

## Safeguarding Policy

*Protecting children and adults at risk of harm*

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|------------------------------|---------------------------------------------------------------------------------------------------------------------------------------|
| Reference                    | FMM – SP – v1                                                                                                                         |
| Status                       | Approved                                                                                                                              |
| Applies to                   | All FMM Sisters in England and Wales, and all employees and volunteers, in every role and ministry                                    |
| Policy owner                 | FMM Trustees, through the Regional Superior and her Council                                                                           |
| Designated Safeguarding Lead | Sr Mary Fitzpatrick fmm, Safeguarding Officer (safeguarding@fmmuk.org)                                                                |
| Deputy DSL                   | Sr Tien Nguyen fmm, Deputy Designated Safeguarding Lead (safeguarding@fmmuk.org)                                                      |
| Prepared by                  | Barbara Veeramallay-Permaul, Safeguarding Assured by BVPSkills                                                                        |
| Approved by                  | FMM Trustees                                                                                                                          |
| Supersedes                   | FMM Safeguarding Policy for England and Wales, January 2026, and the safeguarding provisions of the FMM Institute Policy Part 1, 2020 |
| Issue date                   | 24 August 2026                                                                                                                        |
| Next review                  | One year from approval, or sooner on a significant change to structure, practice or legislation                                       |

### Approval and sign-off

This policy is approved on behalf of the Franciscan Missionaries of Mary of England & Wales (i.e. Franciscan Missionaries of Mary UK CIO). Regional Leadership endorsement and Trustee approval are recorded below.

| Name                        | Title                                          | Signature               | Date     |
|-----------------------------|------------------------------------------------|-------------------------|----------|
| Barbara Veeramallay-Permaul | Prepared by, Safeguarding Assured by BVPSkills | <i>Bpermaul</i>         | 18/08/26 |
| Sr Loetitia Chevallier      | Endorsed by the Regional Superior (FMM)        | <i>LChevallier</i>      | 24/08/26 |
| Sr Mary Fitzpatrick         | Approved by, on behalf of the FMM Trustees     | <i>Mary Fitzpatrick</i> | 24/08/26 |

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## 1. Introduction and our Franciscan commitment

The Franciscan Missionaries of Mary in England and Wales, (i.e. the Franciscan Missionaries of Mary CIO UK), often known by the acronym FMM, is a Catholic Institute of religious women dedicated to bringing the love of Christ to those among whom we live and work. For administrative purposes, the Institute is divided into regions, and the Sisters in England and Wales form part of the North West Europe Region.

Our commitment to safeguarding flows directly from our faith. We believe that every person is made in the image of God, and we share the Church's belief in the preciousness, dignity and uniqueness of every human life. Caring for children and adults at risk of harm is at the heart of the Franciscan spirit. We start from the principle that each person has a right to expect the highest level of protection, love, encouragement and respect.

Following the 2020 safeguarding reviews, we are committed to the One Church Approach to safeguarding. We implement the changes required and respond promptly and compassionately to victims and survivors.

## 2. Purpose and aims

This policy sets out how the Franciscan Missionaries of Mary in England and Wales safeguard children and adults at risk of harm. It brings the Institute's existing safeguarding material into a single, current policy for England and Wales, aligned with the eight National Safeguarding Standards of the Catholic Safeguarding Standards Agency (CSSA). Its aims are to:

- promote a culture in which safeguarding is everyone's responsibility, embedded in leadership, governance, ministry and community life;

- ensure that anyone who has a concern knows how to recognise, respond to and report it;
- respond with care to anyone who reports that they have been harmed;
- manage allegations and concerns fairly, safely and in line with statutory and Church requirements;
- ensure that those who work in our name are recruited, checked, trained and supported appropriately; and
- keep accurate, secure records and provide assurance to the Trustees and to the CSSA.

### 3. Scope and application

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This policy applies to all FMM Sisters in England and Wales, together with all workers, whether employed or voluntary, regardless of their role or the activities they undertake. It covers the safeguarding of both children and adults at risk of harm and applies only in England and Wales.

Every Sister, employee, and volunteer is responsible for preventing abuse, whether by action or omission, and for being familiar with this policy and the procedures it outlines. Abuse in this policy includes physical, sexual, emotional, spiritual, psychological, financial, material, domestic, verbal, organisational and discriminatory abuse, neglect and self-neglect. Behaviour amounting to modern slavery, and evidence of discrimination or radicalisation, are also recognised and addressed as safeguarding matters.

### 4. Our safeguarding principles

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We commit to safeguarding practice built on the following principles, which reflect the eight CSSA National Safeguarding Standards:

- **Leadership and culture.** Safeguarding is led from the top, owned by the Trustees and the Regional Leadership, and lived throughout community life.
- **Communication.** Our safeguarding message and how to report a concern are clear, visible and accessible to all.
- **Care for those who report harm.** We listen, believe, respond and signpost to specialist support.
- **Responding to concerns.** We manage allegations and concerns promptly, fairly and in line with statutory and Church requirements.
- **Fairness to respondents.** We treat anyone subject to a concern fairly and safely while enquiries are underway, without reducing our care for the person who reported the harm.
- **Safe people.** We recruit safely, carry out the required checks, and support and train those who serve.
- **Records and assurance.** We keep secure, accurate records, and we review and assure our practice.

## 5. Definitions

### 5.1 Safeguarding

Safeguarding embeds practices throughout the life and ministries of the Franciscan Missionaries of Mary to protect children and adults at risk of harm.

### 5.2 A child

A child is a person under 18 years of age.

### 5.3 An adult at risk of harm

An adult at risk of harm is a person aged 18 years or over who may be unable to take care of, or protect, themselves from harm or exploitation. This may include a person who is elderly and frail, has a mental illness, including dementia, has an intellectual or physical disability, has a severe physical illness, is homeless, or misuses substances.

### 5.4 Abuse and harassment

The recognised types of abuse are set out in the concern and incident guidance held with this policy. Harassment includes physical, verbal, written or psychological abuse, bullying, racial and religious slurs, and unwelcome touching or inappropriate behaviour. The guidance accompanying this policy lists indicators of abuse, and no single indicator should be taken in isolation as proof that abuse is occurring.

## 6. Roles and responsibilities

### 6.1 The Trustees, the Regional Superior and her Council

The Trustees, through the Regional Superior and her Council, maintain governance and oversight of safeguarding in line with this policy and national guidance. They ensure appropriate policies, procedures, and best practices are in place, including related due diligence, and they directly oversee this policy. Certain functions are delegated to members as set out below. The Regional Superior is Sr Laetitia Chevallier.

### 6.2 The Designated Safeguarding Lead

The Designated Safeguarding Lead (DSL), the FMM Safeguarding Officer, has direct oversight of this policy and its associated guidance. This includes managing documentation, progressing and managing cases, securely and legally storing safeguarding reports and related material, and overseeing the relationship with, and input into the work of, the Religious Life Safeguarding Service (RLSS). The DSL may delegate responsibility to the RLSS by referring a case, but remains the key contact for the duration of the case unless another individual is identified to assume responsibility. The DSL for the Franciscan Missionaries of Mary in England and Wales is Sr Mary Fitzpatrick fmm.

### 6.3 Deputy or cover Designated Safeguarding Lead

A deputy or cover arrangement ensures that safeguarding leadership is always available, including during absence. The Deputy Designated Safeguarding Lead is Sr Tien Nguyen (fmm), contactable at [safeguarding@fmmuk.org](mailto:safeguarding@fmmuk.org). The Trustees confirm her appointment and record it here and in the Governance and Roles Framework.

### 6.4 The Safeguarding Trustee

The Safeguarding Trustee provides trustee-level oversight of safeguarding, scrutinises safeguarding reports, tests that concerns are handled properly, and advises the Trustee board.

### A declared and proportionate arrangement

One Sister holds the Safeguarding Trustee and DSL roles. The Institute is small, with a small number of Sisters in England and Wales, and it does not have the membership to fill both roles separately.

CSSA Standard 1 requires oversight independent of delivery. The Institute meets this by external means rather than internal separation: independent advisory oversight, independent case advice and management through the RLSS, and scrutiny of safeguarding reports and decisions at every Trustee meeting.

The Trustees have recorded this decision, review it annually, and will hold the roles separately should the membership allow. The Governance and Roles Framework sets out the arrangement in full, and the rolling implementation plan at IP-02 records it.

## 6.5 All Sisters, employees and volunteers

Everyone, whether remunerated or voluntary, must know how to respond to safeguarding concerns, be familiar with this policy and its procedures, and disclose to the DSL or the Regional Superior any safeguarding concern raised about them. If the concern is about the DSL, raise it with the Regional Superior or directly with the RLSS, so no one is asked to consider a concern about themselves.

## 7. Recognising, responding to and reporting concerns

### **If someone is in immediate danger or there is a safeguarding emergency**

Call 999 without delay.

If a child or adult needs urgent medical attention, call the emergency services first, then inform the Designated Safeguarding Lead.

Remember, it is not your role to investigate.

If a Sister, worker, volunteer or employee becomes aware of a safeguarding issue, they should contact the FMM Designated Safeguarding Lead or the RLSS Safeguarding Team, and pass on the concern and all associated documentation immediately. The person informed will let the person raising the concern know that they are doing this.

When possible and practical, take brief notes during the conversation. Always ask permission and explain why recording the information matters. Write up your notes as soon as possible afterwards, recording the place, time and date, who was present, whether the matter came by letter, telephone or in person, and the actual words used, including any slang. If you see bruising or an injury, record it on a dated body map. Do not destroy your original notes, and use the safeguarding reporting form held with this policy.

This initial record forms the first entry in the case file retained by the DSL. Do not be selective, and include details that may seem irrelevant, as they may prove invaluable later. Pass all original records, including rough notes, immediately to the DSL or RLSS, and keep any copies securely and confidentially. Not everyone raising a concern will wish to take matters further, but information about a potential allegation must always be passed to the DSL.

### 7.1 What the DSL or RLSS will do

- inform the Regional Superior that there has been a new safeguarding referral;
- ensure the person affected has been told what the next steps are, with options where possible and an indicative timescale;

- contact any relevant statutory or Church bodies, within 24 hours where required;
- complete the safeguarding paperwork and keep an accurate record of all communications, including calls, meetings and discussions.

Where a concern must be reported to a statutory agency, the person raising it will be told that the information cannot be kept confidential and that details will be passed to the police or other appropriate body. Everyone should support the person making the disclosure, while not seeking more detail than is needed for an initial statutory referral.

## 7.2 What and when to report

Where abuse is suspected, witnessed or disclosed, there is a requirement to report the allegation and other relevant safeguarding concerns to the appropriate statutory authority, including social services or the police, within 24 hours. In an emergency, where a child or adult is in immediate danger or needs medical attention, call 999, and contact local social services at the earliest opportunity. Where there is no immediate risk and no requirement to make a statutory report, the Institute, or the RLSS on its behalf, will work with the person to agree desirable outcomes in line with this policy.

In the case of a child, referrals are made to children's social care for the area where the child lives or is found, and to the police where a crime may have been committed. For an adult, referrals are made to the relevant body, to the police where a crime may have been committed, and, where applicable, to the Local Authority Designated Officer (LADO). The Institute confirms verbal and telephone referrals in writing within 48 hours, and records any reference details on the case file.

## 7.3 Serious incident reporting

If a safeguarding referral is made, the Institute will contact its insurer and submit a serious incident report to the Charity Commission where the reporting threshold is met. A serious incident is an adverse event, actual or alleged, that results in or risks significant harm to people connected with the charity, significant loss of money or assets, damage to property, or harm to the charity's work or reputation, judged as significant in the context of the Institute.

## 8. Mandatory reporting and the One Church Approach

It is the policy of the Catholic Church in England and Wales to report to the statutory authorities where a child or adult is at immediate risk of harm, or where there is concern that a child or adult is suffering, or is likely to suffer, significant harm or abuse from someone who does not hold a role within the Church. Action must also be taken under the Church's mandatory reporting policy where there are reasonable grounds to suspect that someone who holds a role within the Church has committed, or is going to commit, a crime, has caused or may cause harm, poses a risk, or is otherwise unsuitable for their role.

## 9. Allegations, including against those in positions of trust

Allegations and concerns, including those about a leader or senior member, and concerns about a person in a position of trust (PiPoT), are managed under the Allegations and PiPoT Procedure that accompanies this policy. That procedure sets out how concerns are received, referred, risk-assessed and recorded, and how fairness to all parties is maintained. We take concerns about a person in a position of trust as seriously as any other, and you may use the reporting routes in this policy, including the whistleblowing route.

## 10. Caring for those who report harm

Anyone who tells us they have been harmed will be met with care, compassion and belief. We listen, respond, and signpost to specialist support, including Safe Spaces, the RLSS, and local services, and we record the support offered. The accompanying Victims and Survivors Care Policy sets out this detailed approach. Caring well for the person who reports harm remains our first priority throughout any enquiry.

## 11. Managing and supporting respondents

We treat anyone who is the subject of a concern fairly and safely while enquiries take place. Fair treatment of a respondent does not reduce our care for the person who reported harm. Separate welfare support, a fair and safe process, documented risk management and confidentiality during enquiries are set out in the Managing and Supporting Respondents Policy that accompanies this policy.

## 12. Safer recruitment, vetting and DBS

All FMM Sisters in England and Wales, and all staff and volunteers, are subject to the appropriate Disclosure and Barring Service (DBS) checks, including enhanced checks where required, in line with statutory and Catholic Church requirements. Appointments are based on the person's experience, skills, and ability to meet the role, and a role is not confirmed until we receive a satisfactory DBS check and acceptable references. We store all applicant documentation securely and confidentially. Anyone seeking to work with children or adults, whether paid or unpaid, is given the opportunity to self-disclose relevant conviction information, in line with the DBS Code of Practice. Full details are set out in the Safer Recruitment, Vetting and DBS Policy, and current checks are held on the Central Safeguarding Register.

## 13. Training, induction and support

All active members undergo safeguarding training for both children and adults, appropriate to their role. The minimum standards are:

| Role                                              | Minimum training                                       |
|---------------------------------------------------|--------------------------------------------------------|
| Regional Superior                                 | RLG Trustee or Leader Training (equivalent to Level 2) |
| Safeguarding Lead                                 | Safeguarding Lead Training (equivalent to Level 3)     |
| Deputy Safeguarding Lead                          | Safeguarding Lead Training (equivalent to Level 3)     |
| Trustees                                          | Trustee Training (equivalent to Level 2)               |
| Community members who work with the public        | Advanced Safeguarding Training (equivalent to Level 2) |
| Community members who do not work with the public | Basic Safeguarding Training (equivalent to Level 1)    |
| Carers                                            | Advanced Safeguarding Training (Level 2)               |

Active members and Trustees undertake refresher training every two years, and employees attend appropriate training every two years. The Training and Induction Framework sets out training, induction, and the training needs analysis, and completion is tracked on the training matrix within the Central Safeguarding Register.

## 14. Records, confidentiality and information governance

The Institute ensures that all case files are accurate, up to date and stored securely. Where the RLSS manages a case, it ensures that records are accurate, auditable and secure. Confidentiality is paramount, and disclosure-sensitive material is handled with particular care. Safeguarding information is not held or received on personal email accounts or personal devices. The Information Governance, Confidentiality and Records Policy that accompanies this policy sets out secure storage, access control, information sharing, and retention and disposal.

## 15. Risk management

Safeguarding risk is identified, assessed and managed across activities, locations, travel, one-to-one contact, private spaces and pending checks. The Risk Management and Risk Assessment Procedure, which accompanies this policy, sets out the approach, templates, and risk register.

## 16. Whistleblowing and complaints

The Institute encourages and enables anyone with a serious concern to raise it without fear of victimisation or disadvantage. Concerns about malpractice, illegal acts or omissions relating to safeguarding, including concerns about leaders, may be raised through the Whistleblowing Policy, and the RLSS is made aware where appropriate. Complaints are managed in accordance with the Complaints Procedure. Both are logged and overseen, and both are included in this policy.

## 17. Governance, quality assurance and review

Safeguarding is embedded through clear governance, recorded leadership oversight, a policy register, a rolling implementation plan and an annual safeguarding report. Practice is assured through review and dip-sampling against the eight CSSA National Safeguarding Standards, and through independent advisory oversight. The Trustees approve this policy through the Regional Superior and her Council, and review it one year after approval, or sooner if there is a significant change to structure, processes, or legislation.

## 18. Related policies and documents

This policy sits at the head of the FMM safeguarding suite and should be read with the Safeguarding Statement, the Governance and Roles Framework, the DSL Job Description, the Code of Conduct, the Reporting and Escalation Procedure, the Allegations and PiPoT Procedure, the Whistleblowing Policy and the Complaints Procedure, the Victims and Survivors Care Policy, the Managing and Supporting Respondents Policy, the Safer Recruitment, Vetting and DBS Policy, the Training and Induction Framework, the Information Governance, Confidentiality and Records Policy, the Code of Practice for Spiritual Direction and Prayer Guidance, the Risk Management Procedure, the Communication Plan, the Rolling Implementation Plan and the Annual Safeguarding Report, together with the Central Safeguarding Register and the supporting trackers and registers.

## 19. Key contacts and support

| Contact                 | Purpose                                      |
|-------------------------|----------------------------------------------|
| Emergency services, 999 | Immediate danger or a safeguarding emergency |
| Police, 101             | Non-emergency police matters                 |

| Contact                                       | Purpose                                                                     |
|-----------------------------------------------|-----------------------------------------------------------------------------|
| FMM Designated Safeguarding Lead              | Sr Mary Fitzpatrick fmm, safeguarding@fmmuk.org                             |
| FMM Deputy DSL                                | Sr Tien Nguyen fmm, safeguarding@fmmuk.org                                  |
| Religious Life Safeguarding Service (RLSS)    | Church safeguarding advice, case management and out-of-hours support        |
| Safe Spaces                                   | Independent support for survivors of Church-related abuse                   |
| Local authority safeguarding teams            | Referrals for children and for adults at risk (to be confirmed by locality) |
| Local Authority Designated Officer (LADO)     | Concerns about an adult who works with children                             |
| Charity Commission                            | Serious incident reporting                                                  |
| Catholic Safeguarding Standards Agency (CSSA) | National safeguarding standards and audit                                   |

## 20. Mapping to the CSSA National Safeguarding Standards

This policy addresses the eight CSSA National Safeguarding Standards as follows.

| CSSA standard                                   | Where addressed in this policy | Status    |
|-------------------------------------------------|--------------------------------|-----------|
| 1. Leadership, governance, ministry and culture | Sections 4, 6, 17              | Addressed |
| 2. Communicating the safeguarding message       | Sections 4, 7, 18, 19          | Addressed |
| 3. Caring for those who report harm             | Section 10                     | Addressed |
| 4. Managing allegations and concerns            | Sections 7, 8, 9, 14           | Addressed |
| 5. Managing and supporting respondents          | Sections 9, 11, 15             | Addressed |
| 6. Robust human resource management             | Sections 12, 13, 16            | Addressed |
| 7. Training and support                         | Section 13                     | Addressed |
| 8. Quality assuring compliance                  | Sections 14, 17                | Addressed |