



The Response of Peterborough Cathedral to the INEQE Safeguarding Audit

The INEQE audit took place in July 2025, but the report was not received until November 2025. This document is an Action Plan in response to the recommendations made by the auditors. There were 35 recommendations in all, and they have all been accepted except two. The document shows the progress achieved in addressing the recommendations. Each recommendation is numbered in accordance with the INEQE report. The C refers to the Cathedral recommendations rather than those of the diocese (which are labelled D).

The most significant recommendation was the employment of a Cathedral-based Cathedral Safeguarding Officer. This is still on hold pending the release of dedicated funds for the post by the Church Commissioners. Many of the actions will be driven forward with more pace and impetus when this recommendation has been met.

Some of the recommendations have already been put into place, others will need time and reflection to make sure they are implemented well. The Cathedral remains committed to our ongoing journey of safeguarding improvement, making progress with pace, acknowledging where work needs to be done, and listening well to victims and survivors.

The report is based on the five National Standards in safeguarding. The majority of the recommendations were in the first of the five, Culture, Leadership and Capacity. For ease of reference, each of the standards is highlighted in a different colour.

The right-hand column shows the status of each recommendation using the following colour codes.

Colour Coding Utilised	
	Recommendation not accepted
	Recommendation accepted but work yet to commence
	Work ongoing
	Recommendation Completed

National Standard One: Culture, Leadership and Capacity	
Recommendation C1: To ensure the Cathedral's positive safeguarding culture is sustained and its remaining challenges (like deference and pace of change) are addressed, the Chapter should establish a formal, continuous monitoring cycle for cultural health. In order to do so, Chapter should commission 'Pulse Surveys', an anonymous reporting mechanism, and safeguarding culture KPIs to measure performance and progress	
C1 Commentary Formalise set reporting standard for Safeguarding training and DBS records. Complete a 'temperature check' survey via an anonymous survey twice a year.	
Recommendation C2: Immediately recruit a dedicated, Part-time Professional Cathedral Safeguarding Officer/Adviser (CSO/CSA) to provide the essential operational resource and support to the Cathedral and professional advice to other staff and volunteers with a safeguarding remit or responsibility	
Commentary C2 COO to establish funding streams for role, and progress role description, line management and SLA with the DST based on this prior to recruitment. This post will be line-managed by the COO and receive supervision from the DST to ensure that the CSO is fully integrated into the DST. The views of the Regional Safeguarding Lead have been obtained. The RSL and DST will be fully involved in the recruitment process. The main reason for the failure to recruit to this role is the lack of funding; the Church Commissioners have promised dedicated funding for this role, but it has not been forthcoming yet	
Recommendation C3: Review and formalise the internal process for the temporary handover of critical roles like CSL to ensure clarity,	

thoroughness, and effective execution under all circumstances.	
Commentary C3 Ensure a more robust onboarding and handover process. Full HR review to be completed by COO. CSO and Diocese working closely together already. The DSO or Assistant DSO attends the meetings of the Cathedral Safeguarding Management Group and works closely with the CSL and volunteer CSO. The new employed CSO will be line managed by the DSO in the newly created role.	
Recommendation C4: The Cathedral should engage in discussions with the Diocesan Board of Finance (DBF) to assess the appetite for and viability of establishing a diocesan-wide Safeguarding Directorate, which would be led by a Director of Safeguarding (DoS). Under this potential structure, the Cathedral's Safeguarding Officer/Adviser (CSO/A) would retain a dedicated and visible presence within the Cathedral. The CSO/A would be accountable, along with the appointed DoS, to the Chapter. However, the CSO/A would also receive professional supervision as an integral part of the wider Diocesan Safeguarding Team.	
Commentary C4 The Cathedral will fully engage with the Diocese on this recommendation, which will be led by the DBF.	
Recommendation C5: Clarify roles and responsibilities by: a) along with the DBF as soon as the new structures and lines of control and reporting are in place to enhance and formalise external support, and b) clearly documenting and communicating the delineated safeguarding responsibilities between the Cathedral and the School.	

Commentary C5 Review and if necessary, update Schools section of Cathedral Safeguarding Policy. Implimentation of formal SLA with School re: choristers. Work is being put in place for a formal data sharing agreement between the Cathedral and the King's School.	
Recommendation C6: Chapter's oversight practice should be enhanced to include more proactive scrutiny. Minutes should consistently reflect the specific areas of challenge, the quality of information requested, and the ultimate rationale behind Chapter's decisions, moving beyond mere recording of observational briefings.	
Commentary C6 Chapter has been tasked to be 'active' in its scrutiny of all information and particularly of the monthly Chapter reports on Safeguarding. This in an ongoing piece of work. The DSO will regularly attend Chapter meetings When the new CSO has been appointed, they will present to Chapter and answer questions on a regular basis	
Recommendation C7 Implement a formal, periodic schedule for non-executive members to engage with various staff groups. This is not for operational involvement but for a 'listening ear' to better understand staff roles, responsibilities, and views on 'what works and what could be improved.' b) Ensure the learning gathered from these staff engagements directly informs Chapter's oversight, enabling non-executives to better test reports, particularly those relating to culture, safeguarding, and risk, that are presented to them.	
Commentary C7 Non-exec Chapter members have been assigned to different departments to liaise and provide a listening ear. There will be an ongoing feature of Chapter.	

Recommendation C8 To address the potential conflict of interest (the Dean chairing the body that holds him to account), Chapter should ensure its minutes clearly document the Senior Non-Executive Member's (and others') challenge and independent oversight, particularly during sensitive discussions like audits, demonstrating that accountability is robustly maintained. b) Chapter should adapt their agenda to ensure that any individual agenda item that may invoke a perception of a conflict of interest for the Dean should, by agreement by Chaired by the SNEM. Furthermore, the washup at the end of meetings that assesses the conduct and management of the meeting should be Chaired by the SNEM.	
Commentary C8 Potential conflicts of interest are requested at each Chapter meeting, in addition to the annual declaration of interests which each Chapter member completes. The SNEM now chairs the washup meeting.	
Recommendation C9 Appoint an appropriately safeguarding-qualified Independent Chair for the Safeguarding Management Group (SMG) to ensure independence and strengthen governance. b) Introduce wider external representation to the SMG, including relevant stakeholders such as police, local charities (especially a victim-focused one), and precinct operators	
Commentary C9 This is on hold until the appointment of the paid CSO. At the most recent CSMG meeting it was agreed that it should work towards the establishment of a Cathedral Safeguarding Advisory Panel (similar to DSAP) which will be chaired by an independent chair and will include representatives of other statutory agencies (e.g. police).	
Recommendation C10	

Constitute a Safeguarding Operations Group (SOG), to be chaired by the Cathedral Safeguarding Officer/Adviser (CSO/A), to focus on operational, day-to-day safeguarding management and coordination. This group should meet more frequently, potentially weekly.	
Commentary C10 This will be established when the new CSO is appointed.	
Recommendation C11. Harmonise the meeting schedules and agendas of existing oversight forums (SMG, Executive, Cathedral Leadership Team) to streamline safeguarding oversight. b) Ensure the SMG meeting takes place before Chapter and that its agenda is strategically focused on supporting overarching requirements and aligning with national safeguarding standards.	
Commentary C11 This has been achieved. The meetings of Chapter and the Finance Committee meeting are scheduled for greater efficiency. The Senior Leadership Team meets weekly. Safeguarding is an agenda item at all Cathedral meetings.	
Recommendation C12. A stand-alone safeguarding review of chorister safeguarding arrangements should be commissioned, jointly led by the CSO and the NST's RSL. Any action plan arising from this activity should be formally reported to Chapter and overseen by the SMG	
Commentary C12 This has been achieved. The RSL has conducted a 'mini audit' on the music department over the course of a day in March. The choristers were involved in the process, and the report has been shared with Chapter. It forms the basis of an ongoing review between the RSL the CSO over each of the five Safeguarding Standards.	

Recommendation C13. The Cathedral should continue start-of-term parent meetings and an anonymous annual survey to build trust, receive feedback and promote awareness of safeguarding arrangements.	
Commentary C13 This is ongoing. It will be easier to implement when the music department is fully staffed.	
Recommendation C14. The Cathedral should expand the use of child-friendly safeguarding messaging in the Song School (No. 28) and other relevant areas to ensure all choristers are regularly reminded of how to seek help	
Commentary C14 This has been implemented.	
Recommendation C15. The Cathedral should update its chaperone induction process to include a clear confidentiality agreement and guidance on how relevant safeguarding information is shared. Parents should be informed of what might be shared, with whom and why, with consent being sought where appropriate.	
Commentary C15 This recommendation will be more fully implemented when a full-time chaperone is in place. A revised chorister handbook will be available at the start of the September term, and this will include revised guidelines for chaperones.	
Recommendation C16.	

CCTV coverage in the Song School (No.28) and organ loft should be reviewed and strengthened to improve safeguarding visibility and oversight.	
Commentary C16 Organ lessons for children are not allowed in the organ loft unless the child's parent is present. Consideration will be given to the installation of CCTV in the lobby of No28.	
Recommendation C17 All staff working with choristers should receive a safeguarding refresher covering concern escalation, urgency, and information sharing pathways	
Commentary C17 This takes place at the start of each term and when new members of staff join the team.	
Recommendation C18 The Cathedral and King's School should establish a joint system for monitoring chorister attendance to ensure consistent oversight and timely safeguarding responses	
Commentary C18 This has been addressed and will be fully covered in the new Chorister Handbook which will be available at the start of the new academic year.	
Recommendation C19 All music department staff with responsibility for children should urgently complete safeguarding training relevant to their role where this remains outstanding. Lone working, data protection, and professional boundaries should be comprehensively covered with new staff / volunteers during induction, or retrospectively where needed	
Commentary C19	

This has been completed. As part of the induction process of new staff in May and September 2026 an interview with the DST has already been planned.	
Recommendation C20 The Cathedral should deliver behaviour management and neurodiversity training for music department staff and volunteers, in collaboration with King's School.	
Commentary C20 This has been delivered in conjunction with the King's School. There is also ongoing work to align the behaviour management policy between the school and the Cathedral.	
Recommendation C21 The Cathedral should review and clarify the language within the chorister MoU to ensure expectations about handbook compliance and absence are communicated in a way that upholds both commitment and wellbeing.	
Commentary C21 The review is complete and a completely revised chorister handbook, which includes the MoU will be in place for the start of the new academic year.	
National Standard Two: Prevention	
Recommendation C22 The Cathedral should review and strengthen the onboarding process to ensure that all staff members with direct responsibility for children have a completed and satisfactory DBS check returned before commencing their roles. This should include formalising a "no start" policy until the DBS clearance is confirmed, in line with the House of Bishops' Safer Recruitment and People Management guidance.	

Commentary C22

No new staff working with children will start without the DBS is in place. The two new members of staff to be starting at the end of May and in September in the Music Department have already completed their DBS check.

Recommendation C23

To ensure effective oversight and monitoring, the Cathedral should report on DBS checks and status to Chapter and the SMG. This report should include, for example, the number of DBS checks completed, the number outstanding, and any 'blemishes' returned.

Commentary C23

This has now been implemented and regular updates on DBS checks and safeguarding training are reported to chapter three times a year in the monthly Chapter Safeguarding report.

Recommendation C24

The Cathedral should thoroughly review and enhance its safeguarding webpage layout ensuring that information is prioritised according to user importance. Specifically, a prominent section on 'how to report a safeguarding concern' should be given primary focus, with other frequently accessed sections re-ordered accordingly. The aim is to logically group supporting resources, making them easily discoverable and accessible. Crucially, the website must also include clear guidance instructing users to contact 999 immediately if they have an urgent safeguarding concern.

Commentary C24

This has now been completed. The Comms team has benchmarked the Cathedral's safeguarding page against that of other Cathedrals.

Recommendation C25 The Cathedral should establish engagement mechanisms to consider the needs, experiences and voices of vulnerable adults and survivors within safeguarding prevention planning.	
Commentary C25 This will form part of the job description of the CSO when they are appointed.	
Recommendation C26 The Cathedral should expand CCTV coverage to include key areas, such as the education room and the chorister's practice room.	
Commentary C26 The installation of CCTV in the education room and choristers' practice room has been rejected as these areas can be used for changing; the installation of CCTV would bring additional potential risks in GDPR (concerning the storage of the images) and safeguarding (who would have access to the them).	
National Standard Three: Recognising, Assessing and Managing Risk	
Recommendation C27 Safeguarding risks as they pertain to the Cathedral should form part of a dedicated safeguarding risk register for the Cathedral	
Commentary C27 There is a dedicated Safeguarding Risk Register which sits as a separate tab on the Cathedral risk register. The Cathedral believes that as all risk is ultimately carried by Chapter, an entirely separate risk register would not be a positive step.	
Recommendation C28 The Safeguarding Policy should be updated to include details on how safeguarding-related disputes are handled and to outline the appropriate escalation procedures.	

Commentary C28

The entire procedure document has been revised as a result of the INEQE audit and this aspect of it is still ongoing. It is to be fully reviewed along with Diocesan governance.

National Standard Four: Victims and Survivors

Recommendation C29

The Cathedral should partner with the DBF to host diocese-wide listening events, providing a platform to hear from a diverse range of voices to inform local practice.

Commentary C29

This work will be part of the job description of the new CSO and can only be implemented in partnership with the DBF, which will be led by the DST.

Recommendation C30

The Cathedral should enhance its existing ‘Safeguarding’ webpage by creating a dedicated sub-section for victims and survivors. This new sub-section should:

- a) Clearly detail the Cathedral's adherence to national guidance ‘Responding Well to Victims and Survivors of Abuse’, explicitly outlining its proactive and supportive stance.**
- b) Provide a reassuring and welcoming online space where individuals seeking support can immediately feel at ease and be confident that they have found the appropriate resources.**
- c) List appropriate signposting for support (both national and local)**

Commentary C30

This is work that is awaiting the appointment of the new CSO.

Recommendation C31 The Cathedral should strengthen its safeguarding telephone guidance for those receiving disclosures by explicitly outlining the importance of a trauma-informed approach and providing further guidance on how to respond to safeguarding disclosures. This should include: a) Providing a clear explanation of the importance of a trauma-informed approach. b) Setting out how disclosures from potential victims and survivors may vary significantly based on their individual experiences. c) Further guidance and examples on using empathetic language, active listening techniques, and non-judgmental responses. d) Strategies for calming distressed callers and managing sensitive conversations. e) on the existing protocols for concluding calls in a way that leaves the caller feeling supported and informed of next steps, e.g. forwarding the call to the relevant individual.	
Commentary C31 Some training has been developed and implemented which has improved practice. Further development is awaiting the appointment of the new CSO.	
National Standard Five: Learning, Supervision and Support	
Recommendation C32 The Cathedral should develop a contextual safeguarding training strategy, supported by a clear programme of learning that outlines available courses, expectations by role, and	

methods of delivery. This strategy should be informed by local needs and the CofE's Safeguarding Learning and Development Framework	
Commentary C32 The Cathedral has not had capacity to develop this level of detailed training; it will be fully reviewed and implemented by the new CSO, however, appropriate levels of national standards and the type of DBS are assigned to different roles in line with the national guidelines. The contextual element of this will be fully worked out by the new CSO.	
Recommendation C33 The Cathedral should update its training records to ensure alignment with current national terminology, enabling accurate tracking and compliance monitoring.	
Commentary C33 The training records are regularly reviewed and the implementation of a new database, specifically for volunteers will assist in this process. It will tighten up accurate tracking and compliance monitoring. The new system will be in place by August.	
Recommendation C34 To ensure effective oversight and monitoring, the Cathedral should regularly report to the Chapter and SMG on the status of safeguarding training among staff and volunteers, including completion rates and renewal dates.	
Commentary C34 The SMG regularly reviews and monitors safeguarding training among staff and volunteers. All staff are up to date with their training; the compliance officer ensures this. The new volunteer database will enable more reliable information on volunteers and will prevent them from volunteering until they are up to date with their training. This will be reported to Chapter on a more regular basis.	
Recommendation C35 The Cathedral should ensure that all new starters receive a safeguarding-specific component as part of their induction	

process that goes beyond a recognition of reading the safeguarding policy and completing safeguarding training.

Commentary C35

This is already happening in an *ad hoc* way, two new starters who work with children and vulnerable adults have interviews with the DST. The new CSO will be the appropriate member of staff to be involved in this important aspect of the induction process.