DIOCESE OF Hexham & Newcastle

Policy for low-level concerns

Responsible Officer	Head of Safeguarding
Date first approved by Board	October 2024
First Review Date	September 2026
Date Review approved by Board	September 2026
Next review date	September 2028
Original Author and date of creation	Ian Colling

Reviewer(s)	Date	Review Actions	Approved by Board
Ian Colling, Rose Anderson, Maureen Dale	16/09/2026	Previous Policy and procedure split into two distinct documents. Wording amended to reflect Head of Safeguarding position.	September 2026

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.

'Concerning behaviour' is 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.

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

2. Scope

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.

Ensuring they are dealt with effectively should also protect those working in or on behalf of the Diocese

from potential false allegations or misunderstanding.

3. Purpose

This Policy applies to all Diocesan Personnel and any other members of the Diocesan family and is underpinned by the Diocesan Values of: Trust, Service, Respect, Integrity and Compassion.

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.

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.

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.

Anyone who raises a low-level concern/s will be responded to sensitively, respectfully, and seriously.

This Policy 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.

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 wilful 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.

5. Roles and responsibilities

The Diocesan Board of Trustees have approved and will periodically review the Policy and Procedure in relation to low-level concerns.
The sub-group of the Safeguarding Committee will examine anonymised versions of low-level concerns to ensure that appropriate responses and actions are being undertaken by the Safeguarding Department. Their observations will be reported to the Safeguarding Committee who will – in turn – report to the Board of Trustees.
The Head of Safeguarding is responsible for ensuring the accurate recording of low-level concerns are undertaken in a timely and sufficiently detailed manner.

6. Data Protection

The diocese is committed to protecting the privacy and personal data of all individuals with whom it works, including beneficiaries, donors, volunteers, staff, and partners. We process personal data in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

The Diocese of Hexham and Newcastle follow the retention and deletion of information procedures of our national regulators, The Catholic Safeguarding Standards Agency

7. Equity, diversity and inclusion

In the spirit of the Gospel and the Church's commitment to the dignity of every person, we affirm that all volunteers are welcomed, valued, and respected as members of our faith community. Inspired by Catholic Social Teaching, particularly the principles of human dignity, solidarity, and the common good, we strive to foster an environment where everyone can contribute their gifts freely and fully.
We are committed to:

Equity
We work to ensure that all volunteers have fair access to opportunities, support, and resources. We recognise that individuals may face different barriers, and we seek to remove these through compassionate practice, thoughtful accommodations, and transparent decision making.

Diversity
We celebrate the richness that comes from the varied backgrounds, cultures, abilities, ages, and life experiences of our volunteers. Each person is created in the image and likeness of God, and their unique contributions strengthen our mission and ministry.

Inclusion
We aim to create a welcoming environment where every volunteer feels respected, heard, and involved. We encourage open dialogue, mutual understanding, and collaboration so that all may participate fully in the life and service of the Church.
As disciples of Christ, we commit ourselves to ongoing reflection, learning, and action to ensure that our volunteering practices continue to uphold the values of justice, compassion, and love for all.

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Procedure for the management of low-level concerns

Responsible Officer	Head of Safeguarding
Date first approved by Board	September 2026
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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 Department who will ensure the guidance for management of low-level concerns is followed. If the concern is in relation to the Diocesan Head of Safeguarding, 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 reoccurrence.

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.

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 confidentiality 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 Head of Safeguarding.
- Encourage and support adults to share their information.

4.3 Regardless of role within the Church the following procedures are to 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 diocesan procedure for the Management of Allegations will be followed.
4.3.2 A child or an adult expresses a concern in respect of somebody with a role within the Church.	**Children and Adults** Inform the Head of Safeguarding 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 Head of Safeguarding 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 Head of Safeguarding, 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.

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.

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.