

Congregation of Our Lady of Sion

Baseline Audit Report

June 2026

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1. Introduction

1.1 This is a baseline audit report of the safeguarding arrangements of the Congregation of Our Lady of Sion, a Catholic Order of vowed women. In the UK they are part of a Communion of Communities which totals 14 members of whom one is in Ireland and one in Poland. Of the 12 members in the UK, four remain in a variety of active ministries, with the remainder in retirement including three in a care home run by a separate organisation. This audit has been undertaken as part of the Catholic Safeguarding Standards Agency's (CSSA) baseline audit phase of Religious Life Groups (RLGs).

1.2 The ministries that the Sisters undertake include spiritual accompaniment with adults and work in Parishes under the applicable diocesan safeguarding arrangements. One Sister is a hospital chaplain and another visits a Care Home. The Congregation of Our Lady of Sion has two Congregational Coordinators whose role is not direct leadership but coordination of the work and care of the Sisters. Decision making is intentionally collaborative and discussed at six-weekly meetings, either online or in-person, of all the Sisters. The Coordinators are not Trustees of the Charity. The three Trustees are other Religious Sisters in the Congregation.

1.3 The Congregation of Our Lady of Sion contracts a professional Safeguarding Lead for two hours a week. They are also members of the Religious Life Safeguarding Service¹ (RLSS). They currently employ a House Manager for their residence in London although this role is in the process of closing. They also employ an individual on a part-time basis to assist with finance. There are no other employees, and the Congregation does not engage volunteers within this region.

1.4 The CSSA has devised a categorisation scheme for Religious Life Groups taking part in safeguarding audits. This categorises Groups on a scale from Level 1 (a small community with minimal outreach and no known safeguarding concerns), Level 2 (a medium sized community with some outreach with vulnerable populations

¹ The RLSS is a team of independent safeguarding professionals offering safeguarding services to the Religious of the Catholic Church in England and Wales.

and/or providing some diocesan activities such as a parish priest) or 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 Our Lady of Sion has been designated as a Level 1 Apostolic audit and completed a corresponding self-assessment.

1.5 The CSSA recognises the rich diversity of the Religious and acknowledges that the RLGs within any particular 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 Initial contact was made with the Congregation of Our Lady of Sion on 19 January 2026. An in-person audit visit date on 9 April 2026 was agreed, with a self-assessment and supporting evidence to be provided by 12 March 2026. One interview took place on 7 April 2026 online. The self-assessment and supporting evidence were provided within the agreed timeframe. The supporting evidence provided is listed in the appendix to this report.

2.2 Interviews were held with Congregational Coordinators, the Safeguarding Lead, the Trustee for Safeguarding and a Sister in ministry who is not part of the leadership. Enquiries have been made with RLSS about the Congregation's engagement with them. The Charity Commission report for the Congregation for the year ending 2024 was read, as was the report for the Congregation of Notre Dame de Sion Limited which holds the finances for the international congregation and disperses funds for the promotion of their ministries and the care and formation of the Sisters.

3. Audit grading

3.1 Practice was assessed against the eight national safeguarding standards adopted by the Catholic Church in England and Wales² and graded in accordance with the CSSA Maturity Matrix for Level 1 Apostolic Orders.

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

Overall grading	Met with Recommendations
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	Met with Recommendations
Standard 3 - Engaging with and caring for those who report having been harmed	Met with Recommendations
Standard 4 - Effective management of allegations and concerns	Met with Recommendations
Standard 5 - Management and support of subjects of allegations and concerns (respondents)	Met with Recommendations
Standard 6 - Robust human resource management	Met with Recommendations

² Full details of the eight standards and underpinning sub standards are available here: [The Eight National Safeguarding Standards \(catholicsafeguarding.org.uk\)](https://catholicsafeguarding.org.uk)

Standard 7 – Training and support for safeguarding	Met with Recommendations
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

4.1.1 The Congregation of Our Lady of Sion’s leadership structure is unusual as the Congregational Coordinators do not act as Chair of Trustees or sit on the Trustee board. They aim to make collaborative decisions amongst all members and, if consensus is unable to be reached, then support is sought from the international leadership in Rome. The three Trustees, who are all Religious Sisters, perceive their role to be financial, ensuring that accurate annual returns are made to the Charity Commission. They only meet formally once a year to achieve that aim. However, this approach is insufficient to meet their obligations under Charity Commission guidance, which includes that they should meet at a minimum of twice a year³. Furthermore, it does not enable the Trustees to fulfil their responsibility to keep everyone who comes into contact with their charity safe⁴. Trustees receive no safeguarding information for their meetings so cannot be assured that, for example, necessary vetting checks have been completed. It was also evident that Trustees would not have effective oversight of any reported concern or allegation and would not be in a position to report a serious incident to the Charity

³ [Charity meetings - GOV.UK](#)

⁴ [Safeguarding for charities and trustees - GOV.UK](#)

Commission⁵. It is imperative that the Congregation of Our Lady of Sion establishes a leadership structure that complies with Charity Commission safeguarding expectations.

4.1.2 Notwithstanding the above, steps have been taken to embed effective safeguarding in the ministry and culture of the Congregation of Our Lady of Sion. This includes the creation of a Safeguarding Policy which all Sisters contributed to in 2024. In 2026, with the assistance of the Safeguarding Lead and based upon an RLSS template, the policy was reviewed. The policy outlines training expectations, which will be reviewed further under standard 7, roles and responsibilities, although those for Trustees are absent, and the policy and procedure to follow if a concern is raised.

4.1.3 Safeguarding has recently been reintroduced as a standing agenda item at the six-weekly meetings of the Sisters. In one meeting in 2026, the pastoral standards document, Integrity in Ministry⁶, was discussed. Interviewees for this audit indicated that the discussion was viewed as having been useful and that the document is considered relevant to how they conduct their ministry.

4.1.4 In addition to their Safeguarding Lead, the Sisters can utilise the safeguarding support service from RLSS. In the last year this support has included processing Enhanced Disclosure and Barring Service⁷ (DBS) checks and utilising five of their training courses.

4.1.5 The Safeguarding Lead has developed a Safeguarding Action Plan which correlates with the eight safeguarding standards. To ensure that the Congregation of Our Lady of Sion is compliant with Charity Commission expectations that Trustees identify risks and how they will be managed⁸, the Action Plan should be

⁵ [How to report a serious incident in your charity - GOV.UK](#)

⁶ Integrity in Ministry is a code of conduct for Religious engaged in ministry in the Catholic Church in England and Wales.

⁷ [Disclosure and Barring Service - GOV.UK](#) The Disclosure and Barring Service processes and issues criminal record checks on individuals applying for employment or a voluntary role for employers.

⁸ [Safeguarding and protecting people for charities and trustees - GOV.UK](#)

developed to include the creation of a Risk Register. Leaders need to ensure the actions are implemented with those responsible held to account for their delivery.

Graded: Not Met

4.2 Standard 2 Communicating the Church's safeguarding message

4.2.1 The primary medium for communicating the importance of safeguarding within the Congregation of Our Lady of Sion is within the six-weekly meetings. All Sisters have received a printed copy of the Safeguarding Policy to refer to as necessary. Posters are also on display in residences which have contact details for the Safeguarding Lead and RLSS. Evidence was seen of the Safeguarding Lead sending emails that highlight available upcoming RLSS training courses.

4.2.2 The international community has a website⁹ for which the Sisters in the UK have no control of the content, although it is understood that the site is under development with a consultation underway. This website currently has no safeguarding information. There is a website connected to the UK community¹⁰. This primarily has links to Zoom sessions that the Sisters used to run but it has been recently updated to reflect their change of address so is current. This also contains no safeguarding information. If the Sisters wish to continue to use this website, then they should add a safeguarding page which includes their Safeguarding Policy, details of how to raise a concern and links to organisations such as Safe Spaces¹¹.

Graded: Met with Recommendations

⁹ <https://www.notredamedesion.org/>

¹⁰ [Sisters of Our Lady of sion – Notting Hill](#)

¹¹ 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.

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

4.3.1 The Congregation of Our Lady of Sion has not had to respond to a safeguarding allegation or concern in England and Wales to date. Therefore, much of the evidence for Standards 3 to 5 is based upon their preparedness for an allegation should one arise.

4.3.2 The Safeguarding Policy contains basic guidance on supporting a Survivor when they disclose a concern. This includes making the Survivor aware that the concern will be passed on to RLSS safeguarding team. According to policy, RLSS then assume responsibility for keeping the Survivor informed of the next steps that will be taken and the timescale for these steps to be taken. Greater detail is given in a guidance document entitled Receiving a Safeguarding Cause for Concern. This includes key information such as being reassuring to the individual, not expressing disbelief or passing judgement and not promising confidentiality.

4.3.3 In the event that an allegation was received from a Survivor, the Congregation of Our Lady of Sion would be guided in their responses through its engagement with RLSS. The Coordinators of the Congregation said that they would meet with any Survivors of abuse that wished to meet with them in their role as representatives of the Congregation of Our Lady of Sion. One Coordinator reflected on dealing with a safeguarding concern that arose in a parish and diocesan context and how this led her to understand that those receiving and managing concerns also need support which might be received through their own Spiritual Director.

4.3.4 There are currently no obvious avenues for those outside of the Congregation of Our Lady of Sion who they currently have contact with, or for those who have engaged with their ministry in the past, to report abuse to them. This is because none of the associated websites give a mechanism to do so. Finding an effective means to allow Survivors to contact them, and to signpost them to Safe Spaces, would allow Survivors to promptly access the support and guidance they need.

Graded: Met with Recommendations

4.4 Standard 4 Effective management of allegations and concerns

4.4.1 The Safeguarding Lead recognised that the current most likely safeguarding concerns to arise for the Congregation of Our Lady of Sion would be related to their ageing population. Although none have arisen to date, the Congregational Coordinators also identified that allegations may arise from the Congregation of Our Lady of Sion's previous involvement in education. To facilitate effective reporting of any concerns they have created a Safeguarding Concern form for the individual receiving or recognising the concern to complete and pass to the Safeguarding Lead. The Safeguarding Lead will record on the form who the concern will be passed to. Agencies listed on the form include police, social services and RLSS as necessary. Information related to any concern would be held by the Safeguarding Lead in a password protected and encrypted laptop. The Coordinators of the Congregation would also have access to the confidential information as necessary.

4.4.2 Section 10 of Receiving a Safeguarding Cause for Concern specifically states that, in the event of immediate risk or danger, police should be called. Interviews did not demonstrate that individuals would always call the police in the first instance, preferring instead to contact the Safeguarding Lead or RLSS for guidance. The Congregation of Our Lady of Sion must ensure members are aware of, and confident to follow, the available guidance so that there are no unnecessary delays in contacting statutory services in an emergency.

4.4.3 Trustees only meet once a year and receive no safeguarding information. Therefore, there is no way that leaders of the Congregation of Our Lady of Sion can maintain effective oversight of any concerns that are received. Their involvement should include oversight of decisions about support for Survivors and Respondents and making sure any necessary referrals, such as notifying the Charity Commission of a Serious Incident, are made.

Graded: Met with Recommendations

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

4.5.1 The Congregation of Our Lady of Sion would utilise the professional support of their Safeguarding Lead and RLSS to ensure that a Respondent's physical, emotional and practical needs were met in the event of an allegation against them. The Coordinators were confident that, were it to be necessary, a Respondent could be accommodated with another RLG if they could not remain in their current accommodation for a period. Canon Law advice could be facilitated through links they have with the Archdiocese of Birmingham.

4.5.2 Sisters who were spoken with were not aware of how the practicalities of support would be managed should there be an allegation against them. They were confident however that they would receive the support they needed. The Coordinators indicated that any Respondent would be encouraged to talk with the Safeguarding Lead and one of them for support. They should consider if a support person should be agreed from outside a role which may be considered as leadership to avoid conflicts of interest between effectively managing a case and providing support to a Respondent.

Graded: Met with Recommendations

4.6 Standard 6 Robust human resource management

4.6.1 There are no current plans for the Congregation of Our Lady of Sion to recruit new employees. Despite this, the Safeguarding Policy has safer recruitment guidance to be followed. This includes a Disclosure and Barring Service¹² (DBS) check according to statutory and Catholic Church requirements. Previous employment references must be acceptable, and employees would be expected to verify that

¹²The Disclosure and Barring Service processes and issues criminal record checks on individuals applying for employment or a voluntary role for employers.

they have read and understood all relevant policies and procedures, including the Safeguarding Policy.

4.6.2 The Safeguarding Lead holds a record of the DBS checks completed on Sisters in any form of ministry. These checks have all been done within the last three years in line with CSSA expectations. Prior to the Safeguarding Lead being engaged, the Congregation of Our Lady of Sion held DBS checks on all Sisters even if they were not in ministry. They will need to ensure that they hold a clear rationale for which Sisters need vetting checks and continue to obtain those that are necessary. If they were to receive a blemished DBS, then forms for the Safeguarding Lead to make a risk assessment and record a rationale for the recruitment decision have been created.

4.6.3 There are no Sisters in Formation in England and Wales. Sisters from overseas may visit occasionally with the sole purpose of undertaking education courses in the English language. They do not undertake any ministry in the UK, but Testimonials of Suitability are provided by the Religious Superiors prior to arrival.

4.6.4 The Safeguarding Policy contains guidance on Whistleblowing which is available for the Sisters to utilise. It directs them to make RLSS aware if the malpractice, illegal acts or omissions are in relation to safeguarding. This is an appropriate way to ensure that the concern is managed by an external agency. Employed staff have a grievance procedure in their staff handbook which they can use to express their dissatisfaction with any aspect of their employment.

4.6.5 The Congregation of Our Lady of Sion does not have a complaints policy which those whom they engage with in ministry or have offered any services to, can use. They should create and publicise a complaints policy to allow this to happen as necessary.

4.6.6 As the Trustees do not receive any information related to safeguarding for their annual meeting, they do not have oversight of vetting procedures. Therefore, if there were any failures to vet individuals in future, the Trustees would not be able to promptly address and mitigate the concern.

Graded: Met with Recommendations

4.7 Standard 7 Training and support for safeguarding

4.7.1 The Safeguarding Policy states that all members of the Congregation of Our Lady of Sion will undergo safeguarding training relevant to their role and they will complete refresher training every two years. The Safeguarding Lead holds records of training completed. Sisters in ministry have completed safeguarding training as expected in the policy. RLSS confirmed that a total of five separate courses on Basic Safeguarding and Safeguarding Adults have been accessed in the last 12 months. The decision about what training is relevant to their role is at the discretion of the individual member.

4.7.2 It is the judgement of the CSSA that the policy should mandate the minimum safeguarding training course completion by role such as Congregational Coordinators, Trustees, the Safeguarding Lead, Sisters in any form of public ministry and Sisters who do not undertake public ministry. The current system has allowed for the situation where only one Trustee has completed the RLSS Safeguarding training for Trustees, which is designed to ensure that they understand and are fulfilling their responsibilities as laid out by the Charity Commission.

4.7.3 When there is a clear training expectation, compliance with this should regularly be reported to the Trustees so they are assured that policy expectations are met and, if they are not, then remedial action can be taken. Feedback should also be sought from Sisters as to the effectiveness of the training they attend and to understand any future safeguarding training needs that they have.

Graded: Met with Recommendations

4.8 Standard 8 Quality Assurance and Continuous Improvement

4.8.1 The Safeguarding Lead has created an action plan which correlates with the eight national safeguarding standards. This plan needs to be implemented, with leadership oversight to hold action owners to account for their delivery. Integrity in

Ministry has been redistributed and discussed in a planned conversation within 2026.

4.8.2 The Congregation of Our Lady of Sion has also engaged with RLSS, using their template for the Safeguarding Policy and utilising their training offer. The Congregation has engaged with CSSA audit and intend to implement the recommendations.

4.8.3 The greatest impediment to effective safeguarding practice at the Congregation of Our Lady of Sion is the complete absence of Trustee oversight of safeguarding. This prevents them from identifying any concerns that arise in relation to compliance with the eight national safeguarding standards and then taking steps to drive improvements. Despite their unusual governance arrangements, they must ensure that their Trustee structure promotes rather than impedes effective safeguarding practice.

Graded: Not Met

5. Summary of overall findings

5.1 This baseline audit found that the Congregation of Our Lady of Sion has a sincere commitment to safeguarding and a culture that is reflective, collaborative and values good practice. Practical steps have been taken in recent years to strengthen safeguarding arrangements, including the development and review of a safeguarding policy, engagement of a professional Safeguarding Lead, membership of and participation in the training of RLSS and involvement in CSSA audit processes.

5.2 Strengths were identified in the Congregation's willingness to engage with external safeguarding expertise, their preparedness to manage concerns should they arise, and their understanding of the importance of compassionate responses to those who report harm. The development of guidance documents, safeguarding forms, and an action plan aligned to the eight national safeguarding standards provides a solid foundation for continued improvement.

5.3 However, the audit identified significant weaknesses in safeguarding governance and accountability. In particular, the absence of active Trustee oversight of safeguarding represents a critical gap. Trustees do not currently receive safeguarding information, do not meet frequently enough to discharge their responsibilities, and are therefore unable to provide assurance that safeguarding duties, including compliance, oversight of concerns, training, vetting, and serious incident reporting, are being fulfilled.

5.4 As a result, Standards 1 and 8 were graded Not Met. While safeguarding practice at an operational level has many positive features, the current governance arrangements prevent effective quality assurance and continuous improvement. Addressing Trustee roles, responsibilities and engagement with safeguarding is essential if the Congregation of Our Lady of Sion is to meet national safeguarding standards and Charity Commission expectations.

6. Recommendations

To support improvement, the following recommendations are made:

Within 3 months

- The Congregation should work with RLSS to review and improve its overall governance arrangements to ensure compliance with Charity Commission expectations.
- Trustees should establish their safeguarding responsibilities, including oversight of concerns, vetting, training compliance and serious incident reporting.
- A safeguarding update should be included as a standing agenda item for all Trustee meetings.
- Guidance should be reinforced with all members on the requirement to contact statutory services, such as the police without delay where there is immediate risk of harm.

Within 6 months

- Trustees should meet at least twice a year and receive regular safeguarding reports to enable effective oversight.
- Minimum safeguarding training requirements should be clearly defined by role (Trustees, Congregational Coordinators, Safeguarding Lead, Sisters in ministry, Sisters not in public ministry).
- A system should be introduced to ensure safeguarding training compliance is monitored and reported to Trustees.
- Safeguarding information should be made accessible to those outside the Congregation, including through the creation of a safeguarding page on the UK-linked website with details of how to raise concerns and links to Safe Spaces.

Within 12 months

- The Safeguarding Action Plan should be fully implemented, with responsibilities allocated and monitored through leadership and Trustee oversight.
- A complaints policy should be developed and publicised for those who engage with the Congregation's ministry or services.
- Trustees should review safeguarding arrangements annually to ensure compliance with the eight national safeguarding standards and to drive continuous improvement.

7. Arrangements for follow-up

7.1 In line with an overall rating of Met with Recommendations, the earliest potential date of the next audit of the Congregation of Our Lady of Sion 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.

8. Appendix

Evidence provided

Adults at Risk of Harm Induction Training slide
Case Oversight Management Tool
Case Record Template
Community of Communities Meeting Agenda February 2026
DBS Adverse Information Risk Assessment
DBS and Training Log
DBS Recruitment Decision Rationale
Email distributing RLSS training dates
Guidelines for Receiving a Safeguarding Cause for Concern
Integrity in Ministry Discussion Session Slide
Safeguarding Action Plan
Safeguarding Adults Training Completion Certificate
Safeguarding Case Discussion Template
Safeguarding Concern Form
Safeguarding Policy Reviewed 2026
Safeguarding Poster
Safeguarding Questionnaire for Sisters
Sisters Safeguarding Meeting Dates
Spiritual Direction safeguarding commitment process
Staff Handbook