

Congregation of the Sisters of the Immaculate Heart of Mary, Mother of Christ

Safeguarding Policy

1. POLICY OVERVIEW

Congregation of the Sisters of the Immaculate Heart of Mary, Mother of Christ is committed to safeguarding all children and adults. For 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.

2. SCOPE

2.1 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.

2.2 It is the responsibility of all the Congregation of the Sisters of the Immaculate Heart of Mary, Mother of Christ to prevent, whether by action or omission, abuse. Abuse in this policy refers to: physical; sexual; emotional; spiritual; neglect; self-neglect; organisational; material; psychological; financial; domestic or verbal. Additionally, behaviour which effectively results in modern day slavery or where there is evidence of discrimination or radicalisation, needs to be recognised and addressed as a safeguarding issue, in accordance with the procedures outlined in Section 6.

3. TRAINING

3.1 All the Congregation of the Sisters of the Immaculate Heart of Mary, Mother of Christ members will undergo Safeguarding Training in relation to both Children and Adults relevant to their role. The list below outlines the minimum standards for training in each role:

- Roles 1–x Training
- Superior – RLG Lead Training
- Safeguarding Lead – Safeguarding Lead Training
- Trustee members – Trustee Training
- Community Members who work with public – Advance Safeguarding Training
- Community members who don't work with public – Basic Safeguarding

3.2 Congregation of the Sisters of the Immaculate Heart of Mary, Mother of Christ members and Trustee members will undertake yearly refresher training.

4. ROLES AND RESPONSIBILITIES

4.1 The Congregation of the Sisters of the Immaculate Heart of Mary, Mother of Christ Trustee

The Trustee has a duty to maintain appropriate governance and oversight of safeguarding in accordance with this policy and national guidelines. Certain functions of the Board will be delegated to congregation members, as indicated below.

4.2 The Superior

The Superior is responsible for ensuring appropriate policy, procedures and best practice are in place for the effective delivery of safeguarding, including any related due diligence checks. Certain functions of the Superior will be delegated to [members], as indicated below.

4.3 The [Safeguarding Lead]

The Safeguarding Lead has direct oversight of [Congregation of the Sisters of the Immaculate Heart of Mary, Mother of Christ safeguarding policy and guidance, including management and oversight of documentation, case progression/management and the secure, legally compliant storage of

safeguarding reports and related material as well as oversight of the relationship with and input in the work of the RLSS.

4.2.1 The Safeguarding Lead may delegate some of this responsibility to the RLSS by referring the case to them but will remain as key contact for the case duration unless another individual is identified to assume responsibility.

4.4 All other roles

All members have an obligation to ensure they know how to respond to safeguarding concerns by being familiar with the content of this policy and the procedure contained within it and any other associated policies/procedures.

4.5 General

Everyone involved in the work of Congregation of the Sisters of the Immaculate Heart of Mary, Mother of Christ has a duty to disclose to the [Safeguarding Lead or Chair any safeguarding concerns that have been raised about them.

5 PRACTICE GUIDANCE

5.1 In accordance with Article 19 of Pope Francis' Apostolic Letter, "Vos Estis Lux Mundi", 7 May 2019 [3], It is the policy of the Catholic Church in England and Wales, as agreed by the Bishops Conference, April 2020, to report to the statutory authorities, all allegations of abuse made against those working in the name of the Church, regardless of whether the allegations or concerns relate to a person's behaviour in relation to their role within the Church or another setting. This policy must be applied in all situations where it is alleged, or there are reasonable grounds to believe, that a member of the Religious Community, lay persons, or associated volunteer or employee, has acted in one of the following ways:

- Has behaved in a way that has harmed or is likely to have caused harm to a child or a at-risk adult. This would include any at-risk adult irrespective of the cause of that vulnerability or whether the vulnerability is temporary or permanent.

- Has or is suspected to have committed a criminal offence against or related to a child or a at-risk adult (including a at-risk adult as indicated above.)

- Has behaved towards a child or at-risk adult in a way that indicates they may pose a risk of harm to children or at-risk adults.

- Has behaved in a way or made statements indicating that they may not be suitable to work with children or at-risk adults.

- Has behaved in such a way that, by actions or omissions, their conduct has been intended to interfere with, prejudice, undermine or avoid a criminal, civil or canonical investigation, against any person associated with or who is a member of a contracting congregation.

5.2 The behaviours above are to be considered within the context of the different categories of abuse outlined above and further detailed guidance is specifically provided in relation to sexual offences against children, including both recent and non-recent offences, and possession and distribution of indecent images of children.

5.3 Additional guidance is provided by the CSSA in relation to the sexual and criminal exploitation of children by organised criminal networks.

5.4 Additional guidance is also provided in relation to adults disclosing abuse outside the context of the Church. If a competent adult explicitly refuses the making of a referral about abuse that occurred outside of the Church, consideration must be given to whether the accused person has access to children who may be at risk. In these circumstances, the name of the accused and details of the allegation must always be referred to the statutory authorities. This can be done without disclosing the name of the victim/survivor where they have refused consent to do so, or where it is not possible to obtain consent.

5.5 It is the policy of the Catholic Church in England and Wales to report to statutory authorities where a child or an adult is at immediate risk of harm, or there is concern that a child or adult is suffering or is likely to be suffering from significant harm or abuse, from somebody who does not hold a role within the Church. This includes, but is not limited to:

- Someone who is at serious risk of harm from self or others
- Someone who poses a serious risk of harm to someone else
- A concern about a child or at-risk adult at risk of harm from someone else
- Concerns over someone's mental capacity

6 PROCEDURE

6.1 If Congregation of the Sisters of the Immaculate Heart of Mary, Mother of Christ becomes aware of a safeguarding issue, they should contact the RLSS Safeguarding Team and pass the concern and all associated documentation immediately. You should ensure the person who made you aware of the concern knows you are doing this.

6.1.1 The RLSS or Safeguarding Lead at Congregation of the Sisters of the Immaculate Heart of Mary, Mother of Christ who takes the case should:

Ensure the victim/survivor or individual has been informed of the next steps

- Explain what will happen, give them options if possible and an indicative timescale
- Contact any relevant bodies
- Complete the safeguarding paperwork and ensure appropriate record keeping of all communications including phone calls, meetings and discussions in relation to the case.
- Inform the Superior that there has been a new safeguarding referral.
- All referrals / reports outside of the RLSS should be made within 24 hours of receiving the information, unless there are exceptional circumstances to postpone making this referral/report
- The decision to delay a referral/report must be authorised by Superior

6.1.2 When the concern needs to be reported to a statutory agency, the individual reporting the issue must be informed that the information will not be kept confidential, and that the details will be passed on to the

police and any other appropriate statutory body. All Sisters should be supportive of the individual making the disclosure but should not seek more details than necessary for an initial statutory referral.

6.2 When to report:

6.2.1 Allegations or safeguarding concerns – When abuse is suspected, witnessed or a disclosure of abuse is received by Congregation of the Sisters of the Immaculate Heart of Mary, Mother of Christ there is a requirement to report these allegations of abuse, and other relevant safeguarding concerns to the appropriate statutory authority including social services/the police within 24 hours.

6.2.2 In case of emergency – If a child or adult is in immediate danger, at imminent risk or requires medical attention, the relevant emergency service must be contacted via 999. Local Social Services should also be contacted at the earliest opportunity in the case of a child or at-risk adult.

6.2.3 In case of non-emergency – In a situation when there is no immediate risk to a child or at-risk adult and no requirement to make a statutory report, the Congregation of the Sisters of the Immaculate Heart of Mary, Mother of Christ or the RLSS on their behalf will work with the individual to agree desirable outcomes in line with this policy.

6.3 Making a referral to the statutory authorities:

6.3.1 Safeguarding bodies (not exhaustive)

- Internal Safeguarding Structures within the Catholic Church
- Local authority Safeguarding team – Adults
- Local authority Safeguarding team – Children
- Police 999
- Police 101
- GP
- Crisis Team

- RLSS Out of Hours Team
- Community Psychiatric Nurse
- Charity Commission
- CSSA
- Local Safeguarding Commission
- Local Authority Designated Officer (LADO)
- NSPCC
- DBS

6.3.2 In the case of a child - Referrals should be made to children's social care for the area where the child is living or is found. If a crime has also been committed, the police in that area should also be contacted. The referrer should confirm any verbal and telephone referrals in writing, within 48 hours, and obtain social care /police report reference details for inclusion on the relevant case file.

6.3.3 In the case of an adult - a person over 18 - Referrals should be made to the relevant body. If a crime has also been committed, the police in that area and if applicable the LADO, should also be contacted. The referrer should confirm any verbal and telephone referrals in writing, within 48 hours, and obtain any report references for inclusion on relevant case file.

6.3.4 When a person's conduct towards a child or an adult may impact on their suitability to work with or continue to work with children or adults, the allegation must be referred to the Local Authority Designated Officer for safeguarding within 24 hours. Additionally, restrictions may need to be placed on the person's role and remit while the matter is investigated for example they may be 'stepped down' from ministry or other conditions may be imposed pending the outcome of an investigation

6.3.5 Where it is believed that a criminal offence may have taken place, regardless of whether the accused person is living or deceased, the allegation should be referred to the police within 24 hours.

7 WHISTLEBLOWING

7.1 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.

7.1.1 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 the RLSS should be made aware.

7.2 The action taken by the 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 the RLSS.

8 RECORDING AND STORAGE OF SAFEGUARDING CONCERNS AND CASE FILES

8.1 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 [Congregation of the Sisters of the Immaculate Heart of Mary, Mother of Christ are maintained.

8.1.1 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 Congregation of the Sisters of the Immaculate Heart of Mary, Mother of Christ or RLSS] and from statutory agencies.
- Rational for actions and or outcome of case

8.2 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.

9 SAFER RECRUITMENT PRACTICE GUIDANCE

9.1 The Congregation of the Sisters of the Immaculate Heart of Mary, Mother of Christ will ensure that staff are subject to the appropriate Disclosure and Barring Service (DBS) checks (including enhanced DBS) in line with both statutory and Catholic Church requirements.

9.2 Appointments will be based on the person's experience, skills and ability to meet the set criteria and job specification for the specific role. It is essential to ensure that all documentation relating to the applicant is stored in a secure place and remains confidential.

9.3 Appointment to a role will not be confirmed until a satisfactory DBS Disclosure check has been received and previous employment references confirmed as being acceptable.

9.4 On appointment, all new employees should be provided with and sign to say they understand all relevant policy and procedures, including a copy of this document and their responsibilities within it highlighted.

9.5 All persons seeking to work with children or at-risk adults whether in a paid or unpaid capacity must be provided with the opportunity to self-disclose relevant conviction information. This is a DBS Code of Practice requirement and applies to anyone being asked to have an Enhanced Disclosure.

10 POLICY REVIEW

10.1 This policy is approved by the [Congregation of the Sisters of the Immaculate Heart of Mary, Mother of Christ Trustee and will be subject to an initial review in OCTOBER 2027 and then annually or sooner, where there is a significant change to the organisational infrastructure, processes, relevant legislation or a safeguarding incident occurring.

as updated: 7th October 2026

next review: 7th October 2027