



DIOCESE OF **Hexham & Newcastle**

**SAFEGUARDING:
POLICY AND PROCEDURE FOR
THE MANAGEMENT OF
LOW LEVEL CONCERNS**

A POLICY

POLICY STATEMENT

As part of the Diocesan approach to safeguarding, every member of Diocesan personnel and the wider Diocesan family will ensure they promote an open and transparent culture in which **any safeguarding concern** about any trustees, clergy, permanent and temporary employees, contractors and volunteers working in or on behalf of the Diocese, or any other member of the Diocesan worshipping community is dealt with promptly and appropriately.

- This Policy must be read in conjunction with the Caring Safely for Others document for Clergy and the Safeguarding Policy.

1. DEFINITIONS

- ‘The Diocese’ refers to the Diocese of Hexham and Newcastle including its constituent Parishes and Partnerships including clubs, associations and parish groups.
- ‘Diocesan Personnel’ refers to trustees, clergy, permanent and temporary employees and volunteers.
- ‘Diocesan family’ refers to anyone who is connected to the Diocese, including, for example, someone attending on Diocesan premises for the purpose of receiving charitable support from a Diocesan service such as a drop-in centre or a member of the worshipping community.
- ‘Low level concern’ is any safeguarding concern which is inconsistent with the standards of behaviour and conduct expected of Diocesan Personnel and the Diocesan Family including inappropriate conduct outside of Diocesan or parish activities but is otherwise not considered serious enough to make a referral to the Local Authority Designated Officer (LADO), police, local adult and children services or the Disclosure and Barring Service (DBS). The term ‘low-level’ concern does not mean that it is insignificant.
- This Policy and Procedure runs alongside and supplements the Safeguarding Policy and the Practice Guidance for the Management of Low-Level Concerns-see appendix 1.

2. SCOPE

- This Policy and Procedure applies equally to Diocesan Personnel and any other members of the Diocesan family and is underpinned by the Diocesan Values of: Trust, Service, Respect, Integrity and Compassion.
- This Policy and Procedure aims to create a culture in which all concerns about personnel are shared responsibly and with the right person, are recorded and dealt with appropriately.
- This Policy and Procedure will:
 - Ensure that clergy, employees and volunteers working in or on behalf of the Diocese are clear about their professional and volunteering boundaries and act within these boundaries, and in accordance with the Values of the

Diocese.

- Minimise the risk of abuse.
- Enable all members of the Diocesan Family to identify concerning, problematic or inappropriate safeguarding behaviour early and report it promptly to the Safeguarding Department.

3. AIM OF THE POLICY AND PROCEDURE

- The aim of this Policy and Procedure is to:
 - Empower all Diocesan Personnel, and members of the Diocesan Family, to share any low-level safeguarding concerns with an appropriate person.
 - Address unprofessional/inappropriate behaviour related to safeguarding and support an individual to correct it at an early stage.
 - Manage and respond to low-level safeguarding concerns sensitively and proportionately when they are raised.

4. COMPLIANCE

- Compliance with this Policy and Procedure is mandatory and Diocesan Personnel are responsible for knowing and understanding it.
- Where breach of this Policy and Procedure is found to be through willful disregard or negligence, Diocesan employees may be subject to the Diocesan Disciplinary Policy and Procedure.
- Clergy may be subject to relevant sanctions which will depend on the seriousness and consequences/potential consequences of the concern raised which will be recommended by the Safeguarding Committee to the Bishop who will make the decision in accordance with Canon Law.
- All volunteers may be subject to relevant sanctions which will depend on the seriousness and consequences/potential consequences of the concern raised which will be decided upon by the Safeguarding Committee having been delegated that authority by the Board of Trustees of the Diocese. There will be no appeal against this decision.
- The Diocesan Board of Trustees will approve and periodically review the Policy and Procedure for responding to reports of low-level concerns.

5. PRINCIPLES

- Concerning behaviour can exist on a wide spectrum, from inadvertent or thoughtless, to behaviour that may look to be inappropriate, but might not be in specific circumstances,

through to that which is ultimately intended to enable and/or facilitate abuse.

- Examples of such behaviour could include, but are not limited to:
 - being overfriendly with children or vulnerable adults.
 - taking photographs of children or vulnerable adults on their own mobile phone (where photographs are taken for the purposes of promoting/advertising, etc. express permission **MUST** be given, and should be recorded in writing).
 - communicating with children or vulnerable adults via social media or private and non-approved communications systems i.e. WhatsApp or private email addresses which cannot be scrutinised.
 - engaging with a child or vulnerable adult on a one-to-one basis in a secluded area, in a car or behind a closed door or
 - using inappropriate, intimidating, overbearing, aggressive, offensive, sexualised behaviours or language.
- Concerns may arise in several ways and from a number of sources.
For example:
 - suspicion.
 - complaint.
 - disclosure made by a child/vulnerable adult, parent or carer or another adult within or outside of the organisation.
 - as a result of vetting checks undertaken.
- Ensuring they are dealt with effectively should also protect those working in or on behalf of the Diocese from potential false allegations or misunderstanding.

PROCEDURE

The Diocese seeks to create an environment where Diocesan Personnel are encouraged to report any concerning behaviour and are confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that falls below the expected standards.

1. HOW TO RAISE A CONCERN

All low-level concerns must be directed promptly to the Diocesan Safeguarding Coordinator where the guidance for management of low-level concerns will be followed. If the concern is in relation to the Diocesan Safeguarding Coordinator, then it should be directed to the Chief Operating Officer.

2. RECORDING LOW-LEVEL CONCERNS

- All low-level concerns will be comprehensively recorded. The record will include details of the concern, the context in which the concern arose, and action taken. The name of the

individual sharing the concern will also be noted. If the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

- Records will be held by the Safeguarding Department and kept confidentially in line with the Diocesan Retention Policy.
- These records will be periodically reviewed, by the Safeguarding Committee, so that potential patterns of concerning, problematic or inappropriate behaviour and/or overall trends can be identified.
- Consideration should also be given to whether there are wider cultural issues within the Diocese that enabled the behaviour to occur and where appropriate policies could be revised, or extra training delivered to minimise the risk of it happening again.

3. INVESTIGATING LOW LEVEL CONCERNS

- Any investigations will be conducted in line with the Practice Guidance for the Management of Low-level Concerns (see appendix 1).
- Where it is deemed necessary to stand a person down from their role/s while the concern is investigated, this will be done 'without prejudice' and only after due consideration has been given to the relative seriousness of the allegation/concern and whether enquiries can be properly conducted while the person of concern remains in their role.
- If the person is a member of clergy, then the request to voluntarily stand down will be taken in conjunction with the Bishop.
- If the person is an employee the decision to suspend from work will be taken in conjunction with Human Resources.
- If the person is a volunteer this decision will be taken by the Safeguarding Coordinator in conjunction with the Chair of the Safeguarding Committee.
- Volunteers are subject to Diocesan Policies and Procedures relevant to their role.
- Any volunteer agreement is binding in honour only and is not intended to be a legally binding contract. It may be cancelled at any time at the discretion of either party.

C APPENDIX 1

MANAGEMENT OF LOW-LEVEL CONCERNS PRACTICE GUIDANCE

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1 WHO THIS PRACTICE GUIDANCE APPLIES TO

This practice guidance is applicable to all those who have a role within the Diocesan Family of Hexham and Newcastle. This includes all lay roles (paid and voluntary), clergy, religious and members of the worshipping community.

2 PRINCIPLES

- 2.1 The Church recognises that it has an important role in safeguarding and is fully committed to:
- Its role in supporting children to achieve their full potential in an environment where they are protected from exploitation, abuse and maltreatment.
 - Actively promoting the empowerment and well-being of adults through the church.
 - Recognising that everyone has the right to live their life free from violence, fear and abuse and
 - Recognising that adults have the right to be protected from harm and exploitation.
- 2.2 All adults acting in the name of the Catholic Church in England and Wales have a responsibility to act and intervene when it appears that adults and/or children need to be made safe from risk of abuse or maltreatment.
- 2.3 A person who has a role within the Diocese and has a low-level concern made against them may be reported to the statutory authorities, dependent upon the nature of the concern.
- 2.4 Anyone who raises a low-level concern/s will be responded to sensitively, respectfully, and seriously.
- 2.5 To ensure that people know who to contact if concerned about the welfare or safety of a child or adult, the Church publicises contact details in churches and other relevant settings related to Church activity.

3 LEGISLATIVE CONTEXT

- 3.1 The Church is fully committed to acting in accordance with legislation and associated statutory and good practice guidance.

- 3.2 To achieve this, the Church will act in an open, transparent and accountable way in working in partnership with Social Care Services, the Police, Health Agencies, Probation Services and other relevant agencies to safeguard children and adults and assist in bringing to justice anyone who has committed an offence against a child or an adult at risk of abuse or neglect.
- 3.3 A child-centred/person centred approach is fundamental to safeguarding and promoting the welfare of children and vulnerable adults.

4. RESPONDING TO CONCERNS

- 4.1 Concerns may be about current events or something that happened in the past but is only now being reported. In either case, the concern will be treated with equal importance because events in the past may have current relevance to the safety of others who might need protecting. In any event, always contact the Safeguarding Team.
- 4.2 The person hearing the disclosure or receiving the information will:
- Be calm and reassuring.
 - Listen and acknowledge what is said without passing judgement or minimising the information.
 - Not interrogate or put words into the person's mouth.
 - Be aware that the person's ability to recount their concern will depend on age, level of understanding, culture, language, communication skills and ability/disability.
 - Explain what they will do next and who they need to contact.
 - Not promise total confidentiality¹ but explain that the information will only be shared appropriately with others who need to know.
 - Make careful notes as soon as possible and include dates, times of the incident and when the recording was made, who was present and sign the notes, making sure the notes are kept securely.
 - Provide the person with some means to contact them and be clear about how and when they will contact the person to advise what will happen next.
 - Ask an adult's consent to take up their concerns and if they do not agree, consult the Safeguarding Coordinator.
 - Encourage and support adults to share their information.
- 4.3 Regardless of role within the Church the following procedures must be followed:

Table 1 – Referral Procedures (CSSA standards)

Issue	Action
4.3.1 Concern that a child or an adult might be suffering, or is suffering from harm, caused by somebody outside of the Church.	In these circumstances, the Practice Guidance for the Management of Allegations will be followed.
4.3.2	

¹ Always be clear that information will only be shared on a need-to-know basis with relevant others, within the confines of the General Data Protection Regulation 2016 and the Data Protection Act 2018. However, if concerns are such that there are reasonable grounds to suspect that harm may come to any individual, there is a statutory duty to share these concerns with the authorities

A child or an adult expresses a concern in respect of somebody with a role within the Church.	Children and Adults Inform the Safeguarding Coordinator within one working day of the concern. Where it appears that a criminal offence may have taken place, the Practice Guidance for the Management of Allegations will be followed and referred to the Police within one working day. The Safeguarding Coordinator will use their professional judgement (along with consultation with the Chair of the Safeguarding Committee and/or Vicar General and Human Resources if required) to establish whether a low-level concern investigation needs to be undertaken. An investigation will be conducted by a member of the Safeguarding Team or suitable line manager to establish the nature of the concern, the cause and effect and recommend any steps required to address unacceptable behaviour or conduct at an early stage. The person about whom the concern(s) is being raised must be given the opportunity to respond, in person or in writing, in the interests of natural justice. While the investigation is ongoing it may be necessary to stand down a volunteer from their role, which will be done in consultation with the Chair of the Safeguarding Committee. If a member of Clergy is requested to withdraw from public ministry whilst the investigation is ongoing, this will be in line with Canon law and consultation with Vicar General and/or Bishop. When the concern relates to employees, the appropriate policy will apply, depending on the circumstances. This is a neutral act and does not imply 'guilt'; it should be considered as both a protective action and as an act to facilitate the progress of enquiries and investigation. This will be done 'without prejudice' and only after due consideration has been given to the relative seriousness of the allegation/concern(s) and whether enquiries can be properly conducted while the person of concern remains in their role. Where a decision has been made to stand down a volunteer and they hold more than one role, they will be stood down from all roles, being cognizant that all volunteering involves at least some element of safeguarding. If the concern is against the Safeguarding Coordinator, the report must be made to the Chief Operating Officer, who will then be responsible for enquiries or investigations.
4.3.3 Concerns about conduct which are not safeguarding related and do not meet the criteria for referral to statutory agencies.	If the concern relates to clergy: The guidance of a qualified Canon Lawyer will be sought to ensure compliance with the requirements of Canon Law. The Safeguarding Coordinator will refer to the Bishop or in his absence the Vicar General for consideration as to whether any further action is required to address the matter. Consideration must always be given to whether it is necessary to notify the Bishop if the individual is linked to a Parish or Seminary within his

	Diocese, regardless of where the individual is domiciled or incardinated. If the concern relates to an employee: The Safeguarding Coordinator will liaise with the Head of Human Resources and line manager and record any discussions.
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5 INFORMATION SHARING

- 5.1 Information must only be shared with those who need to know (including other Dioceses and Religious Congregations where concern is not confined to one Diocese or Congregation) and with statutory agencies. If there is any doubt as to whom information can be shared with, advice must be sought from the Diocesan Data Protection Lead.
- 5.2 Where an adult who is not working or ministering within the Catholic Church in England and Wales provides information about abuse and requests anonymity, they should be encouraged and supported to refer the matter directly to the Local Authority Children's or Adult Services Department or the Police.
- 5.3 Where there is a referral to statutory authorities arising from receipt of information from somebody who has requested anonymity, the person requesting anonymity will be advised that although their request will be noted with the referral, it may not be possible for them to remain anonymous, although every effort will be made to honour the request.
- 5.4 Individuals who have roles within the Church must not make anonymous referrals because they are acting in their professional/volunteering capacity with the requirement to safeguard and protect children and young people and vulnerable adults.

OUTCOMES

6 MANAGEMENT OF CONCERNS WHERE AN INVESTIGATION BY THE SAFEGUARDING DEPARTMENT HAS CONCLUDED AND THERE REMAINS A CONCERN

- 6.1 Any canonical outcomes which are required will be dealt with via the Bishop or Vicar General in accordance with Canon Law.
- 6.2 Responsibilities towards employees are regulated according to diocesan employment policies and procedures, and employment legislation.
- 6.3 Where concerns have been made about a volunteer, and they remain in role after investigation, the Church will consider what action(s) needs to be taken to protect people from potential harm. This might include making further enquiries or permanently removing a volunteer from their role(s). Any volunteering agreement is binding in honour only and is not intended to be a legally binding contract. It may be cancelled at any time at the discretion of either party. An employment relationship will not be created either now or in the future.
- 6.4 Following an investigation, the Safeguarding Coordinator will refer the concern to the Safeguarding Committee who will determine whether:
 1. No further action is necessary.
 2. Further action is necessary and there is enough information to make recommendations*, or:

3. There is insufficient available information from which to make recommendations and further enquiries are required. In this case the Safeguarding Coordinator will initiate whatever enquiries are required.

*Recommendations may include steps necessary to address unprofessional conduct or behaviour such as awareness or training courses. If the offer of training or awareness raising is not agreed by the volunteer subject to the concern, it is likely that volunteer will be permanently stood down.

7 REMOVAL FROM MINISTRY

- 7.1 Any decision to request a member of the clergy to withdraw from public ministry must be made in accordance with Canon Law.
- 7.2 For employees, the line manager and Human Resources department will apply the relevant Policy and Procedure.
- 7.3 Where a decision has been made to stand down a volunteer and the matter has been investigated, a report will be sent to the Safeguarding Committee who will decide whether the stand down can be lifted, should be reviewed (and if so when) or should become permanent. There is no right of appeal from the decision of the Safeguarding Committee in relation to volunteers.

Details of specific reviews and key changes made:

Responsible Officer	Safeguarding Coordinator
Date first approved by Board	October 2024
First Review Date	September 2025
Date Review approved by Board	
Next review date	
Author	Ian Colling/ Meriel Anderson

Reviewer(s)	Date	Review Actions	Approved by Board
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CONTACTS

Any queries regarding this Policy and Procedure should be referred to the Safeguarding Coordinator by emailing safeguarding@diocesehn.org.uk or by telephone on 0191 243 3305.