

The Congregation of the Sisters of the Immaculate Heart of Mary, Mother of Christ Low Level Concerns Policy

Introduction

The Congregation of the Sisters of the Immaculate Heart of Mary, Mother of Christ is committed to safeguarding all children and adults. For The Congregation of the Sisters of the Immaculate Heart of Mary, Mother of Christ this commitment directly relates to the fact that we are all made in the image of God and the Church's common belief in the preciousness, dignity and uniqueness of every human life. We start from the principle that each person has a right to expect the highest level of protection, love, encouragement and respect. Following on from the safeguarding reviews in 2020 we are committed to the One Church Approach to safeguarding by implementing the changes needed and ensuring we respond to victim/survivors promptly and compassionately.

Policy Purpose

This policy forms part of a suite of safeguarding policies aimed at creating a safer Catholic Church. This policy should be read in conjunction with the RLG's safeguarding policy and code of conduct. The Congregation of the Sisters of the Immaculate Heart of Mary, Mother of Christ is committed to creating an open and transparent culture in which all members, staff and volunteers are empowered to highlight and report safeguarding and low level concerns.

Scope

This policy and procedure applies to all workers within the Congregation of the Sisters of the Immaculate Heart of Mary, Mother of Christ Religious, Lay or Voluntary regardless of their role or the activities they undertake.

Definitions of low level concern, children and adults at risk of harm:

- **Low-Level Concern**: Concerns around an adult's behaviour towards a child or an adult which are not consistent with the standards and values of the Congregation of the Sisters of the Immaculate Heart of Mary, Mother of Christ no matter how small. These concerns do not meet the threshold for safeguarding intervention.
- **Safeguarding children (children and young people under the age of 18)** means to:
    - Protect children from abuse and maltreatment
    - Prevent harm to children's health or development
    - Ensure children grow up with the provision of safe and effective care
    - Take action to enable all children and young people to have the best outcomes
- **Adult at risk**: An adult who is or may be in need of community care services by reason of mental or other disability, age, or illness, and who is or may be unable to take care of themselves or protect themselves against significant harm or exploitation

Reporting Concerns

If concerns surrounding a member of the Congregation of the Sisters of the Immaculate Heart of Mary, Mother of Christ staff or a volunteer's behaviour are identified these must be shared either verbally or in writing to the Safeguarding Lead. The Safeguarding Lead will make a timely record of the conversation which includes the relevant details of the concern, the name and role of the reporter, the name and role of the person about whom the concern is raised, and the date and time the concern was raised.

A record must be kept of any conversations with the person with whom the concern is reported, and if they have an opposing view of the concern this must be recorded. Records must be accurate and free of assumptions.

If the person reporting the concern wishes to remain anonymous this will be respected by the Congregation of the Sisters of the Immaculate Heart of Mary, Mother of Christ as far as possible. However, there may be circumstances where this is not possible and as a consequence total anonymity cannot be guaranteed.

Self-reporting

There may be a situation in which members of the Congregation of the Sisters of the Immaculate Heart of Mary, Mother of Christ the Congregation of the Sisters of the Immaculate Heart of Mary, Mother of Christ staff or volunteers' actions are realised by themselves to have been inappropriate, or could be misinterpreted or appear compromising. Wherever possible, this should be proactively reported to the Safeguarding Lead.

This would include emergency situations in which a member of the Congregation of the Sisters of the Immaculate Heart of Mary, Mother of Christ staff or volunteer had one to one access to a child or adult at risk, or if on reflection, the individual has behaved in a way which falls below the standard set out in the code of conduct. Self-reporting helps to create a culture of safeguarding and is a positive step in resolving concerns as they arise.

Procedure

Upon receipt of a low level concern the Safeguarding Lead will:

- Discuss the concern with the reporting person
- Speak with any witnesses (unless they have been advised not to do so by statutory agencies/RLSS)
- Discuss the concern with the individual about whom the concern has been raised (unless advised otherwise by statutory agencies/RLSS)
- Review the information collected to determine whether the concern/behaviour is appropriate and consistent with the code of conduct, a low level concern or a safeguarding concern.
- The Safeguarding Lead will keep timely and accurate records of all conversations (both internally and externally), referrals and advice sought by agencies such as RLSS, decision making and action taken.

Outcome of Reported Concern

The Safeguarding Lead will review the concern and establish if the behaviours reported amount to a low level concern. If it is found that the behaviour is appropriate and consistent with the Congregation of the Sisters of the Immaculate Heart of Mary, Mother of Christ's code of conduct then this should be fed back to both the reporting person and the person about whom the concern was raised.

If the behaviour has been identified as a low level concern this should be managed internally by the person's superior/manager. There may be further actions required following investigation into the concern, such as:

- The concern may indicate a training need.
- The concern may indicate a revision of policy and procedures is required.
- The low level concern may require a values based conversation with the person for whom the concern was raised which makes it clear why their behaviour is considered concerning or inappropriate.
- In some circumstances an action plan/risk assessment designed to address concerns with the person may be appropriate. This must be regularly reviewed with the individual.
- Human Resources advice may need to be sought for staff members in which there are concerns surrounding misconduct or performance issues.

It is important to note that the concern may be minor and requires no further action but all outcomes and actions identified must be clearly recorded.

Where the low level concern triggers the Congregation of the Sisters of the Immaculate Heart of Mary, Mother of Christ's disciplinary, capability, grievance, whistleblowing or other procedures, these must be followed.

If the behaviour is a safeguarding concern, it therefore meets the threshold for referral to RLSS and also statutory services, such as social care/LADO. This may be due to the nature of the concern reported or when reviewed in the context of other concerns that have been raised about the person.

Confidentiality and Whistleblowing

All investigations into low level concerns must be completed discreetly and on a 'need to know' basis.

the Congregation of the Sisters of the Immaculate Heart of Mary, Mother of Christ will encourage and enable anyone with a serious concern, to raise that issue without fear of victimisation, or disadvantage.

If that concern is regarding malpractice, illegal acts, or omissions at the Congregation of the Sisters of the Immaculate Heart of Mary, Mother of Christ or other religious institution relating to safeguarding, then RLSS should be made aware.

The action taken by RLSS will depend upon the nature of the concern referred. However, an investigation will be undertaken if appropriate, followed by appropriate action and written feedback will be provided, including a rationale documenting the reasons why identified actions have been taken. This can be delegated to RLSS.

Data Protection

Primary responsibility for the management of documents and safeguarding case files lies with the Safeguarding Lead/RLSS, who will ensure an accurate, auditable, and secure record of any safeguarding concerns or allegations referred to the Congregation of the Sisters of the Immaculate Heart of Mary, Mother of Christ are maintained.

This record will include:

- Relevant contact details
- Details of how/when the concern or allegation was received.
- Details of the concern itself
- Relevant historical information

- Identified past and present risk factors
- Any actions or investigation undertaken including those by the Congregation of the Sisters of the Immaculate Heart of Mary, Mother of Christ or RLSS] and from statutory agencies.
- Rationale for actions and or outcome of case

All records are potential evidence in a criminal proceeding, civil case or statutory/public inquiry and must be stored in a suitable and retrievable format with an auditable record of provenance and integrity.

Review of this Policy

This policy will be reviewed by the Trustee Board annually at our regular Board meetings. Through this process of regular review we aim to improve our services and ensure that any learnings/developments are implemented, within our RLG.

Date of Document Implementation:	**7th October 2026**
Date Review Due:	**7th October 2027**