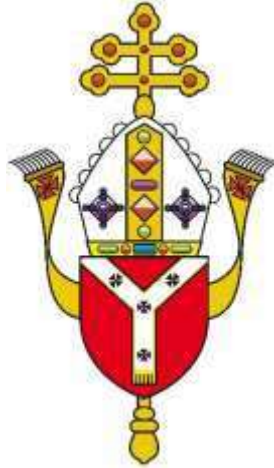


DIOCESE OF WESTMINSTER



Diocesan Safeguarding Service

LOW-LEVEL CONCERNS –

POLICY

Policy prepared by:	Head of Safeguarding
Third Party Policy:	No
Approval of the Safeguarding Committee	2 July 2026
Approval of The Directors of the Trustee	10 July 2026
Review Date	July 2029

Diocese of Westminster Low-Level Concerns – Safeguarding Policy

1. SUMMARY

- 1.1 This policy should be read in conjunction with other Diocese of Westminster Procedures and Guidance including the Diocesan Safeguarding Policy, Code of Conduct, Complaints Procedure, Disciplinary Procedure, Whistleblowing Policy, and Data Protection Arrangements. **This policy to applies to a safeguarding context.**
- 1.2 Any abuse of children and/or adults at risk under the supervision or care of clergy, religious, Church volunteers, employees or persons involved in Church activities will not be tolerated. Such behaviour is contrary to the Gospel and to the Church's mission, stated values and ideals, which require that everyone must be treated with dignity, courtesy, and respect.
- 1.3 It is the policy of the Catholic Church in England and Wales to report all allegations of abuse to statutory authorities, regardless of whether the abuse occurred recently or in the past, or whether the accused person is living or deceased.
- 1.4 A low-level (safeguarding) concern may arise in person, online, in writing, by phone, by email, through social media or in any Church-related setting.
- 1.5 The policy applies to clergy, religious, trustees, employees, office holders, , volunteers, and others acting on behalf of the diocese.
- 1.6 This policy applies to situations in which there are low-level concerns about possible safeguarding matters. Most low-level concerns identified and applicable to this policy will have a clear safeguarding context though sometimes this may not be immediately obvious. It is recognised that early identification and appropriate intervention around low level concerns in safeguarding context can prevent escalation and potential future abuse taking place.¹
- 1.7 The policy sets out how the Diocese of Westminster will identify, report, record and respond to low-level concerns about behaviour that is inconsistent with the various codes of conduct or expected standards but does not meet the threshold for harm. This includes [Code of conduct for leaders and helpers](#) and the [Code of conduct for children and young people](#) ,[Written agreement for volunteers](#) and 'Caring Safely for others.
- 1.8 The purpose of this policy is to help the Diocesan Safeguarding Service ensure that low-level concerns with a safeguarding context identified in parishes and across our church community are appropriately

¹ It is recognised that on occasions conduct and safeguarding matters are not mutually exclusive and where applicable the professional judgement of the Safeguarding Service and discussion with the department involved will take place. The purpose of this policy is not to direct outcomes on any matters that sit outside of the Safeguarding Service.

managed².

2. WHY THIS POLICY IS IMPORTANT

- 2.1 This policy promotes a culture of openness, transparency, and safer practice, ensuring that concerning, problematic or inappropriate behaviour, including behaviour that blurs professional boundaries, is identified early, addressed fairly, and prevented from escalating.
- 2.2 The term '*low-level*' should not be interpreted as meaning insignificant. Low-level concerns can provide important indicators of behaviour that falls below expected standards which, if left unaddressed, might develop into more serious breaches of professional conduct or, in some cases, abusive behaviour.
- 2.3 Early reporting and appropriate management of such concerns are therefore essential to maintaining safe environments and protecting children and adults at risk. A person raising a concern is not required to decide whether the harm or significance threshold is met.

3. HOW TO RAISE A LOW -LEVEL SAFEGUARDING CONCERN

- 3.1. Low-level concerns must be shared without delay with the Diocesan Safeguarding Service. Where a concern may indicate harm, abuse or risk to a child, young person or adult, the safeguarding policy and concerns and allegations procedure must be followed immediately, together with any applicable English reporting duties.
- 3.2. To report a low-level safeguarding concern please contact the Safeguarding Service on:
 - Email: safeguarding@rcdow.org.uk
 - Phone: 020 7798 9352, and choose option 1

The Safeguarding Service operates Monday to Friday, 9am to 5pm only. Emails and phone calls are not monitored outside these times.

If you are concerned about the welfare of a child or a vulnerable adult at risk, do not delay in contacting the police, using 999 if a child or adult is believed to be in immediate danger.

Concerns may also be raised verbally or in writing with anybody working in the Church, including priests

² This policy does not supersede or take primacy over existing low-level concern processes and procedures currently in existence across the Diocese for the management of low-level concerns, conduct and discipline matters. This includes low level grievances that would usually be dealt with through current HR process.

These matters will continue to be managed through Human Resources (HR) and employment processes and the Office for the Vicar General as appropriate. Where such concerns are brought to the attention of the Safeguarding Service – they will be referred to the appropriate department / office in line with existing processes.

and deacons, religious sisters, and parish safeguarding representatives.

Concerns may be reported anonymously but this may limit opportunities to investigate and feedback to the person who reports.

Anyone who brings concerns or allegations to the Safeguarding Service will be responded to sensitively, respectfully and seriously

4. WHAT A PERSON RECEIVING A CONCERN MUST DO

- 4.1. A person receiving a concern must listen carefully, respond respectfully, consider any immediate safety issue and any issue relating to professional boundaries, and must not dismiss the concern or promise absolute confidentiality. They must explain that information will be shared only with those who need to know in order to assess risk, take action and comply with safeguarding, legal or regulatory duties.
- 4.2. They must make a clear and contemporaneous record of the concern and pass it promptly to the correct safeguarding or designated person. They must seek advice from safeguarding leads or senior leaders where needed and ensure any urgent risk is escalated immediately.

5. HOW CONCERNS WILL BE HANDLED

- 5.1. Patterns, repeated concerns and behaviour outside Church settings will be considered when assessing risk and deciding next steps.
- 5.2. People who raise concerns, including self-reports will be taken seriously and treated fairly with responses being proportionate and focused on safer practice. Not all low-level (safeguarding) concerns raised will have another party involved but may be around wider safeguarding matters, for example an individual's personal welfare and / or mental health and wellbeing needs.
- 5.3. All low-level (safeguarding) concerns will be taken seriously and assessed promptly to determine what support (including external Local Authority support) , clarification, risk assessment, referral, escalation, or investigation is required taking into account the individuals' competence and capacity as appropriate.
- 5.4. Where the concern raised involves the conduct of another - the response will be measured, proportionate and focus on the behaviour, context, and risk rather than the language used to describe it. The response will consider context, frequency, vulnerability, professional boundaries, and any pattern of similar concerns about the same individual.
- 5.5. Low-level (safeguarding) concerns may involve intentional, unintentional, thoughtless, or misjudged conduct. The aim is to address issues early, provide support where needed, and take stronger action where patterns or escalating risk are identified.
- 5.6. Where behaviour or relationships outside Church settings are relevant, a risk assessment must consider

whether there is transferrable risk into Church life, ministry, employment, or volunteering.

5.7 Where appropriate, the person who raised the concern and the person about whom the concern has been raised should be spoken to, unless doing so would increase risk or prejudice a safeguarding, statutory or disciplinary process.

5.8 Assessment of the concern here may conclude:

- the behaviour is consistent with expected standards,
- that the behaviour is not consistent with expected standards and should be managed through advice, supervision, support, or training,
- that the behaviour may amount to misconduct or poor performance requiring other internal procedures or meets or may meet the threshold for concerns and allegations and must be dealt with under the Diocese's safeguarding procedures.

5.9 Possible outcomes may include no further action, clarification, supportive conversation, a practice improvement plan, training, supervision, risk management measures, monitoring, a referral for disciplinary investigation, or referral to external agencies or regulators where appropriate

5.10 Full details of actions or outcomes may not be shared where safeguarding, employment, data protection, legal or confidentiality duties prevent this.

5.11 Records of low-level (safeguarding) concerns must be retained securely safeguarding and reviewed, where appropriate, to identify patterns of behaviour, themes and emerging themes, learning and risk.

5.12 Failure to follow this policy, including failure to raise, record, escalate or respond appropriately to a known concern, may amount to misconduct and may itself create safeguarding risk.

6. RECORDING THE CONCERN

6.1. A report of a low-level (safeguarding) concern should, where possible, include the name and role of the person raising the concern, the name and role of the person about whom the concern is raised, the context in which the concern arose, a clear chronological account of what is alleged or observed, relevant dates, and any immediate safeguarding or management action taken. It should distinguish clearly between fact, observation, opinion and hearsay.

6.2. The report must be factual, dated and stored securely in the safeguarding record-keeping system in accordance with safeguarding policies and practice.

7. WHAT SHOULD BE RAISED UNDER THIS POLICY

7.1. Concerns under this policy may include behaviour such as conduct that blurs or breaches professional boundary:

- over-familiar behaviour
- favoritism
- inappropriate language
- blurred professional boundaries.
- conduct that gives rise to unease.
- inappropriate contact
- other behaviour falling below the standards set by the Church's code of conduct.

- 7.2. A person raising a concern is not required to decide whether it is a low-level concern or whether it meets the harm threshold. If in doubt, the concern should still be reported to the Safeguarding Service so that the appropriate safeguarding decision can be made.

8. CONFIDENTIALITY, DATA PROTECTION AND INFORMATION SHARING

- 8.1. Information about low-level concerns must be shared on a need-to-know basis and handled in accordance with data protection law, confidentiality duties, human rights principles and safeguarding information-sharing requirements.
- 8.2. Data protection law does not prevent proportionate information-sharing where this is necessary to safeguard children, young people or adults, assess transferrable risk, identify patterns of behaviour, investigate concerns, or comply with legal, regulatory or safeguarding duties.
- 8.3. A secure safeguarding record must be kept of the concern, the information considered, any risk assessment, decisions taken, actions agreed, referrals made and the rationale for those decisions

9. COMPLAINTS

- 9.1. Where an individual is dissatisfied with how their low-level (safeguarding) concern has been handled they can raise a complaint in accordance with the Diocesan Complaints Policy.
- 9.2. Where it gives rise to wider safeguarding or governance issues the escalation process to the Chief Operating Officer will be enacted in accordance with the Diocesan Complaints Policy

10. GOVERNANCE, ACCOUNTABILITY AND SAFER PRACTICE

- 10.1. The Diocesan Safeguarding Service will provide the Safeguarding Committee with information and data on low-level concerns received by the Service for their oversight and assurance. This policy is distinct

from complaint, grievance and disciplinary processes, although low-level concern may lead to, or sit alongside, those processes.

- 10.2. Action under this policy is for safeguarding risk assessment, safer practice and appropriate response; it does not replace any statutory safeguarding duty, employment process, regulatory process or reporting obligation. Where a concern indicates possible harm or abuse, the Concerns and Allegations Procedure and all relevant safeguarding reporting duties in England or Wales must be followed without delay.

11. KEY DEFINITIONS

Low-level concern means any concern, however small, that a person may have behaved in a way that is inconsistent with the Church's code of conduct, expected standards or professional boundaries but does not meet the threshold for harm. **For this policy to apply a safeguarding context is required.**

Concern or allegation meeting the threshold means information indicating that a person who works with children, young people or adults may have harmed them, may pose a risk of harm, may have committed a relevant offence, or may otherwise be unsuitable to work with them.

Code of Conduct means the standards of behaviour, professional boundaries and safer working expectations that apply to all clergy, religious, trustees, staff, volunteers and others acting on behalf of the Church.

Self-report means a situation in which a person recognises that their own behaviour, judgement or actions may have fallen below expected standards, may be open to misinterpretation, or may give rise to concern, and reports this promptly.

Adult at risk should be understood in line with the safeguarding and legal framework that applies in the relevant jurisdiction. In England this will usually relate to an adult with care and support needs as set out in the Care Act 2014. In Wales this should be understood in line with the Social Services and Well-being (Wales) Act 2014 and related safeguarding procedures.

12. SUPPORTING INFORMATION: LEGISLATION, GUIDANCE AND LINKED DOCUMENTS

- 12.1. This policy should be read and applied in line with relevant legislation, statutory guidance and Church safeguarding standards in England and Wales.

- Children Act 1989 and Children Act 2004
- Working Together to Safeguard Children (England statutory guidance)
- Keeping Children Safe in Education, where relevant to Church bodies operating schools, colleges, or related education settings

- Care Act 2014 and Care and Support Statutory Guidance, where relevant to adults with care and support needs in England
- Social Services and Well-being (Wales) Act 2014, Working Together to Safeguard People, and Wales Safeguarding Procedures
- Data Protection Act 2018 and UK General Data Protection Regulation
- Human Rights Act 1998
- Charity law and Charity Commission guidance, including serious incident reporting where applicable.
- Employment law, equality law and other legal duties relevant to the Church body
- National Catholic safeguarding standards, guidance and any applicable diocesan, religious institute, or Church body safeguarding procedures