

The Daughters of Divine Love

Baseline Audit Report
April 2026

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1. Introduction

1.1 This is the baseline audit of the safeguarding arrangements of the Daughters of Divine Love (DDL). This audit has been undertaken as part of the Catholic Safeguarding Standards Agency's (CSSA) Baseline Audit phase of Religious Life Groups in England and Wales.

1.2 The congregation of the DDL was founded in 1969 by Bishop Godfrey Mary Paul Okoye C.S.Sp during the Nigeria-Biafra war. The DDL now number more than 1,000 professed Sisters working in locations on the continents of Africa, Europe and America. The DDL combine contemplation with apostolic action, with many taking professional roles in healthcare, education, social work and in offices as well as doing pastoral work in dioceses and communities across the world. The international congregation is led by a Mother General with the congregational offices for the DDL based in Nigeria¹.

1.3 The DDL in the England and Wales region number 60 sisters living in 16 communities across seven dioceses. The region is led by a Regional Superior who is supported by a Regional Vicar and Regional Council. The region of England and Wales is sub-divided into zones for operational purposes (London zone, Northern zone and Midlands zone). Within these zones, sisters live in small community houses and are supported and represented by their own Regional Councillors. Most of the sisters' work in paid employment; with three retired members continuing to actively serve their communities in a voluntary capacity. The sisters' work brings them into contact with organisations including the National Health Service (NHS), schools, local authorities, with other charitable organisations as well as working directly with Catholic dioceses across England and Wales in parishes.

1.4 The DDL permanently employ a lay safeguarding advisor to work with them as they develop and implement their safeguarding policies and processes. In addition, the DDL work with volunteers that support their charitable work with the homeless

¹ [Daughters of Divine Love. English Region – Love is our distinguishing mark](#)

and other marginalised groups in England and Wales. The DDL are members of the CSSA, the Conference of Religious² and the Religious Life Safeguarding Service³.

1.5 This audit seeks to assess the effectiveness of the current safeguarding arrangements by considering practice over the last 12 months. The CSSA has categorised Religious Life Groups (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 to vulnerable populations and/or providing some Diocesan activities, such as Parish priests), to Level 3 (a large community and/or one with significant outreach to vulnerable populations and/or a disproportionately high number of open safeguarding cases). The Daughters of Divine Love are categorised as a Level 3 community due to the number of members and ministries, and they completed a corresponding self-assessment.

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.

2. Methodology

2.1 The CSSA met with the DDL Designated Safeguarding Lead (DSL) and members of the Safeguarding Committee on 10 November 2025. It was agreed that audit of the DDL would take place on Friday 16 January 2026 with the self-assessment and supporting evidence to be submitted by 15 December 2025. The self-assessment

² The Conference of Religious in England and Wales represents the leaders of religious life by encouraging collaboration on the major issues facing religious today and by addressing issues from a Catholic perspective on their behalf [Conference of Religious](#)

³ The Religious Life Safeguarding Service is an independent team of safeguarding professionals offering safeguarding services to the Religious of the Catholic Church in England and Wales [Religious Life Safeguarding Service – Religious Safeguarding](#)

was returned with supporting evidence on 15 December 2025. Additional evidence was viewed during the audit visit.

2.2 Audit interviews were undertaken with the following:

- The Regional Superior
- The Designated Safeguarding Lead and Chair of the Safeguarding Committee
- The Regional Council Members
- The Safeguarding Committee members
- The Lay Safeguarding Advisor
- A focus group of 16 members from across the communities of England and Wales.

2.3 An anonymous online survey about safeguarding practice was sent to members of the DDL. It was open between 16 January 2026 and 30 January 2026. Four responses were received.

2.4 The seven dioceses where the DDL are situated were approached for comment on their experiences of safeguarding and the DDL, with responses received from the Diocese of Hexham and Newcastle, the Diocese of Wrexham and the Diocese of Portsmouth. The former two reported positive engagement from the DDL, while the Diocese of Portsmouth had had no direct contact with the DDL community. No responses were received from the Archdioceses of Birmingham, Southwark or Westminster or the Diocese of Leeds raising any concerns. The RLSS were approached for information on their contacts with the DDL and reported frequent, appropriate and willing engagement from them, and with them.

3. Audit grading

3.1 Practice was assessed against the eight national safeguarding standards adopted by the Catholic Church in England and Wales⁴ and graded in accordance with the CSSA Maturity Matrix for Level 3 Religious Life Groups⁵.

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

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

⁴ Full details of the eight standards and underpinning sub standards are available here [The Eight National Safeguarding Standards](#)

⁵ [APPENDIX-5-LEVEL-3-MATURITY-MATRIX-February-2025.docx](#)

Standard 7 – Training and support for safeguarding	Early 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 DDL became members of the RLSS in October 2025 and used this as a platform to review and develop their safeguarding policies and procedures. To this end the DDL has an updated safeguarding policy for the region that acknowledges a zero-tolerance approach to abuse of any kind. This policy and a statement by the DDL that clearly defines their approach to safeguarding are available to all on the DDL website in the 'safeguarding' subcategory⁶. The update of this safeguarding policy was accompanied by the renewal and development of other safeguarding policies including a low-level concern policy, a whistleblowing policy, a complaints policy, a safer recruitment policy and a visitors' policy which are also available on the website. These refreshed documents combined with existing policies on anti-bullying, data protection, disciplinary policy, retreat policy and the DDL code of conduct provide the sisters with the information and guidance they require to ensure positive and proactive safeguarding practice, and to manage concerns if they arise. All documents are in line with the expected standards for safeguarding policies and are a combination of policies devised using RLSS templates and self-written policies.

⁶ [Safeguarding – Daughters of Divine Love, English Region](#)

4.1.2 The DDL has no direct experience of contact with survivors of abuse within the Catholic Church and is therefore currently limited to ensuring that reporting a concern to the DDL is as accessible and as easy as possible, by way of engagement. The DDL website has contact details of the DSL and her deputy as well as those for the RLSS and two national helplines, Childline⁷ and the NSPCC⁸. The site would benefit from having the additional contact details for victim support services such as Safe Spaces⁹ (posters advertising their services were however seen in community buildings). The DDL also use the experience of their lay safeguarding advisor to help them understand the voice of the survivor when developing and implementing their safeguarding practice. There was an acknowledgement by the DSL and the safeguarding committee that this was an area that required further development.

4.1.3 The DDL leadership in Nigeria has not formally committed to a statement on safeguarding for the worldwide congregation but do require all sisters to sign a document committing to good safeguarding practice. The DDL region in England and Wales has recognised however, the importance and need to publicly state its commitment to safeguarding to meet the requirements of the eight national safeguarding standards. This commitment is seen in a statement on their website and through posters and information seen in buildings belonging to the community. The safeguarding committee oversee a safeguarding communications plan which includes the review and development of the messaging that supports this statement.

4.1.4 Membership of the RLSS and the subsequent review and development of the DDL safeguarding practices in England and Wales have contributed to an increased awareness amongst the sisters of the principles of safeguarding and how these are embedded in their day-to-day life and work. There is a commitment

⁷ [Childline | Free counselling service for kids and young people | Childline](#)

⁸ The National Society for the Prevention of Cruelty to Children (NSPCC) is a UK children's charity who have worked to stop child abuse for over 140 years. [NSPCC | The UK children's charity | NSPCC](#)

⁹ Safe Spaces England and Wales is a free and independent support service providing a confidential, personal and safe space for anyone who has been abused by someone in the Church or as a result of their relationship with the Church of England, the Catholic Church in England and Wales or the Church of Wales [Home - Safe Spaces England and Wales](#)

by the Regional Superior and the safeguarding committee to ensure that a proactive and positive safeguarding culture is embedded in the DDL in England and Wales, and the evidence seen at audit showed that this process is well underway. Attendance at training and positive and widespread engagement in the preparation for this audit from all members of the community has shown a renewed interest in ensuring that safeguarding practice is of a high standard. It is important going forward that the impact of the work completed to date is evaluated to ensure that those driving the agenda have been successful in embedding an ongoing culture of safeguarding.

4.1.5 The Regional Superior has a Regional Council that support her to discharge her responsibilities and provide representation for the communities living in the three zones of England and Wales. There are currently five members of the Regional Council: the Regional Superior, the Regional Vicar, the Regional Secretary and two Regional Councillors. The governance arrangements for the DDL are established with the Regional Council meeting every two months. Evidence from meeting minutes show that safeguarding is a standing agenda item for these meetings with initially one Regional Councillor holding specific responsibility for safeguarding. The notification of audit from the CSSA and subsequent membership of RLSS resulted in the Regional Council reviewing their safeguarding governance arrangements. This review has led to the naming of all Regional Councillors as Safeguarding Trustees, meaning that they all now hold joint responsibility for safeguarding. In order to be able to fulfil this role, all Regional Councillors will be attending Trustee training with the RLSS in February 2026. There are currently two trustees listed on the Charity Commission¹⁰ website, the Regional Superior and one other Sister. The DDL do not hold formal Trustee meetings, but the two trustees collaborate to ensure they fulfil their expected duties. At interview, the Regional Superior recognised that there was little resilience in the system and will be looking to increase the number of charitable trustees in the near future and hold formal Trustee meetings. The DDL should ensure that decisions reserved to trustees take place in Trustee Board

¹⁰ The Charity Commission for England and Wales register and regulate charities in England and Wales
[The Charity Commission – GOV.UK](https://www.gov.uk/the-charity-commission)

meetings and that they meet at least twice a year, as recommended by the Charity Commission. The two charitable trustees will also be attending the RLSS Trustee training in February.

4.1.6 The review and restructure of the governance arrangements for safeguarding included the development and implementation of a safeguarding committee. This committee has been in place since October 2025 and has met frequently as the DDL has been updating their policies and procedures and preparing for the CSSA audit. Going forward, the safeguarding committee will meet quarterly and in addition will hold extraordinary meetings if required. The safeguarding committee has terms of reference, and in addition each member of the committee holds individual responsibility for a specific element including safer recruitment, data protection and training. The committee is chaired by the DSL and membership includes the lay safeguarding advisor. Minutes from these meetings were seen and demonstrated oversight of key areas including safer recruitment, training, policy development, risk and the progress and implementation of the safeguarding development and communications plans. Reports from these meetings were shared at the Regional Council meetings providing oversight for the Safeguarding Trustees.

4.1.7 The DDL has an organisational risk register that includes safeguarding risks. The responsibility for the management of the risk register sits with the Regional Superior and there is evidence that risk is managed and mitigated. The safeguarding committee report safeguarding risk to the Regional Council and there was evidence that risk had been discussed in the meeting minutes of both groups. One of the risks identified was regarding the safer recruitment of volunteers and them holding Disclosure and Barring Service (DBS)¹¹ certificates for their work with the DDL. Previously, volunteers have brought DBS certificates from other roles when registering with the DDL. Membership of RLSS had highlighted to the group that this

¹¹ The Disclosure and Barring Service processes and issues criminal record checks for employers on individuals applying for employment or a voluntary role in England, Wales, the Channel Islands and the Isle of Man [DBS Update Service – GOV.UK](https://www.gov.uk/government/organisations/disclosure-and-barring-service)

was insufficient and mitigations have been put in place whilst additional DBS checks are completed for DDL on volunteers by the RLSS.

4.1.8 The DDL are active members of the Conference of Religious and have adopted the *Integrity in Ministry*¹² standards on safeguarding practice. These are actively promoted within the DDL and there was evidence that these had been shared and signed for by the sisters. The DDL in the England and Wales region has not had any safeguarding cases since their arrival in 1989 at the invitation of the then Archbishop of Southwark. There is a recognition in the policies and procedures that, should there be a safeguarding concern, lessons from it should be learned as part of the process of managing the concern.

4.1.9 The DDL has adopted a policy of openness and transparency in their safeguarding practice. Policies are available for public scrutiny on the website and have been widely shared within the communities in England and Wales. The DDL has also employed a lay safeguarding advisor to provide them with additional expertise in the development and communication of safeguarding messages. The DDL has appointed one of the safeguarding committee members as a data protection officer who holds responsibility for the management and sharing of information and who is trained in data protection and has a data protection policy. The DPO works closely with the lay safeguarding advisor who is also a member of the safeguarding committee.

4.1.10 The DDL has actively engaged with the CSSA during the audit process and are aware of their need to seek advice from external organisations as part of their ongoing work to establish and embed good safeguarding practice. There is evidence that they are proactive in engaging with external providers including the RLSS and this should be continued as they move forward as their involvement with RLSS is relatively recent.

¹² Integrity in Ministry is a code of conduct for Religious engaged in ministry in the Catholic Church in England and Wales

Areas for development

4.1.11 The DDL has recently reviewed and renewed their safeguarding policies and procedures. These have been widely shared, and it is important that the impact of these is evaluated in terms of the sisters' knowledge and understanding of their roles and responsibilities for safeguarding. The CSSA recommend that an evaluation and feedback exercise is conducted to ensure that these documents have been understood and are being implemented in practice.

4.1.12 The DDL should develop Key Performance Indicators¹³ (KPI's) to provide data that can be scrutinised by the safeguarding committee and reported on to the Regional Council. Data could include safer recruitment statistics such as DBS currency and training compliance statistics. Other KPI's could be developed from the safeguarding development plan.

Graded: Firm Progress

4.2 Standard 2 Communicating the Church's safeguarding message

Strengths

4.2.1 The DDL has developed a communication plan that sets out the actions required to implement its strategy for ensuring that safeguarding communications are shared widely and are current. The communication plan has been reviewed during the preparation period for the audit by the safeguarding committee members. This now needs to be formally added to the quarterly safeguarding committee meeting agenda so that members can scrutinise the progress against longer-term goals and report to the Regional Council.

¹³ Key Performance Indicator definition from the Oxford English Dictionary: A [quantifiable](#) measure used to evaluate the success of an organization, employee, etc. in meeting objectives for performance.

4.2.2 The DDL has established links and good working relationships with the RLSS and the Conference for Religious, attending events and seeking advice and information to support their safeguarding practice. The DDL has also developed positive links with those dioceses where they have sisters actively working and have engaged with the diocesan policies, processes and training.

4.2.3 The safeguarding communication plan is relatively new and has been developed using the expertise of the lay safeguarding advisor, RLSS and the DSL. To date there has not been any direct involvement of any volunteers in shaping the communications that are created and safeguarding messages are standardised messages on the principles of good safeguarding practice. These messages are yet to be evaluated for their effectiveness. Communications seen included the safeguarding statement, contact details for safeguarding support both from the DDL and RLSS and posters advertising adult victim support from Safe Spaces. These communications have been shared in all convents in England and Wales and apart from the details for Safe Spaces, on the DDL website.

Areas for development

4.2.4 The communication plan is in place, and some progress has been made on delivering the strategy. The DDL need to ensure that further progress on the plan is formally monitored and reviewed by the safeguarding committee as they move forward post audit. They should consider the development of KPIs that can be used to ensure targets are met and also look at ways that the effectiveness of their messaging is evaluated for effectiveness, appropriateness and impact.

4.2.5 Consideration should be given to the inclusion of relevant stakeholders including the volunteers that work with the DDL in the creation of communication resources to ensure that they reflect their needs. Again, evaluation of communications used will help identify gaps and facilitate this development.

Graded: Firm Progress

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

Strengths

4.3.1 The DDL has policies and procedures in place for the sisters should they receive a disclosure that include the requirement to contact the DSL and the RLSS. The sisters spoken to all reported that they would inform the DSL and in addition contact the RLSS for expert advice on the next steps to take, and to seek the provision of specialised help and advice for the survivor. There is a recognition that, although the DDL has not received any allegations against their own members, they might be likely to receive disclosures of harm from survivors of all forms of abuse including church abuse in their voluntary activities and pastoral work. In addition to being aware of internal processes, those sisters working in external organisations have been trained how to engage with a survivor in the event of a disclosure, and all reported being confident to do so.

4.3.2 The DDL has access to the specialised services of RLSS and have also built good working relationships with the dioceses in which they work. In addition, they have engaged with Safe Spaces as a source of advice and support for survivors of church abuse. There is an understanding of the role of statutory services and details of these and how and when to contact them is on the DDL website as well as in internal communications. The DDL has contracted the RLSS to provide signposting to professional services such as counselling for survivors of abuse and would be supportive if this was required. The DDL has not had any experience of managing a disclosure of harm and therefore have not been able to test their policies and procedures to evaluate their effectiveness.

Areas for development

4.3.3 Consideration should be made as to how to learn from the experiences of others who have experienced disclosures from survivors of abuse. This could be achieved through attendance at safeguarding events or by networking with other RLGs. The safeguarding committee could consider the use of case scenarios that might allow the sisters to implement the policies and procedures and evaluate their

effectiveness. Additional training for sisters should be considered if gaps in knowledge and skills are identified.

Graded: Early Progress

4.4 Standard 4 Effective management of allegations and concerns

Strengths

4.4.1 The DDL has a clear policy and process for reporting and managing allegations and concerns. In addition, the DDL has developed flowcharts from the CSSA templates for those members working in dioceses, with the process to be followed and contact details of the diocesan safeguarding teams as well as the DDL safeguarding contacts, both local and national. For those sisters working in external organisations all reported feeling that their local policies for reporting concerns were robust and well supported by named safeguarding leads and safeguarding teams.

4.4.2 The DDL policy has been recently updated and includes all the actions that need to be taken following an allegation including the recording of any information shared together with guidelines on how, when and to whom this information can be reported. In addition, the policy recognises the difficulties faced and the courage required of those who are disclosing harm or making an allegation and offers guidance on how to sensitively engage with and listen to people in this position. It acknowledges the need to be honest about the requirement to share information or make reports to statutory authorities and recommends that sisters seek advice from the DSL or the RLSS if they need support to do this.

4.4.3 The DDL has a data protection officer (DPO) and data privacy notice, which has recommendations for information sharing and the storage of records, and is in line

with General Data Protection Regulations (GDPR)¹⁴. The privacy notice contains the contact details of the DPO and for the Information Commissioners Office¹⁵. The DPO has attended specialised training to enable her to fulfil this role. The safeguarding policy details what information should be recorded and provides guidance on ensuring that sisters do not overstep and attempt to elicit information that could compromise a statutory investigation later. At the time of audit, none of the sisters spoken to had received or had to manage any allegations of abuse, therefore although the guidance is robust and meets the required standard it has not been tested in practice. Once it has been there will be scope to evaluate and review its effectiveness.

4.4.4 Current DDL policy for the management of allegations includes the need to pass information to statutory authorities for further investigation as per the ‘One Church’¹⁶ approach adopted by the Catholic Church in England and Wales that provides for a consistent approach to safeguarding across the Church following the Independent Inquiry into Child Sexual Abuse (2022). Sisters, the DDL Regional Council members and trustees were all aware of their responsibility to ensure that the statutory authorities were informed without delay should they receive an allegation of abuse. The governance structure for the DDL and terms of reference for the safeguarding committee demonstrated a process for ensuring that allegations were shared with the Regional Councillors and that they would have oversight of the management and outcomes of these. The policy also included a clear reporting structure to the RLSS who would, in the event of an allegation, complete any investigation and support the DDL and trustees to make the necessary referrals and notifications to the Charity Commission and CSSA.

¹⁴ General Data Protection Regulations are the data privacy laws in the United Kingdom that have been in place since May 2018. [Data protection: The UK's data protection legislation - GOV.UK](#)

¹⁵ The Information Commissioners Office provide practical information for the public about their data protection and information rights as well as guidance and resources for public bodies, private and third sector organisations and sole traders [Information Commissioner's Office](#)

¹⁶ [K.3: Embedding a culture of safeguarding and the ‘One Church’ approach | IICSA Independent Inquiry into Child Sexual Abuse](#)

4.4.5 In addition to the management of allegations policy the DDL has developed and implemented a low-level concerns policy. This allows them to proactively manage concerns that might not reach threshold for statutory service involvement but need to be managed to prevent escalation or need to be considered as learning points for preventative safeguarding work. The DDL hold a log for low-level concerns and have a process in place to seek advice and support from the RLSS in their management. At time of audit, no low-level concerns were logged.

Areas for development

4.4.6 The DDL has not had any experience in using the systems put in place so have been unable to evaluate their effectiveness in practice. Although the sisters reported being aware of the procedures to follow, they have not worked through them to identify any issues. Consideration should be given to developing a training exercise using scenarios that would enable the sisters to practice and identify any areas of concern as well as prepare them to use them in real time.

4.4.7 The DDL has enlisted the support of the RLSS to support them in the investigation and referral of safeguarding allegations to the Charity Commission and CSSA. This process, although in place was not demonstrably understood by the Regional Superior or Regional Councillors at time of audit. The RLSS trustee training to be undertaken in February 2026 will address this gap in knowledge and it is important that all of those involved in this process are clear on the processes and rationale involved in these circumstances. In addition, there needs to be a greater understanding of the role of Canon Law in the management of allegations.

Graded: Firm Progress

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

Strengths

4.5.1 The DDL has procedures in place to manage and support respondents to allegations and concerns. They have access to the expertise of the RLSS in providing guidance and signposting for the respondent to additional support resources for personal wellbeing. In addition, the DDL have the capacity to provide spiritual support for respondents as well as alternative accommodation and financial provision should this be required or requested. Although there was an awareness of the need to provide Canon Law support it was unclear from whom this would be sought or how easy access to this would be for sisters.

4.5.2 The RLSS would be responsible for any investigation into an allegation made against a member of the DDL. This would include the provision of a risk assessment and safeguarding plan should this be required. The DDL process is that the sister would be spoken to firstly by the DSL to establish the history of the allegation and based on this the situation would be either managed within the DDL if the concern is of low-level or a conduct issue, or referred to the RLSS if it constituted a substantive allegation. The sister would be offered peer support within the DDL throughout any investigations or processes. The DDL have a code of conduct and disciplinary policy in place to manage conduct issues. The Regional Superior would take the lead on this with the support of the Mother General if required. The DDL position on confidentiality is defined in the DDL Data Protection Policy and Data Privacy Notice and there is a recognition for the need for confidentiality agreements. At time of audit a template for a confidentiality agreement was not available and this should be rectified.

4.5.3 Despite the DDL having not had any allegations made against any sisters, the sisters spoken to in the focus group recognised that this was a risk and spoke of how they would provide peer support to any member of the community in this situation. They were aware of the pastoral support available to them and felt confident that they would be cared for should they themselves be the subject of an

allegation. None of the sisters demonstrated awareness of the legal implications, canonical or civil, that might ensue and this should be raised with them during future safeguarding discussions. At the time of audit none of the DDL sisters were trained in the support of those who were the subject of an allegation, and this should be considered moving forward.

Areas for development

4.5.4 The DDL need to ensure that they have robust arrangements in place for accessing both civil and Canon Law support in the event of an allegation being made against a sister. Details should be included in the policy documents and should be readily available to sisters. Consideration needs to be given to how they might financially support a sister to access civil law support should this be required.

4.5.5 The DDL need to ensure that all documentation templates are available to support the processes within the policy, including the provision of a confidentiality agreement should this be required. The provision of training for a cohort of sisters who would be able to support subjects of an allegation should be considered to strengthen the DDL provision in this area.

Graded: Firm Progress

4.6 Standard 6 Robust human resource management

Strengths

4.6.1 The DDL has a robust safer recruitment policy that includes all the elements required to ensure that those who are employed by or volunteer for the DDL can do so only after a clearly defined process has been followed. This process includes performing checks for suitability, reference checks and DBS checks. In addition, the DDL has a roles and responsibilities document that sets out the expectations of all in terms of safeguarding whatever role they have and includes specific requirements for those in positions of authority and responsibility. The DDL has one employee and there is a job description for that role as well as evidence that shows

the safer recruitment process was followed. Volunteers also follow the safer recruitment processes although at time of audit, the volunteers within the DDL London based charity work all held a DBS as part of their paid employment within other organisations rather than a DBS through DDL for their volunteer roles. RLSS is currently processing the checks of these volunteers so they will all hold the correct DBS specific to this volunteer role with the DDL.

4.6.2 Most of the DDL sisters hold a DBS as part of their work in the secular world, for example as NHS employees, carers and teachers. Work is currently underway through the RLSS to review the DBS status of these sisters to determine if additional DBS is required to fulfil their religious community duties as well. The sisters working in parishes hold DBS certificates from the individual dioceses. The DDL has a nominated sister on the safeguarding committee who has oversight of the safer recruitment process including the DBS checks and she holds a DBS register for all the sisters, employee and volunteers on a secure database. The register showed that all sisters, their employee and most volunteers are up to date with their DBS checks. The few outstanding DBS checks for volunteers are in progress and are being managed by the RLSS.

4.6.3 Recruitment to the England and Wales region begins in Nigeria. Sisters are selected by the Mother General and are sent on their missions by her with a letter of suitability. Prior to joining the sisters in England and Wales, a police check is completed from the country-of-residence of the sister, and a DBS check will also be completed once they have arrived in England. Sisters who arrive in England and Wales are supported by the Formation Sister and go through a period of induction and training, which includes safeguarding training, prior to being allowed to begin their ministry. During induction, the sisters stay with the Formation Sister for a month where they are culturally inducted. To support this process the DDL have created an induction booklet that shares British history and the nuances of British culture. This document is considered by the analyst to represent notable practice.

4.6.4 In addition to the constitutions and handbooks, the DDL has a code of conduct that all sisters are required to adhere to. Should there be any issues with conduct, there is a disciplinary policy in place that sets out any actions that might be

required. If a situation arose where a new sister in her induction period was found not to be suitable, a process is in place to return her to her previous home country. In such a situation, the Regional Superior would write to the Mother General who would take the required action to relocate the sister. The DDL accept visitors from overseas on occasion who come with letters of introduction. These sisters do not participate in any active work whilst they are in the country so do not require any additional checks. The DDL do not welcome priests into their communities and attend mass in local churches.

4.6.5 The DDL has a complaints policy and a whistleblowing policy. Both are readily available on the DDL website, and electronic copies have been shared with all sisters. At the time of audit neither policy had been used in the past 12 months. The sisters meet twice a year as a full congregation, and the discussions were reported by all those spoken to as honest with issues discussed in open forum and resolutions sought by the whole community. All sisters spoken to were confident that they could raise any issues with their local Regional Councilor and the Regional Superior if that were required. The Regional Superior has an open-door policy and was considered by those spoken to as approachable and always willing to listen.

Areas for development

4.6.6 Prior to this audit the DDL had not secured separate DBS checks for volunteers and now recognises that this is required. The ongoing process to review and rectify this situation should continue and this requirement needs to be clear to those who volunteer in the future.

4.6.7 The DDL has appointed a sister to oversee all safer recruitment processes and, as part of this role, consideration needs to be given as to how and when the safer recruitment processes are reviewed and evaluated to ensure that they are effective. There is the requirement for Trustee oversight of safer recruitment processes and the DDL should consider developing KPIs to enable this.

Graded: Firm Progress

4.7 Standard 7 Training and support for safeguarding

Strengths

4.7.1 The DDL safeguarding policy outlines the training requirements and expectations for the sisters. All sisters must undertake the basic safeguarding training provided by the RLSS in addition to any safeguarding training they may complete as part of their secular roles and roles within dioceses. At the time of audit, most sisters had completed the RLSS basic training and those for whom this was outstanding were booked for sessions in February and March 2026. There was some evidence in the focus group of a lack of awareness of some safeguarding principles in those sisters who had not yet completed training, with some confusing health and safety issues with safeguarding ones. Once basic training has been completed for all sisters, it would be advisable to evaluate their knowledge and expertise to ensure they have clarity in this area.

4.7.2 There is a recognition that additional training is required for sisters with special responsibilities including the DSL, her deputy, Trustees, safeguarding trustees, the DPO and the sister responsible for safer recruitment. These training requirements have been identified and action has been taken to ensure that additional training is booked for these sisters. At the focus group it was highlighted by one sister that there was a gap in understanding about some of the safeguarding legislation, particularly in relation to adult safeguarding as much of the training they had undertaken so far had focused on child safeguarding. A survey of sisters' needs would support the development of a formal training needs analysis together with advice from the RLSS.

4.7.3 The Regional Superior and Regional Council demonstrated an awareness of the need for and the value of safeguarding training for all sisters. They showed a commitment to ensuring that all sisters had access to and completed the mandatory elements of training documented in the safeguarding policy document. The DSL records attendance at training on a register and reports compliance to the Regional Council. At present there is an expectation that sisters will complete basic safeguarding training every three years. The lay safeguarding

advisor has proposed that an annual refresher training is introduced for all sisters in addition to this to ensure that all sisters are up to date in their practice.

4.7.4 All vocational training takes place in Nigeria. Women wishing to join the DDL undertake a period of Aspirancy, followed by Postulancy or pre-Novitiate period and finally as part of this initial phase a Novitiate period. Those who are deemed suitable and wish to continue their formation will then enter a period of Temporary Profession which lasts a minimum of six years before the Final Profession of vows can take place. Ongoing formation is in place for all sisters and takes the form of lectures, seminars and study weeks. Sisters meet with their spiritual directors regularly and have access to the Regional Superior if they need to speak with her about any issues or concerns.

Areas for Development

4.7.5 The development of a formal training needs analysis is recommended to ensure that consideration has been given to the levels of training required for specialised roles and for all sisters. A survey of knowledge and skills should be conducted to ensure that any gaps are identified and addressed. The DDL should consider the recommendation of the lay safeguarding advisor to introduce annual refresher safeguarding training into their schedule to maintain knowledge and skills and to provide the opportunity for sisters to reflect on safeguarding practice.

4.7.6 There is not currently any consequence for not attending training as all sisters are engaging with training in a positive manner. Consideration should be given to what actions might be required if compliance becomes an issue.

4.7.7 Formal evaluation of the effectiveness of training should be completed once all sisters have completed basic training and those sisters who have a need for additional training have completed this. This will identify whether additional training is required from other external providers as currently training is sourced from only one provider which may limit the options for the sisters.

Graded: Early Progress

4.8 Standard 8 Quality Assurance and Continuous Improvement

Strengths

4.8.1 The DDL has created a safeguarding development plan that they will use to track their progress against the eight national safeguarding standards. Although the DDL were aware of the eight national safeguarding standards and had some policies and procedures in place their recent membership of RLSS and the pre-audit review of their circumstances have found areas for development which are now reflected in the safeguarding development plan. The plan is supported by a tracker that is enabling the DDL to monitor progress of which a great deal has been made in renewing, refining and developing policies and procedures. This work has resulted in the DDL now having a comprehensive suite of policies that will support the delivery of the eight national safeguarding standards. The next step will be to ensure that these policies are embedded in practice and understood by all the sisters in England and Wales.

4.8.2 The recent review of safeguarding governance and the introduction of a safeguarding committee has provided a reporting structure for the trustees and Regional Council to receive safeguarding updates and assurance on compliance with the eight national standards. This new structure needs to be evaluated after it has been in place for a period of time to ensure that the processes are working as intended and that any gaps in assurance processes are identified and addressed. Minutes from the meetings of both the safeguarding committee and Regional Council show that safeguarding is discussed and progress against the standards scrutinised. There is an awareness that an annual report on safeguarding should be created to bring together the progress and challenges faced in safeguarding in one document and development of this is pending.

4.8.3 The DDL has entered a contract with CSSA for independent audits of their safeguarding practice and this report represents the findings of the baseline audit. The Regional Superior, Regional Councillors and DSL have all engaged positively with the CSSA in facilitating this audit and have stated their keenness to reflect on and action any recommendations from the audit. The DDL demonstrate a good level of self-awareness of the areas for development and additional

recommendations will be added to the safeguarding development plan. The DDL have the support of the RLSS to action recommendations to improve practice.

Areas for Development

4.8.2 The DDL need to develop an audit programme of policies and procedures to ensure that these have been embedded in practice and that there is compliance with them. The DDL would also benefit from reviewing the new governance structures to ensure that they are working as intended and that any gaps in assurance are identified and addressed.

4.8.3 The DDL are in the fortunate position of not having had any allegations or concerns raised against them. They also have limited experience working with survivors of church harm. To this end consideration needs to be given as to how they include the voices of survivors in their work to improve safeguarding practice going forward. Attendance at events and engagement with other RLGs with more experience could provide an opportunity to do so.

4.8.4 The reporting processes of the DDL through their newly enhanced governance structure are in their infancy and need to be reviewed and evaluated periodically for effectiveness. Development of an annual safeguarding report for trustees that could be shared on the DDL website would enhance this and would support their commitment to being open and transparent in their safeguarding practice.

Graded: Early Progress

5. Summary of overall findings

5.1 The Daughters of Divine Love has demonstrated at this audit their commitment to ensuring that their safeguarding practice meets the requirements of the eight national safeguarding standards. The notification of audit was a catalyst for the DDL to reflect and review their current safeguarding practice and led to several positive actions including engaging with and becoming members of the RLSS and the employment of a lay safeguarding advisor to help them with updating and strengthening their existing safeguarding practice. Throughout the audit process

the DDL has proactively and positively engaged with the CSSA to understand the requirements of the eight national standards in more detail and to identify further areas for development. Members have used the audit process to drive their safeguarding agenda forward through the creation of a new suite of updated policies and procedures that must now have time to be embedded in practice and evaluated. The culture of safeguarding is open and transparent, and all the sisters spoken to as part of the order had a shared determination to ensure that their safeguarding practice is of the highest standard.

5.2 The focus for the DDL is now to develop an audit programme of policies and procedures to ensure that these have been embedded in practice and that there is compliance with them. The DDL would also benefit from reviewing the new governance structures to ensure that they are working as intended and that any gaps in assurance are identified and addressed. Finally, there is a need to consider how they might engage with and learn from the experiences of those who have been harmed by the Church as this would add an important perspective to the work they are currently doing to improve their safeguarding practice.

6. Recommendations

To support improvement, the following recommendations are made:

Within 3 months

- The DDL should confirm that all sisters have undertaken basic safeguarding training in line with policy requirements and that all training completed is evaluated for effectiveness.
- DBS checks for all volunteers without DDL specific DBS checks should be completed in line with safer recruitment policy.
- The DDL should ensure that all sisters have current DBS checks that reflect their ministry.

- The DDL should review governance arrangements to ensure that formal Board of Trustees meetings are held in accordance with Charity Commission expectations and that trustees exercise expected oversight.

Within 6 months

- The DDL should develop strategies for evaluating the effectiveness of the new policy suite developed in the past six months with the view to auditing them to ensure they are having the intended impact.
- The DDL should develop Key Performance Indicators (KPI's) to provide data that can be scrutinised by the safeguarding committee and reported on to the Regional Council.
- The DDL should where possible include relevant stakeholders (volunteers and victim/survivors) in the creation of communication resources to ensure that they reflect their needs.

Within 12 months

- The safeguarding committee should consider the development of an annual safeguarding report to be shared with the Regional Council and trustees.
- The DDL should ensure that they have robust arrangements in place for accessing both civil and Canon Law support in the event of an allegation being made against a sister.
- The DDL should develop a formal training needs analysis to ensure that consideration has been given to the levels of training required for specialised roles and for all sisters going forward.

7. Arrangements for follow-up

7.1 In line with an overall rating of Firm Progress, the earliest potential date of re-audit 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 will be required.