

Sisters of the Holy Family of Nazareth

Baseline Audit Report
November 2025

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1. Introduction

1.1 This report is a baseline audit of the safeguarding arrangements for the Sisters of the Holy Family of Nazareth¹. 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 international apostolic religious order of the Congregation of the Sisters of the Holy Family of Nazareth is the Jesus the Good Shepherd Province which is composed of 57 Sisters residing in communities in England, France and Italy. The Holy Family Convent in Enfield is the Sisters of the Holy Family of Nazareth's sole community in England and is home to ten Sisters in total. Three Sisters work in schools as employees and the remainder undertake roles in the convent or are of retirement age. One elderly Sister requires the services of an individual carer provided by the local council who visits twice each day and the District Nurse tends to those who require medical care. The Sisters of Holy Family of Nazareth allow the Maronites² to use the chapel adjoining the convent for Sunday Eucharist and annual celebrations, and the Roman Catholic school next door to the convent also use the chapel. These are a self-organised groups who are required to book in advance to use the premises and have no direct input from the Sisters of the Holy Family of Nazareth when they visit with connecting doors locked shut when they are present. The chapel remains locked until there is an official service and so is not open to members of the public. The group have no volunteers, two part-time cooks, one housekeeper and employ the services of an agency cleaning company who provide cleaners.

1.3 This audit covers safeguarding arrangements for the period up to the 12 months preceding the audit week which took place in June 2025. The scope will cover the practice of the group itself and will not include comment on the safeguarding arrangements in place for the diocese in which Parish support is undertaken nor the Sisters' paid work for host organisations.

¹ Sisters of the Holy Family of Nazareth are a registered charity with the charity number 234201

² The Maronites are an Eastern Rite Church in full communion with Rome. Our Lady of Lebanon Catholic Church UK is the mission in England which serves mainly the Lebanese and Cypriot communities

1.4 The CSSA has devised a categorisation scheme for Religious Life Groups taking part in safeguarding audits. This categorises groups on a scale of *Level 1, Level 2 and Level 3*. Level 1 is classed as a small community with minimal outreach and no known safeguarding concerns. Level 1 is itself divided into two categories: *Enclosed* (for Enclosed Orders) and *Apostolic* (for non-Enclosed Orders). Level 2 is for Orders of medium sized communities with some outreach with vulnerable populations and/or providing some diocesan activities such as a Parish Priest. Level 3 audits cover larger communities and/or one with significant outreach with vulnerable populations and/or a disproportionately high number of open safeguarding cases. The Sisters of the Holy Family of Nazareth have been assigned to a Level 2 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 Safeguarding Lead for the Sisters of the Holy Family of Nazareth was initially contacted by the CSSA Analyst via e-mail on the 12 December 2024 to notify them of the intention to complete a safeguarding audit in March 2025 and the relevant Level 2 audit guidance documents were shared. The date for the audit was later changed by the CSSA for operational reasons, in agreement with the Sisters of the Holy Family of Nazareth, to the week commencing the 2 June 2025 with an in-person visit that same week on the 5 June.

2.2 Following the e-mail correspondence the Level 2 Self-Assessment (an assessment tool which provides background information on the Sisters of the Holy Family of Nazareth's adherence to the eight individual National Safeguarding Standards³) was completed by the group and then e-mailed to the CSSA Analyst

³ A description and full details of the Standards can be found on the CSSA website [here](#)

with accompanying evidence on the 10 March 2025. Following the review of the Self-Assessment and the supporting evidence provided, the CSSA Analyst completed the in-person visit to the Holy Family Convent in Enfield, London on the 5th June where they interviewed the House Superior, who is also a House Counsellor, the Safeguarding Lead and the Chair of Trustees, who is also a House Counsellor.

2.3 The evidence provided in both the Self-Assessment form and the in-person visit has been assessed against the Level 2 Maturity Matrix and ratings for each standard have been assigned (see Section 3 Audit Grading), together with a combined overall grade. The following evidence has been considered in the preparation of this report in reaching decisions regarding scoring for the individual safeguarding standards and the overall grade:

- E-mail liaison with the RLSS
- The Sisters of the Holy Family of Nazareth website⁴
- The Charity Commission website for the Sisters of the Holy Family of Nazareth
- Level 2 Self-Assessment form completed by the Safeguarding Lead and submitted to the CSSA Analyst
- The Policy for Safeguarding People Especially Children and Vulnerable Adults in the Jesus the Good Shepherd Province document dated 2012

2.4 No case audit work has been undertaken during the course of this audit as there have been no safeguarding allegations or concerns reported involving the Sisters of the Holy Family of Nazareth within the last 12 months and hence there are no current case files to pass comment on.

3. Audit grading

3.1 Safeguarding practice is graded in accordance with the CSSA Maturity Matrix for Level 2 Religious Life Groups. Each standard is graded on an ascending six point scale of *Basic*, *Early Progress*, *Firm Progress*, *Results Being Achieved*,

⁴ [Holy Family Convent – Sisters of the Holy Family of Nazareth – Enfield](#)

Comprehensive Assurance and *Exemplary*. If a Religious Life Group fails to provide sufficient evidence from which to be scored on this scale they will be graded as *Below Basic*. Grades for individual Standards are combined in order to produce an overall grading for the Religious Life Group as an outcome of the audit.⁵ The audit draws on evidence generated from Self-Assessment, interviews, supporting documentation and any other evidence as listed in the Appendix.

3.2 This report summarises the findings of the audit undertaken of the Sisters of the Holy Family of Nazareth and their progress towards meeting the eight National Safeguarding Standards, the grading for each of which is tabulated below. The Sisters of the Holy Family of Nazareth have received an overall rating of Basic.

Overall grading	Basic
Standard 1 – Safeguarding is embedded in the Church body’s leadership, governance, ministry and culture	Basic
Standard 2 – Communicating the Church’s safeguarding message	Below Basic
Standard 3 – Engaging with and caring for those who report having been harmed	Basic
Standard 4 – Effective management of allegations and concerns	Early Progress
Standard 5 – Management and support of subjects of allegations and concerns (respondents)	Basic

⁵ Full information on supporting documentation in respect of the audit methodology is available here: [Quality Assurance Framework for Religious Life Groups](#)

Standard 6 – Robust human resource management	Below Basic
Standard 7 – Training and support for safeguarding	Below Basic
Standard 8 – Quality assurance and continuous Improvement	Below Basic

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 In relation to governance, the Sisters of the Holy Family of Nazareth have House Council meetings on an at least monthly basis, which are attended by the Trustees, and monthly community meetings which are attended by all members. At the Province level the House Superior meets with the Provincial Council twice per year (once in-person and once via virtual meeting) and once per year the group receives a canonical visitation from the Provincial Superior. One of the Sisters who resides at the convent is a member of the Provincial Council. The Sisters of the Holy Family of Nazareth are not members of the Religious Lives Safeguarding Service (RLSS)⁶.

4.1.2 The group have a "Policy for Safeguarding People Especially Children and Vulnerable Adults" which is thorough in its scope and contains a rationale, safeguarding policy statement and sections on creating a safe and supportive

⁶ RLSS are an independent team of Safeguarding professionals offering Safeguarding services to the Religious of the Catholic Church in England and Wales

environment, definitions of abuse, procedures for preventing abuse, responding to allegations, code of conduct and roles and responsibilities for safeguarding.

4.1.3 The Sisters of the Holy Family of Nazareth have an allocated Safeguarding Lead who has relevant safeguarding experience working as a Teaching Assistant and volunteering as a school governor since 1990, and having previously been a member of Westminster Diocese Safeguarding Commission and on the Conference of Religious Safeguarding Advisory Committee. The Safeguarding Lead receives safeguarding training through her roles within school. The Chair of Trustees also has experience in this area as she was responsible for safeguarding for the Province covering Italy, France and England when she was on the Provincial Council.

Areas for development

4.1.4 The Charity Commission website page⁷ for the Sisters of the Holy Family of Nazareth shows five Trustees. However, the Safeguarding Lead advises that there are now only four Trustees, all of whom are Religious Sisters. As previously noted, Trustees meet at least four times per year and minutes are kept of their discussions. However, Trustee meeting minutes were not provided as evidence for the safeguarding audit as safeguarding has not been discussed within these meetings. The Chair of Trustees sees this as a sign that safeguarding is being managed effectively within the group because the topic would only be discussed if there was an issue. It is an expectation of the Charity Commission that Trustees provide active oversight of safeguarding arrangements and that safeguarding is a standing agenda item at all Trustee meetings to allow the space to raise issues of safeguarding.

4.1.5 Despite the fact the Policy for Safeguarding People Especially Children and Vulnerable Adults was written in 2012 and is therefore 13 years old, it does contain some relevant information but nevertheless urgently requires updating. There is also no evidence to show that all members have previously received a copy of the Safeguarding Policy, have read and understand it. The policy is an umbrella policy

⁷ The Charity Commission website page can be accessed [here](#)

for the Jesus of the Good Shepherd Province and is published in English, French, Italian and Polish, however it is an expectation of the National Safeguarding Standards that a local policy should be in place that is specific for the English community and outlines local processes.

4.1.6 The Sisters of the Holy Family of Nazareth should make publicly available statements of their safeguarding commitments that are displayed physically and on-line. This would also help support a culture of safeguarding within the group as a set of ideals to uphold and illustrate to members of the public that the group understands the importance of the protecting the vulnerable.

4.1.7 There is no evidence that the Sisters of the Holy Family of Nazareth have shared *Integrity in Ministry*⁸ with its members. This document should be shared with all members, copies made available for ongoing reference, and discussions held to ensure understanding.

4.1.8 Proactive measures should be taken in regards to putting practical safeguarding arrangements in place in and around the convent for the sisters and those groups visiting.

Graded: Basic

4.2 Standard 2 Communicating the Church's safeguarding message

Strengths

4.2.1 The Self-Assessment form indicates that the convent and the services offered by the Sisters of the Holy Family of Nazareth are mentioned in the Parish newsletter, although there was no indication that these have ever relayed safeguarding

⁸ *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](#)

communications. Although the CSSA Analyst did not see evidence of this prior to, or during the in-person visit, features in the Parish newsletter would be a useful way of reaching parishioners with safeguarding messages.

Areas for development

4.2.2 Safeguarding does not feature on the group's website. The Sisters of the Holy Family of Nazareth should have a designated section in the website outlining their commitment to safeguarding the vulnerable and sharing messages regarding the reporting of abuse and the support available to survivors.

4.2.3 There are no safeguarding-related posters displayed in the convent. Messaging regarding how to make a disclosure or who to approach with any safeguarding concerns should be displayed in public areas. Posters in the chapel and meeting rooms advising on who to report complaints or abuse to and where to go for support would be a helpful way of publicising this.

4.2.4 There is no Communications Plan and neither is this an area covered within the Safeguarding Policy. The Sisters of the Holy Family of Nazareth should have a Communications Plan which outlines how, to whom, and in what manner it will communicate messages of safeguarding or include this in a Safeguarding Action Plan that can be periodically reviewed.

4.2.5 The only links to other external organisations which aim to ensure people's safety were those that the Sisters working in schools come across in their employment; for instance Local Authority Designated Officers (LADOs). It would be beneficial for the Sisters of the Holy Family of Nazareth to forge links with other church bodies to learn from each other and share best safeguarding practice.

Graded: Below Basic

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

Strengths

4.3.1 It is clear from discussions with the Safeguarding Lead that she and other members in the convent are aware of how to respond if they receive disclosures of abuse. Although requiring review, localisation, and assurance that all members have read and understood the document, the Safeguarding Policy covers the area of responding to abuse and outlines reporting expectations.

4.3.2 During interview the House Superior, Safeguarding Lead and Chair of Trustees demonstrated empathy and the need for respect and dignity in caring for those reporting abuse. Although the group do not have a designated form for recording disclosures of any kind the policy outlines that written records of disclosures should be made either during the disclosure or as soon as possible afterwards and records retained in the Provincial archives. The Safeguarding Lead also commented that a secure and confidential computer file could be arranged in the event of any disclosure.

4.3.3 The Sisters of the Holy Family of Nazareth state that they could fund counselling or other types of support for those who report abuse should this be appropriate in the future. They expressed a desire to support survivors mentally, spiritually and emotionally.

Areas for development

4.3.4 There appears to be little resource immediately available to those who might make a disclosure of abuse. Safe Spaces⁹ support is not actively promoted to members of the public and the Self-Assessment indicates that those disclosing abuse would be directed to appropriate professionals where necessary. However, at present the group does not have access to any such support or a formal process for doing so and could not name organisations they might contact. Not being

⁹ Safe Spaces is a free and confidential support service funded by the Catholic Church for victims and survivors of abuse. Their website can be accessed [here](#)

members of the RLSS or similar service would also restrict their ability to seek advice if the need arose. There was also little recognition of the possibility of non-recent abuse being reported.

4.3.5 The Sisters of the Holy Family of Nazareth do not have a public commitment towards supporting those who have been abused. Having such a statement publicised would help to demonstrate a willingness to listen and encourage people to report their experiences.

4.3.6 The Self-Assessment reports that the nature of the small number of members within the group means that any signs of harm would be easily detected. Whilst this may be the case there is no evidence to show that the more infirm, and hence potentially more vulnerable members, have received any recent specific training to understand the signs of abuse themselves or how to relay concerns regarding other members.

Graded: Basic

4.4 Standard 4 Effective management of allegations and concerns

Strengths

4.4.1 During interview the House Superior advised that should the group receive any safeguarding concerns these would be shared with the Provincial Superior and with the diocesan safeguarding team. Any low-level safeguarding issues relating to local parishioners would be shared with the Parish Safeguarding Representative and any regarding the Maronites would be shared with the Maronite's clergy representative. If the concerns were regarding the clergy, the Sisters would inform the clergy's superior.

4.4.2 It is acknowledged that with no current or recent experiences of handling reports of allegations the Sisters of the Holy Family of Nazareth have a limited opportunity to evidence working practices in this standard. That said, during the in-

person visit the Safeguarding Lead was able to give an account of arrangements for reporting allegations to senior leaders and Trustees; a process which is also described in the Safeguarding Policy. A sound awareness of the need to share information with the relevant authorities in appropriate timescales and to keep records accurate and confidential was displayed.

Areas for development

4.4.3 As the Sisters of the Holy Family of Nazareth have not contracted the RLSS, or other safeguarding service provider, the group would be responsible for reporting, investigating and managing any allegations made by, or against, one of its Sisters. At present there is no indication that the group is in the position to do so.

4.4.4 In responding to the questions on how the Sisters of the Holy Family of Nazareth might theoretically support those who may make allegations and those who are subject to allegations in the future, the Safeguarding Lead advised that a member would be appointed who would be able to offer assistance. They reported that this person would encourage and show a sustained interest in the survivor or in the person being accused. However, at present there are no members trained to offer this specific support. Although some Sisters have received safeguarding training through their employment, this is not considered to be fully transferable to a Religious Life Group setting and is unlikely to be wholly relevant or cover the management of concerns and supporting those who have been accused. There need to be structures in place to provide this type of training and there should be an effective supervision in place for anyone delivering this support.

Graded: Early Progress

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

Strengths

4.5.1 The House Superior advises that if a Sister was accused of abuse there is the possibility of moving them through the general administration to another international community where the group has facilities. There are no other alternative lodgings within the UK and the nearest places would be Italy or France which would obviously bring with it a different language and a different lifestyle to adapt to. The House Superior is aware that any such move would need to be carefully managed with the receiving community putting in place adequate risk management.

4.5.2 During interview the Safeguarding Lead, Chair of Trustees and House Superior demonstrated an understanding of the possible impact on the respondent when accused of abuse and the need to offer spiritual and emotional support. To this end they feel their close community would be able to offer the respondent pastoral support and there was a recognition of the potential need for further practical support to be offered.

Areas for development

4.5.3 The Sisters of the Holy Family of Nazareth are not members of the RLSS. In interview and in the Self-Assessment they have commented that they would seek the advice of a canon and/or civil lawyer or ask CSSA for recommendations should the need arise and assert that they have not needed to contact any safeguarding service for decades. There was some uncertainty over who would conduct a risk assessment and who would facilitate and manage a safeguarding plan if one was required. The Sisters of the Holy Family of Nazareth should make firm arrangements regarding who they could approach for safeguarding services in advance of when this might be needed. Despite citing the diocesan safeguarding team as a potential source of support during interview it is of note that the Safeguarding Lead advised that at present the Sisters of the Holy Family of Nazareth have no interaction with the team.

4.5.4 During interview the House Superior and Safeguarding Lead described how there is very little resilience in the group in terms of resources. Therefore, if a member was accused of abuse and had to limit their role or move away the remaining members would struggle to fulfil what is expected of them.

4.5.5 During interview the House Superior, Chair of Trustees and Safeguarding Lead advised they were not immediately aware of avenues of support open to them should they or a member of their group be accused of abuse although they commented that they could approach the Vicar for Religious for signposting should the need arise. The Sisters of the Holy Family of Nazareth should make arrangements for safeguarding support so they have a service to utilise if an allegation was received.

Graded: Basic

4.6 Standard 6 Robust human resource management

Strengths

4.6.1 The Sisters of the Holy Family of Nazareth have had no prospective community members since 1990. However, they do receive visitors from overseas from time-to-time and have most recently had three Sisters visit from the USA. These visitors are from other Provinces within the international group and so are known to the Sisters of the Holy Family of Nazareth but nevertheless come with references from superiors. These guests are purely visitors and do not participate in any ministry whilst in the convent and are therefore not required by the Sisters of the Holy Family of Nazareth to evidence appropriate criminal record checks or safeguarding training in advance of their arrival.

4.6.2 Although there is no standalone Complaints Policy for the Sisters of the Holy Family of Nazareth, the Safeguarding Policy makes clear the route for complaints from members if the usual route through the House Superior is not appropriate. In such instances the Provincial Superior should be approached. The House Superior was aware of this avenue for complaints as were the Safeguarding Lead and Chair

of Trustees who advise that other members have free and easy access to the Provincial Superior should they wish to contact her. In addition, all of the members receive visits from Parish clergy and would have the opportunity to share grievances with them if they wished to.

Areas for development

4.6.3 Three Sisters work in external apostolates as employees in schools and as such it falls to the school to ensure they hold the correct DBS certificates. Only those Sisters who are formally engaged in employment with face-to-face contact with children or members of the public have current DBS checks completed through their employers. Those Sisters who are not in active contact with parishioners and vulnerable groups do not receive a DBS check. There is no single central system for recording who requires a DBS check, when they received it and when it is next due.

4.6.4 As covered in paragraph 1.2, the Sisters of the Holy Family of Nazareth have three direct employees; two part-time cooks and a housekeeper. The Housekeeper does the laundry, cleaning of rooms and greets visitors at the front door but the role does not include providing personal care to Sisters. The House Superior and Safeguarding Lead advise that their solicitor applies for DBS checks for all employees at the recruitment stage and that the DBS certificates are available to them if they require them. As in paragraph 4.6.3 above it is recommended the Sisters of the Holy Family of Nazareth hold a record of DBS checks and that Trustees and leaders have oversight of this list. They should also seek advice regarding the level of checks required for their employees and assure themselves that the correct level of checks have been undertaken.

4.6.5 The Sisters of the Holy Family of Nazareth should create and publish their own Complaints Policy that outlines the process of making a complaint about a safeguarding service and how it will be responded to. There should also be consideration given to how whistle-blowing should be managed within the group, who may wish to incorporate Complaints and Whistle-Blowing policies into a Safeguarding Policy which is bespoke for the group.

Graded: Below Basic

4.7 Standard 7 Training and support for safeguarding

Strengths

4.7.1 The Safeguarding Lead reports that she receives updates in relation to safeguarding practices from the Charity Commission and from the Association of Provincial Bursars and that she is able to cascade this out to other members in the group if it is relevant. The Safeguarding Lead also receives informal updates on safeguarding practice through a safeguarding platform she uses in her professional capacity as a Special Educational Needs and Disabilities (SEND) Teaching Assistant.

4.7.2 During interview with the House Superior, Chair of Trustees and Safeguarding Lead there was an acknowledgement of the need to keep up-to-date with safeguarding matters and that there is a danger they could let change pass them by if they failed to keep alert to changes.

Areas for development

4.7.3 The three Sisters who are employed in schools are required to undertake safeguarding training through the host organisations that employ them. School-based training alone is not deemed to be suitable in meeting the requirements of Standard 7 due to the differing nature of safeguarding in a school setting; most notable of which is the absence of a safeguarding adults element. The remaining Sisters who are not engaged in public-facing roles are not required to undertake any safeguarding training by the Sisters of the Holy Family of Nazareth. It is recommended that all Sisters who are able undertake safeguarding training and that a record is taken and retained for all those completing safeguarding training and that this is overseen by Trustees and leaders who can ensure compliance. Although some Sisters are no longer participating in active ministry it would be beneficial for them to be aware of the signs and types of abuse and how to report onwards should they be subject to abuse themselves. A basic training needs analysis would assist in assessing who needs to do what training and determine a plan for completion.

4.7.4 Employees and key personnel have not undertaken any relevant, tailored safeguarding training. To help develop learning it is recommended that employees, leaders, Safeguarding Lead and Trustees undertake bespoke training for their roles and that all training is evaluated for effectiveness.

Graded: Below Basic

4.8 Standard 8 Quality Assurance and Continuous Improvement

Areas for development

4.8.1 At present there is little space designated to reflecting on safeguarding practice or learning from experiences or the experiences of others in order to broaden knowledge and improve the service offered. The Sisters of the Holy Family of Nazareth should seek to improve safeguarding practice and quality assure their work by putting in place and maintaining processes that will evaluate their compliance with the safeguarding standards.

4.8.2 The Sisters of the Holy Family of Nazareth do not have a Safeguarding Action Plan. Devising such a plan that incorporates any recommendations and learning from this audit, identifies and mitigates risks and is regularly reviewed and updated, would help drive safeguarding in the group and assist leaders and Trustees in meeting their expectations.

4.8.3 Trustees should also review how they are meeting Charity Commission expectations in respect of safeguarding. In this respect, it is not clear how concerns around compliance with safeguarding expectations would be reported to the Charity Commission. This process should be delineated in policy.

Graded: Below Basic

5. Summary of overall findings

5.1 The Sisters of the Holy Family of Nazareth are a small group with an aging population and minimal resources. Whilst safeguarding may not have been given a good deal of prominence the group do express a willingness to learn from the outcome of this audit and improve their focus on safeguarding. A desire to keep abreast of developments in safeguarding is expressed along with an acknowledgement that change could pass them by if they failed to do so.

5.2 There nevertheless remains an expectation that all RLG must reach a minimum level in respect of the national safeguarding standards. In this instance, all eight standards require some form of pressing attention with policies, trustee responsibilities, training needs and DBS checking being primary areas for consideration. Failure to make recommended improvements and develop safeguarding processes could lead to members of the public, the Sisters of the Holy Family of Nazareth, and its members being at an increased risk.

6. Recommendations

To support improvement, the following recommendations are made:

Within 3 months

- Agree a Safeguarding Policy which is specific to the Holy Family Convent and ensure that this is read and understood by all members. This should include the process for self-referral to relevant authorities should the need arise.
- Make publicly available statements of safeguarding commitments that are displayed physically and on-line.
- Safeguarding should be added as a standing agenda item to all Trustee meetings and minutes taken to evidence this

- Messages should be placed in public areas to inform those visiting of the process for reporting abuse and of the support available to them such as Safe Spaces.
- Make suitable arrangements for safeguarding services provision and provide details of the chosen individual/service to the CSSA.
- Determine who to approach for support and what other methods of support are available should a member be accused of abuse. This should be supported by a written statement or policy and shared with all members.
- A central record should be devised for all Sisters recording whether or not they require a DBS check, to what level, when it was completed and when it should be refreshed.
- Employee's roles should be examined to determine if they have the correct level of DBS check and their certificates should be verified, a log kept and provided to the Trustees for oversight.

Within 6 months

- Copies of *Integrity in Ministry* to be shared with all members.
- Create and publish a Complaints Policy that outlines the process of making a complaint and how it will be responded to.
- Create a Whistle-Blowing Policy which could potentially be part of a Complaints Policy or integral to a localised Safeguarding Policy.
- The website should feature a safeguarding section which publishes a statement or commitment to safeguarding, the Safeguarding Policy and Complaints Policy, details of the Safeguarding Lead, reporting directions and any sources of support available to those who report abuse.
- Create and periodically review a Communications Plan, or incorporate one into a Safeguarding Action Plan, that outlines how, to whom, and in what manner the group will communicate safeguarding messages.

- Ensure adequate training and structures are in place to support those making allegations and support and manage those subject to allegations.
- A training needs analysis is undertaken and all employees and Sisters complete specified safeguarding training including specialised training for leads, leaders and Trustees. A record of completions should be taken and retained which is then overseen by Trustees and the effectiveness of the training should be analysed.
- Devise a Safeguarding Action Plan that incorporates any recommendations and learning from this audit, identifies and mitigates risks, is regularly reviewed and updated and overseen by Trustees.

Within 12 months

- Forge links with other church bodies to learn from each other and share best safeguarding practice.
- Develop quality assurance methods in order to review the effectiveness of safeguarding processes within the group.

7. Arrangements for follow-up

7.1 The Sisters of the Holy Family of Nazareth will be requested to provide an action plan in response to the above recommendations, with an update on progress sought after six months. In line with the overall rating of Basic, the earliest date for the next audit of the by the CSSA will be in one years' time. However, this period may be reduced if the CSSA becomes aware of any significant concerns or allegations indicative of a weakening of safeguarding arrangements that are raised in the meantime.