Firm Progress.

6. Recommendations

To support improvement, the following recommendations are made:

Within 3 months

- **Ensure all current DBS checks are up to date for all facilities; address overdue checks and submit documents or start the process within 7 days. Risk mitigations should be put in place for any checks not up to date.**
- Set up a centralised DBS register covering all staff, Sisters, carers, and volunteers.
- The Sisters of The Cross and Passion should create an implementation plan. This plan should be developed, reviewed regularly with trustees, and ensure alignment with best practices.
- The Sisters should clarify escalation routes and the role of the Safeguarding Lead across all sites and ensure this is clearly documented.
- Create a centralised safeguarding concerns log with standardised recording format for all facilities.
- Establish a training log for staff, Sisters, and trustees with completed and required training.
- New staff (e.g., those who started in January 2025) should be prioritised to complete safeguarding training as soon as practically available, ideally within two weeks of starting. Going forward, all new starters must have safeguarding training booked and completed before undertaking any active work with vulnerable groups.

- Consolidate training records from all facilities into a single accessible tracking system to allow effective oversight by trustees.
- Trustees should be involved in regular reviews of the low-level concerns log and training data to ensure ongoing safeguarding oversight. The low-level concerns log should be reviewed quarterly. Training data should be reviewed at least biannually, and more frequently if there are significant staffing changes or emerging concerns.

Within 6 months

- The Sisters of The Cross and Passion should share important information such as contact information for the safeguarding lead, newsletters and policies (such as the safeguarding and complaints policies) on the websites for the Sisters of the Cross and Passion and the Briery.
- Establish a formal feedback mechanism to support the continuous improvement of safeguarding policies and practices. This could include opportunities for Sisters, staff, and those attending retreats or using the services of the Sisters of the Cross and Passion to share feedback on policies or general experiences.
- To create a comprehensive training needs analysis for all roles and establish a process to regularly gather feedback from members and staff on safeguarding training and use this to inform the TNA.

Within 12 months

- Liaise with other Religious Life Groups which have experience of managing allegations and concerns, supporting Survivors and supporting Respondents to see if there are any transferable lessons that can be learned and to inform future safeguarding practices.
- Align whistleblowing policy content between the employee handbook and standalone version.
- Update complaints policy to reflect CSSA's role as the final safeguarding complaints stage.
- Review and align all safeguarding policies with input from the Safeguarding Lead and Operations Manager. Update safeguarding policy and/ or implement guidance to:

- Include commitment to survivor and respondent support.
- Detail data protection and confidentiality procedures for safeguarding information.
- Finalise full alignment of recruitment policies across sites, including overseas safeguarding checks.
- Include safeguarding implementation plan progress, case outcomes (anonymised), and lessons learned in the safeguarding lead's annual reports to Trustees.

7. Arrangements for Follow-up

7.1 In line with an overall rating of Firm Progress, the earliest date of the next audit of the Sisters of The Cross and Passion by the CSSA is within two years in March 2027. If the CSSA becomes aware of a significant Safeguarding concern or allegation in the intervening period, then an earlier audit will be required.

8. Appendix

Evidence List

- 1 Coercive Control 125.pdf
- 2 3. Safeguarding in the context of Catholic Social Teaching 28.01.24 (3).pptx
- A. SISTERS OF THE CROSS AND PASSION CIO – SAFEGUARDING POLICY FEBRUARY 2025–
GI191059.pdf
- 3 GI191059.pdf
- 4 B . Sisters Of The Cross and Passion CIO Whistleblowing Policy Feb 2025 .pdf
- 5 Briery Alcohol and Drugs Policy.pdf
- 6 Briery Bullying and Harassment (including Sexual Harassment) Policy.pdf
- 7 Briery Equality and Diversity Policy.pdf
- 8 Briery Grievance Procedure.docx
- 9 Briery Lone Working Policy & Procedures.docx
- 10 Briery Safeguarding Policy.pdf
- K. Sisters Of The Cross and Passion CIO – Safeguarding Lead Job Role and
Responsibilities.pdf
- 11 D Sisters of the Cross and Passion CIO Conflict of Interest Policy and Declarations – Blank
form February 2025 .pdf
- 12 E. Safeguarding procedure v1.1.pdf
- 13 Easthome Convent – Safeguarding policy_ (003).pdf
- 14 ELMLEIGH CONVENT DBS. APPLICATIONS 2025 doc.pdf
- 15

- 16 ELMLEIGH CONVENT TRAINING MATRIX 2024 – 2025 (002).pdf
- 17 F.1 Online and Social Media Use.pdf
- 18 F.2 Spiritual Abuse Leaflet.pdf
- 19 F.3 Welcome Pack – RLSS (2).pdf
- 20 G. Collated Safeguarding actions from CIO meetings last 6 months.pdf
- 21 H. Sisters Of The Cross and Pasion CIO Data Protection Policy .pdf
- 22 J.1 RLSS cert Sister .pdf
- 23 L. 2 CIO Trustee agendas Sept 24 to feb 25 .zip
- 24 SCP Comprehensive Handbook .pdf
- 25 L.1 Collated Safeguarding actions from CIO meetings last 6 months.pdf
- 26 M . Safer Recruitment Final 3.pdf
- 27 training Feb 25.pdf
- 28 O – Trustee Report – Safeguarding text March 2024 – Charity Commission .pdf
- 29 P. Correspondence with RLSS FW Invitation to participate in a care project .msg
- 30 Q . 4 Notes from a meeting RLSS – RLSS Safeguarding Officer.msg
- 31 Q 5 RLSS December 2024 Member Update.msg
- 32 Q. 2 RLSS letter .docx
- 33 Q. 3 RLSS Safeguarding.msg
- 34 Q.6 RLSS Training finding a Training location.msg
- 35 Q.7 RLSS Jan 25.pdf
- 36 The Briery Training – Safeguarding .pdf
- 37 The Briery Code & Conduct Safeguarding .pdf
- 38 The Briery Parish–Safeguarding–Statement–Dec–202313.pdf