



Seagate Safeguarding Policy

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Published by Alan MacLeod

Seagate Safeguarding Coordinator

Signed

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Date 06.07.2026

Approved by Mark Inglis

on behalf of Seagate Elders

Signed

A handwritten signature in dark ink, appearing to read "Mark Inglis", written over a horizontal line.

Date 06.07.2026

Approved by Dave Tudor

on behalf of Seagate Trustees

Signed

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Date 06.07.2026

Section 1: Details of the place of worship / organisation

Name of Place of Worship / Organisation: Seagate Evangelical Church

Address: 33-35 West Portland Street, Troon, KA10 6AB

General Email address: admin@seagatechurch.org.uk

Senior Leader Name: Richard Woods

Senior Leader Contact Telephone/Email: 07904972733
richardwoods@seagatechurch.org.uk

Safeguarding Coordinator Name: Alan MacLeod

Safeguarding Coordinator Contact Telephone/Email: 07982716995
alanmacleod100@gmail.com

Membership of Denomination/Organisation: Independent

Charity Number: SCO18710

Company Number: N/A

Regulators OSCAR

Insurance Company: Victor Insurance UK –
Commercial combined insurance

The following is a brief description of our place of worship / organisation and the type of work/activities we undertake with children and adults who have care and support needs:

Church building with two main halls, creche, counselling room and offices.

Main use: regular church services, regular church groups for unemployed, elderly, families accompanied and unaccompanied activities and Youth activities. These are all run by church staff and/or volunteers and subject to this policy.

In addition, we let the hall to various groups e.g. South Ayrshire Council. Careful thought is given to the management of these groups to ensure they follow our policies and procedures, in addition to their own.

We have additional premises at Meadowgreen, 141 Deveron Road, Troon consisting of a Community Café and a separate Community Centre. The Café runs on a commercial basis.

We also let the Community Centre to various groups e.g. Keep-Fit, Toddlers groups etc. The various groups are subject to their own Safeguarding policies.

The Community Centre is also used by the Meadowgreen Community Church who form part of the Seagate Church family and come under the direction and oversight of the Seagate Church Leadership and Trust Governance and are subject to this policy.

Section 2: Governance and leadership

Our commitment

As a Leadership we recognise the need to provide a safe and caring environment for children, young people and adults. We acknowledge that children, young people and adults can be the victims of physical, sexual and emotional abuse, and neglect. We accept the UN Universal Declaration of Human Rights and the International Covenant of Human Rights, which states that everyone is entitled to “all the rights and freedoms set forth therein, without distinction of any kind, such as race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth or other status”.

We also concur with the Convention on the Rights of the Child which states that children should be able to develop their full potential, free from hunger and want, neglect and abuse. They have a right to be protected from “all forms of physical or mental violence, injury or abuse, neglect or negligent treatment or exploitation, including sexual abuse, while in the care of parent(s), legal guardian(s), or any other person who has care of the child.” As a Leadership we have therefore adopted the procedures set out in this safeguarding policy in accordance with statutory guidance.

We are committed to build constructive links with statutory and voluntary agencies involved in safeguarding.

Our safeguarding statement can be found in **APPENDIX 1**.

The policy is based on the ten safeguarding standards published by Thirtyone:eight.

Governance

Seagate Church board of trustees is appointed to have independent authority and legal responsibility. This includes having a critical role in decision making and compliance as well as setting the values, standards and behaviours of the organisation.

The standards and behaviors may be referred to as the culture of the organisation or “the way we do things around here”. Culture can be shaped in both negative and positive ways.

“The culture of a charity goes beyond mere compliance with legal and regulatory demands. Charity governance is most effective when it provides assurances not just that legal requirements are met, but that the behaviour of people working for the charity, and those who come into contact with it, is proper and ethical. Culture, alongside good governance, can be pivotal to whether a charity achieves its stated object” (ICSA The Governance Institute, 2017).

The Seagate board of trustees will have overarching responsibility for safeguarding within the organisation, including referring to the Office of the Scottish Charity Regulator.

The following Safeguarding Policy and Statement aims, to not only meet the requirements of ensuring a safe environment for those accessing activities in our organisation but to also build an open culture where:

- those who lead do so by example
- are committed to the safeguarding of all
- those that work or volunteer are safely recruited and trained for their roles
- there are accountability structures
- with codes of conduct
- the values of the organisation are embedded in its day-to-day actions and behaviours of its people
- and there is open communication

Section 3: Prevention

Understanding abuse and neglect

Defining child abuse or abuse against an adult is a difficult and complex issue. A person may abuse by inflicting harm or failing to prevent harm. Children and adults with care and support needs may be abused within a family, an institution or a community setting. Very often the abuser is known or in a trusted relationship with the child or adult.

In Scotland, the definition of the child varies depending on the contexts. For example, children who are under child protection may be classed as a child up to 16 years old as opposed to 18 years old. The Adult Support and Protection (Scotland) Act 2007 legislation can apply to over 16-year-olds and the Children and Young People (Scotland) Act 2014, includes all children and young people up to the age of 18.

An adult at risk of harm will be defined in this policy as the following:

The Adult Support and Protection (Scotland) Act 2007 refers throughout to an 'adult'. In terms of Section 53 of the Act, 'adult' means a person aged **16 years** or over.

Section 3(1) defines an 'adult at risk' as someone who meets all of the following three-point criteria:

- They are unable to safeguard their own **well-being, property, rights or other interests**
- They are at risk of harm; and
- Because they are **affected by disability, mental disorder, illness or physical or mental infirmity** they are more vulnerable to being harmed than adults who are not so affected

To safeguard those in our organisation we adhere to the UN Convention on the Rights of the Child and have as our starting point as a definition of abuse, Article 19:

1. *States Parties shall take all appropriate legislative, administrative, social and educational measures to protect the child from all forms of physical or mental violence, injury or abuse, neglect or negligent treatment, maltreatment or exploitation, including sexual abuse, while in the care of parent(s), legal guardian(s) or any other person who has the care of the child.*
2. *Such protective measures should, as appropriate, include effective procedures for the establishment of social programmes to provide necessary support for the child and for those who have the care of the child, as well as for other forms of prevention and for identification, reporting, referral, investigation, treatment and follow-up of instances of child maltreatment described heretofore, and, as appropriate, for judicial involvement.*

Also, for adults the UN Universal Declaration of Human Rights with particular reference to Article 5:

No one shall be subjected to torture or to cruel, inhuman or degrading treatment or punishment.

This policy is in line with the following legislation:

- Children and Young People (Scotland) Act (2014)
- Protection of Vulnerable Groups (Scotland) Act (2007)
- National Guidance for Child Protection in Scotland (2014)
- Adult Support and Protection (Scotland) Act 2007 and the Code of Practice (2014)
- Adults with Incapacity (Scotland) Act (2000)

Detailed definitions, and signs and indicators of abuse, as well as how to respond to a disclosure of abuse, are included here in our policy. Please see guidance notes for a list of these. **APPENDIX 2.**

Positions of Trust

All adults working with children, young people and vulnerable adults are in a position of trust. All those in positions of trust need to understand the power this can give them over those they care for and the responsibility they have because of this relationship.

Seagate Trustees and Seagate Safeguarding Compliance Team have defined “workers” from the Safeguarding Policy as “All Seagate Elders, Trustees, Employed Staff (excluding Café 141 staff), Volunteers in Leadership Roles e.g., main leader of Jam Time, mainly music.

It is vital that all workers ensure they do not, even unknowingly, use their position of power and authority inappropriately. They should always maintain professional boundaries and avoid behaviour which could be misinterpreted.

Safer recruitment

The Leadership will ensure all employed staff and volunteers in leadership roles will be appointed, trained, supported and supervised in accordance with government guidance on safe recruitment. Where relevant this includes ensuring that:

- There is a written job description / person specification for the post
- Those applying have completed an application form
- Those short listed have been interviewed
- Safeguarding has been discussed at interview
- Written references have been obtained, and followed up where appropriate
- A self-declaration form and disclosure and barring check has been completed where necessary (we will comply with Code of Practice requirements concerning the fair treatment of applicants and the handling of information)
- Qualifications where relevant have been verified
- A suitable training programme is provided for the successful applicant
- The applicant has completed a probationary period
- The applicant has been given a copy of the organisation's safeguarding policy and knows how to report concerns.

Safeguarding training

The Leadership is committed to on-going safeguarding training and development opportunities for all workers, developing a culture of awareness of safeguarding issues to help protect everyone. All our workers will receive induction training and undertake recognised safeguarding training on a regular basis.

The Leadership will provide or facilitate basic safeguarding training which will be renewed every three years.

The Leadership will provide or facilitate the Safeguarding Lead and Safeguarding Coordinator undertaking advanced safeguarding training which will be renewed every three years. Where possible, the Leadership will provide or facilitate additional training for the requirements of the role.

The Safeguarding Lead and the Safeguarding Coordinator shall follow the Scottish national standards for training that supports the Child protection learning and development 2024: National framework.

The Leadership will provide or facilitate specialist safeguarding training for all office-bearing trustees (Chair of Trustees, Trust Secretary, Trust Treasurer and Trust Compliance Officer) which will be renewed every three years.

The Leadership will also ensure that children and adults with care and support needs are provided with information on where to get help and advice in relation to abuse, discrimination, bullying or any other matter where they have a concern.

Practice Guidelines

As an organisation working with children, young people and adults with care and support needs we wish to operate and promote good working practice. This will enable workers to run activities safely, develop good relationships and minimise the risk of potential harm or abuse and false or unfounded accusations.

For some activities you will need specific forms, e.g. consent forms, risk assessments etc. These are available to view on request.

Management of Workers – Codes of Conduct

As a Leadership we are committed to supporting all workers and volunteers and ensuring they receive support and supervision. All workers have been issued with a code of conduct for supporting children, young people and adults with care and support needs, and will be given clear expectations about what is expected of them both within their role and outside of their role. They will also receive further training as necessary.

The code of conduct is available to view on request.

Section 4: Partnership working

The diversity of organisations and settings means there can be great variation in practice when it comes to safeguarding children, young people and adults with care and support needs. This can be because of cultural tradition, belief and religious practice or understanding, for example, of what constitutes abuse.

We therefore have clear guidelines with regards to our expectations of those with whom we work in partnership, whether in the UK or not. We will discuss with all partners our safeguarding expectations. It is also our expectation that any organisation using our premises, as part of the letting agreement will have their own policy that meets our safeguarding standards.

We believe good communication is essential in promoting safeguarding, both to those we wish to protect, to everyone involved in working with children and adults with care and support needs and to all those with whom we work in partnership.

We promote Safeguarding by using Posters on display on information boards with Safeguarding Lead and Safeguarding Coordinator contact details and make use of the Church Newsletter to provide Safeguarding updates.

This safeguarding policy is just one means of promoting safeguarding.

Section 5: Responding to allegations of abuse

Under no circumstances should a volunteer or worker carry out their own investigation into an allegation or concern of abuse. Follow procedures as below:

Documenting a concern

- The worker or volunteer should make a report of the disclosure, allegation or concern by using the Cause for Concern Form. This form is available from the Seagate Administrator, Safeguarding Leader or Safeguarding Coordinator.
- The person in receipt of the disclosure, allegation or concern of abuse should report concerns as soon as possible to:

Seagate Senior Safeguarding Leader

Name: Mark Inglis

Tel: 01292 221739/ 07954898710

Email: mark_inglis123@sky.com

The Senior Safeguarding Leader is nominated by the Leadership to act on their behalf in dealing with the disclosure, allegation or concern, including referring the matter on to the statutory authorities.

In the absence of the above person, or if the concerns in any way involve the above person, then the report should be made to:

Seagate Safeguarding Coordinator

Name: Alan MacLeod

Tel: 07982716995

Email: alanmacleod100@gmail.com

If the concerns implicate both people named above, then the report should be made in the first instance to:

thirtyone:eight PO Box 133, Swanley, Kent, BR8 7UQ

Tel: 0303 003 1111

Alternatively contact Social Services or the police.

The Senior Safeguarding Leader or Co-ordinator should contact the appropriate agency, or they may first ring the thirtyone:eight helpline for advice. They should then contact the relevant Social Services department in the area the child or adult lives.

Name of local Social Work Department

Children's Social Services

Tel: 01292 267 675

Out of hours Tel: 0800 328 7758

Email Address: initialresponseteam@south-ayrshire.gov.uk

Adult Social Services

Tel: 01292 616102

Out of hours Tel: 0800 328 7758

Email Address: asp@south-ayrshire.gov.uk

Police Scotland Tel: 101

- The Senior Safeguarding Leader or Co-ordinator may need to inform others depending on the circumstances and/or nature of the concern
 - Chair of trustees or trustee responsible for safeguarding who may need to liaise with the insurance company or the Office of the Scottish Charity Regulator to report a serious incident/raise a concern
 - Children's Social Services (Child Protection Team) if the allegation concerns a worker or volunteer working with someone under 18
 - Report to Disclosure Scotland if the allegation concerns a person working with a child or vulnerable adult
- Concerns must not be discussed with anyone other than those nominated above. A written record of the concerns should be made in accordance with these procedures and kept in a secure place.
- Whilst disclosures, allegations or concerns of abuse will normally be reported to the Safeguarding Co-ordinator, the absence of the Safeguarding Co-ordinator or Leader should not delay referral to Social Services, the Police or taking advice from thirtyone:eight.
- The role of the Safeguarding Leader or Co-ordinator is to collate and clarify the precise details of the disclosure, allegation or concern and pass this information on to statutory agencies who have a legal duty to investigate.
- The Leadership will support the Safeguarding Lead or Coordinator in their role and accept that any information they may have in their possession will be shared in a strictly limited way on a need-to-know basis.
- It is, of course, the right of any individual as a citizen to make a direct referral to the safeguarding agencies or seek advice from thirtyone:eight, although the Leadership hope that members of the place of worship / organisation will use this procedure. If, however, the individual with the concern feels that the Safeguarding Leader or Co-ordinator has not responded appropriately, or, where they have a disagreement with the Safeguarding Co-ordinator(s) as to the appropriateness of a referral, they are free to contact an outside agency direct. We hope by making this statement that the Leadership demonstrate its commitment to effective safeguarding and the protection of all those who are vulnerable.

We encourage the reporting of Safeguarding Low Level Cause for Concerns. Often, the earliest indicators of a potential problem show up in small moments: comments, patterns of behaviour, minor boundary slips, or things that “just don't sit right.” Low-level concerns help us notice these early warning signs, respond wisely, and maintain a culture of openness, accountability and safety. Refer to **APPENDIX 3** for further guidance on Low Level Concerns and distinguishing between Safeguarding Concerns and Low Level Concerns.

Detailed procedures where there is a concern about a child:

Allegations of physical injury, neglect or emotional abuse:

If a child has a physical injury, a symptom of neglect or where there are concerns about emotional abuse, the Safeguarding Leader or Co-ordinator will:

- If the child requires immediate medical attention, contact the relevant medical services, informing the Doctor of any concerns.

- Contact Children's Social Services (or Thirtyone:eight) for advice in cases of deliberate injury, if concerned about a child's safety or if a child is afraid to return home.
- If the disclosure, allegation or concern is directly about the parents, then do not tell the parents or carers unless advised to do so, having contacted Children's Social Services.
- For lower-level concerns, (e.g. poor parenting), encourage parent/carer to seek help, but not if this places the child at risk of harm.
- Where the parent/carer is unwilling to seek help, offer to accompany them. In cases of real concern, if they still fail to act, contact Children's Social Services direct for advice.
- Seek and follow advice given by Thirtyone:eight (who will confirm their advice in writing) if unsure whether to refer a case to Children's Social Services.

Allegations of sexual abuse:

In the event of allegations or concerns of sexual abuse, the Safeguarding Leader or Co-ordinator will:

- Contact the Children's Social Services Department Duty Social Worker for children and families or Police Scotland Child Protection Team direct.
- Depending on the circumstances, they will need to consider whether it is appropriate to speak to the parents of the child. If they are not sure about this, then they will contact Thirtyone:eight.
- Seek and follow the advice given by Thirtyone:eight if for any reason they are unsure whether to contact Children's Social Services or Police Scotland. Thirtyone:eight will confirm its advice in writing for future reference.

Detailed procedures where there is a concern about an adult at risk:

Concerns or allegations of abuse or harm including; physical, sexual, organisational, financial, discriminatory, neglect, self-neglect, forced marriage, modern slavery, domestic abuse.

If there is concern about any of the above, Safeguarding Leader or Co-ordinator will:

- If the adult is in immediate danger or has sustained a serious injury contact the Emergency Services, informing them of any concerns.
- Contact the Adult Social Care Team who will be able to advise whether this reaches the safeguarding threshold and actions required. Alternatively, thirtyone:eight can be contacted for advice

If there is a concern regarding spiritual abuse, Senior Safeguarding Leader or Co-ordinator will:

- Identify support services for the survivor i.e. counselling or other pastoral support
- Contact thirtyone:eight and in discussion with them will consider appropriate action with regards to the scale of the concern.

Allegations of abuse against a person who works with children/young people:

If an accusation is made against a worker (whether a volunteer or paid member of staff) whilst following the procedure outlined above, the Safeguarding Lead, will:

- Refer the matter to Children's Social services who will investigate the concerns and pass on information to Disclosure Scotland in relation to the worker
- Make a referral to Disclosure Scotland for consideration of the person being placed on the barred list for working with children or adults with care and support needs. This decision should be informed by Children's Social Services if they are involved.
- Share information about the concern with Police Scotland.

Allegations of abuse against a person who works with adults with care and support needs:

The Safeguarding Leader or Co-ordinator will:

- Liaise with Adult Social Services to establish whether this can be investigated under their safeguarding processes.
- Make a referral to Disclosure Scotland following the advice of Adult Social Services.
- Share information about the concern with Police Scotland.

The Adult Support and Protection (Scotland) Act 2007 and the Code of Practice April 2014 places the duty upon Adult Services to investigate situations of harm to adults with care and support needs. This may result in a range of options including action against the person or organisation causing the harm, increasing the support for the carers or no further action if the 'victim' chooses for no further action and they have the capacity to communicate their decision. However, this is a decision for Adult Social Services to decide not the organisation.

Allegations of non-recent sexual abuse from an adult:

If an accusation is made of non-recent sexual abuse from a child, the procedure in relation to sexual abuse will be followed (please see above).

If an accusation is made of non-recent sexual abuse from an adult, the Safeguarding Leader or Coordinator will:

- Give the adult the option to report this to Police Scotland. If the adult does not wish to report this to the police, then the Safeguarding Leader can pass on the information relating to the alleged Perpetrator, however, must not share details of the Survivor.
- If the alleged Perpetrator is in a role working or volunteering with children or young people, make a referral to the Children's Social Services whose function is to handle all allegations against adults who work with children and young people whether in a paid or voluntary capacity.
- If the alleged Perpetrator is in a role working with adults with care and support needs, liaise with Adult Social Services to establish whether this can be investigated under their safeguarding processes.
- If the alleged Perpetrator is in a role within your organisation, contact Thirtyone:eight and in discussion with them will consider appropriate action with regards to the scale of the concern.

Making a Referral to Disclosure Scotland

When a volunteer or member of staff is permanently removed from a regulated role, there are certain circumstances where an organisation must notify Disclosure Scotland that this has happened. This is called 'Making a Referral'. The actions detailed below continue to

apply even if a member of staff or volunteer leaves their regulated role prior to any action being taken, irrespective of the reason that they leave.

Two conditions must be met before making a referral:

Condition 1 – A person has been permanently removed/removed themselves from a regulated role

Condition 2 – At least one of the following five grounds apply:

- Caused harm to a child or protected adult
- Placed someone at risk of harm
- Engaged in inappropriate conduct involving pornography
- Engaged in inappropriate sexual conduct
- Given inappropriate medical treatment

When both of these conditions have been met, it is a legal requirement to make a referral to Disclosure Scotland within three months of the permanent removal of the individual.

Where there is an historical allegation of harm or inappropriate behaviour about someone who is no longer in a regulated role here but which would, in all probability, have led to the two conditions being met, consideration will be made around making a referral but the legal responsibility applies only after 28 February 2011 when PVG was first introduced.

Where it is necessary to make a referral, this process will be carried out by the Senior Safeguarding Leader or Safeguarding Co-ordinator.

Those who are in a position which may involve carrying out disciplinary action which may result in the removal from a regulated role or dismissal of someone in a regulated role must ensure they notify the Safeguarding Leader or Co-ordinator of the legal requirement to make a referral where the conditions above have been met.

The form for making a referral can be found on Disclosure Scotland's website (<https://www.mygov.scot/pvg-referrals/how-to-make-a-referral>), along with instructions for completing the form and Disclosure Scotland can be contacted on 03000 2000 40.

Failure to make a referral where required, may result in our organisation being prosecuted.

Section 6: Wellbeing Support and Pastoral Care

Supporting those affected by abuse

The Leadership is committed to offering wellbeing support/pastoral care, working with statutory agencies as appropriate, and support to all those who have been affected by abuse who have contact with or are part of the organisation.

Please see below the details for the individual responsible for wellbeing support/pastoral care:

Name: Richard Woods (Senior Leader and Pastor of Seagate Church)

Tel: 07904972733

Email: richardwoods@seagatechurch.org.uk

Working with those who may pose a risk

When someone attending the organisation is known to pose a potential risk to children, or adults with care and support needs; the Leadership will supervise the individual concerned and offer wellbeing support/pastoral care, but in its safeguarding commitment to the protection of children and adults with care and support needs, set boundaries for that person, which they will be expected to keep. These boundaries will be based on a risk assessment and through consultation with appropriate external parties.

APPENDIX 1: Safeguarding statement

Protection of Children and Adults Policy Statement

Seagate Church and incorporating Meadowgreen Community Church

The following statement was agreed by the leadership/organisation on 30/04/2025:

- This place of worship/organisation is committed to the safeguarding of children and adults with care and support needs and ensuring their well-being.
- We recognise that we all have a responsibility to help prevent harm to children and adults with care and support needs in all their recognised forms.
- We recognise that the personal dignity and rights of adults and children and will ensure all our policies and procedures will reflect this.
- We believe all people should enjoy and have access to every aspect of the life of the place of worship/organisation.
- We undertake to exercise proper care in the appointment and selection of those who will work with children and adults with care and support needs.
- We believe every child and adult should be valued, safe and happy. We want to make sure that all those we have contact with know this and are empowered to tell us if they are experiencing significant harm.

We are committed to:

- Following statutory denominational and specialist guidelines in relation to safeguarding children and adults and will ensure that as a place of worship/organisation all workers will work within the agreed procedure of our safeguarding policy.
- Implementing the requirements of all relevant legislation including, but not limited to; Children and Young People (Scotland) Act (2014); Protection of Vulnerable Groups (Scotland) Act (2007); National Guidance for Child Protection in Scotland (2014) (2021, revised 2023); Adult Support and Protection (Scotland) Act 2007 and the Code of Practice (2014); Adults with Incapacity (Scotland) Act (2000)
- Supporting, resourcing and training those who undertake this work.
- Ensuring that we are keeping up to date with national and local developments relating to safeguarding.
- Ensuring that everyone agrees to abide by these recommendations and the guidelines established by this place of worship/organisation.
- Supporting all in the place of worship/organisation affected by abuse.

We recognise:

- Children's Social Services has lead responsibility for investigating all allegations or suspicions of abuse where there are concerns about a child. Adult Social Services has lead responsibility for investigating all allegations or suspicions of abuse where there are concerns about an adult with care and support needs.
- Where an allegation suggests that a criminal offence may have been committed then Police Scotland should be contacted as a matter of urgency.
- Safeguarding is everyone's responsibility.

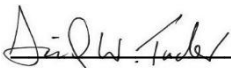
We will review this statement and our policy annually.

If you have any concerns for a child or adult, then speak to one of the following who have been approved as safeguarding Leads for this place of worship/organisation.

Mark Inglis (Contact No: 07954898710) - Safeguarding Leader

Alan MacLeod (Contact No: 07982716995) - Safeguarding Coordinator

Signed by the Leadership:

Signed  _____ Dave Tudor Chair of the Trustees

 _____ Mark Inglis Chair of the Elders

Date 06/07/2026

APPENDIX 2

Definitions of Abuse together with signs and indicators – children

- Physical
- Sexual
- Emotional
- Neglect

Definitions of Abuse together with signs and indicators – adults

- Physical
- Sexual
- Emotional
- Financial
- Neglect

NB - in Scotland, the legislation refers to “harm” as opposed to “abuse”.

Our safeguarding policy shall also consider some other areas of concern that do not come directly under the categories of harm or abuse. Please see below for some suggestions:

Children

- Child on child abuse
- Child sexual exploitation (CSE)
- Child criminal exploitation (CCE)
- Radicalisation
- Domestic abuse
- Bullying

Adults

- Extremism and radicalisation
- Cuckooing
- Mate crime
- Hate crime
- Stalking/harassment
- Spiritual abuse
- Romance fraud

APPENDIX 3

Safeguarding Concerns and Low-Level Concerns

Keeping people safe is not just about dealing with the big obvious issues. Sometimes it's the little things – those nagging doubts or moments of unease – that, if left unchecked, can escalate into something much more serious. These are what we call 'low-level concerns'.

Before we look at several examples of low-level concerns, it's helpful to remember what we mean by a serious safeguarding concern, something that suggests a child or adult may be at risk of harm and requires immediate action.

- **Child whose behaviour changes over a period of time**, becoming withdrawn and disengaged
- **Parent attending with visible bruising or regular injury**
- **Staff member behaving inappropriately**, such as being overly familiar with a child, crossing boundaries, or ignoring safeguarding guidance
- **Child disclosing harm or fear**, especially about someone at home, at school, or within the church
- **Child regularly arriving with unmet basic needs**, such as poor hygiene, no lunch, unsuitable clothing, or consistently being very hungry
- **A parent or carer arriving under the influence of alcohol or drugs**, or appearing unable to safely care for their child
- **Young person expressing suicidal thoughts or self-harm**, or showing visible signs of injury
- **An allegation or concern raised about a staff member or volunteer**, particularly involving inappropriate contact, language, online communication, or being alone with a child
- **Domestic abuse indicators**, such as controlling behaviour, intimidation, or a parent appearing fearful of their partner
- **Repeated breaches of safe procedures**, for example children regularly being left unsupervised, or poor sign-in/out safeguarding practice

These kinds of concerns require immediate action and should always be passed on to the safeguarding lead without delay.

However, not all concerns are immediately clear or high-risk. Often, the earliest indicators of a potential problem show up in small moments: comments, patterns of behaviour, minor boundary slips, or things that "just don't sit right." Low-level concerns help us notice these early warning signs, respond wisely, and maintain a culture of openness, accountability and safety. Each small incident may seem insignificant on its own, but together they can provide an important wider picture and help us respond early.

What is a Low-Level Concern?

A low-level concern doesn't mean insignificant. It's any behaviour that:

- Is inconsistent with Seagate's code of conduct for workers or volunteers – including behaviour outside of work
- Does not meet the threshold for harm but still raises some concern

Here are some real-life examples and actions you could take.

*NB: Seagate's Safeguarding Policy defines Seagate's **Workers** as "All Seagate Elders, Trustees, Employed Staff or Volunteers in Leadership Roles".*

1. Not following the code of conduct or safeguarding policy

Steps to take:

- Meet with the person to discuss where they've fallen short
- Put support in place to help them align with the policy
- Be clear on the consequences if the behaviour repeats

Who handles it?

- Worker, with safeguarding lead involvement if required

2. Speaking aggressively or unkindly to children

For example at Jam time or YF

Steps to take:

- Establish what happened and listen to their side of the story
- Remind them of the code of conduct
- Speak to other leader/helpers who were present
- Offer support or training if needed

Who handles it?

- Worker. Safeguarding lead if escalation is needed.

3. Inappropriate touch or lack of boundaries

For example, demonstrating a lack of understanding around personal space, or continually touching other adults without asking.

Steps to take:

- Speak to the individual, allowing them to share their perspective
- Explain how their behaviour affects others
- Reinforce the importance of personal space and consent

Who handles it?

- Safeguarding lead

4. A child attending Jam time/YF looking unkempt and hungry

Steps to take:

- Check in with the child (without leading questions)
- Provide food if needed
- Share concerns with the safeguarding lead
- Speak to the parents and offer support if necessary

Who handles it?

- Worker, with safeguarding lead consulting Children's Services if concerns persist
- *This example may escalate from a low-level concern to a serious concern*

5. Offering lifts to under-18s alone

Steps to take:

Find out why they are giving lifts.

- Clarify the organisation's policy on transporting under-18s
- If unavoidable, outline safe travel procedures (e.g., child sits in the back)

Who handles it?

- Worker, safeguarding lead to consult Children's Services if needed

6. A youth leader favouring certain young people

For example, a youth leader may spend more time with a few members of the group and even socialise with them or include them in photos or videos, while excluding others.

Steps to take:

- Speak to them about how their behaviour appears to others
- Explain the impact on others
- Remind them of the job role and code of conduct.
- Offer training and set clear boundaries

Who handles it?

- Worker, safeguarding lead for training support.

7. Leadership team member handling money for a vulnerable couple

For example, a member of the leadership team is buying food for an elderly couple who struggle to leave the house, and the couple give their credit card to the leader.

Steps to take:

- Advise the couple not to share bank cards or PINs
- Guide the leader on proper financial procedures
- Consider whether the organisation should step in to provide support

Who handles it?

- Worker

8. Unauthorised contact with children

For example, a member of the organisation, who is not on the children's work team keeps picking up toddlers or babies.

Steps to take:

- Check to see if parents have given consent
- Speak to the individual and clarify expectations

- Monitor for further incidents

Who handles it?

- Worker

9. A member of the organisation has inappropriate interactions with others

This could look like:

- Spending a disproportionate amount of time with specific people
- Consistently seeking those individuals out
- Uninvited communication
- Overly friendly and familiar
- Invading personal space
- Physical touch, such as touching a back or arm, trying to hold hands, etc
- Making sexualised, racist or homophobic comments

Steps to take:

- Speak to the individual about concerns raised
- Set clear boundaries for their contact with the person/people
- Monitor behaviour and take action if issues continue

Who handles it?

- Safeguarding lead

10. 'Casual' racism from an older member

For example using slurs as everyday language.

Steps to take:

- Explain how their language is perceived
- Reinforce that such language is not acceptable
- Offer DEI training, or training on the impact of language

Who handles it?

- Worker

11. A couple in the organisation showing signs of distress

For example consistent arguing, injuries or withdrawal.

Steps to take:

- Speak to them separately to offer support
- If disclosures are made, escalate to the safeguarding lead
- Signpost to counselling or support services
- Monitor and record concerns

Who handles it?

- Worker or safeguarding lead for serious concerns
- *This example may escalate from a low-level concern to a serious concern*

Final Thoughts

Low-level concerns might seem small, but they are often early warning signs. Responding early helps us:

- **Prevent issues from escalating** into something more serious
- **Support individuals to grow**, improving understanding, behaviour and boundaries
- **Strengthen a culture of accountability and safety**, where concerns are welcomed and acted on

Don't ignore those gut feelings – **recognise, respond, record, report, reflect**. If you ever feel out of your depth, consult with your safeguarding team.