

**Minutes of the meeting of the All-Party Parliamentary Group
on Safeguarding in Faith Communities**

11 November 2025, 14.00-15.30, Committee Room 3a, House of Lords

Present (Parliamentarians and Secretariat)

RJ Jones MP – Chair (RJ)
Rachel Treweek, The Lord Bishop of Gloucester – member (RT)
Baroness Sheila Hollins – member (SH)
Sam Carling MP, Labour – officer (SC)
Lord Brooke of Alverthorpe - member
Baroness Pinnock – member
Henrietta Edwards, office of Baroness Grey-Thompson
Justin Humphreys, (Principal Advisor to the APPG) (JH)
Peter Wharrad, Chair of Trustees
Leah Grey, Disclosure Adviser
Jackie Mills, Executive Project Manager (Note taker)

(Details of further attendees withheld from public record)

Speakers

David Holdsworth, CEO Charity Commission (DH)
Colette Bennett, Charity Commission (CB)

SC welcomed everyone on Ruth's behalf and thanked DH and CB for coming to speak to the APPG. He gave a brief update on what the APPG has been working on (see point 3) and handed over to DH.

1. DH, CEO Charity Commission

DH offered some opening remarks on the Commission's role in relation to safeguarding, including an overview of trustees' safeguarding duties, and the steps the Commission takes to make its guidance accessible to charities. DH noted in particular the work of the Commission's Charities Engagement Team, which hold free training events, a number of which are aimed specifically at faith-based charities (the Team's diary of future events [can be found here](#)). DH then answered a number of questions.

Q1. What mechanisms does the UK Charity Commission have to detect and prevent temporary charities from being created by unregistered religious organisations, to move significant funds internationally to associates of the same group under the guise of charitable grants?

This is a challenge. Charities only have to register once their income is £5000 or above. The Commission relies heavily on reports of issues being sent to them. DH asked that if anyone is aware of people operating in this space and of issues and breaches, the best thing to do is to raise these with the Commission. Even though charities are not registered, they are still subject to charity law in England and Wales.

Q2. What efforts are you making to understand the faith context? In particular, the challenges that face this context such as poor practices and leadership culture, which allows harm and abuse to be perpetrated.

The Commission reviews the cases it handles and looks at how to learn lessons as a regulator but also how the sector learns lessons. From the 185,000 charities, around 9,000 complaints may be received about different charities every year. The Commission needs to focus on those cases where there is highest risk and harm and triage them to take proportionate action. Faith charities are not regulated differently to any other charities. There may be different risk factors or causations

involved, but they are all held to the same standards in law. The Commission also ensures, via the charities engagement team and online guidance, that trustees have easy access to this to help them fulfil their roles. Trustees are volunteers and unpaid, so action needs to be proportionate. The Commission does act robustly where it needs to do so.

Q3. What would be the key indicators/behaviours to convey when reporting poor leadership, culture and governance to the Charity Commission?

It is important to ensure good leadership culture: this is particularly key in the area of safeguarding. When problems are identified, the Commission will know when a culture isn't good. The red flag is often when people don't feel safe to report concerns. Lack of reporting is not a sign of not having a safeguarding problem, either within charities or then in charities' reporting of serious incidents to the Commission. Reporting is seen as a positive sign where trustees are identifying the issues and people are reporting to the charity, trustees are dealing with them and being open and transparent with the Commission. Similarly, where there is a lack of timely reporting of financial accounts this can also be a red flag about other governance issues.

Q4. Please could you outline the process for serious incident reports to the Charity Commission and the expected timescales for charities in the faith sector to hear back about the outcome of these?

The process and guidance is outlined [on the Commission's website](#). The key thing to note is that reports must be made as soon as something is known about. The Commission can then proactively provide guidance and will test what the next steps are, understand how the trustees plan to act and can then determine if early intervention is needed. If, while engaging with trustees, the Commission is not satisfied with the response, formal guidance can be provided to help them. If after that it is felt that the trustees are not competent to take action, then a statutory inquiry may be initiated.

The reporting process is publicised – it's an electronic form¹ on the website. In terms of the timescales, this can vary as concerns will be triaged and risk assessed. Where there is live harm, the response will be quicker. If someone is whistleblowing, they should get a call within 72 hours, then there would be a 30-day window depending on the assessment.

Some incident reports will be received where the trustees are aware of what they need to do so the Commission may not have a role. Engagement happens more where this is not the case.

Q5. With the growing number of public inquiries and court cases concerning the safeguarding practices of high-control religions—particularly regarding shunning, isolation, and the handling of child sexual abuse—would the Commission consider opening a new inquiry into their eligibility for charity status? As someone personally harmed by these practices, I believe they conflict with the Commission's principles and that hearing from those directly affected would offer vital insight.

DH expressed sadness in hearing about this experience. He was aware of historic concerns about the Jehovah's Witnesses, to which the questioner appeared to be referring. There was a published inquiry into *Watch Tower and Bible Tract Society* in 2023² which included child protection advice provided to them. The findings were clear and with robust expectations. There is an ongoing case with Kingdom Hall around safeguarding and DH was not able to go into details as this is a live case.

More broadly – and not to be understood as any inference about the specific case to which he questioner referred - Parliament has not granted the Commission with the authority to remove charitable status as a sanction, so this only happens when a charity ceases to operate or has been mistakenly registered. This legislative approach reflects the idea that, at the point of registration, the applicants demonstrated that the charity met the necessary criteria – and while individuals may

¹ [Reporting or Updating a Serious incident](#)

² [Watchdog reports on investigation into Watch Tower Bible and Tract Society of Britain - GOV.UK](#)

inadvertently or deliberately not fulfil their duties, then the default should be that they are replaced by others who will, rather than the charity being closed down as a sanction.

A follow-up question was raised from the floor - do you have the powers to enforce safeguarding? Legal challenges and other tactics have been used by some charities to delay the work of the Charity Commission. They don't want to do the right thing. Do we need changes to charity law?

Powers are kept under review regularly, with three acts coming about within the last decade. The Commission has more power to act than prior to 2016. Some of this has come about as a result of learning from cases. DH is aware of certain tactics by those with deeper pockets who try to tie up resources in courts and use underhand tactics. However, the Commission does not go away and will always get an outcome in the end.

Q6. In light of the Charity Commission's post-IICSA efforts to elevate safeguarding standards across the charity sector, including faith-based organisations, what steps are being taken to ensure that smaller, independent places of worship and informal religious groups are not left behind? While larger, well-resourced religious charities have responded proactively, many grassroots faith communities continue to face barriers such as limited awareness of child protection norms, language challenges, and mistrust of external authorities. How can the Charity Commission and the All-Party Parliamentary Group work together to leverage local capacity, faith networks, and community-led initiatives to deliver sustained, inclusive, and culturally competent safeguarding improvements across the faith sector?

The first thing is to ensure the guidance is clear and accessible. Safeguarding was prioritised as part of the Commission's review of its suite of guidance for trustees – now offered as a 5 min guide, alongside a short animated video which can be used at start of a trustee meeting. The Commission also engages with other partners and agencies, such as the DfE and sector umbrella bodies, to reach smaller organisations.

The Commission's Charities Engagement Team offers free sessions, in person to help where there may be additional barriers for trustees – such as English not being the predominant first language of the charity's board, etc.

RJ – we are concerned with safeguarding more than financial issues – is there a temptation to look at finance and safeguarding is in the 'too difficult' box?

DH – we are robust in applying standards on safeguarding for all charities. In terms of engagement by the state, the Commission is often 'first in, last out' when safeguarding concerns are raised about or by charities. This is particularly the case if allegations do not reach the criminal threshold, meaning other statutory bodies are not in a position to act. There is no regulatory body yet for safeguarding, and we await any further developments in this area.

Questions from the floor

What percentage of inquiries are safeguarding?

Of the 4,000 regulatory compliance cases handled in an average year by the Commission, probably around 15% are safeguarding related. The Commission's assessment of serious incident reports received from charities is not included within these figures.

It is so important for the voice of those with lived experience to be at the centre of what is happening. Issues of power and fear are huge. How do we check that those issues of power and fear don't come into the regulatory space and that mutual learning is built?

As a statutory body, independent of government, our primary concern is for the public interest and the charity. The quality of engagement with trustees from the outset is important and will determine the tone of engagement with charities going forward. If we are stonewalled by a leader, then engagement by the Commission will be calibrated in response. Openness is encouraged along

with good dialogue and a willingness to work together, be understanding of the legal duties and work towards solutions.

Is there any publicly available information about larger denominations and bulk reporting? For smaller organisations is it possible to investigate them if they are not carrying out their safeguarding obligations?

This data is not made publicly available, in part to avoid discouraging reporting. However, the macro anonymised data could be published and we are currently exploring this. Resources and technology have historically been barriers, but forthcoming investment may enable the Commission to look into this in more detail.

What is the definition of a large denomination, in terms of bulk reporting?

The Commission currently has arrangements with the Church of England and Roman Catholic Church, and outside a faith setting, with The Scout Association among others. Bulk reporting is dependent upon the willingness of those within these groups to report in this way: it is a collaborative process rather than something the Commission imposes on 'federated' structures when they reach a certain size.

RJ thanked DH and CB for attending the APPG and urged everyone to review the Charity Commission website [The Charity Commission - GOV.UK](https://www.gov.uk/charity-commission).

Note that the upcoming event in Birmingham is now full, but there is a waitlist and these events are repeated.

DH then left the meeting.

2. Update on the Crime and policing Bill

Amendments have been submitted around Mandatory Reporting, with further meetings being set up to discuss these and there will be an extensive debate within the House of Lords as it progresses through this stage in the process.

3. Update on representation of interested parties

There is a desire to ensure sufficient diverse representation from interested parties and parliamentarians. Good progress is being made and all were encouraged to suggest other parties who could enhance this further, especially reaching the smaller communities.

Next steps for the APPG – potential inquiry on definition of regulated activity within faith communities

It was agreed to launch an Inquiry into Regulated Activity next year. There are tight definitions around this and more clarity is needed. This issue is known to exist across faith settings. The following points were raised:

- Better definition is needed; also consideration of those who are not in Regulated Activity but could pose a risk.
- This applies across multiple settings, not faith settings.
- There are challenges around two groups – youth services within church and out of school settings (OOSS). If these settings were regulated, they would receive the appropriate support to run the services safely.
- This overlaps with the consultation on OOSS so need to take many of these into account.
- It would be helpful to understand what people understand about Regulated Activity. The key element should be about what the groups do, not about who with or how often. Within the faith sector there can be lack of understanding about what Regulated Activity means.

- There are often have a range of settings who are harder to reach for understandable reasons and others who are resistant to compliance. In order to bring focus to this, the intention would not be to single people out but to level the playing field.
- Note that if the entity is a charity, it is still regulated even if not registered. If they are exempt, they would have another primary regulator. Managing concerns in this scenario is harder but issues would still be reported to the Charity Commission
- It was acknowledged the Inquiry should include looking across the four nations of the UK, as Scotland are not subject to the same restrictions on Regulated Activity.

The Co-Chairs and Secretariat will work on the Terms of Reference for this Inquiry, which will be circulated for comment.

4. Closing remarks and update on Co-Chair role

RJ shared that the Lord Bishop of St Edmundsbury & Ipswich, Joanne Grenfell, has agreed to Co-Chair the APPG with RJ. Bishop Joanne has been the lead Bishop for Safeguarding within the CofE for some time, so comes with expertise and interest in this area. Bishop Joanne will take a seat in the House of Lords later this month and the plan will be to then bring her in at the AGM early in 2026.

RJ thanked everyone for attending and asked that everyone stays informed on APPG activity.