

Sisters of Mercy, Gravesend

Baseline Audit Report
December 2025

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1. Introduction

1.1 This is a baseline audit of the safeguarding arrangements of the Sisters of Mercy, Gravesend, referred to for the remainder of this report as the Sisters of Mercy. This audit has been undertaken as part of the Catholic Safeguarding Standards Agency's (CSSA) baseline audit phase of Religious Life Groups (RLGs).

1.2 The Sisters of Mercy are an autonomous convent of pontifical right of the Federation of the Sisters of Mercy. They number eight Sisters, seven of whom live at the Convent in Gravesend. One Sister lives in London and is a chaplain at a prison. Responsibility for vetting and training for that role lies with His Majesty's Prison and Probation Service (HMPPS). The ministry of the Sisters at the Convent is visiting the sick and taking Holy Communion to individuals in their homes. This is done on behalf of Parishes in the Archdiocese of Southwark, so under diocesan safeguarding arrangements. All of the Sisters exceed the State Pension age so the extent of their ministry has reduced in recent years.

1.3 The Sisters of Mercy employ six staff. This includes a Secretary, and cooks and cleaners in part time roles. Carers are engaged for Sisters that need additional support. They are supplied by Kent Social Care Professionals¹. The Sisters of Mercy do not have any volunteers.

1.4 This audit seeks to assess the effectiveness of current safeguarding arrangements by considering practice over the last 12 months. The CSSA 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 safeguarding cases). The Sisters of Mercy were categorised at Level 1 as they are a small community with no known safeguarding concerns.

¹ [Home Care in Kent | Care Assistant Jobs & Vacancies | Kent SCP](#)

2. Methodology

2.1 Initial contact was made with the Sisters of Mercy by email on 5 March 2025. Due to circumstances outside the control of the Sisters of Mercy or the CSSA it was not possible to arrange a telephone discussion about audit until 24 April 2025. It was then agreed that audit interviews would be completed on 17 September 2025, with the self-assessment and supporting evidence provided by 20 August 2025. The self-assessment and supporting evidence were sent on 18 August 2025.

2.2 Audit interviews were carried out on 17 September 2025 with the Sister in Charge, who is also the Safeguarding Lead, one of the Sisters and the Secretary.

2.3 Liaison with the Religious Life Safeguarding Service² (RLSS) about the engagement of the Sisters of Mercy took place on 25 September 2025. RLSS confirmed that the Sisters of Mercy had recently engaged their services and been in touch with the safeguarding, vetting and training teams.

2.4 The supporting evidence provided by the Sisters of Mercy is listed in the Appendix.

3. Audit grading

3.1 Safeguarding practice is assessed against the eight safeguarding standards adopted by the Catholic Church in England and Wales³.

3.2 Safeguarding practice is graded in accordance with the CSSA Maturity Matrix for Level 1 Religious Life Groups. Each standard is graded on an ascending three-point scale of Not Met, Met with Recommendations and Met. Grades for individual

² [Religious Life Safeguarding Service - Religious Safeguarding](#)

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

standards are combined to produce an overall grading for the Religious Life Group as an outcome of the audit.

3.3 This report summarises the findings of the audit undertaken with the Sisters of Mercy and their progress towards meeting the eight safeguarding standards. The overall rating was Met with Recommendations with six of the eight standards being graded as that. Standards 7 and 8 were graded as Not Met.

Overall grading	Met with Recommendations
Standard 1 – Safeguarding is embedded in the Church body’s leadership, governance, ministry and culture	Met with Recommendations
Standard 2 – Communicating the Church’s safeguarding message	Met with Recommendations
Standard 3 – Engaging with and caring for those who report having been harmed	Met with Recommendations
Standard 4 – Effective management of allegations and concerns	Met with Recommendations
Standard 5 – Management and support of subjects of allegations and concerns (respondents)	Met with Recommendations
Standard 6 – Robust human resource management	Met with Recommendations
Standard 7 – Training and support for safeguarding	Not Met
Standard 8 – Quality assurance and continuous improvement	Not Met

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 The Sisters of Mercy have created a Safeguarding Statement, which is displayed in various locations throughout their Convent. It commits them to "safeguarding of all children and adults from abuse and neglect". It is a detailed four-page statement with sections including the responsibilities of the Sisters and the Staff, the responsibilities of the named Safeguarding Lead, Procedures if a Concern is Reported and Safer Recruitment. It is the judgement of the CSSA that their Safeguarding Statement is equivalent to a Safeguarding Policy, and it will be treated as one for the purposes of this audit.

4.1.2 The Sister in Charge is the longstanding Safeguarding Lead for the Sisters of Mercy. She has completed training for Safeguarding Leads with RLSS, as has the Secretary. Key steps have been taken to ensure that the Convent is a safe environment for the Sisters. This includes having CCTV to the front of the property so visitors can be seen before the door is opened and ensuring that fire doors do not close too quickly for sisters whose mobility is limited. The Sister in Charge has taken the decision that the Convent door will not be opened to visitors at night. The Convent has a Chapel but this, and the Convent in general, is not open to the public.

4.1.3 As seen in 2.3 the Sisters of Mercy have contracted RLSS and have started to explore the support they can provide. They are also contracted to the CSSA for audit and improvement purposes.

Areas for development

4.1.4 Over approximately the last 18 months, the Sisters of Mercy have had significant building work undertaken at their Convent. During this period formal meetings, such as Trustee meetings, have not taken place. It is therefore unclear how key tasks, such as ratifying the Safeguarding Statement in June 2025, took place. The Sisters must ensure that Trustee meetings are reinstated to meet the

Charity Commission's recommended minimum of twice a year⁴. These meetings should also have safeguarding on the agenda to make sure that the Trustees, all of whom are Religious Sisters, are assured that key safeguarding tasks such as vetting and training are being carried out.

4.1.5 The Sisters of Mercy have sourced a copy of Integrity in Ministry⁵ from RLSS. The Sister in Charge has read the document. It will now be important for other members of the convent, who undertake any form of ministry, to understand its key messages.

Graded: Met with Recommendations

4.2 Standard 2 Communicating the Church's safeguarding message

Strengths

4.2.1 The Sisters of Mercy have no online presence and do not intend to create one. Safeguarding information, including the Safeguarding Statement, guidance on what to do if you receive an allegation, and what to do if you are concerned about someone's welfare, is displayed hard copy in various communal locations around the Convent for Sisters and staff.

4.2.2 The primary concern for the Sisters of Mercy is ensuring that their home environment is safe for the Sisters and that they can carry out their ministry safely. In addition to the steps outlined in 4.1.2, they only use a trusted taxi driver and have taken steps to confirm that any carers that come to the Convent have been vetted and trained in safeguarding by their direct employer.

⁴ [Charity meetings - GOV.UK](#)

⁵ Integrity in Ministry is a code of conduct for Religious engaged in ministry in the Catholic Church in England and Wales

4.2.3 The Sister who lives outside the Convent keeps in touch with the community through telephone calls and occasional visits.

Areas for development

4.2.4 The Safeguarding Statement displayed by the Sisters of Mercy includes contact details for the Archdiocese of Southwark who are not contracted to provide safeguarding support directly to the Sisters, although they would be involved in safeguarding in the Parishes where they minister. To avoid confusion the materials in the Convent should reference only RLSS as a source of direct safeguarding support for the Sisters.

4.2.5 The Sisters should also consider providing contact details for Safe Spaces⁶ on their printed materials. This would ensure Sisters were aware of the service and could then signpost anyone needing support to them.

Graded: Met with Recommendations

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

Strengths

4.3.1 The Sisters of Mercy have no experience of dealing with a safeguarding concern. Therefore, much of the evidence for Standards 3 to 5 is theoretical and based upon how they would respond if a concern were raised.

4.3.2 Importantly, their Safeguarding Statement, which is readily available throughout the Convent, gives clear guidance to the Sisters on what to do if a concern is raised to them. This includes listening, empathising, offering support and

⁶ Safe Spaces is a free and independent support service, providing a confidential, personal and safe space for anyone who has been abused by someone in the Church or as a result of their relationship with the Church of England, the Catholic Church in England and Wales or the Church in Wales.

making a written record, including the time and date of the disclosure. In an emergency, the Safeguarding Statement is clear that police must be contacted.

4.3.3 Leaders in the Sisters of Mercy understand that Survivors of abuse need support, advice and pastoral care. They would be guided by RLSS in how they would provide that support. In addition to that, the Safeguarding Statement lists Childline and the local Adult Social Care as potential sources of support for Survivors.

Areas for development

4.3.4 Whilst there is written guidance available to the Sisters, only the Safeguarding Lead and Secretary have received safeguarding training in the last 12 months. Furthermore, internal discussions about safeguarding have been informal so confidence that Sisters would recognise and report harm must be qualified until training is completed and safeguarding discussions are regular.

4.3.5 The Safeguarding Statement also references that further information of safeguarding can be sought from the Archdiocese of Southwark. The archdiocese is responsible for safeguarding in the Parishes where the Sisters minister but, if there were an allegation of abuse specifically reported to a Sister outside her parish role, then support for the Survivor and management of the risk posed should be in conjunction with RLSS. Reference to the Archdiocese of Southwark should be removed to avoid confusion.

Graded: Met with Recommendations

4.4 Standard 4 Effective management of allegations and concerns

Strengths

4.4.1 As noted above, the Safeguarding Statement provides an understanding of how to respond to an allegation of abuse. It includes reporting emergencies to the police, informing the Sister in Charge immediately and the expectation that she will promptly report to RLSS. In the absence of the Sister in Charge, or if the Sister did

not want to report directly to her, then Sisters would report concerns to her deputies or directly to RLSS. RLSS contact details are on the Safeguarding Statement.

4.4.2 Although there have been no reported allegations, the Sisters of Mercy ensure that electronic confidential records are securely stored with access limited to the Sister in Charge and the Secretary. Similarly, hard copy records are in locked storage with access limited to those who need it.

Areas for development

4.4.3 As they are a small community, it is inevitable that any safeguarding concerns raised would come to the attention of Trustees. However, without formal Trustees meetings taking place, discussions would not be recorded and there would be no way to demonstrate that effective oversight was taking place. Therefore, Trustees meetings must be planned and regular.

4.4.4 As the Archdiocese of Southwark do not provide direct safeguarding services to the Sisters of Mercy they should stop using their Safeguarding Policy as a source of guidance. RLSS provide template safeguarding policies which the Sisters could use if they choose. However, they may consider that the Safeguarding Statement is sufficient for them if amended to remove references to the Archdiocese of Southwark.

Graded: Met with Recommendations

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

Strengths

4.5.1 If there were an allegation against one of the Sisters, leaders would primarily look to RLSS for guidance on managing their risk and supporting their needs. This is in line with CSSA expectations. If a Sister needed to be moved from the Convent, then the Sister in Charge would approach leaders of another Convent of Mercy for support in accommodating them. She confirmed that, where necessary, financial

support would also be given. The Sister interviewed was confident that, if there were an allegation against her, then she would be supported by the Sisters of Mercy throughout any process.

4.5.2 If advice in Canon Law were needed, the Sisters of Mercy would approach the Vicar for Religious from the Archdiocese of Southwark for guidance.

Areas for development

4.5.3 The Sisters of Mercy should enhance their Safeguarding Statement by including within it express provision stating that Respondents to allegations would receive support according to their individual need. This may include legal, spiritual or emotional as required.

Graded: Met with Recommendations

4.6 Standard 6 Robust human resource management

Strengths

4.6.1 The Safeguarding Statement references the Sisters of Mercy's Safer Recruitment Process which is a standalone document. This was introduced on 11 June 2025 with an expected annual review. It postdates the employment of current staff but expects two satisfactory references and a Disclosure and Barring Service⁷ (DBS) check if the role is eligible.

4.6.2 DBS check records are held for all the Sisters, including the one who does not reside in the Convent. Six of the eight have DBS checks from 2025. Checks were facilitated by RLSS and the Sisters have confirmed with RLSS that the other two Sisters do not require a DBS check. They are in the process of getting DBS for staff and contractors, with four of six staff having either a Basic or Enhanced DBS. One of three contractors also has an enhanced check with another being in process. The

⁷ <https://www.gov.uk/government/organisations/disclosure-and-barring-service>

Sisters of Mercy have also got email confirmation from their care provider that the staff working with them are appropriately vetted and trained.

4.6.3 The Sisters of Mercy have not had anyone in Formation for several years and do not anticipate having anyone join in the future. Neither do they receive Sisters from overseas as they are not part of an international community. Therefore, they do not need to prepare safeguarding training or vetting for potential new members of the Convent.

4.6.4 The Safeguarding Statement contains a brief note on whistleblowing saying that they “will encourage and enable anyone with a safeguarding concern, to refer the concern without fear of victimisation, or disadvantage”. This would therefore include the Sisters of the Convent who could report any concerns they had in this way. The Sister that was interviewed was confident that she could raise any concerns that she had about safeguarding with the leadership or, if they were about the leader, with the second person in the community. The eight safeguarding standards of the Catholic church in England and Wales reference implementing a safeguarding complaints policy. Individuals who wished to raise a concern at the Sisters of Mercy would be able to utilise the whistleblowing guidance so a separate complaints policy is not deemed necessary.

Areas for development

4.6.5 A Priest from the Archdiocese of Southwark celebrates Mass most days in the Convent. The Sisters of Mercy have not verified that he holds a celebret⁸ from the archdiocese. Routinely requesting that Priests verify they have a celebret would ensure that only Priests in good standing in their own diocese could celebrate Mass in the Convent.

4.6.6 As noted above, the vetting checks that have been completed are all from 2025 and not all employees and contractors yet have them. This demonstrates that improvements in human resource management are recent, and they need to be completed and embedded in practice. The Safeguarding Statement should outline

⁸ A celebret is issued by a Bishop or Religious Superior authorising a Priest to celebrate Mass in a diocese other than his own. It confirms that the Priest is free from canonical censure.

how frequently vetting checks should be renewed, with them being undertaken at least every three years in line with CSSA guidance.

Graded: Met with Recommendations

4.7 Standard 7 Training and support for safeguarding

Strengths

4.7.1 The Safeguarding Lead and the Secretary have completed RLSS Safeguarding Lead training in August 2025.

4.7.2 Due to the Sisters needing in-person training, it is planned for RLSS to deliver Basic Safeguarding Training to a mix of Sisters and staff at the Convent on 7 January 2026.

Areas for development

4.7.3 Prior to the completion of training by two individuals in August 2025, there had been an extended gap in completion of safeguarding training. It is important that training is completed in 2026 as planned so that all Sisters and staff know how to recognise and report abuse.

4.7.4 The Safeguarding Statement, or Safeguarding Policy if they adopt one, should say what level of safeguarding training is expected by role and how often it should be refreshed. This should include if specialist training is needed for a particular role such as the Safeguarding for Trustees training provided by RLSS. These expectations should be incorporated into the records of safeguarding training which they have started to keep.

Graded: Not Met

4.8 Standard 8 Quality Assurance and Continuous improvement

Strengths

4.8.1 The Sisters of Mercy have contracted to RLSS to provide them with safeguarding support. They are in the process of ensuring that safeguarding training has been provided to all Sisters and staff who need to complete it. The Sisters of Mercy have also signed the CSSA contract so that their current safeguarding practice can be audited and improvements identified can be made.

Areas for development

4.8.2 As Trustees are not currently meeting, they have no formal active oversight of safeguarding. This must change and the Trustees must set out how they will implement the recommendations of this audit in an action plan, and how they will ensure that the expectations of Integrity in Ministry are known and adhered to across the Sisters of Mercy.

Graded: Not Met

5. Summary of overall findings

5.1. The Sisters of Mercy are a Level 1 Religious Life Group whose ministry has lessened over recent years. Safeguarding responsibilities for the ministries that they do undertake lie with the Archdiocese of Southwark and HMPPS. In recent years considerable building work has been completed at their Convent to ensure it is, and remains, a safe environment for the Sisters.

5.2 Recent progress has been made in safeguarding practice with safeguarding leaders having completed appropriate training, and vetting checks are in progress. A comprehensive Safeguarding Statement, readily available in the Convent, also promotes effective safeguarding. The Sisters of Mercy must ensure that Trustees meet regularly and have oversight of safeguarding when they do convene. The safeguarding training for the remainder of the Sisters and staff should be supported by a planned refresher training period, outlined in the Safeguarding

Statement. The Sisters of Mercy must ensure that their documentation eliminates any confusion around the Archdiocese of Southwark providing safeguarding support as this is not their role.

5.3 Overall, the evidence of this audit demonstrates that the Sisters of Mercy have received a rating of Met with Recommendations against the eight safeguarding standards of the Catholic church in England and Wales.

6. Recommendations

To support improvement, the following recommendations are made:

Within 3 months

- Reinststate regular formal Trustee meetings and have safeguarding on each agenda
- Develop an action plan to implement the recommendations of this audit
- Verify that any Priest who celebrates Mass in the Convent holds an up-to-date Celebret
- Complete vetting checks on staff and volunteers

Within 6 months

- Ask Sisters in ministry to read Integrity in Ministry and discuss in community meetings
- Remove reference to the Archdiocese of Southwark from printed safeguarding information
- Add contact details for Safe Spaces to printed safeguarding information
- Complete initial safeguarding training for Sisters and staff
- Plan how often safeguarding training and vetting should be refreshed

Within 12 months

- Update the Safeguarding Statement or ratify a Safeguarding Policy from an RLSS template

7. Arrangements for follow-up

7.1 In accordance with an overall audit grading of Met with Recommendations, the minimum period before re-audit of the Sisters of Mercy by the CSSA is two years. If, in the intervening period, evidence is received of a weakening of safeguarding arrangements then an earlier re-audit may result.

8. Appendix

Evidence Provided

- General Privacy Notice
- God Made Us a Family statement
- If a Safeguarding Concern or Allegation is Made to You guidance
- Safeguarding Contact Information Sheet
- Safeguarding Lead Poster
- Safeguarding Statement
- Safer Recruitment Policy