

St Joseph's Society for Foreign Missions (Mill Hill Missionaries)

Baseline Audit Report
December 2025

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1. Introduction

1.1 This is a baseline audit of the safeguarding arrangements of St Joseph's Society for Foreign Missions. This audit has been undertaken as part of the CSSA's Baseline Audit phase of Religious Life Groups (RLGs).

1.2 St. Joseph's Society for Foreign Missions was founded in 1866 by Cardinal Herbert Vaughan at Mill Hill in London. The Society is an "international fellowship of Missionaries, dedicated to the work of evangelisation, to the building up of young Churches, and to the assisting of Churches in special need outside their home regions". In December 2006 the Society's Generalate moved from Mill Hill to Maidenhead following the sale of St. Joseph's College in Mill Hill which traditionally had been the principal training centre of the Society. Due to its historical foundation the Society and its members are known as the Mill Hill Missionaries and will be referred to as such in the remainder of this report. The Society is organised into three Missions: the Europe and North America Mission (comprising Great Britain, Netherlands, Ireland, United States, and the German speaking region, encompassing houses in Italy and Austria), the Africa Mission and the Asia Mission. Until recently it has drawn the majority of its members from Europe and North America, however current candidates are from east Africa, Cameroon, Congo, India and the Philippines. The Mill Hill Missionaries state that their aims are reflected by principal objectives, focus on advancing religious and charitable mission. These include the promotion, maintenance and support of the Society and its members including the education of those members, the relief of poverty and the advancement of the Roman Catholic Religion.

1.3 The Mill Hill Missionaries in England and Wales currently comprise a total of 48 members. Of these, 26 reside at Herbert House, a retirement home administered by the Society in collaboration with the Franciscan Missionaries of St Joseph (commonly known as the 'Mill Hill Sisters'). A number of members at Herbert House are elderly or infirm and receive day-to-day support; however, several continue to provide some ministry, including parish assistance, supply ministry, chaplaincy to local convents, and participation in local prayer groups. Within Maidenhead, there are 11 members, including eight who reside at Colby Gardens, two at St Joseph's Parish, and one who lives in a presbytery in Twyford. Five of these members currently

serve on the General Council. In addition, two members live in community in Sunderland, and two in Salford. The remaining seven members live independently in the dioceses of Hexham and Newcastle, Portsmouth, Brentwood, Westminster, and Hallam. Overall, 31 of the 48 members are currently engaged in active ministry, including roles as parish priests, spiritual accompaniers, and in mission appeals, an area that remains a significant part of the Society's ongoing work.

1.4 Both Herbert House and Colby Gardens are overseen by a Rector. Herbert House employs 26 staff, of whom 15 require Disclosure and Barring Service (DBS) checks due to the nature of their roles. While care is provided within Herbert House, the setting does not meet the criteria for Care Quality Commission (CQC¹) regulation.

1.5 This audit seeks to assess the effectiveness of current safeguarding arrangements, by considering practice over the last twelve months. The Mill Hill Missionaries live across England and Scotland; however, this audit focuses solely on the activities, governance and operations of those residing in England. 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 safeguarding cases). The Mill Hill Missionaries have been assigned to a Level 3 audit.

1.6 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. Mill Hill Missionaries have been assigned to a Level 3 audit.

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

² [Catholic Safeguarding Standards Agency](#)

2. Scope and methodology

2.1 The CSSA analyst initially contacted the Provincial Leader on the 11 February 2025 to confirm a baseline audit for the week commencing the 20 June 2025.

2.2 In advance of the formal audit week, the Mill Hill Missionaries were requested to complete a Level 3 audit self-assessment tool providing information on their adherence to the eight National Safeguarding Standards and progress in the overall implementation of said standards. Mill Hill Missionaries were provided with the self-assessment tool and guidance on the 11 February 2025. The completion date for the self-assessment and supporting evidence was scheduled for the 19 May 2025.

2.3 On 17 February 2025, the CSSA analyst held a Teams meeting with the Religious Safeguarding Lead and Regional Representative to discuss the audit arrangements in further detail.

2.4 This baseline audit was undertaken following the submission of the self-assessment on 3 June 2025 and further evidence was reviewed by the analyst during a site visit on 20 June 2025.

2.5 Information from the self-assessment and supporting evidence provided by Mill Hill Missionaries was reviewed by the CSSA analyst and this evidence was assessed against the Level 3 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 Mill Hill Missionaries on the 20 June 2025:
 - Interview held via Zoom on the 20 June 2025
 - Trustees
 - Interviews held at the Herbert House in Freshfield on the 20 June 2025
 - Interview with the Religious Safeguarding Lead and the newly appointed safeguarding lead

- Focus group interview with nine retired members residing within Herbert House
- Focus group interview with eight active members living within Herbert House
- Interview with Herbert House Care Manager
- Interviews held by telephone 23 July 2025
 - Interview with a member living independently
- Interviews held by Zoom 24 July 2025
 - Interview with four members residing within Colby Gardens

2.6.2 Document Review

- The following documents were reviewed:
 - Self-assessment form
 - Supplementary evidence (Listed at Appendix A)

2.7 Liaison has also taken place between auditors, RLSS and the Safeguarding Teams in the dioceses of Hexham and Newcastle, Portsmouth, Brentwood, Westminster, and Hallam regarding Mill Hill Missionaries' 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 Wales³ and graded in accordance with the CSSA Maturity Matrix for Level 3 RLGs.

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 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)

Overall grading	Firm Progress
Standard 1 – Safeguarding is embedded in the Church body’s leadership, governance, ministry and culture	Early 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)	Results Being Achieved
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 The Mill Hill Missionaries' website hosts a dedicated safeguarding page for the British Region, overseen by the Religious Safeguarding Lead. It demonstrates alignment with the One Church approach and includes both the safeguarding policy and mission statement as separate documents. The mission statement sets out core principles such as creating safe environments, supporting survivors, and promoting accountability. The safeguarding policy, based on the RLSS template and last reviewed in May 2024, outlines key procedures for managing concerns and Implementation of these measures is considered further under Standard 4.

4.1.2 The Mill Hill Missionaries' Safeguarding Policy requires "all members, associates, and staff" to understand its contents and disclose any safeguarding concerns about themselves to the Safeguarding Lead. The Religious Safeguarding Lead confirmed that this policy is reviewed annually at the British Region assembly, attended by all members. This forum allows for collective discussion, feedback, and clarification, promoting awareness and consistent understanding of safeguarding responsibilities and procedures across the organisation. In addition to the Safeguarding Policy the Mill Hill Missionaries have a code of conduct within their constitutions which outlines expected behaviours of its members. The Religious Safeguarding Lead confirmed this was ratified in 2023.

4.1.3 The Regional Council, which convenes quarterly, serves as the principal governing body for the British Region, with overarching responsibility for operational oversight, including safeguarding. It is tasked with ensuring that safeguarding governance aligns with the Mill Hill Missionaries' Safeguarding Policy and applicable national frameworks. The Council also holds responsibility for "delegating specific safeguarding duties to appropriate members and associates, thereby ensuring that responsibilities are clearly allocated and safeguarding standards are upheld throughout the organisation. Evidence provided by the Mill Hill Missionaries shows that safeguarding is a standing agenda item at Council meetings, reflecting its

importance. Extracts from the agenda minutes provided as evidence indicate that Regional Council meetings during the last twelve months included discussions on individual cases and updates, as well as the ongoing monitoring of safeguarding plans. These matters will be further explored under Standards 3 and 4.

4.1.4 The Safeguarding Policy requires all members and associates to complete safeguarding training relevant to their role, covering both children and adults. It outlines the minimum training expectations for specific roles, including the Regional Superior, Safeguarding Lead, Regional Council members, those working with the public, and community members not working with the public. Additionally, all members must complete annual refresher training. Those involved in parish ministry or appeals are also expected to attend Diocesan safeguarding training, RLSS indicated that 18 members of the Mill Hill Missionaries have completed or provisionally booked training over the past 12 months, topics include basic safeguarding, manipulation and coercive control, and safeguarding in the context of the Sacrament of Reconciliation. This Safeguarding Policy does not cover the training requirements for those who are employed through Mill Hill Missionaries.

4.1.5 The Safeguarding Policy outlines the specific safeguarding responsibilities assigned to key roles, including the General Superior and General Council, The Regional Superior and Regional Council, the Safeguarding Lead, and all other members, associates and staff 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.

4.1.6 The Mill Hill Missionaries submitted two documents as evidence in relation to safeguarding risk management. The first, titled "Safeguarding Risk Assessment Report", provides an overview of specific safeguarding risks relevant to the organisation. This document effectively identifies key issues such as inadequate training, inconsistent record keeping, and gaps in safeguarding policy and procedure. For each identified risk, the report assesses both the likelihood and potential impact and outlines a series of mitigations. It also clearly assigns responsibility to named individuals and sets target dates for completion of actions, demonstrating a structured and accountable approach to risk management. The

second document, an Excel spreadsheet titled “MHM-May 2025 Risk Assessment”, appears to serve a different purpose. Rather than functioning as an operational or strategic risk register, this document primarily acts as a summary of existing documentation, aligned to the National Safeguarding Standards. While useful in mapping evidence and existing practice against the standards, it does not function as a risk management tool and does not appear to assess operational vulnerabilities or support active monitoring of safeguarding risks. The Safeguarding Risk Assessment Report is a valuable tool that demonstrates good safeguarding governance practice. However, to ensure it is fully effective, it should include a clear mechanism for regular review, such as scheduled review dates, update logs, and integration into broader governance processes. The accompanying Excel-based summary document, currently titled “Risk Assessment,” could benefit from being renamed or restructured, as its current title may create confusion by implying it serves the same purpose as the risk register. To strengthen overall risk oversight, it is recommended that the safeguarding risk assessment be integrated into a wider organisational risk register, enabling the identification and management of intersecting risks such as legal, financial, and reputational issues. Regular review of both documents is essential to ensure they remain active and responsive tools that support continuous improvement and accountability in safeguarding practice.

4.1.7 The Religious Safeguarding Lead confirmed that a new action plan was created in April 2025 and will be reviewed monthly by the lay Safeguarding Lead and quarterly by the Regional Council. The evidence submitted by the Mill Hill Missionaries includes two key documents relating to safeguarding planning and implementation. The first, titled the “Safeguarding Action Plan (May 2025)”, outlines short-term, operational actions aligned to the eight Catholic Safeguarding Standards. It includes measurable actions, named responsibilities, deadlines, and regular update fields. The second document, the “MHM 3-Year Development Plan”, presents a broader strategic plan spanning multiple years, with actions linked to specific standards and expected outcomes over time. While both documents reflect a strong commitment to safeguarding, they contain overlapping content, such as similar actions under communication and leadership, though with differing timelines and progress reporting. It is advised that these two plans be more clearly aligned to ensure consistency, avoid duplication, and improve clarity for those

involved in oversight or implementation. This could involve cross-referencing strategic goals from the 3-year plan within the operational action plan.

4.1.8 Safeguarding and personnel records are securely stored either electronically or in paper files within locked cabinets with access restricted to those who need it. These records are also shared with RLSS when necessary, as outlined in the Safeguarding Policy “primary responsibility for the management of documents and safeguarding case files lies with the Safeguarding Lead and RLSS, who will ensure an accurate, auditable, and secure record of any safeguarding concerns or allegations referred to the British Region are maintained”. Where concerns relate to employees, these are stored in the manager’s office. Where a concern is raised regarding the wellbeing of a member who is residing within Herbert House and receiving care, this is logged in their care plan, and a copy of the safeguarding concern form is stored within a file held by the manager. The analyst noted that, on occasion, the Religious Safeguarding Lead would be informed about these concerns, this is discussed further in Standard 4. The Religious Safeguarding Lead confirmed that if the concern related to a Safeguarding Lead or the Provincial Lead, then the information would be held by the Superior General.

4.1.9 Extracts from minutes of the Regional Council demonstrate an active commitment to strengthening safeguarding within the Mill Hill Missionaries. In March 2024, the Council agreed that a layperson should be appointed to the role of Safeguarding Lead, noting that “a layperson would be better able to fulfil the role and communicate our commitment to transparency.” The April 2025 minutes confirm the appointment of a new Safeguarding Lead. The current Religious Safeguarding Lead reported that, during the transition period, he and the incoming Safeguarding Lead meet weekly, with plans to return to a monthly meeting schedule once the new Lead formally begins her role. The current Religious Safeguarding Lead has been in post since 2021, serving in the role for three and a half years. He holds a Doctorate in Canon Law and is a Canonical Advisor for the General Council. Additionally, he serves as a Trustee and Director of RLSS and has completed Safeguarding Lead training through RLSS in March 2023. In his capacity as a trustee and school governor, he has also undertaken Trustee and governance training. He is currently a priest in the Diocese of Hexham and Newcastle and has completed all mandatory safeguarding training required by the Diocese. A

transition period is underway at the time of writing, with the new lay Safeguarding Lead formally taking over from 1st July, the current Religious Safeguarding Lead will remain the link person on the Regional Council. The newly appointed lay Safeguarding Lead attended the interviews with the analyst and confirmed she will work one day a week however she will remain available 24/7 for urgent matters. The Religious Safeguarding Lead stated that monthly safeguarding highlight reports will now be coordinated by the new lead. The Safeguarding Lead is from an education background and is the designated safeguarding lead for other religious and non-religious organisations. She has level 3 safeguarding training and is a member of the 'Safeguarding Network'⁴ for designated safeguarding leads and the 'Strategic Development Network'⁵.

4.1.10 Throughout all interviews, members, both in active ministry and retired, demonstrated an understanding of the importance of addressing low-level concerns and sharing relevant information with the Safeguarding Lead and the RLSS, when appropriate. There was a collective recognition that, in certain circumstances, referrals to statutory agencies may also be necessary. The analyst noted ongoing conversations and thoughtful questions related to safeguarding, including discussions around consent and scenarios during interviews. These conversations created opportunities for members to raise questions about safeguarding practices, enabling open challenge and reflective dialogue among the groups. Importantly, they were also able to articulate their own safeguarding practices and views, with some members actively challenging others' responses, particularly in relation to issues of consent and confidentiality. This demonstrated a culture of openness, critical reflection, and shared responsibility for safeguarding.

4.1.11 The Mill Hill Missionaries have contracted to the RLSS and CSSA.

⁴ The Safeguarding Network provide a wide range of resources, tools, training, and expert advice to help DSLs and staff with safeguarding responsibilities, to meet their setting's needs, saving time and making safeguarding more robust. <https://safeguarding.network/>

⁵ ⁴ A 'Safe Space' for Designated Safeguarding Officers (DSO's) to support and learn from one another. <https://www.strategicdevelopmentnetwork.co.uk/sdnevent/dso-training>

Areas for development

4.1.12 Governance is provided by three Trustees, all of whom are Religious members; however, the Trustees meet only on an ad hoc basis and do not hold regular meetings. While two of the three Trustees attend the Regional Council meetings, the Trustees themselves lack consistent oversight through formal meetings. This gap poses a risk to effective accountability and assurance and does not align with Charity Commission guidance, which requires regular trustee meetings (at least twice a year) to ensure effective oversight. It is recommended that the Trustees schedule regular meetings and establish a formal and consistent agenda to provide ongoing scrutiny and support for safeguarding practices.

4.1.13 The Charity Commission⁶ states Charity trustees should regularly review and assess the risks faced by their charity in all areas of its work and plan for the management of those risks. The guidance provided by the Charity Commission states that the trustees should set a risk framework that allows them to identify the major risks that apply to their charity, make decisions about how to respond to the risks they face and make an appropriate statement regarding risk management in their annual report. As the Trustees do not meet on a regular basis the requirements set out by the Charity Commission are not met.

4.1.14 The Safeguarding Policy outlines the specific safeguarding responsibilities assigned to key roles; however, it does not include trustees. To ensure full accountability and clarity of governance, the policy should be updated to explicitly define the safeguarding roles and responsibilities of trustees.

4.1.15 The Trustees and the Regional Council are two distinct governance bodies within Mill Hill Missionaries. While the membership of these bodies is different, formal remits and governance structures defining the relationship between the Trustees and the Regional Council are not documented. Establishing clear governance documentation would be important to support transparency, accountability, and effective safeguarding oversight. Additionally, the absence of a dedicated

⁶ <https://www.gov.uk/government/publications/charities-and-risk-management-cc26/charities-and-risk-management-cc26>

Safeguarding Committee limits focused attention on safeguarding matters. The creation of a Safeguarding Committee, with defined roles and responsibilities, would strengthen governance by providing specialist oversight, facilitating regular review of safeguarding policies and practice, and ensuring clear communication between operational staff, the Regional Council, and the Trustees.

4.1.16 While individual risk assessments related to personal care are appropriately managed by the registered nurse and overseen by the manager, it is essential that the Safeguarding Lead has access to overarching risk assessments and is informed of any safeguarding related concerns arising from these care plans. Although the Safeguarding Lead may not require the detailed clinical information contained within individual care plans, they must fulfil the responsibility of maintaining an overall safeguarding risk assessment to provide a comprehensive view of all potential risks to residents' wellbeing and safety. Currently, there is no organisational-wide risk register or overarching safeguarding risk assessment process in place that includes the wellbeing of residents at Herbert House. This lack of a comprehensive risk framework and integration means that safeguarding concerns may not be fully identified or addressed promptly, creating potential gaps in safeguarding oversight. Additionally, as Mill Hill Missionaries' facilities are not registered with the Care Quality Commission (CQC), they are not subject to the same external regulatory oversight as registered care providers. Therefore, it is vital for Mill Hill Missionaries to implement robust internal mechanisms to audit compliance, monitor the quality of care, and uphold safeguarding standards to ensure the safety and wellbeing of all residents.

4.1.17 The current safeguarding policy for Mill Hill Missionaries was last updated in May 2024 and was due for renewal in May 2025. To ensure the policy remains current and responsive, it is recommended that the policy should be reviewed as soon as possible.

4.1.18 Mill Hill Missionaries members confirmed during interview that they had not discussed or reviewed the document Integrity in Ministry⁷ since its publication and currently rely on their Code of Conduct within their Constitutions rather than adopting the Integrity in Ministry framework. While there may be a preference to maintain their own internal approach, the expectation under Substandard LGC 3 is that Integrity in Ministry is adopted as the nationally agreed framework for promoting compassionate, transparent, and safe leadership in safeguarding. Continued reliance on internal documents without alignment to this standard does not meet national safeguarding expectations, and steps should be taken to ensure compliance.

Graded: Early Progress

4.2 Standard 2 Communicating the Church's safeguarding message

Strengths

4.2.1 The Mill Hill Missionaries' website demonstrates a strong commitment to safeguarding by publicly affirming a zero-tolerance approach to abuse and clearly outlining safeguarding responsibilities and procedures. It includes key documents such as the British Region Safeguarding Policy, a Safer Recruitment Policy, and a Safeguarding Mission Statement, all of which highlight the importance of accountability and transparency. The website also provides contact information for the Religious Safeguarding Lead and the RLSS, ensuring clear and accessible reporting pathways. Additionally, it references Safe Spaces⁸, signposting individuals to external survivor focused support.

⁷ 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.

⁸ <https://safespacesenglandandwales.org.uk/> – an independent service offering professional support to those affected by abuse in the Church

4.2.2 The CSSA analyst noted that within Herbert House, many of the Mill Hill Missionaries' policies and guidance documents are displayed within the communal lounge. In addition to this the contact information for the RLSS is displayed. The buildings have limited public access and locked entry doors, and all visitors are requested to sign into a visitors' book. The chapel is accessed through the main building and is available to all members who wish to pray and participate in mass and other services.

4.2.3 The British Region Communication Plan, created in April 2025 and due for review in April 2026, outlines clear and structured methods for communicating safeguarding arrangements, policy updates, and training requirements to all members, lay staff, and volunteers.⁹ It includes monthly email updates, monthly catch-up meetings, quarterly notice board updates, and an annual safeguarding review to ensure ongoing awareness and compliance. Roles and responsibilities for the Religious Leader and Safeguarding Lead are clearly defined to maintain consistent and effective communication. As a newly implemented document, the plan is not yet fully embedded in practice; therefore, upon the review date, an evaluation of its effectiveness would be beneficial to assess how well it is functioning and whether any early adjustments are needed to improve uptake, clarity, or delivery.

4.2.4 The Religious Safeguarding Lead and Regional Representative reported that communication with members occurs regularly through both formal and informal channels, including annual regional assemblies, email, telephone, and face-to-face interactions. Within Herbert House, The Mill Hill Missionaries also hold community meetings every two months, which serve as a platform for information sharing; however, these gatherings are informal and are not supported by agendas or recorded minutes.

4.2.5 The Regional Representative produces a British Regional Newsletter approximately every six months. Newsletters provided as evidence for this audit

⁹ While a number of policies and other documents quoted within this report reference volunteers, the Mill Hill Missionaries do not currently engage any volunteers.

included a dedicated safeguarding section, with content referencing audit expectations, requests for updates on safeguarding training and updates on safeguarding personnel. This newsletter could be developed into a more interactive safeguarding communication tool by incorporating regular prompts for member feedback, updates from the Safeguarding Lead, and key safeguarding messages or learning points. Including the Safeguarding Lead's contact information within the safeguarding section would also enhance accessibility and promote direct communication where needed. The newly appointed Safeguarding Lead has indicated an intention to promote newsletters as part of their communication strategy. It would be prudent for the Regional Representative and Safeguarding Lead to collaborate on the development and distribution of newsletters to avoid duplication and ensure that safeguarding information is shared consistently and effectively across the Mill Hill Missionaries.

4.2.6 During interviews with members residing at Colby Gardens, it was noted that in addition to the formal community meeting held at Colby Gardens every two months, many informal meetings also take place among members. While these formal meetings have set agendas, safeguarding is not consistently included, although it is occasionally discussed. Members interviewed acknowledged this as a missed opportunity, as safeguarding is not routinely recorded or reflected in minutes. Additionally, a weekly wellbeing meeting is held via Zoom on Mondays, a practice that began during the COVID-19 pandemic and continues to support members living independently, with approximately six participants. It would be beneficial for the Mill Hill Missionaries to document the frequency and purpose of all community meetings, both formal and informal, within the communication plan as well as identify opportunities for shared learning and discussion. The lay Safeguarding Lead could use this information to promote safeguarding awareness, embed safeguarding into regular dialogue, and ensure the Trustees are kept informed of all relevant engagement opportunities and safeguarding discussions across the wider community.

Areas for development

4.2.7 Mill Hill Missionaries should consider providing documentation in a range of accessible formats to meet the diverse needs of their members. Interviews with retired members suggested that alternative formats, such as large print, audio

recordings, or accessible digital versions, would be helpful. Offering information in multiple formats would support better access, learning, and understanding for all members, especially those with differing needs.

4.2.8 Interviews with members living outside of Herbert House Freshfield, including those living independently and those based in Colby Gardens, indicated inconsistent access to safeguarding information. While individuals who attended the regional assemblies reported receiving documentation and updated policies, those unable to attend did not receive this material. Many members were unaware of recently introduced policies, and although one individual recalled receiving a list of upcoming RLSS training dates during the assembly, others had not. Several members expressed that it would be beneficial for all members to receive digital copies of safeguarding policies and any information shared at regional assemblies, regardless of attendance. While there was general awareness of the newsletter produced by the Regional Representative, it was suggested that a separate safeguarding-specific newsletter would be a welcome addition to improve communication and awareness across the membership (see 4.2.5).

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, the Mill Hill Missionaries had two separate allegations of inappropriate behaviour, made against one member, this is further discussed in 4.4.1. In addition to this the Mill Hill Missionaries had two low-level concerns, which are discussed in 4.4.9.

4.3.2 During the site visit to Herbert House, the analyst observed that the notice board in the communal lounge prominently displayed safeguarding materials. This included a poster outlining the commitment to safeguarding, the One Church Approach, the safeguarding policy statement, and the contact details for the Religious Safeguarding Lead, the RLSS, and Safe Spaces. In addition to the poster,

the “Supporting Survivors/Victims of Abuse Policy” was also displayed separately on the board. Interviews with other members residing in communities outside Herbert House confirmed that this information is similarly displayed in other communities. In light of the recent appointment of a new safeguarding lead, the Mill Hill Missionaries will need to review and update all relevant documentation, including the contact details on the poster and within displayed policies, to ensure the information reflects the current safeguarding lead. Interviews with other members residing in communities outside Herbert House confirmed that this information is displayed in other communities.

4.3.3 The Mill Hill Missionaries Safeguarding Policy requires that any allegations or concerns about abuse involving members, lay persons, or associated volunteers, or employees must be reported promptly to the Safeguarding Lead or the RLSS Safeguarding Team, regardless of whether the allegations or concerns relate to a person’s behaviour in relation to their role within the Church or another setting. The policy states that when safeguarding issues arise, the person receiving the concern must immediately pass all information and documentation to the Safeguarding Lead and ensure the individual who raised the concern is informed. The policy commits to informing the victim or survivor about the next steps, providing options and indicative timescales, and maintaining clear communication throughout the process. It clearly addresses issues of consent, recognising that where a competent adult explicitly refuses a referral regarding abuse outside the Church context, decisions must be carefully balanced with the need to protect children or adults at risk. The policy outlines that concerns must be reported within 24 hours to the appropriate statutory authority in all cases, whether the concern involves a child or an adult at risk. Throughout, the policy emphasises supporting survivors with sensitivity while ensuring safeguarding procedures are followed to protect all vulnerable individuals.

4.3.4 In addition to the Safeguarding Policy (published in May 2024, review due May 2025), the Mill Hill Missionaries have developed a dedicated “Supporting Survivors/Victims of Abuse Policy”, issued in May 2025 with a review date set for May 2026. This document complements the Safeguarding Policy by focusing on the provision of survivor-led, trauma-informed care. It outlines key principles such as respect, dignity, confidentiality, and access to independent emotional, medical,

legal, and spiritual support. The policy aligns with the Catholic Safeguarding Standards Agency (CSSA) framework; however, it incorrectly references Standard 7 instead of the appropriate Standard 3: Care and support for victims and survivors, which should be corrected in future updates.

4.3.5 The Supporting Survivors/Victims of Abuse Policy provides a clear step-by-step process for responding to disclosures of harm. This includes offering immediate safety, notifying the Designated Safeguarding Lead (DSL) within 24 hours, arranging a confidential meeting, developing a tailored support plan, and reviewing support through an “open door” approach. Key responsibilities are assigned to the Safeguarding Lead, with procedures in place for documentation and liaison with external agencies. A comprehensive list of support services is also included. The policy is scheduled for review in May 2026.

4.3.6 During interviews, the Trustees, Religious Safeguarding Lead, and Regional Representative confirmed their commitment to meeting with survivors, listening attentively, involving the RLSS where appropriate, and making statutory referrals when necessary. They referenced previous instances of providing such support, including funding for counselling in cases beyond the 12-month scope of this audit.

4.3.7 The Religious Safeguarding Lead is well-trained and experienced in handling disclosures of harm. He is also a priest within the Diocese of Hexham and Newcastle and has completed diocesan safeguarding training. The newly appointed lay Safeguarding Lead is a qualified Mental Health First Aider and has completed both Level 3 Mental Health Awareness and Level 3 Safeguarding in Education training.

4.3.8 All participants in the interviews stated that, in the event of receiving a disclosure, they would listen to the individual and offer support either pastorally or through appropriate referrals. All members were aware of the need to contact the Religious Safeguarding Lead in the event of a safeguarding disclosure. They also understood the importance of documenting appropriate information in writing and sharing these concerns with the Religious Safeguarding Lead.

Areas for development

4.3.9 The Supporting Survivors/Victims of Abuse Policy references the role of a Safeguarding Committee in overseeing implementation and ensuring survivor feedback informs policy and practice. However, the Mill Hill Missionaries do not

currently have a Safeguarding Committee in place. As a result, this responsibility is not being fulfilled as outlined in the policy. This presents a gap between policy and practice and highlights the need for the establishment of a Safeguarding Committee.

4.3.10 It is recommended that, with the appointment of the new lay Safeguarding Lead, all policies be updated to use consistent terminology for safeguarding personnel. Terms such as Designated Safeguarding Lead, Religious Safeguarding Lead, and Safeguarding Leads should be standardised across all documents to ensure clarity and avoid confusion about roles and responsibilities.

4.3.11 The Mill Hill Missionaries should use their website to share the Supporting Survivors/Victims of Abuse Policy.

4.3.12 Best practice in this standard will be to ensure that all active members have received training in supporting victims of harm, and that those in appropriate roles such as the safeguarding lead and provincial leader have completed training in how to provide a trauma informed response to those who report having been harmed, in line with the 'Supporting Survivors/Victims of Abuse Policy'.

4.3.13 The Mill Hill Missionaries should proactively engage with local statutory and voluntary organisations, such as local safeguarding partnerships or community-based support services. Regular meetings or participation in multi-agency forums would enable the sharing of best practices, facilitate collaborative working, and ensure the Mill Hill Missionaries remain informed about developments in safeguarding practice. This engagement would demonstrate a commitment to working within the wider safeguarding community.

4.3.14 The Mill Hill Missionaries noted in their self assessment the need to document learning from survivor interactions and integrate this into policy reviews. Leaders should consider how engagement with survivors directly or through Religious Life Groups with direct experience or contact with the RLSS, can inform future safeguarding practices. This engagement could also provide an opportunity for bespoke training focused on survivor interaction, improving the members' ability to offer informed and compassionate support.

Graded: Firm Progress

4.4 Standard 4 Effective management of allegations and concerns

Strengths

4.4.1 As discussed in 4.3.1, the Mill Hill Missionaries received two separate allegations of inappropriate behaviour against one member in March 2024 and May 2024, respectively. While both allegations occurred outside the audit period, the subsequent actions taken, particularly those following the second allegation, fall within the audit timeframe. Case file evidence indicates that an initial meeting was held after the first allegation, involving the respondent, the Safeguarding Coordinator from the Catholic Diocese in which the member ministers, and the Regional Representative of the Mill Hill Missionaries. Following this meeting, the individual was withdrawn from ministry and relocated to Herbert House to minimise risk. Although a safety plan is not included in the case file, its implementation is referenced in email correspondence. After the second allegation, a further meeting took place between the Mill Hill Missionaries and the relevant diocese, during which it was agreed that a formal independent risk assessment would be commissioned. Although the assessment outcome was not included in the audit evidence, it was reported to have informed decisions regarding the individual's future ministry within the Mill Hill Missionaries overseas. It was determined that the individual would undertake additional training and participate in a structured programme to support accountability and safeguarding awareness for a period of three months, after which further decisions regarding his future ministry would be made by the General Council. All relevant information concerning this case has been shared with the General Council and assurances were given to the analyst by the Mill Hill Missionaries that the General Council will continue to monitor the situation and take any necessary steps to manage risk.

4.4.2 Further correspondence with the RLSS evidenced non-recent cases brought to the attention of the Mill Hill Missionaries, which fell outside the audit remit and were therefore not included in this report. However, the RLSS Safeguarding Officer confirmed that the Order "have been very cooperative and proactive in terms of working with RLSS" and "I cannot speak highly enough of how the Order handled

these matters". The safeguarding officer also noted that information had been appropriately shared to allow case progression and that the former Religious Safeguarding Lead "has a good understanding of his safeguarding responsibilities. He dealt sensitively with the survivors and liaised effectively with RLSS."

4.4.3 The Mill Hill Missionaries Safeguarding Policy states "In accordance with Article 19 of Pope Francis' Apostolic Letter, *Vos Estis Lux Mundi*, it is the policy of the Catholic Church in England and Wales, as agreed by the Bishops Conference in 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". The policy also outlines the procedure for escalating and reporting concerns. It distinguishes between emergency and non-emergency scenarios and sets a clear requirement to escalate concerns to statutory authorities within 24 hours. The policy procedure section states that "If a member, associate or staff member becomes aware of a safeguarding issue, they should contact the Safeguarding Lead or the RLSS Safeguarding Team and immediately pass on the concern and all associated documentation. You should ensure the person who made you aware of the concern knows you are doing this" it then provides further information regarding the procedure for the RLSS or Safeguarding Lead.

4.4.4 The recently implemented Supporting Survivors/Victims of Abuse policy reflects several elements of effective safeguarding governance and personnel management. It outlines clear lines of responsibility, including the role of the Safeguarding Lead in coordinating responses, developing support plans, liaising with statutory agencies, and overseeing implementation. The inclusion of a structured, step-by-step procedure ensures a consistent approach across all cases, with appropriate documentation, survivor consent, and follow-up. The policy also sets out regular review processes, anonymised reporting to trustees, and engagement with survivor feedback, demonstrating a commitment to accountability and continuous improvement. Furthermore, the listing of key support contacts ensures clarity for all personnel involved in safeguarding response. However, as the policy is newly implemented, there is limited evidence of it being embedded in current practice. Additionally, while the policy refers to anonymised

reporting to trustees and oversight by a Safeguarding Committee, the trustees do not meet regularly to receive such reports, and no Safeguarding Committee currently exists within the region. These gaps highlight the need for improved governance structures to support the effective delivery and oversight of the policy.

4.4.5 The newly appointed Safeguarding Lead introduced a central concerns log in June 2025 to ensure consistent documentation of all safeguarding concerns. This log records key information, including the identity of the person of concern or allegation, the location, nature of the concern, whether it has been referred to the RLSS, a summary of actions taken, and the status of the case. It is securely password protected with access restricted solely to the lay Safeguarding Lead and the former Religious Safeguarding Lead. Although no entries have yet been recorded due to its recent implementation, the Religious Safeguarding Lead confirmed that relevant information will be shared with the Regional Council as needed.

4.4.6 The Safeguarding Leads clarified that responsibility for the ongoing management of allegations and concerns will lie with the RLSS, not with the Mill Hill Missionaries themselves.

4.4.7 All members, both active and retired, interviewed during the audit process were 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.

4.4.8 The Safeguarding Policy states that Mill Hill Missionaries have a responsibility to ensure that all case files held are accurate, up to date and stored securely. The policy notes that “all records are potential evidence in a criminal proceeding, civil case or statutory/public inquiry and must be stored in a suitable and retrievable format with an auditable record of provenance and integrity”.

Areas for development

4.4.9 The Supporting Survivors/Victims of Abuse Policy and the Safeguarding Policy show inconsistencies in terminology and reporting structures. The Safeguarding Policy consistently refers to the role of the “Safeguarding Lead,” while the Supporting Survivors Policy uses the term “Designated Safeguarding Lead (DSL).” This difference in terminology, along with the lack of clear cross-referencing between the two policies, creates confusion around governance and procedural

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responsibilities. Furthermore, interviews with the former Religious Safeguarding Lead and current Safeguarding Lead confirmed that members are expected to report safeguarding concerns to the Safeguarding Lead, who then escalates to the RLSS. However, this reporting structure is not clearly articulated in the current policies. The Safeguarding Policy refers to raising concerns with either the Safeguarding Lead or the RLSS, which creates ambiguity around the correct escalation pathway. Additionally, the Supporting Survivors Policy does not reference the RLSS at all. To ensure consistency and reduce confusion, all safeguarding-related policies should clearly reflect that the Safeguarding Lead is the initial point of contact and that the RLSS is the primary escalation body for all safeguarding concerns. Aligning terminology and procedural responsibilities across both policies and cross referencing, would strengthen clarity and consistency.

4.4.10 During an interview with the care manager, two low-level concerns were brought to the attention of the analyst. One related to the well-being of an individual with dementia, which had not been reported to the Safeguarding Lead. Such concerns should always be formally recorded and escalated to ensure that any patterns are identified, risks are properly assessed, and timely interventions implemented. The second concern involved potential financial abuse of a member by a carer. While this concern was reported to the Safeguarding Lead, it was not initially escalated to the RLSS, nor were the police informed. Instead, the matter was managed internally by the care manager as a human resources issue. There were no case notes beyond the original logged concern, and no documented evidence of subsequent meetings with the member were evidenced on the visit. The manager explained that she had met with both the member and the carer and, as the member was not deemed vulnerable, both she and the Safeguarding Lead did not consider further escalation necessary. This approach is not appropriate. All safeguarding concerns, regardless of perceived vulnerability, should be reported to the Safeguarding Lead, who should ensure that the matter is shared with the RLSS, in line with current safeguarding arrangements. As confirmed in interviews and the self-assessment, the RLSS is responsible for managing safeguarding cases for the Mill Hill Missionaries and therefore should have been informed directly at the earliest opportunity. Managing concerns solely at the managerial level risks inadequate oversight, failure to identify recurring issues, and non-compliance with safeguarding expectations. Although the concern was eventually reported to the

RLSS, this did not occur until after the analyst's visit. The RLSS has since confirmed receipt of the concern post-visit and reiterated that all safeguarding concerns, including low-level issues, must be shared with them, further supporting the recommendation in 4.4.9 to clarify escalation routes, including low level concerns, and ensure consistency across safeguarding policies.

4.4.11 During interviews Trustees confirmed that if an allegation required reporting to the Charity Commission, the Safeguarding Lead would make the decision on the referral and inform the Regional Council, with any updates also communicated to them. However, as the Trustees do not meet regularly, only those who are members of the Regional Council are kept informed. Low-level concerns are not routinely shared with either the Regional Council or the wider Trustee body. Furthermore, neither the Regional Council or the Trustees hold regular meetings to review lessons learned from safeguarding cases, which limits opportunities for collective learning, oversight, and improved safeguarding governance.

4.4.12 Although the RLSS maintains the central safeguarding case files, the Mill Hill Missionaries also retain their own copies. However, these internal files lack clear structure or narrative, making it difficult to quickly understand the nature of the concern, the actions taken, and the outcomes. In addition, some information is referenced in correspondence but not included in the case files, such as risk assessments and support plans. For transparency, accountability, and effective case management, it would be beneficial for the Mill Hill Missionaries to ensure that each safeguarding file contains all relevant documentation, alongside a clear case chronology and a concise case summary. This should outline the key actions taken, statutory referrals made, the rationale for decisions, and the resulting outcomes. Such documentation would support consistent oversight, enable informed review by safeguarding personnel or trustees, and provide evidence of adherence to safeguarding standards.

4.4.13 Mill Hill Missionaries 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 practices, reflect the values and needs of the broader community, and are continually improved through feedback from various perspectives.

4.4.14 Mill Hill Missionaries do not currently have a Data Protection Policy. The Mill Hill Missionaries' Safeguarding Policy includes a section on the recording and secure storage of safeguarding concerns and case files, outlining the types of information to be kept and the importance of maintaining an auditable, secure record. However, the policy does not explicitly reference legislation, or provide detail on data retention periods, access controls, or digital security measures. To strengthen compliance and transparency, further clarification on these areas should be included, or a separate Data Protection Policy agreed.

Graded: Firm Progress

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

Strengths

4.5.1 Mill Hill Missionaries currently have two ongoing safeguarding plans, both of which have been in place for over five years. The latter plan, which was included in the case file as evidence for the audit, was initially developed by the Diocese and later revised with support from the RLSS following the transition of safeguarding responsibilities. The most recent version, completed by the RLSS, is present in the Mill Hill Missionaries' records and is both signed and dated. In respect of the earlier plan, there was no evidence of the original version within the files reviewed; however, a more recent version was present. Both plans were updated in June 2024. The Safeguarding Lead and Regional Representative confirmed that both plans have been reviewed and updated annually, although no earlier versions were provided as evidence. In addition, while the plans reference a dynamic risk assessment, no such document was included in the audit evidence.

4.5.2 Within the evidence submitted to the analyst, in addition to the safeguarding plans, the case files included a brief chronology of wellness meetings. It is positive to see these meetings have been conducted intermittently over several years, demonstrating ongoing care and monitoring. However, the absence of a formal timeframe makes it difficult to assess their regularity or overall impact. Introducing

a structured approach to wellness reviews, defining frequency, format, and documentation, would further enhance support for individuals subject to safeguarding plans and strengthen ongoing risk management.

4.5.3 During the interview with the respondent, it was noted that following their removal from active ministry, they experienced low moods and felt isolated due to being unable to engage in any activities, including non-public facing roles. The respondent acknowledged that, in the past, these feelings had contributed to behaviours that led to the implementation of the current safeguarding measures. Boredom and isolation were identified as risk factors in the original safeguarding concerns, a view also noted by the former Religious Safeguarding Lead. This highlights the ongoing risk these factors can pose if not appropriately addressed. In response the RLSS confirmed that, since the audit visit, a subsequent meeting was held with the respondent to discuss appropriate roles that do not involve contact with children or vulnerable adults. As a result, the safeguarding plan has been amended to reflect the agreed activities that can be safely undertaken, supporting both the respondent's well-being and effective risk management.

4.5.4 The safeguarding policy outlines "It is the responsibility of everyone in the British Region to prevent abuse. Abuse in this policy refers to: physical; sexual; emotional; spiritual; neglect; self-neglect; organisational; material; psychological; financial; domestic or verbal. Additionally, behaviour which effectively results in modern day slavery or where there is evidence of discrimination or radicalisation, needs to be recognised and addressed as a safeguarding issue." The policy references unacceptable behaviours and draws from *Vos Estis Lux Mundi*¹⁰, reinforcing its application in all relevant situations involving members, laypersons, or associated volunteers or employees.

4.5.5 The Mill Hill Missionaries developed and agreed a 'policy for supporting individuals accused of safeguarding allegations in the Catholic church.' Within the policy key principles are detailed which include fair treatment, child and vulnerable

¹⁰ https://www.vatican.va/content/francesco/en/motu_proprio/documents/20230325-motu-proprio-vos-estis-lux-mundi-aggiornato.html

adult protection, confidentiality, safe spaces agenda, compliance with civil and canon law. The immediate actions and escalation process is briefly detailed as is the 'support for the accused,' record-keeping and confidentiality, roles, and responsibilities and how the policy will be reviewed. The policy will be subject to annual review and will be updated as required following legal or church safeguarding developments.

4.5.6 Mill Hill Missionaries have shown a proactive commitment to safeguarding by actively engaging with the RLSS through ongoing training and collaboration. The RLSS provide personnel that are trained in managing, monitoring and supporting respondents of allegations. In the event of any allegation or disclosure, the Mill Hill Missionaries have acknowledged the importance of consulting with the RLSS to ensure the appropriate actions are implemented, and stated they would seek support from the RLSS, if a Safeguarding Plan is needed. This approach was clearly reflected in their response to the recent allegation and previous safety plans, where they worked closely with the RLSS, cooperating to ensure the situation was managed properly and in line with best practices.

4.5.7 The Regional Representative and Former Religious Safeguarding Lead acknowledge that respondents may need to be withdrawn from ministry and indicated that, should such a situation arise, the respondent would receive ongoing support from the safeguarding lead, Regional Council, and RLSS. This was evidenced in recent and non-recent cases.

4.5.8 The Trustees stated in interview that, in the event of an allegation or disclosure, they would seek canonical advice through their former Religious Safeguarding Lead who is also a member and holds a doctorate in Canon Law and is a Canonical Advisor for the General Council.

Areas for development

4.5.9 The Mill Hill Missionaries should review the policy for supporting individuals accused of safeguarding allegations in the Catholic church as the current offer of support is available to lay staff, volunteers, parish members and affiliated organisations. It is recommended that the Mill Hill Missionaries consider whether the scope of this policy is too broad and whether it would be more appropriate to have a policy that differentiates the type and level of support available based on the

individual's role and relationship to the organisation. This would help ensure that the support offered is proportionate, role-specific, and consistent with safeguarding best practice.

4.5.10 The updated policy should include more detail of potential canon law processes and the support available to a respondent who cannot remain in his place of residence. Clergy may benefit from knowledge in respect of safety management plans, and how they will liaise with the RLSS. The policy should also outline how Trustees will maintain oversight of any canonical investigations. Similarly to 4.4.9, the policy should be updated to reflect consistent terminology and cross referencing.

4.5.11 Mill Hill Missionaries 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.

4.5.12 The Trustees, Safeguarding Lead, and members demonstrated a clear understanding of the importance of confidentiality when managing safeguarding allegations and recognised that respondents may require emotional, psychological, legal, or practical support. It is acknowledged that the Supporting Individuals Accused of Safeguarding Allegations in the Catholic Church Policy was only approved in April 2025. As such, interviews with members reflected a limited awareness of the support and guidance it provides. Therefore, it would be beneficial to ensure that all relevant individuals, including members, leaders, and those responsible for pastoral care, are familiarised with the policy and its procedures. This would help ensure consistent, informed, and compassionate support for respondents in line with national safeguarding expectations. Additionally, regular reviews should be undertaken to assess understanding of the policy and its effectiveness in practice.

Graded: Results Being Achieved

4.6 Standard 6 Robust human resource management

Strengths

4.6.1 The Mill Hill Missionaries have created and approved a Safer Recruitment Policy, formally adopted in April 2025. This policy applies to the recruitment of “members, employees, and volunteers within the British Region” and reflects national safeguarding best practice. It outlines clear procedures for advertising roles, application and interview processes, reference checks, DBS vetting, and safeguarding training. It also includes provisions specific to the recruitment of new or visiting religious members. The policy remains in the early stages of implementation, and a review of its effectiveness, including its consistent application and impact across the organisation, is expected within six months. In addition to the newly implemented Safer Recruitment Policy, safer recruitment practices are also briefly addressed within the Mill Hill Missionaries' Safeguarding Policy. This includes requirements for appropriate Disclosure and Barring Service (DBS) checks, the use of references, and the need for new appointees to receive and acknowledge relevant safeguarding policies and procedures. The former Religious Safeguarding Lead confirmed that the Care Manager is responsible for the recruitment of carers within Freshfield, including DBS checks, and the Care Manager stated that she follows the Safer Recruitment Policy for all appointments. Additionally, the newly appointed lay Safeguarding Lead explained that her recruitment process included a discussion, submission of work samples, references, and a review of her job description. She also provided a current DBS certificate from her other employment, aligning with safer recruitment practices.

4.6.2 The Mill Hill Missionaries do not currently have any members in formation within the UK, nor are they actively recruiting new members in this region. However, the Safeguarding Lead confirmed that safeguarding arrangements for members and visitors to the British Region are guided by the policies in place. Section 7 of the Safeguarding Policy outlines specific requirements for visiting clergy, overseas members appointed to the Region, and members or associates visiting from other areas. These include verifying good standing and a valid celebret for liturgical functions, ensuring timely safeguarding training and DBS checks, and requiring

testimonials of suitability for ministry. These measures help ensure that appropriate safeguarding standards are upheld, even in the absence of active recruitment or formation activities in the region.

4.6.3 The Mill Hill Missionaries employ 26 staff members at Herbert House, 15 of whom require a DBS check due to the nature of their roles. All required DBS checks for staff are currently up to date, and the Care Manager maintains a central database specifically for staff records. The lay Safeguarding Lead confirmed that staff DBS information will soon be incorporated into the main central safeguarding database used for all DBS checks, as referenced in section 4.6.7.

4.6.4 The Care Manager has been in her current role for two years but has worked with the Mill Hill Missionaries since 2003, initially as a carer. She holds a Level 5 NVQ in Health and Social Care. In addition to the Care Manager, the Mill Hill Missionaries employ a Nurse-in-Charge who is a Registered General Nurse (RGN). The Nurse-in-Charge is responsible for updating care plans, which are reviewed and updated on a monthly basis to ensure they remain accurate and responsive to the residents' needs. The Care Manager stated that five members currently require personal care. However, if a member's needs were to increase and more intensive support became necessary, discussions would be held with the Regional Representative to explore alternative accommodation options. This may include moving the individual to a specialist care facility to ensure their needs are appropriately met. All members within interviews were able to demonstrate their understanding of how to report any concerns regarding other members welfare and stated there were mechanisms and support in place to do so.

4.6.5 The Mill Hill Missionaries do not have a process to manage a blemished DBS, however if a member did receive a blemished DBS the Mill Hill Missionaries would consult the RLSS and seek their support to complete a blemished DBS risk assessment.

4.6.6 The Mill Hill Missionaries have up to date whistleblowing and safeguarding complaints policies, both of which are promoted on their website. The complaints policy is clear that the Mill Hill Missionaries aim to resolve issues quickly, and timescales for acknowledgement, investigations and outcomes are outlined as is the appeal process. Complainants are also provided with the detail for the CSSA for

external review once the complaints process has been exhausted. The Whistleblowing Policy encourages “staff member/volunteer/Trustee Board member, etc.” to report any concerns about wrongdoing, unethical behaviour, or illegal activity, offering protection “to anyone who honestly and reasonably believes that underhand or illegal practices are taking place and provides the environment in which to report them, confidentially”. It covers issues such as criminal conduct, health and safety risks, regulatory breaches, and attempts to conceal such actions. It states concerns should be reported to a manager or senior figure, and that while anonymity is allowed, it may limit investigation. The policy states the Mill Hill Missionaries will comply with “all applicable laws relating to the prohibition of retaliation against good faith Whistleblowers, including the Public Interest Disclosure Act 1988” and malicious or knowingly false allegations may lead to disciplinary action.

Areas for development

4.6.7 The Safeguarding Lead maintains a centralised database of DBS checks for all members of the Mill Hill Missionaries in the British Region. For members engaged in active ministry within parishes, DBS checks are carried out by the host Diocese, and members are required to provide this information to the Safeguarding Lead. For active members not operating within a Diocese, DBS checks are completed directly by the Safeguarding Lead using the UCheck system. The database includes details of every member, indicating whether they are in active ministry and whether a DBS check is required. Where a member is not engaged in active ministry, it is appropriately recorded that no DBS is necessary. According to the database, there are currently 31 members in active ministry. Of these, 14 members do not have DBS certificates that fall within the recommended three-year renewal period. While the database indicates that several members are enrolled in the DBS Update Service, the dates recorded do not consistently reflect when the most recent status check was carried out. Additionally, the central database does not include DBS expiry dates, making it more difficult to monitor compliance. The former Religious Safeguarding Lead stated that most DBS checks are believed to be in date; however, one member has not engaged in communication regarding their DBS, and this has been escalated to the Regional Council. It is recommended that the Safeguarding Lead carry out a full audit of DBS records for all Mill Hill Missionaries in

the British Region. For those enrolled in the DBS Update Service, the database should be updated to include the most recent date the status check was completed. Furthermore, the database should be revised to include explicit DBS expiry dates, calculated from the issue date or last Update Service check, to support routine monitoring and ensure timely renewals.

4.6.8 The Mill Hill Missionaries Whistleblowing policy would be strengthened by explicitly referencing the organisation's safeguarding policies and clarifying how whistleblowing relates to safeguarding concerns, such as abuse or neglect. It should also include contact details for the designated or lay safeguarding lead to guide individuals in raising safeguarding-specific issues. Additionally, the policy lacks a review date, which is important to ensure it is regularly assessed and remains compliant with current safeguarding legislation and best practice.

4.6.9 The complaints policy, currently states that there is a separate policy to follow for safeguarding complaints, however this is intended to mean safeguarding concerns, and when rectified will render the policy fit for purpose for the management of safeguarding complaints.

4.6.10 As stated in section 4.6.6, the Whistleblowing Policy currently refers to "staff member/volunteer/Trustee Board member, etc." The Mill Hill Missionaries should revise the policy to provide greater specificity regarding who it applies to. In particular, the policy should clearly state whether it applies to Religious members within the Mill Hill Missionaries, to ensure there is no ambiguity in its scope.

4.6.11 Similarly to areas for development in standard one, the Mill Hill Missionaries should ensure that the Trustees can demonstrate effective oversight of DBS compliance.

4.6.12 The Mill Hill Missionaries should establish a clear mechanism for receiving feedback on policies, providing for continuous improvement and ensuring that they meet the needs and expectations of those who may need to use them.

Graded: Firm Progress

4.7 Standard 7 Training and support for safeguarding

Strengths

4.7.1 The Mill Hill Missionaries' Safeguarding Policy outlines clear expectations for training based on members' roles. The policy states "All members and associates will undergo safeguarding training in relation to both children and adults relevant to their role", with specific training standards outlined for each role. For example, the policy details requirements for the Regional Superior, safeguarding leads, trustees, those working with the public, and community members not in public-facing roles. Annual refresher training is noted as mandatory for all. Members engaged in parish ministry or appeals are also expected to attend local diocesan training, which may meet the internal safeguarding requirements. The Safer Recruitment Policy also outlines safeguarding training requirements. It states that comprehensive induction training on safeguarding policies and procedures must be provided before the commencement of duties, ensuring that recruits understand their responsibilities and how to report concerns. It also requires ongoing training and support, including regular safeguarding training and updates at least once a year, as well as supervision to ensure continued compliance with safeguarding policies and procedures.

4.7.2 The Care Manager confirmed that she oversees the training for staff, ensuring that all required training is completed and a log of completed training is maintained. The lay Safeguarding Lead maintains a record for the members, see 4.7.6 for further discussion.

4.7.3 The training log states that the Regional Representative last completed safeguarding training in May 2024 however, during interview he confirmed that safeguarding training had been undertaken in June 2025. The lay Safeguarding Lead has completed level 3 Designated Safeguarding Lead training in addition to data security and safeguarding for governors training.

4.7.4 The lay Safeguarding Lead and Regional Representative receive regular email updates from the RLSS regarding upcoming training opportunities, which are

shared both formally and informally within the community. Within Herbert House, the analyst noted that upcoming training dates were displayed on the communal lounge noticeboard, and members reported receiving the training list during the Regional Assembly. However, interviews with members outside Herbert House revealed that those who did not attend the assembly did not receive a copy of the list. To strengthen communication and ensure safeguarding remains a priority, it is recommended that all members receive a digital copy of training opportunities, ensuring consistent access to information across all communities, regardless of attendance at specific gatherings or meetings.

4.7.5 During interviews with members residing at Herbert House who are not in active ministry, a number of complex safeguarding questions were raised, indicating a strong interest and engagement with safeguarding practices, despite their lack of formal roles. These individuals were appropriately directed to the lay Safeguarding Lead for further guidance. The Analyst noted that there were specific areas of safeguarding knowledge and awareness that may benefit from further exploration within this group. The former Religious Safeguarding Lead confirmed that many of these members had received safeguarding training in the past, and that safeguarding discussions have previously taken place during Regional Assemblies. However, it was recognised that informal meetings or sessions tailored to the needs and context of retired or non-active members could provide additional support and clarity. The lay Safeguarding Lead confirmed plans are in place to offer these tailored informal safeguarding discussions in the future, helping to ensure that all members remain informed, confident, and engaged in safeguarding responsibilities appropriate to their context.

Areas for development

4.7.6 The safeguarding training log for members is currently stored within the central database alongside DBS information, which makes it difficult to clearly and efficiently track individual compliance with safeguarding training requirements. This combined format lacks clarity and does not provide a comprehensive overview of safeguarding training, as it lists only training providers or Dioceses without detailing course titles, levels, or specific content. Many of the recorded training dates are from 2023 or earlier and would therefore be considered out of date if refresher training is required annually, as expected in the Mill Hill Missionaries

Safeguarding Policy. While some individuals have received recent training or have upcoming sessions scheduled, others have no recent entries, and notably, one individual has no safeguarding training recorded at all, the same person who also has no DBS check listed. This represents a significant safeguarding compliance risk. In addition, during interviews with those living in Colby Gardens, it was confirmed that some members have been allowed to continue attending Diocesan safeguarding training due to their active ministries within the Diocese. However, members who do not hold specific roles have been directed to complete training through the RLSS instead. As a result, some individuals now have training that is due for renewal, and there is a clear need for support to help them access and complete this required training to maintain safeguarding compliance across the community. To ensure proper oversight, it is recommended that safeguarding training be logged separately from DBS data, with clear records of training titles, dates, levels, content, and scheduled refreshers, to support full compliance with safeguarding standards and policy expectations. Additionally, as discussed in section 4.7.2, the Care Manager maintains records of staff training, and this information should also be incorporated into the safeguarding training log to ensure a complete and centralised record of all relevant training activity.

4.7.7 The Mill Hill Missionaries should create a Training Needs Analysis to identify the training needs for individuals by the roles that they undertake and the expected frequency of refresher training, this should include members and staff. Compliance should then be reported to the Trustees for their meetings to assure them that safeguarding training is proceeding according to expectations. They should also request feedback as to the quality and effectiveness of training. This will ultimately strengthen safeguarding practices and ensure that training is tailored to the specific requirements of the members and staff.

4.7.8 Interviews with the Trustees confirmed that they have not undertaken safeguarding trustee training and this has not been recorded by the lay Safeguarding Lead. Trustees should complete, and refresh, RLSS Safeguarding Trustee training to ensure that they understand their responsibilities in full in relation to safeguarding.

4.7.9 Similarly to areas for development in standard one and six, the Mill Hill Missionaries need to ensure that the Trustees can demonstrate effective oversight of training compliance.

Graded: Firm Progress

4.8 Standard 8 Quality assurance and continuous improvement

Strengths

4.8.1 The Mill Hill Missionaries have acknowledged the importance of strengthening their safeguarding arrangements and have recruited a lay professional to support them with developing safeguarding policies and processes. The Mill Hill Missionaries have also signed contracts with both the CSSA and the RLSS, and the RLSS report good relationships with them stating that they actively engage with support offered.

4.8.2 The lay Safeguarding Lead introduced a questionnaire, in May 2025, as a tool to evaluate members' understanding and attitudes towards safeguarding. These questionnaires are designed to be updated every six months to ensure they remain relevant and responsive to current needs. The most recent version included four straightforward questions, using a 1–5 scale ranging from "strongly disagree" to "strongly agree." Results from the questionnaire indicated a high level of awareness among members regarding their individual safeguarding responsibilities, familiarity with the safeguarding policy, and confidence in how to raise concerns. However, the findings also highlighted areas for development, particularly around engagement with training, accessibility of training opportunities, and the need to foster shared leadership in safeguarding across the community.

4.8.3 As identified in Standard One, the Mill Hill Missionaries have developed both a Safeguarding Action Plan and a three-year Development Plan aimed at strengthening and advancing safeguarding practices across the organisation. These plans are intended to provide structured, long-term support for continuous improvement. Their effectiveness will be further enhanced by implementing the adjustments recommended in section 4.1.7.

4.8.4 Mill Hill Missionaries recognise the importance of listening to and engaging with Survivors of abuse. The Trustees have affirmed their commitment to meeting with any Survivor who chooses to come forward if that is the Survivor's request. This reflects the organisation's dedication to openness, accountability, and the ongoing need to learn from the experiences of Survivors to strengthen safeguarding practices.

4.8.5 Mill Hill Missionaries intend to use the recommendations of this audit with a view to improving their Safeguarding practice and ensuring their adherence to the eight National Safeguarding Standards of the Catholic Church in England and Wales.

Areas for development

4.8.6 To support, regular, evidence-based reporting to leadership, the lay Safeguarding Lead should produce an annual safeguarding report for the Board of Trustees. This report should include key activity from the year, such as training compliance, incident data, policy updates, risk assessments, and identified areas for improvement. Together, these measures will enable Trustees to fulfil their legal responsibilities and provide effective strategic oversight of safeguarding practices.

4.8.7 Trustees should ensure they are holding regular meetings, in line with Charity Commission expectations. At present, the Trustees are not meeting this standard, as they do not currently hold regular meetings. Safeguarding should be a standing agenda item at each meeting, with oversight provided to the delivery of the Safeguarding Action Plan. Trustees should also ensure that any actions arising are clearly allocated to individuals or groups, who are provided with the necessary resources and time to complete them. Progress on these actions should be reported back to Trustees at subsequent meetings, allowing for the early identification and resolution of any issues or barriers.

4.8.8 To ensure effective accountability and transparency in safeguarding, the Mill Hill Missionaries should formally establish a Safeguarding Committee with clearly defined responsibilities, authority, and operating procedures documented in writing. This committee should be responsible for providing strategic guidance, monitoring compliance with safeguarding policies, reviewing risk assessments and case management processes, and supporting the Safeguarding Lead in

implementing safeguarding standards across all missions. Its functions, membership, meeting frequency, and reporting obligations should be outlined in formal Terms of Reference, approved by trustees, and reviewed regularly to ensure alignment with best practices and Catholic safeguarding standards.

Graded: Early Progress

5. Summary of overall findings

5.1 The Mill Hill Missionaries in England and Wales comprise 48 members, including those residing at communities at Herbert House, Colby Gardens, Salford and in Sunderland as well as members living independently across multiple dioceses. With the recent transition from a religious Safeguarding Lead to a lay Safeguarding Lead, significant progress has been made in developing policies that reflect best safeguarding practices. As these policies are newly adopted, there is a clear need for ongoing reflection and structured review to ensure they are effective, relevant, and consistently applied across all contexts. While internal communication within Herbert House is a recognised strength, the next step should focus on enhancing communication and engagement with members living in other locations to ensure a shared understanding and consistent implementation of safeguarding responsibilities throughout the community.

5.2 As a matter of urgency, the Mill Hill Missionaries should ensure that the Trustees are meeting regularly with formal minutes taken, that safeguarding is a standing item on the agenda, and that they are actively reviewing safeguarding action plans and monitoring compliance with National Safeguarding Standards. Annual safeguarding reports should be submitted to the Board of Trustees to promote transparency and track progress against agreed objectives. The lay Safeguarding Lead should also prioritise ensuring that the central database for DBS checks and training records accurately reflects current compliance levels across all members, enabling the production of up-to-date safeguarding reports and the identification of any gaps in safer recruitment or training requirements.

5.3 While the Mill Hill Missionaries have experience of managing both non-recent and recent allegations, with positive feedback received from the RLSS and a survivor St Joseph's Society for Foreign Missions audit report

in a recent case, it is clear that although the Regional Representative and former Religious Safeguarding Lead have responded to disclosures with compassion, care, signposting, and pastoral support, there has been no formal documentation of learning from practice. Establishing clear mechanisms for ongoing feedback and policy review involving staff, members, and survivors will be essential in embedding a strong and sustainable safeguarding culture that promotes transparency, accountability, and continuous improvement across all areas of mission and ministry.

5.4 Mill Hill Missionaries have demonstrated that their current practice exceeds minimum safeguarding practice. They have been rated as achieving Early Progress against two of the standards, Firm Progress against five standards and Results Being Achieved against the remaining standard. This gives an overall rating of Firm Progress.

6. Recommendations

To support improvement, the following recommendations are made:

Within 3 months

- Ensure Trustees meet regularly with formal minutes taken, that safeguarding is a standing item on the agenda, and that they are actively reviewing safeguarding action plans and monitoring compliance with national safeguarding standards. Trustees should hold an initial meeting within three months and develop a schedule of subsequent regular meetings.
- The Mill Hill Missionaries should formally establish a Safeguarding Committee through the development of appropriate governance documents. These should include clear terms of reference, defined roles and responsibilities, reporting mechanisms to the Trustees, and lines of accountability. Existing policies should be updated accordingly.
- The Mill Hill Missionaries should formally define and document the governance relationships between all key groups, including the Trustees, the Regional Council, leadership teams, and safeguarding personnel; thereby establishing clear lines of accountability and decision making.

- Mill Hill Missionaries should ensure that all of their communities display safeguarding information, such as policies, contact details for the new lay Safeguarding Lead, details of support agencies, and training materials, similarly to the standard set at Herbert House.
- Ensure the action plan and 3-year plan align to ensure consistency, avoid duplication and improve clarity (see 4.1.6 for further details).
- Clear guidelines should be established to specify the review process for care plans.
- Ensure all active members are up to date with safeguarding training in line with best practice expectations of the Catholic church.
- Ensure that all new policies or safeguarding information is shared digitally with members including those who are unable to attend regional assemblies.

Within 6 months

- The Mill Hill Missionaries should update all policies and documentation including those on their website, to reflect the appointment of a new lay Safeguarding Lead. All policies should use consistent terminology for safeguarding personnel, and roles should be standardised across all documents.
- Amend the Mill Hill Missionaries Safeguarding Policy to reference the correct safeguarding standard as Standard 3 not Standard 7.
- All safeguarding related policies should clearly reflect that the Safeguarding Lead is the initial point of contact and that the RLSS is the primary escalation body for all safeguarding concerns. Aligning terminology and procedural responsibilities across both policies and cross referencing specifically the Safeguarding Policy and other supporting policies such as the Supporting Survivors/Victims of Abuse Policy and Supporting Individuals Accused of Safeguarding Allegations in the Catholic Church
- Review the wording in the complaints policy, directing those with safeguarding concerns to the safeguarding policy.

- The centralised DBS register should be updated to accurately reflect the current status of all members and expanded to include relevant staff. If any are found not to have current DBS checks risk mitigations should be put in place until this is resolved.
- Update the communication plan to include communication to those who report having been harmed.
- Publish the policy for supporting survivors/victims of abuse on the Regional webpage.
- Review the scope of the policy for supporting individuals accused of safeguarding allegations in the Catholic Church, including guidance on potential canon law processes.
- Create a Training Needs Analysis to identify training requirements by role including those in retirement and staff.
- Initiate the development of a centralised training matrix for all staff and members. Consolidate training records from all facilities into a single accessible tracking system to allow effective oversight by trustees.

Within 12 months

- Consult with survivors (directly or via Religious Life Groups) to inform future safeguarding practices. Additionally, liaise with other Religious Life Groups which have experience of managing allegations and concerns, supporting Survivors and supporting Respondents to identify if there are any transferable lessons that can be learned.
- Produce an annual safeguarding report summarising key activity, including training compliance, incidents, risk assessments, and lessons learned.
- Establish a formal feedback mechanism for continuous policy improvement. Consider allowing feedback on policies or general experiences through the website.
- Implement robust internal mechanisms to audit compliance, monitor the quality of care, recruitment of staff and uphold safeguarding standards to ensure the safety and wellbeing of all residents.
- Develop and implement a comprehensive data protection policy.

- Establish a process to regularly gather feedback from members and staff on safeguarding training and use this to inform the training needs analysis.
- Revise the Whistleblowing policy to provide greater specificity regarding who it applies to. In particular, the policy should clearly state whether it applies to Religious members within the Mill Hill Missionaries.

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 Mill Hill Missionaries by the CSSA is in two years. If the CSSA becomes aware of a significant safeguarding concern or allegation in the intervening period, then an earlier audit may be required.

8. Appendix

Evidence List

Annual report and Financial Statements submitted to the Charity Commission for the year ended 31 December 2023

Supporting Survivors_ Victims

SAFEGUARDING CENTRAL REGISTER

MHM – May 25 Risk Assessment

2023 MHMBR Safeguarding Policy

MHM Questionnaire Insights Report – May 2025

MHM_Safeguarding_Risk_Assessment_Landscape_May_2025

MHMBR Whistleblowing Policy

Communication Plan

Complaints Policy

MHM 3 Year Development Plan

Mill Hill Missionaries Level 3 Self-Assessment

Mission Statement

PORTSMOUTH CONTRACT 2025

Safeguarding Action Plan – May 2025
Safer Recruitment Policy
Supporting Individuals Accused