

**DS26(04)a**

## **Briefing paper for Diocesan Synod March 26**

This paper is a report to Diocesan Synod regarding the outcome of the 2025 Charity Commission regulatory investigation into a safeguarding matter.

As Synod is aware, the Charity Commission issued an Official Warning in January 2026 to the Trustees of the Liverpool Diocesan Board of Finance (LDBF). This followed an investigation by the Commission into the circumstances that led to the former Bishop of Liverpool, the Right Reverend Dr John Perumbalath, stepping back from ministry in January 2025, followed by his resignation later in the year.

Allegations had been raised by two women against Bishop John in 2023, one of whom resided in Bishop John's former diocese and one of whom was the Bishop of Warrington, as publicly acknowledged by her. Both allegations were denied but reports in the media in January 2025 led to a regulatory investigation by the Charity Commission. The Commission concluded that LDBF trustees had not adequately discharged their safeguarding responsibilities in 2023 in relation to the reporting of these allegations and that there were failings in our safeguarding processes and procedures.

The Official Warning, published on the Commission's website, will remain in place for twelve months. The Warning is to the body corporate of the LDBF – there were no sanctions or disqualifications of individual trustees.

Trustees were required to respond to the Charity Commission to explain the steps taken to fulfil the requirements set out in the Official Warning. The full response to the Charity Commission is at Appendix 1.

The Commission's findings have wider policy implications for the national church, including the work of the Safeguarding Structures programme board. William Nye, Secretary General for the Archbishops' Council, is engaging with the Commission in constructive policy dialogue and we have shared our learning and experience to support that conversation.

### **Shaping a new safeguarding vision and culture**

We remain committed to working together with a vision for all those in the Diocese of Liverpool who encounter our churches to be kept safe from abuse and harm - through effective relationships, empathic communication, and proactive support to enable everyone to live safeguarding as their responsibility. We are committed to promoting a safeguarding culture where the voices of children and young people are heard more readily and where we are learning from, and able to more effectively engage with, victims and survivors. Senior leaders in the Diocese are accountable for creating a culture of safeguarding that embodies this vision, with direction from the independently chaired Diocesan Safeguarding Advisory Panel and clearer governance oversight from trustees.

Sharon Parr  
Diocesan Secretary  
March 2026

Appendix 1:

Letter to the Charity Commission March 2026

By email only to  
Stephanie Charlton  
[RCCorres1@charitycommission.gov.uk](mailto:RCCorres1@charitycommission.gov.uk)

Your Reference: 249740/C-156156-F7R6/RC

6<sup>th</sup> March 2026

Dear Ms Charlton

Margaret Swinson  
Chair of Liverpool Diocesan Board of  
Finance  
Diocese of Liverpool  
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I am responding on behalf of all the trustees of the Liverpool Diocesan Board of Finance (LDBF) in answer to your letter of 9 January 2026 which enclosed an Official Warning addressed to the charity under s.75A(1)(b) of the Charities Act 2011.

### **Response to publication of Official Warning**

We responded publicly to the Official Warning with a public statement posted on Liverpool Diocese's website. The Right Reverend Ruth Worsley, Interim Bishop of Liverpool, and the Diocesan Secretary also recorded a short video which was shared on Diocesan social media. We aimed to demonstrate our willingness to be held accountable and to act where we know we can do better.

The public statement from myself as Chair of Trustees included:

*We accept the Commission's findings and apologise for the shortcomings identified. We have already made changes to strengthen reporting and governance processes, and we commit to ongoing learning, accountability and continuous improvement. The Diocese of Liverpool is dedicated to ensuring that the church is a safe and inclusive environment where concerns can be raised in a culture of accountability, transparency and compassion.*

As we anticipated, national media covered the story, referring to the original allegations. The Diocesan Safeguarding Team (DST) were briefed to respond to victims and survivors of church related abuse who were triggered by the media coverage, and to offer support to Parish Safeguarding Officers.

We contacted both Bishop Bev and Bishop John to ensure they could prepare themselves for further media intrusion and we requested additional pastoral support for them. We understand that Chelmsford Diocese offered additional support to the claimant in Chelmsford.

### **Trustee Reflection and Governance Strengthening**

The trustees recognise that the Commission's findings relate not only to safeguarding structures but to a failure by trustees to ensure appropriate consideration and investigation of a safeguarding

complaint. Trustees have reflected carefully on this failure and have taken steps to strengthen both individual and collective oversight and quality assurance.

Following the resignation of the former Bishop of Liverpool in 2025, trustees embarked on a comprehensive review of governance and leadership of safeguarding – a process which was helpfully informed by the issues raised by the Charity Commission in its draft Official Warning. Trustees collectively reviewed Charity Commission guidance including CC3 (The Essential Trustee), Safeguarding and Protecting People for Charities and Trustees, and guidance on Serious Incident Reporting. All trustees have undertaken a safeguarding refresher session focused specifically on trustee oversight responsibilities.

As we explained in our Representations, safeguarding is already a standing agenda item at every trustee meeting, but we have developed a more robust approach to formalize reports to trustees including key metrics, data on serious incident reporting and progress against safeguarding objectives. Future reporting to trustees will also incorporate reports from the Diocesan Safeguarding Advisory Panel (DSAP) to support quality assurance, trustee scrutiny, and challenge.

Trustees gave detailed consideration to revised safeguarding policies, which were then referred to DSAP for further consideration and recommendations. These will return to trustees for approval following DSAP review.

Trustees approved a formal resolution to delegate responsibility for reporting safeguarding Serious Incidents to the Charity Commission and the National Safeguarding Team and a separate resolution to delegate responsibility for reporting non-safeguarding Serious Incidents to the Charity Commission. The Resolutions adopted ensure that serious safeguarding incidents which, in the professional opinion of the Head of Safeguarding (DSO), may require to be reported to the Charity Commission, are brought directly to the Chair of Trustees, the Diocesan Secretary and relevant lead trustees within defined timescales.

A Serious Incident Reporting Policy reflecting these resolutions will be reviewed by DSAP, now led by a new independent and experienced Interim Chair, and then formally adopted by trustees.

### **Actions taken by LDBF to rectify the breach**

As requested, we are reporting on our progress in fulfilling the Requirements a-d in the Official Warning. Action was taken at the point of issue of the Draft warning. An action plan was drawn up and progress reported to the November 2025 meeting of the Trustees. Subsequent actions are also noted below

#### **a) Action taken to ensure “adequate understanding within the charity of the Commission’s guidance relating to safeguarding and protecting people who come into contact with the charity” includes:**

By November 2025 Trustees had refreshed their understanding of their duties in connection with safeguarding.

- They were provided with information to refresh their understanding of their duties as trustees and in connection with safeguarding (including the Commission’s *The Essential Trustee*, *Safeguarding for Charities and Trustees* and *How to report a serious incident in your charity*).
- They have also been provided with CofE guidance on serious incident reporting and a written briefing on safeguarding within the Diocese - to reinforce understanding of policies and procedures relating to safeguarding and protecting people.

Subsequent to the November 2025 meeting

- Trustees were provided with information and slides from the recent Charity Commission webinar ‘Safeguarding in a Faith Charity Context’. The Chair of Trustees, the Diocesan Secretary and a number of other trustees attended the webinar live.

- We also shared these materials with the DST who have included the information in a comprehensive outreach programme with Deanery Synods – to be a helpful learning resource for PCCs.

**b) Action taken to ensure that “*where operational responsibility for safeguarding is delegated, suitable and robust policies and procedures in relation to monitoring and reporting are implemented, understood and followed*” and that “*reporting from the Diocesan Safeguarding Advisor/Team (DSA/DST) and the Diocesan Advisory Panel (DSAP) is robust and includes a process for check and challenge by the trustees*”.**

- The actions already described above are relevant to providing assurance that, where operational responsibility for safeguarding is delegated, suitable and robust policies in relation to monitoring and reported are implemented, understood and followed, including robust reporting from the Head of Safeguarding (DSO)/DST and DSAP. These processes support trustee check and challenge.
- The compliance checklist and updated business continuity plan now include a protocol for engagement on procedural matters with the Charity Commission.
- Trustees are more informed about strategic management of safeguarding risk – with a more informed ‘live’ safeguarding risk register developed with support from the Interim DSAP Chair underpinning operational safeguarding
- The 2025 Annual Safeguarding Report and a new draft Liverpool DSAP 2026 Action Plan has been prepared as a key monitoring and reporting tool for trustees. The Annual Report will be presented at Diocesan Synod (the Diocese’s synodical governance body) in March by the Interim DSAP Chair. The session will include a practical exercise with members to highlight safeguarding responsibilities and increase awareness.

**c) Action taken to “*review the Commission’s guidance on reporting serious incidents and ensure that processes are put in place so that serious incidents are reported to the Commission promptly*”.**

- Trustees have been reviewed the Commission’s guidance *How to report a serious incident in your charity* and have implemented revised delegation arrangements. Serious Incident Reporting is embedded within the standard safeguarding agenda item at each trustee meeting.
- As noted under **Trustee Reflection and Governance Strengthening** new Serious Incident Reporting delegation has been agreed and implemented.
- SIR 779479 related to this matter was updated twice in 2025 and then again in January 2026 following publication of the Official Warning when national media coverage revisited the original allegations against the former Bishop of Liverpool.

### **Capacity and structural strengthening**

Further practical steps were taken in 2025 to strengthen governance, leadership, and capacity in safeguarding including:

- The appointment in November 2025 of an experienced **Interim DSAP Chair**, Debbie Innes-Turnill whose skills and experience in safeguarding (including with Gloucester DSAP and as a member of the National Safeguarding Structures operational programme board) are providing independent scrutiny and challenge from DSAP. This includes benchmarking and challenge of safeguarding in Liverpool diocese against the CoFE standards, preparing and preparing for the INEQE safeguarding audit and establishing DSAP in line with the new terms of reference in preparation for the recruitment of a substantive chair.

- Building capacity and strengthening the Diocesan Safeguarding Team by:
  - Successful recruitment (subject to onboarding checks) of an experienced and strategic safeguarding specialist **Head of Safeguarding, (DSO)** to lead safeguarding across the diocese and ensure that safeguarding is embedded in every aspect of diocesan life. This senior leadership role has independent authority of the Diocesan Bishop, reporting directly to Chapter and LDBF trustees, attending Bishop's Senior staff and Bishop's Council. The postholder is expected to take up their post in late April '26
  - The appointment of a new **Deputy DSO** to support the Head of Safeguarding in their responsibilities.
  - The appointment of a dedicated **Cathedral Safeguarding Officer** and a **Safeguarding Training Officer** to further strengthen the team and support its capacity.
- Proactively engaging our **Regional Safeguarding Lead** (RSL) to secure professional safeguarding supervision and quality assurance for the safeguarding team. We are working with the RSL to ensure we are engaged with national safeguarding improvements and it is anticipated we will secure Archbishops' Council Certification of our safeguarding arrangements in March 2026 subject to successful recruitment to the DSO role. The RSL is also invited to attend and contribute to DSAP.
- Establishing **Peer Safeguarding Improvement** activity through learning from others and partnering with a neighbouring diocese (Chester).

Similar steps have also been taken to strengthen governance and oversight of safeguarding by the trustee body for Liverpool Cathedral. Chapter has appointed a **Lead Safeguarding Trustee** as a non-exec member of Chapter - to support and challenge the approach to safeguarding, to attend DSAP and to provide additional assurance to Chapter on how the Cathedral is responding to its safeguarding responsibilities.


#### **Other safeguarding matters for the Charity Commission to note:**

- The Diocese of Liverpool has this week undergone an independent safeguarding audited by INEQE Safeguarding Group. This includes submitting evidence of the Diocese's governance, culture and capacity around safeguarding. Findings by INEQE will lead to an action plan for the Diocese and Cathedral to strengthen our approach to safeguarding across the Diocese. Trustees welcome all scrutiny which may better enable the Trustees of the LDBF, and other church bodies in the Diocese of Liverpool, to better discharge our safeguarding responsibilities and regulatory obligations.
- The LDBF has entered into Memorandum of Understanding and Safeguarding Partnership Framework with Liverpool Cathedral (MOU). This governs joint working on safeguarding and to align with Charity Commission Guidance and the Church of England's National Safeguarding Standards and Quality Assurance Framework. The agreement is based on similar arrangements in the Diocese of Chester. The agreement will be refined as our safeguarding structures develop in 2026.

#### **Conclusion**

Trustees recognise that safeguarding is not solely a matter of structure but of culture, vigilance, and accountability. The steps outlined above are designed to embed safeguarding oversight into trustee governance practice on a sustained basis. Trustees remain committed to continuous improvement and to maintaining open and constructive engagement with the Charity Commission

Yours sincerely



**Maggie Swinson**  
**Chair of Liverpool Diocesan Board of Finance**