Catholic Safeguarding Standards Agency

Congregation of the Franciscan Sisters of the Heart of Jesus (London)

Baseline Audit Report

May 2026

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1. Introduction

1.1 This is the baseline audit of the safeguarding arrangements of the London community of the Congregation of the Franciscan Sisters of the Heart of Jesus (referred to hereafter as 'the Congregation'). The Congregation is a Religious Institute of apostolic life and pontifical right, aggregated to the Order of the Friars Minor, and was the first female Congregation founded in the Maltese Islands. The Province of Malta *Our Lady of the Sacred Heart of Jesus* was founded on the 22nd of June 2001, when the Congregation was divided into Provinces and Regions. It is made up of 12 communities in Malta, four in Gozo, and one in London[1]. This baseline audit considers the safeguarding arrangements and practice of the community in London. At present there are five sisters living in the convent in London. The convent is part of a larger building that is run as a hostel providing accommodation for Maltese patients and their relatives who are sent to London by the Maltese government for medical treatment[2]. In addition, rooms are offered to tourists of all faiths and none who are visiting London from all over the world. The hostel has 20 rooms of which no fewer than nine are contractually reserved by the Maltese government for adult patients. The remaining rooms can be used for tourists or for more patients dependent on need. The hostel has a maximum capacity of 50, however the number of patients and visitors rarely exceeds 20 persons at any one time. The sisters do not have any external apostolate, and their duties are reserved to hosting the patients and guests. They accept individuals, couples and families but no unaccompanied minors into the hostel.

1.2 The building housing the hostel and convent is built over six floors. There are stairs between all floors as well as a lift. The building has had health and safety checks in line with the legislative requirements of the Health and Safety Executive[3] and safety notices are seen throughout the building including fire escape notices and evacuation plans. The convent is attached to the main building and occupies a

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[1] The history of the Congregation is taken from https://fcjmalta.com/our-province/

[2] About Us | Fcj Hostel London

[3] HSE: Information about health and safety at work

private space to the rear. Access to the convent is restricted to the sisters only and all doors to the convent are locked providing privacy and security for the sisters. The local Superior leads the sisters and has an office on the ground floor from where she co-ordinates the running of the hostel. All the sisters living in the convent are fully active so there is no requirement for adaptations to accommodate any additional needs. Visiting patients are provided with accommodation, and all their meals. Relatives and tourists are provided with bed and breakfast only. All patients and guests must be fully mobile and able to self-care as no nursing or care provision is available or provided by the sisters. Rooms are currently not en-suite, and guests and patients share bathrooms. Funding has been secured from the Maltese government to improve the accommodation for patients, and a schedule of work is planned that will reduce the number of overall rooms in the building but add bathrooms in those that are used by patients. All areas of the building seen were well maintained and clean. The sisters have four lay employees that assist with the cleaning of the house and the preparation of meals.

1.3 The CSSA assess Religious Life Groups against a categorisation scheme based on the safeguarding risk that is likely to be associated with their activities and size, from Level 1, a small community with minimal outreach and no known safeguarding concerns, with a further distinction drawn between Apostolic and Enclosed Orders, Level 2, a medium sized community with some outreach with vulnerable populations and/or providing some Diocesan activities such as Parish Priests and 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 Congregation of the Franciscan Sisters of the Heart of Jesus (London) was categorised as Level 1 Apostolic for the purpose of this audit.

1.4 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 eight national safeguarding standards[4] in such a way that reflects their uniqueness.

2. Methodology

2.1 The CSSA notified the Congregation of the Franciscan Sisters of the Heart of Jesus of its intention to audit on 7 March 2025. An information request was made the same day that included the provision of a self-assessment document with an agreed completion date of 5 May 2025. Following email correspondence, a date for the audit of 7 August 2025 was agreed. A further email confirming the arrangements was sent by the CSSA analyst to the safeguarding lead on 31 July 2025.

2.2 In advance of the audit week the Congregation was asked to submit a self-assessment tool providing information and supporting evidence on their compliance with the eight national safeguarding standards and their progress in the implementation of them. The self-assessment was submitted by the Provincial Lead in Malta.

2.3 Information provided within the self-assessment and the evidence provided at audit were analysed by the CSSA using the bespoke Level 1 Apostolic Maturity Matrix[5] to arrive at ratings for each standard and a combined overall grade. No new allegations or concerns have been reported to, or about, the sisters within the previous 12 months therefore it was not possible to examine casework during this audit or assess some aspects of direct safeguarding practices.

2.4 An interview was held with the superior for the community on 7 August 2025. Due to language difficulties, it was not possible to speak with the other members of the

[4] The eight standards lay out what CSSA expects in terms of level of safeguarding practice in church bodies (that is, dioceses and religious life groups) A description and full details of the Standards can be found on the CSSA website here

[5] APPENDIX-5-LEVEL-1-APOSTOLIC-MATURITY-MATRIX-February-2025.docx

community at audit. Email correspondence was sent to the Provincial safeguarding team in Malta for further information and clarity, but this did not elicit a response.

3. Audit grading

3.1 Practice was assessed against the eight national safeguarding standards adopted by the Catholic Church in England and Wales and graded in accordance with the CSSA Maturity Matrix for Level 1 Apostolic Religious Life Groups.

3.2 Potential audit ratings against each standard, and the final overall ratings, are: Met, Met with recommendations and Not met.

3.3 The grading for the Congregation of the Franciscan Sisters of the Heart of Jesus community in London reflects the fact that, although the Order has robust safeguarding arrangements, documentation and oversight in Malta, these had not been implemented within the London community at the time of the audit. As the grading reflects the safeguarding arrangements in place on the day of the audit, the community received a low grade, with the Congregation not meeting the basic safeguarding requirements for England and Wales in a number of areas. The sisters explained that the arrangements operating in Malta were intended to be introduced in the London community within a few months of the audit. A re-audit will therefore confirm whether these arrangements have been implemented and embedded in practice.

Overall grading	Not met
Standard 1 - Safeguarding is embedded in the Church body's leadership, governance, ministry and culture	Not met
Standard 2 - Communicating the Church's safeguarding message	Not met

Standard 3 - Engaging with and caring for those who report having been harmed	Met with recommendations
Standard 4 - Effective management of allegations and concerns	Not met
Standard 5 - Management and support of subjects of allegations and concerns (respondents)	Not met
Standard 6 - Robust human resource management	Not met
Standard 7 - Training and support for safeguarding	Not met
Standard 8 - Quality assurance and continuous improvement	Not met

4. Audit findings against each standard

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

Strengths

4.1.1 The Congregation did not have a safeguarding policy specific to England and Wales in place at the time of audit. The Congregational safeguarding policy is robust and well written and would meet the requirements of the eight national safeguarding standards but would need to have an appendix that included the roles and responsibilities, the reporting requirements and the actions to be taken should a safeguarding issue arise in the London community. The local Superior was not clear on any processes she might need to follow within England and Wales and had no knowledge or experience in safeguarding in this country to draw on. The local Superior was expected to take the role of Designated Safeguarding Lead following her training which was due to take place in Autumn 2025. This training is to be provided by the safeguarding team from Malta, and it was unclear whether it would include information on the statutory requirements in England and Wales.

4.1.2 All safeguarding governance is directed and managed from Malta. Information from these meetings is shared with the sisters via monthly community meetings. There are three Trustees who are responsible for the London charity. There was no evidence to show that they hold regular Trustees meetings in terms of minutes or agendas for this purpose. This means that compliance with the Charity Commission's recommendation that a minimum of two Trustee meetings should be held per annum[6] could not be demonstrated. None of the Trustees have completed any training to support them in this role and reporting to the Charity Commission is completed by the Congregation's accountant in London. The local Superior was unaware of any reporting responsibilities for safeguarding incidents to either the Charity Commission or the CSSA. The Congregation is not a member of RLSS[7]. There was no awareness of the Integrity in Ministry[8] principles or the eight national safeguarding standards for England and Wales.

Areas for development

4.1.3 The Congregation in Malta has a robust system in place that sets out the expectations for safeguarding practice across all the Provinces and Regions where they are active. At time of audit none of this work had been implemented in the community in London and there was a lack of understanding about safeguarding roles and responsibilities. There is considerable work to be completed in educating and informing the sisters in London of their roles and responsibilities regarding

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[6] This is the recommended minimum where the charity's governing document does not stipulate the expected frequency. https://www.gov.uk/government/publications/charities-and-meetings-cc48/charities-and-meetings

[7] The RLSS is a team of independent safeguarding professionals offering safeguarding services to the Religious of the Catholic Church in England and Wales Religious Life Safeguarding Service - Religious Safeguarding

[8] Integrity in Ministry is a code of conduct for Religious engaged in ministry in the Catholic Church in England and Wales Integrity in Ministry - Religious Life Safeguarding Service

safeguarding practice in England and Wales. The planned creation of a designated safeguarding lead role and providing appropriate training and ongoing support is essential to ensure that the Congregation meets the basic requirements of the eight national safeguarding standards.

4.1.4 The Congregational leadership in Malta needs to ensure that it understands fully its responsibilities regarding safeguarding in England and Wales. The self-assessment showed a lack of understanding that compliance was needed with the statutory regulations in England and Wales and this must be addressed. The Congregation should consider seeking advice from local safeguarding experts in England and Wales as to how they might adapt their policies and procedures to ensure that they meet the requirements of these countries. In addition, there needs to be consideration of the safeguarding risks that are associated with the running of the guest house for the sisters as well as the visitors. There should be a risk register that details the risks and the mitigations put in place and this should be reviewed regularly.

Graded: Not met

4.2 Standard 2 Communicating the Church's safeguarding message

Strengths

4.2.1 The community in London had a safeguarding poster on display throughout the public areas of the building. This poster gave the local Superior's details as the designated safeguarding lead, a role for which she was yet to receive training and be formally appointed. There were contact details for the safeguarding team in Malta included on the poster, but no additional information on statutory or local services in London. There was no information in the guest rooms or communal areas on safeguarding or any expectations on behaviours or boundaries. The Congregation has an online presence for both the international order and for the guest house in London. There is scope to add information on safeguarding to the website for the guest house.

4.2.2 The analyst was advised that safeguarding information is shared with the sisters at community meetings. There were no formal minutes for these meetings so this could not be evidenced.

Areas for development

4.2.3 The Congregation's leads in Malta have demonstrated through the evidence they sent with their self-assessment that there is a clear understanding of the need to communicate safeguarding messages and have a safeguarding statement and contact details on their safeguarding team and services. This needs to be shared and implemented in the community in London and at time of audit, plans were in place to do this in the Autumn of 2025. A re-audit would confirm whether this work has been completed and that in addition to understanding the key safeguarding messages from Malta, that the sisters based in London understand the key messages from safeguarding bodies in England and Wales.

4.2.4 The leadership of the Congregation should support the sisters in the London community to develop a behavioural code to safeguard all visitors and guests. This should include boundaries and expectations together with the details of services they should contact should they require support or help.

Graded: Not met

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

Strengths

4.3.1 The Congregation's work in Malta includes engaging with and supporting those who have been harmed by their interactions with the Church. This is achieved through the Victim Care and Advocacy Safeguarding Team who offer a high level of expertise and support to both victims and secondary victims. If anyone reported being harmed to the sisters in the community in London, they would be referred to this team and all the management of their complaint and their ongoing support needs would be provided in Malta. It is unclear what would happen if the victim was a guest or visitor from another country other than Malta, and how support would be managed in this instance. The leadership and safeguarding team in Malta have robust systems and processes in place to support victims throughout their contact with them and recognise that learning from this work should be shared and used to inform practice. There are suitably trained and skilled individuals within the team in Malta to complete this work.

Areas for development

4.3.2 At the time of audit, none of the sisters in the London community had received any training on how to respond to those who report having been harmed. The process they would follow would be to inform the safeguarding team in Malta who would then take the lead in the management of these issues. The sisters were not aware of any local resources they could use in these circumstances and including these in their upcoming training would provide them with more options for those who ask for support but are not yet ready to make a disclosure. An example of this would be knowing to signpost people to external resources such as Safe Spaces.[9]

Graded: Met with recommendations

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

4.4 Standard 4 Effective management of allegations and concerns

Strengths

4.4.1 There was no local safeguarding policy in place that set out the roles and responsibilities and processes for managing allegations and concerns raised in England and Wales. As with all current practice, the local Superior would refer the matter to the Congregational safeguarding team in Malta to manage. There was no understanding of the need to inform local statutory authorities in England and Wales. The sisters in the London community had not received safeguarding training on how to manage an allegation but would take notes and pass these on to the safeguarding team in Malta. Any records taken would be stored in the office in locked cabinets. The local Superior was able to articulate her responsibilities in terms of data protection in line with GDPR[10] and data protection legislation.

Areas for development

4.4.2 The main policy and processes in Malta are robust and of a high standard but there is a requirement for the current safeguarding policy to include guidance and set out clear expectations on roles and responsibilities, reporting requirements and actions to be taken that align with the statutory requirements in England and Wales for the order to be compliant with the eight national safeguarding standards. As a charitable organisation operating in England and Wales, they are legally accountable for their responses to safeguarding concerns. At present there is no safeguarding provision in place in England and Wales (such as RLSS) that would provide the sisters with the knowledge and ability to undertake investigations in this context.

Graded: Not met

[10] The General Data Protection Regulation is part of the UK's data privacy legislation that has been in effect since May 2018 [Data protection: The UK's data protection legislation - GOV.UK]

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

Strengths

4.5.1 As in Standard 3, the management and support of respondents would be managed entirely in Malta. The Congregational policy provides clear guidance and information on processes that would be put in place to manage and provide support for a sister who was the subject of an allegation. Should this sister be resident in one of the communities outside Malta they would be returned to Malta for the period of any investigation and for the determination of any next steps.

Areas for development

4.5.2 Other than understanding the need to refer any such incidences to the safeguarding team in Malta, there was little understanding of the processes that would be followed. This will be addressed during the safeguarding training planned for the Autumn of 2025. Understanding of this would be assessed at a future re-audit of the community in London.

4.5.3 There was no indication of what action would be taken should an individual not be able to return to Malta due to a statutory investigation or process and how this person would be managed and supported in England and Wales.

Graded: Not met

4.6 Standard 6 Robust human resource management

Strengths

4.6.1 The safer recruitment policy, although developed and ratified, had not been put into place at the time of audit. This policy sets out the requirement for all sisters and staff to undergo safer recruitment checks including interviews, references and safeguarding clearance checks in Malta. There are additional requirements for those entering formation who would require psychological assessments and testimonials of suitability. The policy does not consider the requirements for other countries, or how these might be met. The community in London does not currently have a safer recruitment policy in place and all staff recruitment had been completed by word of mouth. The local Superior in London reported the sisters as having current Disclosure and Barring Service (DBS)[11] certificates in place, however these were not seen by the analyst and it was not clear how they had been obtained. Advice should be sought as to whether the requirements of the sister's roles necessitate a DBS check. None of the staff had undergone DBS checks as this was not considered as necessary for their roles as domestics.

4.6.2 The Congregational safeguarding policy includes information on complaints which would be managed in Malta. There is currently no whistleblowing policy in place which is a requirement of the Charity Commission and an omission that needs to be addressed.

4.6.3 Ministry is provided for the sisters by two Maltese chaplains who live nearby. It was not clear if either chaplain had a celebret[12] in place as these had not been requested by the local Superior.

Areas for development

4.6.4 The Congregation must review its safer recruitment policy to ensure that it meets the requirements of the eight national safeguarding standards for England and Wales. This should include the requirement for DBS checks to be overseen and managed with closer scrutiny by senior leadership and more formal arrangements for the recruitment of staff and the oversight of the credentials of visiting clergy.

4.6.5 The Congregational leadership should develop a whistleblowing policy to allow for the sharing of concerns that might not otherwise be reported.

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[11] The Disclosure and Barring Service processes and issues criminal record checks on individuals applying for employment or a voluntary role for employers. https://www.gov.uk/government/organisations/disclosure-and-barring-service

[12] A celebret is a letter issued by a bishop or religious superior in the Catholic Church that authorises a priest to celebrate Mass in a diocese other than his own. It serves as a form of identification for the priest, confirming that he is free from canonical censures and is permitted to perform sacraments.

Graded: Not met

4.7 Standard 7 Training and support for safeguarding

Strengths

4.7.1 The community of sisters in London had not completed any formal safeguarding training in the past 12 months and were scheduled to receive training in the new policies and procedures in the months following the audit visit (Autumn 2025). This training was to be provided by the safeguarding personnel from Malta in collaboration with the training arm of the order, the Pastoral Formation Institute. The course information shared with the analyst demonstrated a high level of training that would equip the sisters with the knowledge and skills to understand the principles of safeguarding and how to recognise signs of abuse. It should be noted that the training only includes legislation from Malta and there is no reference to the legislation and requirements of England and Wales. Without this information, the sisters will not be able to fulfil their responsibilities in terms of safeguarding in this country and therefore this needs to be addressed.

4.7.2 There is a plan for training records to be kept and certificates to be provided following training. There are different levels of training, and the policy sets out the requirements for training clearly which are dependent on role and responsibilities.

Areas for development

4.7.3 It is a requirement for the Congregational leadership and safeguarding team to ensure that the sisters in the community in London receive adequate information during training to ensure that they can function effectively in England and Wales in terms of good safeguarding practice that meets statutory requirements and the eight national safeguarding standards.

Graded: Not met

4.8 Standard 8 Quality Assurance and Continuous Improvement

4.8.1 At present, there is no clearly defined role for the Trustees of the charity in terms of safeguarding. Trustee meetings are not held regularly and there was no record of any discussions having been held regarding safeguarding. The local Superior was unclear of her responsibilities as a Trustee in terms of the Charity Commission other than to ensure that the accountant provided the annual finance report to them. The Congregation does not have any links with RLSS, or any other UK based safeguarding organisation which limits their understanding of their responsibilities in this country and this needs to be addressed.

4.8.2 The Congregational safeguarding team are aware of the need for safeguarding practice to be scrutinised and reviewed in Malta and engage with the Safeguarding Commission accordingly. There was little understanding demonstrated of the role of the CSSA in England and Wales in this respect and it has been a challenge for the analyst to get engagement accordingly before, during and after the audit.

Graded: Not met

5. Summary of overall findings

5.1. Progress on safeguarding is clearly very good in Malta, and the evidence shows that the Congregation has taken its responsibilities seriously and have developed a robust system supported by well written policies and procedures to ensure that they are meeting their obligations. The key area of concern is the lack of awareness of their safeguarding responsibilities in England and Wales. At the time of the audit, steps were being taken to educate and inform the sisters about safeguarding, and a plan was in place to have a designated safeguarding lead in the community in London, which is a good start. However, without acknowledging the need to meet the local requirements of safeguarding practice in England and Wales, these actions will not fully address the issues raised at this audit.

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6. Recommendations

To support improvement, the following recommendations are made:

Within 3 months

The Congregational safeguarding leads should engage with the CSSA to discuss the findings of this audit and to understand their obligations regarding safeguarding practice in England and Wales. This should include the development of a management action plan to address the issues raised in this report which include but are not limited to the following points:

- The development of a safeguarding policy or annexes to existing international policy that meet the specific requirements of safeguarding practice in England and Wales and the requirements of the Charity Commission.
- All sisters at the community in London should complete safeguarding training. Trustees should complete Trustee training in addition to this.
- A robust governance process for safeguarding oversight in the community in London should be developed and implemented to include the management of any safeguarding concerns in England and Wales that cannot be transferred to the Maltese team.
- Safer recruitment processes should be implemented.
- A safeguarding risk assessment should be completed for the hostel and the Sisters' ministry.
- Trustees should review whether they are meeting Charity Commission expectations in respect of their frequency of meetings and oversight of safeguarding arrangements.

7. Arrangements for follow-up

7.1 In addition to the expected engagement with CSSA noted in the Recommendations section above, and in accordance with an overall rating of Not met, the earliest potential date of re-audit by the CSSA is in one year. If the CSSA becomes aware of a significant safeguarding concern or allegation in the intervening period, then an earlier audit will be required.