Congregation of the Sisters of Nazareth	**UK Region** **POLICY AND PROCEDURE** **SAFEGUARDING**

1. Policy Overview:

The Congregation of the Sisters of Nazareth are committed to safeguarding children and vulnerable adults from every form of harm and abuse. This commitment stems from the knowledge that everyone is made in the image of God, and in the light of this understanding, we believe in the dignity and uniqueness of all human life.

Rationale:

To provide important information and guidance about how the Sisters of Nazareth prevent, identify and respond to abuse and harm towards children and adults at risk. The Congregation of the Sisters of Nazareth are committed to the 'One Church Approach' to safeguarding by implementing the changes needed and ensuring we respond to victims/survivors promptly and compassionately.

2. Scope:

This policy and procedure applies to all workers within the Congregation of Sisters of Nazareth including Religious, Employees and Lay Volunteers, regardless of their role or the activities they undertake.

It is the responsibility of all the Congregation of the Sisters of Nazareth members to prevent abuse, whether by action or omission. 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:

The members of the Congregation of the Sisters of Nazareth, Board and Staff members, undergo Safeguarding Training in relation to both children and adults relevant to their role.

The Congregation of the Sisters of Nazareth members, Board and Staff members, will undertake refresher training.

4. Roles and Responsibilities:

4.1 The Congregation of the Sisters of Nazareth Board

The Board 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 members as indicated below.

4.2 The Regional Superior

The Regional 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 Regional Superior will be delegated to members as indicated below.

4.3 The Safeguarding Lead

The Safeguarding Lead has direct oversight of the Congregation of the Sisters of Nazareth's 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 Religious Life Safeguarding Service (RLSS).

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 of the Congregation, including Staff and Volunteers, 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 the Congregation of the Sisters of Nazareth has a duty to disclose to the Safeguarding Lead or the Regional Superior any safeguarding concerns that have been raised about them.

5. Practice Guidance:

In line with the 1999 Safeguarding policy in Scotland, when the Bishops' Conference of Scotland introduced nationally agreed guidelines for the protection of children and vulnerable adults, the Catholic Church must report all allegations of abuse to statutory authorities.
In accordance with Article 19 of Pope Francis' Apostolic Letter, "Vos Estes Lux Mundi," 7th May 2019[3], it is the policy of the Catholic Church of 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 vulnerable adult. This would include any vulnerable adult irrespective of the cause of that 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 vulnerable adult including a vulnerable adult as indicated above.
- Has behaved towards a child or vulnerable adult in a way that indicates they may pose a risk of harm to children or vulnerable adults.
- Has behaved in a way or made statements indicating that they may not be suitable to work with children or vulnerable adults.
- Has behaved in 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.

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

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

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.

It is the policy of the Catholic Church in England, Wales and Scotland 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 risk of harm from self or others
- Someone who poses a serious risk of harm to someone else
- A concern about a child or vulnerable adult at risk of harm from someone else
- Concerns over someone's mental capacity

6. Procedure:

6.1 If the Congregation of the Sisters of Nazareth become aware of a safeguarding issue, they should contact the RLSS Safeguarding Team (in relation to England and Wales), or the relevant Diocesan Safeguarding office (in relation to Scotland), and pass the concern and all associated documentation immediately. They should ensure that the person who made them aware of the concern knows they are doing this.

The RLSS, the relevant Diocesan Safeguarding office (if relating to Scotland), or Safeguarding Lead at The Congregation of the Sisters of Nazareth 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 leadership that there has been a new safeguarding referral
- All referrals/reports outside the RLSS or the relevant Diocesan Safeguarding office (in relation to Scotland) 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 the leader

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 staff should be supportive of the individual making the disclosure but should not seek more details than necessary for an initial statutory referral. Any actions taken by the Sisters of Nazareth must not jeopardise or interfere with any statutory investigation that is ongoing.

6.2 When to Report:

6.2.1 Allegations of safeguarding concerns - When abuse is suspected, witnessed or a disclosure of abuse is received by the Congregation of the Sisters of Nazareth, 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 with 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 vulnerable adult.

6.2.3 In case of non-emergency - in a situation when there is no immediate risk to a child or vulnerable and no requirement to make a statutory report, the Congregation of the Sisters of Nazareth or the RLSS or relevant Diocesan Safeguarding office (in relation to Scotland) 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
- SCSSA
- Local Safeguarding Commission
- Local Authority Designated officer (LADO)
- NSPCC
- DBS/PVG/Police check

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 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.

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. Any investigations that they undertake will take place in accordance with Canon Law and that Respondents will be guided by the advice of a Canon lawyer independent of the Sisters of Nazareth.

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

The Congregation of the Sisters of Nazareth 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 Nazareth or other religious institution relating to safeguarding, then the RLSS or relevant Diocesan Safeguarding office (in relation to Scotland) should be informed.

The action taken by the RLSS or relevant Diocesan Safeguarding office (in relation to Scotland) will depend upon the nature of the concern referred.

8. Recording and Storage of Safeguarding Concerns and Case Files:

8.1 Primary responsibility for the management and safeguarding case files lies with the Safeguarding Lead/RLSS/ relevant Diocesan Safeguarding office (in relation to Scotland) who will ensure an accurate, audible, and secure record of any safeguarding concerns or allegations referred to the Congregation of the Sisters of Nazareth 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 Nazareth or RLSS or relevant Diocesan Safeguarding office (in relation to Scotland) and from statutory agencies
- Rational for actions and or outcomes 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.
All Safeguarding records must be kept for 75 years.

9. Safer Recruitment Practice Guidance:

9.1 The Congregation of the Sisters of Nazareth will ensure that staff are subject to the appropriate Disclosure and Barring Service (DBS) checks (including enhanced DBS) or Protecting Vulnerable Groups (PVG) in Scotland in line with both statutory and Catholic Church requirements.

9.2 Appointments will be based on the person's experience, skill 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/PVG 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 Anyone seeking to work with children or adults whether in a paid or unpaid capacity must be provided with the opportunity to self-disclose relevant conviction information. This is a DBS/PVG Code of Practice requirement and applies to anyone being asked to have an Enhanced Disclosure.

10. Some useful Contacts and External Links:

10.1 Sisters of Nazareth Global Safeguarding Co-ordinator
Email: safeguarding.generalate@sistersofnazareth.com

10.2 External Contacts:

Safe Spaces
- SafeSpaces@Firstlight.org.uk
- 0300 303 1056

Religious Life Safeguarding Service
- safeguarding@religioussafeguarding.org
- www.religioussafeguarding.org

Catholic Safeguarding Standards Agency
- admin@catholicsafeguarding.org.uk
- www.catholicsafeguarding.org.uk/

Archdiocese of Glasgow Safeguarding Advisor (Caterina O'Connor)
- caterina.o'connor@rcag.org.uk
- 0141 226 5898
- General Office email: safeguardingadministrator@rcag.org.uk
- General office 0141 225 260

Archdiocese of St Andrews and Edinburgh
- Scott.Mackenzie@stand.org.uk
- 0131 623 8948
- General Office line: 0131 623 8900

Scottish Catholic Safeguarding Standards Agency
- contact@scsafeguarding.org.uk
- www.scssa.org.uk
- 0141 332 7177

The National Association for people abused in childhood
- www.napac.org.uk/
- 0808 801 0331

The Survivors Trust
- info@thesurvivorstrust.org
- 01788 550554

11. Policy Review:

This policy is approved by the Sisters of Nazareth UK Region and Generalate and will be subject to an initial review biennially or sooner where there is a significant change to the organisational infrastructure, processes or to relevant legislation.

Date of next review: July 2028

Name: Sister Doreen Cunningham

Signed: Sr D Cunningham

Position: Safeguarding Lead

Date: 22nd July 2026