

# SISTERS OF OUR LADY OF APOSTLES



## CHILD SAFEGUARDING POLICY



# MISSIONARY SISTERS OF OUR LADY OF APOSTLES

## CHILD SAFEGUARDING POLICY AND PROCEDURES

### OUR POLICY STATEMENT

We, the Sisters of Our Lady of Apostles (OLA), commit ourselves by the vows of religion to follow Christ as the Apostles did. We are committed to the promotion and protection of authentic human values, which are an integral part of the proclamation of the Gospel.

Inspired by the example of Jesus in showing great love, respect and care for children, we believe that each child must be cherished and affirmed as a gift from God and has an inherent right to dignity of life and bodily integrity.

We commit ourselves to do all in our power to ensure that the children who come in contact with us in any way will be cared for in a safe and enabling environment, where their holistic development is facilitated and where they are safeguarded against any form of harm or abuse. We do our utmost to ensure that the fundamental rights of these children are always respected and upheld.

### OUR GUIDING PRINCIPLES

**The following principles underpin the OLA policy statement:**

Each child is a gift of God and hence a person with innate dignity. This must be recognized and affirmed, by according him/her the inalienable right to the following:

- to dignity of life and bodily integrity
- to respect - being listened to, consulted and taken seriously
- to holistic care in a developmentally supportive and safe environment
- to justice - being treated fairly and safe from any abuse or neglect.

These principles have their foundations in the following:-

## **GOSPEL VALUES**

Children have a key place in the heart of Jesus who showed how much he valued them when he said:

***“Whosoever receives a little child like  
this in my name receives me”***

(Matt: 18:5)

Following Christ’s example, we strive to ensure that in all our apostolates, children are welcomed, cherished and protected. The fact that Jesus had strong warnings for anyone who would undermine the faith of little ones, is a reminder to all of us that we have an obligation to do our utmost to ensure children are not at risk of any harm or abuse while in our care.

***“Let the children come to me and do not stop them for it is to  
such as these that the kingdom of God belongs.”***

(Luke 18: 15-16)

## **OUR OLA HERITAGE**

***“Spread the gospel of Jesus Christ...make the missions  
attractive to the women so that they may desire to be taught and  
ask to be instructed in Christianity; love the children,  
it is for these reasons that the Sisters are in Africa”***

Fr. Augustine Planque SMA: (Cf: Letter to Sr. Emile Oct 1887 )

Acknowledging the experience we have in international and intercultural living for 140 years, we strive to respect the cultures of the various peoples with whom we live and work. Since our beginning we are aware of the strengths and challenges in each culture particularly in relation to child safeguarding. Each child belongs to a specific culture, which ensures its growth and development. As Missionary Sisters of Our Lady of Apostles, we are committed to immersing ourselves in the local culture concerning the rights and responsibilities of children, in all our places of mission, so that we can work for the safeguarding and protection of children in all societies and cultures.

### ***Children’s Rights, International and National Law***

The United Nations Convention on the Rights of the Child (UNCRC) outlines the 42 fundamental rights to be implemented in National Law by signatories to the convention (this includes all countries where OLA work). Full realisation of these

rights will ensure that children will be *'brought up in a spirit of peace, dignity, tolerance, freedom, equality and solidarity'*.

It is the responsibility of the leadership and safeguarding personnel in each entity to be familiar with National/State laws that are linked to this convention and to ensure that these laws are reflected and respected in the OLA Child Safeguarding Policy adapted for their entity.

### **CONGREGATIONAL COMMITMENTS:-**

In light of the principles outlined above, we recognise that we have a duty to act according to the legal requirements in each jurisdiction and notify the civil authorities about children where there are suspicions, concerns or allegations of abuse whether:

- Physical
- Emotional
- Sexual
- Neglect, or
- In the generation of child pornographic images

These suspicions, concerns or allegations can relate to possible abuse by a member of the Church, or in the child's family, or elsewhere. We undertake to do all in our power to ensure that children will be safe, and we will work to meet the following commitments:

### **Caring for the welfare of all children**

We will put in place measures to create and maintain environments which are safe for children, which prevent abuse, and create nurturing caring conditions within the Church for children.

### **Responding appropriately to Child Protection suspicions, concerns or allegations**

Anyone who brings suspicions, concerns or allegations of current or past abuse of a child to the notice of OLA will be responded to sensitively, respectfully, actively and in a timely manner, in line with statutory child protection procedures.

All allegations will be reported to the appropriate statutory agencies. This will be done irrespective of the status of the person (lay, religious or cleric) who is suspected or believed to be or to have been abusive to a child. OLA will cooperate with the civil authorities in all cases and demonstrate accountability through establishing effective monitoring and audit structures.

In responding to complaints of child sexual abuse relating to clergy and religious , OLA Leadership will act in accordance with the requirements of Canon Law and so will respect the rights and uphold the safeguards afforded in that Code, both to the complainant and to the respondent.

### **Caring pastorally for complainants and other affected persons**

Those who have suffered child abuse while under the care of OLA will receive a compassionate and just response and will be offered appropriate pastoral care, counselling and support as they seek to rebuild their lives. Their families and relevant other people will also receive such a response and support options.

### **Caring pastorally for respondents and other affected persons**

The Missionary Sisters of Our Lady of Apostles, in response to suspicions, concerns and allegations of child sexual abuse, will respect the rights under natural justice, civil law and canon law of an accused cleric or religious, lay staff member or volunteer. The legal presumption of innocence will be maintained during the statutory and Church inquiry processes. As the processes develop, additional assessment, therapy and support services may be provided to the respondent.

We will take responsibility to ensure that any cleric or religious, lay staff member or volunteer who is considered to constitute a danger to children is managed according to a risk management plan that does not allow them to have any unsupervised access to children.

All requisite steps will be taken to restore the good name and reputation of anyone who has been wrongly accused of abusing a child.

Respondents belong to families and to diocesan or congregational communities. The Missionary Sisters of Our Lady of Apostles will be mindful of the need to provide support to members of families and communities affected by the respondent's changed situation.

### **SCOPE OF THE POLICY**

For the purposes of this document, a child means everyone below the age of 18 years, unless under the law applicable in the child's jurisdiction, majority is attained earlier.

**It is the responsibility of each entity to research the applicable laws in its jurisdiction, clarify in what circumstances majority is attained earlier and include this information in their policy.**

This Policy applies to:-

- ALL SISTERS in the Congregation of the Sisters of Our Lady of Apostles
- All Staff working in Institutions owned or administered by OLA Sisters
- All Volunteers and Collaborators in OLA activities.

Each Entity identifies the specific individuals/groups to whom their policy applies.

### **Putting the Policy into practice**

The Missionary Sisters of Our Lady of Apostles will implement this policy by ensuring that all our ministry and activities comply with seven safeguarding standards.

1. Creating and Maintaining Safe Environments
2. Procedures for responding to child protection allegations, concerns and suspicions
3. Care and support for the complainant
4. Care and Management of the Respondent
5. Training and support for keeping children safe
6. Communicating the Church's Safeguarding Message
7. Implementing and monitoring the standards

**What to do if you are concerned about the welfare and safety of a child**

Each entity must include the contact details of the relevant person/ authorities to be contacted in case of concerns, suspicions or allegations of abuse.

DESIGNATED LIAISON PERSON:  POLICE:  CHILD PROTECTION SERVICE:
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**Commitment by OLA Leadership**

On behalf of the Missionary Sisters of Our Lady of Apostles, I commit to safeguarding children by agreeing to follow the Child Safeguarding Policy of the Missionary Sisters of Our Lady of Apostles as detailed above.

We will abide by and uphold the seven Standards in our entire ministry and contacts with children.

*Mary T. Barron, OLA*

January 06, 2019

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Mary T. Barron, OLA  
Superior General

\_\_\_\_\_  
Date

# SEVEN STANDARDS OF CHILD SAFEGUARDING

## STANDARD 1 CREATING AND MAINTAINING SAFE ENVIRONMENTS

### WHAT IS THE STANDARD?

We are committed to developing a culture of safety that welcomes children and contributes to their well-being and empowerment. Creating and maintaining safe environments reduces the risk of children being harmed in any way while under our care. Three key approaches ensure that safe environments are created, insofar as possible. These include having: -

1. clear guidelines on acceptable and unacceptable behaviour in areas such as:
  - adult-to-child behaviour,
  - child-to-child behaviour.
  - physical contact with children.
  - anti-bullying strategies and protocols
  - whistleblowing

See resource section..... for guidelines

2. a clear and comprehensive recruitment and selection policy and
3. clear guidelines on how to organize safe activities with children.

### 1.GUIDELINES ON ACCEPTABLE AND UNACCEPTABLE BEHAVIOUR

#### CODE OF BEHAVIOUR FOR ADULTS WORKING WITH CHILDREN

This code indicates what is and what is not acceptable behavior for an adult when interacting with children. It must be signed by each person as an indication of her/his commitment to fully enact it in her/his work with children.

#### **The OLA Code of Good Behaviour requires all adults to:**

- treat all children with respect
- provide an example of good conduct you wish others to follow
- operate within the Church principles and guidance and any specific procedures
- be visible to others when working with children whenever possible
- challenge and report potentially abusive behaviour
- develop a culture where children can talk about their contacts with staff and others openly
- respect each child's boundaries and help them to develop their own sense of their rights as well as helping them to know what they can do if they feel that there is a problem.

**In general, it is inappropriate to:**

- spend excessive time alone with children away from others
- indulge in any form of substance abuse when caring for children or introduce children to alcohol, drugs
- take children to your own home, especially where they will be alone with you.

**OLA Sisters, Employees, volunteers and others must never:**

- hit or otherwise physically assault or physically abuse children
- develop sexual relationships with children
- develop relationships with children which could in any way be deemed exploitative or abusive
- act in ways that may be abusive or may place a child at risk of abuse.

**Employees, volunteers and others must avoid actions or behaviour that could be construed as poor practice or potentially abusive. For example, they should never:**

- use language, make suggestions or offer advice which is inappropriate, offensive or abusive
- behave physically in a manner which is inappropriate or sexually provocative
- have a child/ children with whom they are working to stay overnight at their home unsupervised
- sleep in the same room or bed as a child with whom they are working
- do things for children of a personal nature that they can do for themselves
- condone, or participate in, behaviour of children which is illegal, unsafe or abusive
- act in ways intended to shame, humiliate, belittle or degrade discriminate against, show different treatment, or favour particular children to the exclusion of others.

**Children with disabilities:** In dealing with child abuse, it is crucial to be aware of the particular vulnerability of children with disabilities, especially those who require intimate care. They may be less able to resist abuse due to a number of factors which make detection especially difficult:-

- bruising or inappropriate sexual behaviour may be confused or explained away due to the nature of the disability and their dependency for intimate care

- they may be unable to recognise abusive behaviour due to learning difficulties and less exposure to the norm for adult/child interactions
- they may have a poor and/or incomplete body image due to disabilities
- they may have little involvement with adults outside their home or care setting
- children with a communication difficulty may be unable to convey their experiences to others or adults may be unable to communicate with them - special advice should be sought in relation to this matter.

It is important to remember there is still societal and professional reluctance to accept that disabled children could be abused.

Each entity must develop other codes of behavior that are appropriate for their context. Guidelines are provided in the resource section. Clear ways must also be spelt out for personnel to raise concerns around unacceptable behaviour of colleagues towards children. (Outlined in Standard 2)

## 2.SAFE RECRUITMENT PROCEDURES

We will do our utmost to recruit personnel who do not pose a risk to children by following the following recruitment procedures:-

- i. Always applying thorough selection procedures regardless of who the applicant is, and whether the position is full-time, part-time, permanent, paid or voluntary.
- ii. Interviewing the individual to assess her/his experience of working with children and young people, her/his ability to communicate with children and young people and her/his knowledge of child protection issues.
- iii. Ensuring that interviews are conducted by more than one person and that at least one of those interviewing has established competence in interviewing and selection for posts involving work with children.
- iv. Taking all reasonable steps to exclude unsuitable candidates by insisting on and verifying references, qualifications and previous records of employment.
- v. Defining the role the individual is applying for (clear job description).
- vi. Insisting that a person applying for any post of responsibility completes the relevant application form and provides proof of identity.
- vii. Ensuring that where applicable, each individual completes and signs the relevant Vetting Application form which is then processed.
- viii. Requesting references and doing reference checks for preferred applicants. We will ensure that any appointment whether paid or voluntary, is approved. In relation to references, we will

- Obtain two (2) references in writing; one of which is from an employer/relevant other from a position where the applicant worked with Children.
  - Applicants will be asked to supply the names of 2 referees who are not family members & ideally who have first-hand knowledge of the applicant's experience of work/contact with children.
  - Referees will be asked specifically to comment on the applicant's suitability to work with children.
  - References should be provided in writing & followed up with a phone call if appropriate. Where references are obtained or verified orally/by phone, it is important that a signed written record of the conversation is kept on file. (see Resource ... for a sample recording form)
  - The identity of referees should be verified.
- ix. Setting an appropriate probationary period according to the jurisdiction.
  - x. Maintaining and storing the following records for the required time period in the jurisdiction: process date; applications, notes on the screening process, interviews, notes and final selection.
  - xi. Providing initial and periodic updates on Child Safeguarding training to all OLA Sisters, Staff, Volunteers and colleagues (where there is involvement with children) as may be required for their own protection and under the law.
  - xii. Providing all personnel with a copy of our Congregation's Safeguarding Children Policy and ensuring they are given an opportunity to look for clarity on any aspect of this.

## VETTING

Where applicable, each entity must follow the vetting process in their jurisdiction and include guidance on how to do so.

In jurisdictions where there is no official vetting process, all applicants should be asked to sign a declaration stating

- that there is no reason why they would be considered unsuitable to work children
- to declare any past criminal convictions and pending cases against them

It is recommended that each Entity should seek legal advice in drawing up this Declaration Form. (See Resource..... for a template).

## INDUCTION

A good induction programme is essential for all personnel engaged with children. This includes creating basic awareness of the concepts of child safeguarding and protection; an introduction to our Child Safeguarding Policy and Procedures, procedures for dealing with grievances and allegations. Clarity in relation to the OLA structure for safeguarding children is also important. On appointment, each person will be given:

- The name and contact details of the Designated Liaison Person and advised of her role
- A copy of our Code of Behaviour for working with children and young people.
- Regular updates or training when relevant.

## 3.ORGANIZING SAFE ACTIVITIES

### PROCEDURES FOR ENSURING THE PHYSICAL SAFETY OF CHILDREN/ YOUNG PEOPLE

- Adequate and appropriate supervision must be provided in relation to all events and activities organised for children and young people.
- In places such as changing areas, toilets and showers separate provision must be made for boys and girls.
- There must be
- adequate and gender-appropriate supervision of boys and girls in changing areas.
- Make sure that a First Aid Kit is readily available. This should be regularly checked and replenished. It is advisable that First Aid training be provided for workers and volunteers.
- Access to a telephone at all times is essential in case of emergency.
- Relevant information about the children, such as allergies, medical problems and special needs
- Adequate insurance must be obtained to cover all activities. In cases of uncertainty about the level of cover, check with the relevant insurance provider.
- Where OLA is providing transport, make sure that drivers and vehicles meet legal requirements. Where transport is being hired, check with the service provider that drivers and vehicles conform to legal requirements. Always inform parents/guardians about transport being used and obtain appropriate consent.

- A clear policy should be agreed with parents and guardians regarding the taking of photographs and the making of video recordings of children or young people involved in OLA organized activities or events.
- There should be up to date contact numbers for parents and staff.
- Ensure that an Accident/Incident report form is completed in the event of any accident or incident relating to a child/young person.

In planning a trip or activity it is necessary to decide how many adults are needed to supervise children in a safe manner. It is recommended that an appropriate adult-to-child-ratio is agreed upon; however, this ratio is also dependent on whether the children have specific needs or requirements.

**A general rule is that two adults are required for each activity, i.e. at no point should one adult be alone supervising activity.**

Each entity must ensure they have written guidelines in place for the following:

- transporting children when taking them on trips, overnight stays, pilgrimages and retreats.
- process for dealing with complaints about matters that are not allegations of abuse
- use of OLA premises by external groups.
- For participating with children and young people with specific needs.
- Discipline and dealing with challenging behaviours
- On the use of photography and information technology.

***See Resource section for examples of the above.***

## SUPERVISION AND SUPPORT OF STAFF

Supervision of staff is a key element of best practice. It allows those with responsibility to assess the attitudes, relationships and competencies of each staff member. It may also highlight the need for additional training and for change in policies or practice.

It is useful to keep a brief, written record of the discussion that takes place during supervision and the recommendations made. It is also important to have a system of written review of staff so that they can be given recognition for the good work they are doing and helped to develop their skills further, where necessary. Those with responsibility for the supervision of staff need to be alert to any unusual incidents or activities that take place where staff may be putting themselves in vulnerable positions.

During annual staff appraisals, care is taken to address performance in relation to safeguarding practices.

## **ROLES OF SAFEGUARDING PERSONNEL IN RELATION TO THIS STANDARD**

**Provincial/District Leader:** In relation to Standard 1, the leader in each entity is responsible for:

- Appointing a Safeguarding Committee, and with that committee ensuring that Local Safeguarding Representatives (LSR's) are in place in the entity.
- With local Superiors, ensuring that all those who are recruited as personnel are suitable and appropriate for their role.
- Ensuring compliance with civil law and policy in creating and maintaining safe environments, and regarding areas such as vetting, safe recruitment, adult to child ratios, codes of conduct and risk assessment.

### **Safeguarding Committee**

In relation to Standard 1, the Safeguarding Committee is responsible for:

- Producing a 3-year plan for how to implement and maintain Standards 1, 5, 6 and 7 across the entity. This includes the development of procedures and practice around creating and maintaining safe environments.
- Liaising with the Local Safeguarding Representatives to identify areas where guidance and support on policy or practice is needed.
- Ensuring that records for child safeguarding related activities are produced and stored appropriately

### **Local Safeguarding Representative (LSR)**

In relation to Standard 1, the LSR is responsible for:

- Checking and providing advice and support to ensure that all Church activities are being carried out in line with the safeguarding policies and procedures of the diocese, religious order or Church body.
- Liaising with the Child Safeguarding Committee around areas where further child safeguarding advice and support is required.

## STANDARD 2 RECOGNIZING, RESPONDING AND REPORTING

### WHAT IS THE STANDARD?

**This section guides us on how to recognize abuse and on how to respond to all concerns, suspicions, allegations or disclosures of abuse, whether current or historical.**

#### 2.1 RECOGNISING CHILD ABUSE

In order to respond effectively to concerns, suspicions or allegations, all personnel must first be aware of the main forms of abuse:- **Physical Abuse, Emotional Abuse, Sexual Abuse and Neglect**. In order to create awareness, the leadership in each entity must ensure that appropriate training in recognizing and responding to abuse will be organized for all Sisters, staff and volunteers whose work brings them into contact with children.

#### Recognising: Definitions of Abuse

According to the World Health Organization, **Child Abuse** is defined as:

*“All forms of physical and or emotional ill-treatment, sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the child’s health, survival, development or dignity in the context of a relationship of responsibility, trust or power.”*

Harm is described as *“the ill-treatment or the impairment of the health or development of a child. Whether it is significant is determined by the child’s health and development as compared to that which could be expected of a child of similar age”*.

The following definitions of some forms of abuse are taken from UNICEF:

#### **Physical abuse**

Physical abuse of a child is defined as the intentional use of physical force against a child that results in – or has a high likelihood of resulting in – harm for the child’s health, survival, development or dignity. This includes hitting, beating, kicking, shaking, biting, strangling, scalding, burning, poisoning and suffocating. Much physical violence against children in the home is inflicted with the object of punishing.

#### **Sexual abuse**

Sexual abuse is defined as the involvement of a child in sexual activity that he or she does not fully comprehend, is unable to give informed consent to, or for which the child is not developmentally prepared, or else that violates the laws or social taboos of society. Children can be sexually abused by both adults and other children who are – by virtue of their age or stage of development – in a position of responsibility, trust or power over the victim.

Acts of child sexual abuse are committed by both adult males and females. Child sexual abuse can be physical, verbal or emotional and includes:

touching and fondling of the sexual portions of the child's body (genitals and anus) or touching the breasts of pubescent females, or the child's touching the sexual portions of a partner's body; sexual kissing; penetration, which includes penile, digital, and object penetration of the vagina, mouth or anus; exposing children to adult sexual activity or pornographic movies and photographs; making lewd comments about the child's body; having children pose, undress or perform in a sexual fashion on film or in person (exhibitionism); 'peeping' into bathrooms or bedrooms to spy on a child (voyeurism). It also includes efforts to encourage children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). This broad definition of child sex abuse captures the complex and many ways that sexual behavior may harm a child.

### **Emotional and psychological abuse**

Emotional and psychological abuse involves both isolated incidents, as well as a pattern of failure over time on the part of a parent or caregiver to provide a developmentally appropriate and supportive environment. Acts in this category may have a high probability of damaging the child's physical or mental health, or its physical, mental, spiritual, moral or social development. Abuse of this type includes: the restriction of movement; patterns of belittling, blaming, threatening, frightening, discriminating against or ridiculing; and other non-physical forms of rejection or hostile treatment.

### **Neglect**

Neglect includes both isolated incidents, as well as a pattern of failure over time on the part of a parent or other family member to provide for the development and well-being of the child – where the parent is in a position to do so – in one or more of the

following areas: • health; • education; • emotional development; • nutrition; • shelter and safe living conditions. The parents of neglected children are not necessarily poor. They may equally be financially well-off.

Definitions of the different categories of child abuse may differ in different jurisdictions. It is important that each entity includes (in their policy) the definitions accepted in their jurisdiction.

## **SITUATIONS IN WHICH CHILDREN CAN BE PARTICULARLY VULNERABLE TO ABUSE**

While abuse can happen anywhere and can be perpetrated by anyone, in the various contexts where we have our missions, we are aware of some groups of children who can be particularly vulnerable to different types of abuse. These include domestic servants, child soldiers, street children, children who are trafficked, among others.

### **2.2 PROCEDURE FOR RESPONDING TO A CONCERN, SUSPICION, ALLEGATION OR DISCLOSURE OF ABUSE**

We are committed to taking all concerns, allegations, suspicions and disclosures of abuse very seriously. The following procedure sets out the action that must be taken if any concern, allegation, suspicion or disclosure is made, whether current or historical, that indicates an OLA Sister, member of Staff, Volunteer or Colleague has:

- behaved in a way that has harmed a child, or may have harmed a child
- committed a criminal offence against a child or related to a child
- behaved towards a child or children in a way that indicates s/he is unsuitable to work with children.

This honours best practice and legal requirements at national and international levels. Any person who has reason to believe that a child or young person is being abused has a duty to report their concern to the appropriate safeguarding personnel (i.e. to the Safeguarding Representative or Designated Officer) so that the matter can be fully investigated. Therefore key personnel have been appointed with specific roles and responsibilities for the safeguarding of children and the implementation of this policy.

#### **Guidance on how to respond when an allegation is made**

It is often very difficult for people to talk about abuse so it is important to create a safe, welcoming and accepting atmosphere environment. It is important to be patient

and to listen carefully and actively, so that the person is able to tell you as much as they can remember. This will help those with responsibility for investigating the incident(s) do so as thoroughly as possible.

**People may tell you about:**

- abuse that's happened to them now – current
- abuse that happened to them some time ago – historical
- something they've been told by someone else and that they strongly believe is true

**You may also witness or people may tell you about:**

- signs of abuse, such as physical injuries on a child
- something, such as the behaviour of an adult to a child, that made you feel uncomfortable.

**If someone comes to you with a concern it is important that you:**

**Listen:** Follow the guidance given in the next section on how to respond.

**Record:** Ensure the child protection recording form is completed (Resource.....)

**Report:** Report the matter to the Designated Liaison Person immediately. If there is a serious risk or danger to the child concerned, the relevant authority must be contacted, according to the jurisdiction. It is the responsibility of each entity to know which authority must be contacted.

**Some guidelines for responding:**

- Stay calm and listen carefully. Give the person time to say what (s)he wants to say, but do not ask intrusive or leading questions.
- Take what the person raising the concern says seriously, and reassure them they are doing the right thing.
- Check with the person to make sure that you have understood what they actually said. Do not suggest words, but use theirs.
- Make no promises that cannot be kept, particularly in relation to secrecy, making it clear that you will have to discuss this information with someone.
- Explain these procedures and the referral procedures to the person.
- Inform them regarding the availability of a Support Person.

- Do not make any comments about the respondent, make assumptions or speculate.
- Be aware that a person's ability to recount his or her concern or allegation will depend on age, culture, nationality and upon any disability which may affect use of language and range of vocabulary.
- Adopt a listening style which is compassionate, calm and reassuring. If the information given to you shocks, disgusts or distresses you, do not allow these feelings to show. If you do, you may inadvertently dissuade the person from giving any further information.
- Avoid statements about your belief or otherwise, of the information given.
- Do not question beyond checking what has been said. It is the responsibility of each entity to know which authority has responsibility for investigating the matter further. This detail must be included in the policy. There must be no probing for detail beyond that which has been freely given.
- If the abuse is being disclosed by a child it is important to reassure her/him that she/he is not to blame, that she/he is doing the right thing in reporting it and that you will do what you can to help.

### 2.3 PROCEDURES FOR REPORTING CONCERNS, ALLEGATIONS OR DISCLOSURE

The following procedure sets out the action to be taken and applies whether the abuse is current or historical. **Remember:** It is not your role to investigate.

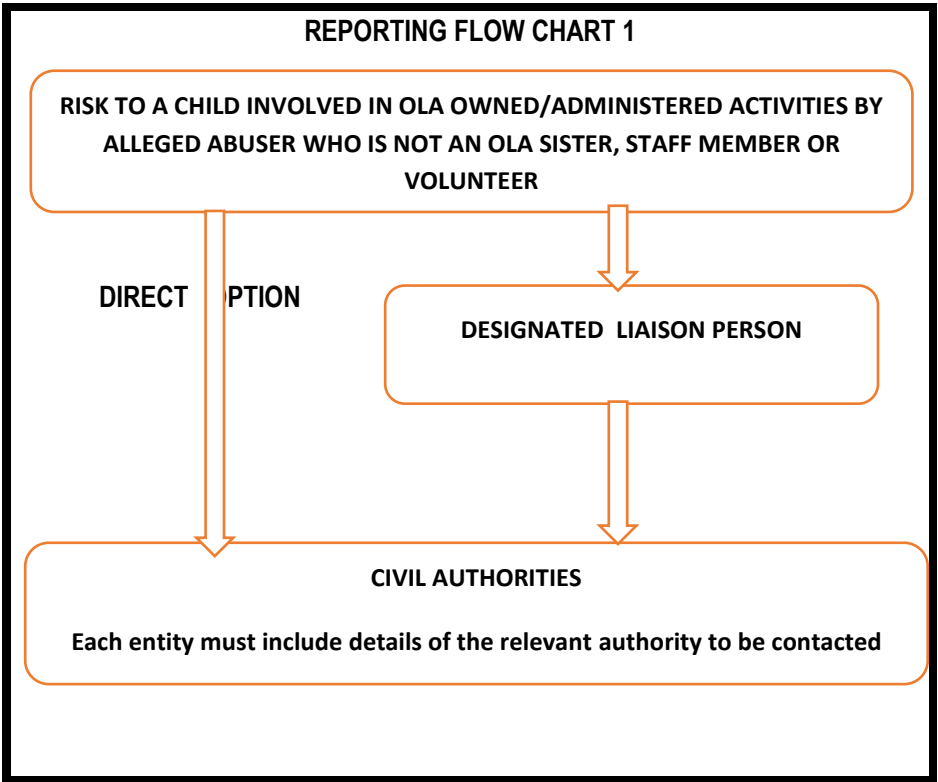
- All concerns, suspicion, disclosure or allegation of abuse, must be referred immediately to the OLA Designated Officer who must report the complaint to the relevant civil authorities **without delay**. Each entity must include in their policy details of the authority to be contacted.
- Whenever possible and practical, take notes during the conversation. Always ask permission to do this and explain the importance of recording all information. Where it is not appropriate to make notes at the time (e.g. if it is a child making a disclosure), make a written record as soon as possible afterwards and in any case before the end of the day.
- Record the time, date, location (or if the matter has been communicated by letter or telephone), and persons present. (Use the Child Protection Recording Form Template in Resource ..... to do this.) The record should be signed and dated by the author. The record would also normally include:
  - accurate identifying information as far as it is known. This should include the name and address of the person who has raised a concern

(as well as their date of birth, and parents'/carers'/ names and addresses where the person who has raised a concern/ allegation is a child)

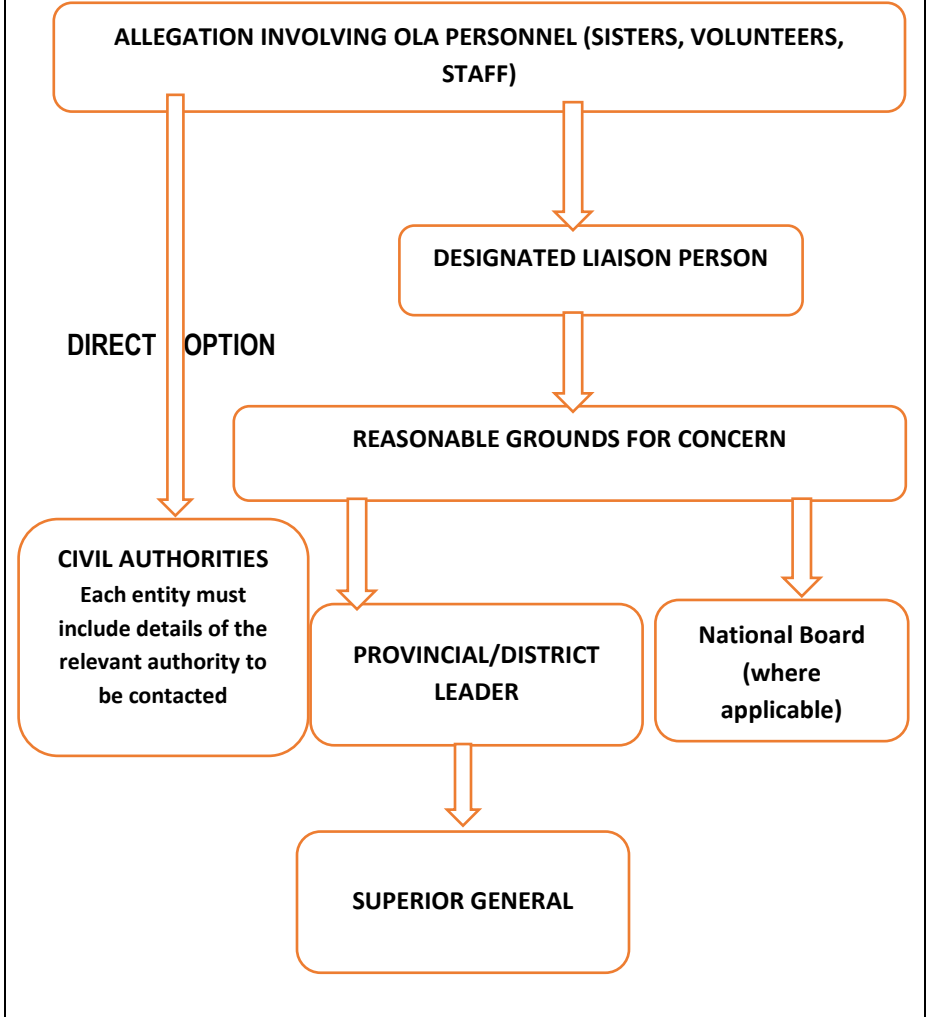
- the name of the individual against whom the concern/ allegation is being raised and any other identifying information
  - as much information as possible about the circumstances that led to the concern/allegation being raised, why is the person worried about the welfare and safety of the child or children
  - dates when the concern arose, or when the incident(s) occurred
  - circumstances in which the concern arose, or the incident(s) occurred
  - any explanation offered to account for the risk, injury or concern
  - the child's own statement using the words they used to describe the events or incident(s), if possible. Do not make assumptions about the intended meaning of words used
  - details of any action already taken about the incident/ concern/ allegation.
- Do not be selective. Include detail which to you may seem irrelevant. It may prove invaluable at a later stage in an investigation.
  - All original records, including rough notes, must be passed immediately to the relevant Designated Officer. Any copies of records retained must be kept secure and confidential.
  - Explain to the child/person raising the concern what will happen next. Indicate who will be made aware of the information given by them. Leave contact details of the Designated Officer in case the referrer needs to ask questions later.
  - In cases of emergency, where a child appears to be at immediate and serious risk, an immediate report should be made to the Health and Social Services as well as to the relevant Designated Officer.
  - Where the appropriate authority staff are not available, each entity must include details of who is to be contacted to ensure that under no circumstances a child is left in a dangerous situation pending intervention.
  - It is important not to discuss the incident/concern with anyone other than those detailed in these procedures.

The following flowchart outlines the procedure for reporting any concerns, suspicions, allegations or disclosures.

## 2.4 REPORTING ABUSE FLOWCHARTS

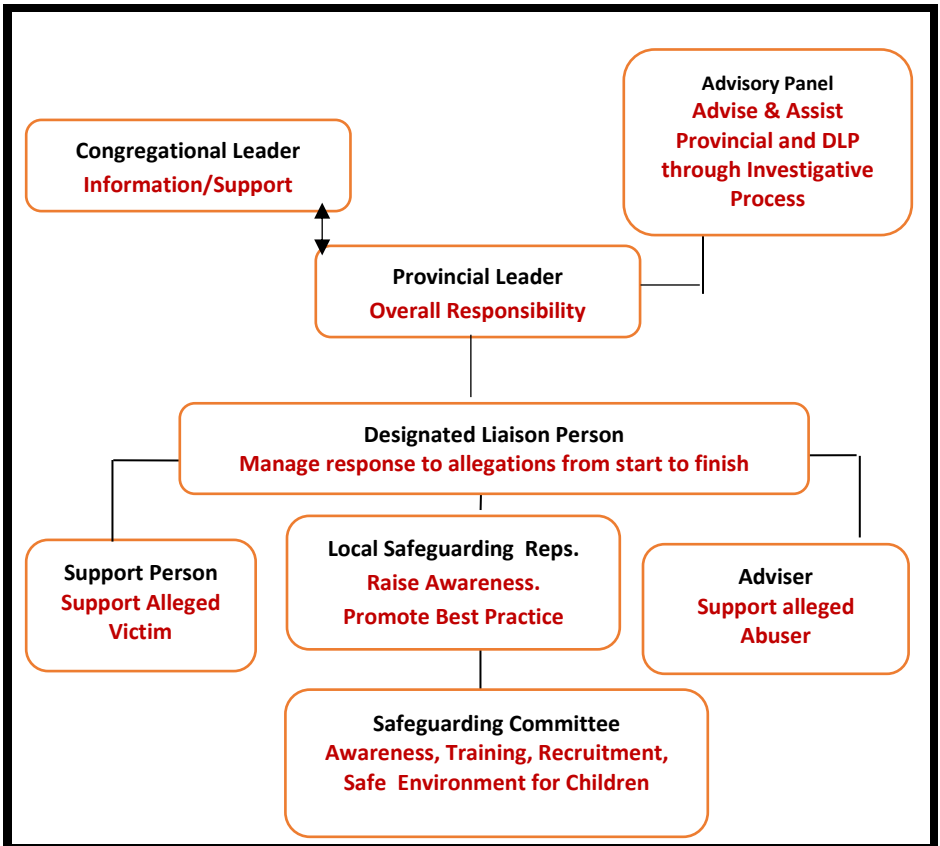


## REPORTING FLOW CHART 2



## 2.5 OLA STRUCTURE FOR SAFEGUARDING CHILDREN

The following diagram illustrates the formal OLA structure for safeguarding children within each entity. Personnel are carefully selected and mandated for participation in this safeguarding structure. Their roles and responsibilities are clearly spelt out and they will be subject to on-going monitoring and evaluation. (See Resource ... for a description of all relevant roles).



## ROLES OF SAFEGUARDING PERSONNEL IN RELATION TO THIS STANDARD

In order to implement these procedures effectively, it is important that key personnel are selected and are given clear guidelines and training concerning their specific roles and responsibilities. While every adult has a responsibility for safeguarding children, the following personnel are central to the effective implementation of this standard.

**The Leader** in each entity has overall responsibility to ensure that any allegations are responded to in accordance with this standard.

The Director of Safeguarding.....

The role of the **Designated Liaison Person** includes:

- To receive all concerns relating to the safeguarding of children, including any disclosure or allegation of child abuse and to take responsibility for the management of the response to that concern or disclosure from start to finish. This may include referral to the relevant statutory bodies.
- To report all instances of suspected or disclosed abuse, where there are 'reasonable grounds for concern' to the relevant authority appropriate to the jurisdiction, using the standard reporting form.
- Out of office hours and in the case of an emergency, where a child is at serious and immediate risk, to report the matter to the relevant authority (Police) without delay.
- To explain procedures for addressing concern/allegation to the person who has raised the concern (including parent or guardian)
- To ensure that the person raising a concern, disclosing abuse, or making an allegation is informed about the progress of the inquiry process.
- To liaise with the Provincial/District leadership and National Office where applicable.
- To carefully record all steps undertaken as part of these procedures.
- To conduct an internal investigation at the conclusion of any external investigation or where no such investigation has taken place. Any internal investigation will be initiated in cases where child protection concerns remain or where disciplinary action needs to be considered.
- In the event of the Designated Person not being available or a child being at immediate risk, contact should be made with the local Health/Welfare Services as appropriate or with local police.

\*\*\* A more detailed description of the role is outlined in Resource 4.

**Name and contact details of Designated Officer must be published in all Child Safeguarding Policies.**

**Advisory Panel.** The role of the Advisory Panel is essentially about managing any cases of abuse. The safety and welfare of the child must be paramount for the panel at all times. The panel may advise on:

- the complaint itself
- the appropriateness of providing help to the child making an allegation and to the child's family
- the issue of the respondent remaining in present ministry
- the right of the respondent to her/his good name and a fair trial
- the necessity or otherwise for a specialist risk assessment
- the needs of the community/family to which the respondent belongs
- the needs of the wider community
- the appropriateness and timing of a public statement.

The Panel must keep records on the matters presented for advice, documents considered (including those noting any previous allegations) and recommendations made. The advice given by an Advisory Panel must be included in any inspection of an incident/allegation report file conducted by any external body. No member of the panel shall act in a professional capacity to either the person making the allegation or the respondent.

In some jurisdictions there is a national body to support Congregations in this area.

## STANDARD 3 CARE AND SUPPORT FOR THE COMPLAINANT

### WHAT IS THE STANDARD?

People who have suffered abuse as children should be received with compassion and must be offered appropriate support, advice and pastoral care in a non-judgemental way.

The Congregation is committed to establishing safe and caring environments where complainants can report abuse knowing that they will be listened to and heard. They and their families will be offered appropriate care and support at this difficult time in their lives. All allegations will be reported to the statutory services.

Each entity will appoint at least one support person, depending on the size and structure of the entity.

Each entity must ensure that their policy includes:

- information for children about sources of support;
- information for adults about sources of support;

They must also ensure records of contacts with complainants are maintained.

### ROLES OF SAFEGUARDING PERSONNEL IN RELATION TO THIS STANDARD

#### Province/District Leadership

In relation to Standard 3, Leadership is responsible for:

- Ensuring that a Support Person is appointed, or that procedures are in place to share the services of a Support Person if required; and
- Ensuring that practice and policy on the care of the complainant is compliant with civil and canonical law. This includes:
  - Ensuring that complainants are met and facilitated to disclose abuse in an environment that meets their individual needs;
  - Ensuring that complainants are heard in a spirit of acceptance and trust;
  - Ensuring that appropriate assistance is offered to those who have been abused and as required, to their families;
  - Ensuring that counselling, support and information is given to children and adults who wish to make a complaint of abuse;
  - Ensuring that pastoral care is given to those who have been abused by Church personnel where this is deemed helpful by the complainant.

#### Designated Liaison Person

In relation to Standard 3, the DLP is responsible for:

- Attending the initial Meeting with the complainant;
- Ensuring that all appropriate internal and external inquiries are instigated;
- Ensuring that relevant information regarding contact with the complainant is recorded and stored appropriately in the case file;

- Keeping the Church Authority updated regarding the complainant;
- Liaising with the Support Person to ensure that support, advice and pastoral care is offered to the complainant.

### **Support Person**

In relation to Standard 3 the Support Person is responsible for:

- Attending the initial meeting with the complainant with the DLP and the Church Authority in order to support them, keep them informed of the progress of their case, and direct them to counselling and support as necessary;
- Ensuring that support is provided to complainants and their families as required;
- Ensuring that the complainant is offered appropriate counselling, support and advice;
- Ensuring the complainant is offered pastoral care that meets their individual needs;
- Arranging a pastoral meeting with the Congregational Leader in accordance with the complainant's wishes.
- Recording any meetings or contact they have with the complainant and passing on relevant information to the DLP as appropriate. They will not be responsible for managing the file but will pass on written records to the Designated Liaison Person as appropriate, during regular meetings with them.

### **Advisory Panel**

In relation to Standard 3 the Advisory Panel are responsible for:

- Providing advice to the Province/District Leadership if required with regard to the credibility of the complaint and the appropriateness of providing help to a complainant or their family.
- Creating a written record of its recommendation; and noting the matters upon which it has been asked to advise and the documents it has considered. These records should be passed to the DLP who will store them in the Third Party Information section of the case file (Guidance 2.3A).

## STANDARD 4 CARE AND MANAGEMENT OF THE RESPONDENT

### WHAT IS THE STANDARD?

The impact of abuse on a child is recognised as having potentially serious lifelong consequences. Those who are accused of abusing a child have a right to fair process in the investigation and management of any child abuse concerns.

Where reasonable grounds have been established that abuse may have occurred, we, the Sisters of our Lady of Apostles must put in place a system of support, monitoring and supervision for those who have been accused so that everyone is appropriately protected and supported, to prevent further abuse of children.

Each entity will appoint at least one advisor, depending on the size and structure of the entity. Each entity must include the following in their policies:

- Guidelines on leave from ministry/apostolate
- Guidelines on case management
- Guidelines on risk management
- Guidance on the sharing of information between entities when a Sister transfers from one entity to another

### ROLES OF SAFEGUARDING PERSONNEL IN RELATION TO THIS STANDARD

#### **Province Leader**

In relation to Standard 4, the Province Leader is responsible for:

- Ensuring that a DLP is appointed to manage the case and an Adviser is appointed following consultation with the respondent, to support them;
- All liaisons with the Holy See - through the Superior General;
- Ensuring that practice and policy on care of the respondent is compliant with civil and canonical law. This includes:
  - I. Ensuring that appropriate assistance is provided to those who have been accused of child abuse and as required, to their families; and
  - II. Ensuring that counselling, support and information is given to an adult who has disclosed that they have abused a child.

#### **Designated Liaison Person**

In relation to Standard 4, the DLP is responsible for:

- Ensuring that all appropriate internal and external inquiries are instigated;
- Ensuring that relevant information regarding contact with the complainant is recorded and stored appropriately in the case file;
- Keeping the Church Authority updated regarding the respondent and liaising with the Adviser to ensure that support, advice and pastoral care is

offered to the respondent. If relevant child safeguarding concerns are raised with the Adviser by the respondent, the DLP must ensure that these are passed on to the civil authorities.

- Attending the initial meeting with the respondent.

### **Adviser**

In relation to Standard 4, the Adviser is responsible for:

- Attending the initial meeting with the respondent with the DLP and the Church Authority in order to support them, keep them informed of the progress of their case, and direct them to counselling and support as necessary;
- Helping the respondent access both civil and canon law advice;
- Considering the respondent's wishes in regard to a pastoral response by the Church to his or her family;
- Identifying with the respondent any therapeutic or other needs they have, and suggesting how these may be best met;
- Recording any meetings or contact they have with the respondent and passing on relevant information to the DLP as appropriate. They will not be responsible for managing the file but will pass on written records to the Designated Liaison Person as appropriate, during regular meetings with the DLP.

### **Advisory Panel**

In relation to Standard 4, the Advisory Panel are responsible for providing advice to the Province/District Leadership with regard to:

- The credibility of the complaint;
- The appropriateness of providing help to a respondent or their family;
- The appropriateness of the respondent continuing in his or her present pastoral assignment, having regard to the paramount need to protect children;
- How the right of the respondent to a fair trial on any criminal charge can be preserved and his or her good name and reputation appropriately safeguarded;
- Whether a specialist risk assessment for the respondent should be sought ;
- The needs of a parish or other community in which a respondent has served. The Advisory Panel will create a written record of its recommendation and should note the matters upon which it has been asked to advise and the documents it has considered. These documents should include information on any previous allegations that have been made against the individual concerned. These records should be passed to the DLP who will store them in the Minutes of Meetings section of the case file (Guidance 2.3A).

## STANDARD 5: TRAINING AND SUPPORT FOR KEEPING CHILDREN SAFE

### WHAT IS THE STANDARD?

All OLA Sisters/Staff/Volunteers/Collaborators should be trained and supported in all aspects of safeguarding relevant to their role, to develop and maintain the necessary knowledge, attitude and skills to safeguard and protect children.

It is important to ensure that all training delivered are up to date and relevant.

We must also pay attention to develop a spirituality of safeguarding that roots our commitment to child safeguarding in our Christian faith. Resources should be developed that enable us to reflect on this area and grow in our understanding and nurture a compassionate and caring attitude.

Each entity must ensure that the following receive training appropriate to their role:

- Leadership
- Director of Safeguarding
- Advisory Panel
- Designated Officer
- Support Person
- Adviser
- Local Safeguarding Representative
- Safeguarding Committee
- Trainers (where applicable)

Everyone in OLA owned and administered apostolates has a role to play in safeguarding children. Everyone working in OLA activities with children will receive an induction into the OLA Policy and Procedures. To carry out their role effectively the entity should provide opportunities for personnel to be supported in acquiring and maintaining the necessary competencies in order to safeguard and protect children.

All personnel should take a proactive approach to ensure that their specific training needs are identified and adequately met and that they receive relevant support in their role.

Effective safeguarding requires working in cooperation and partnership within the Church and with other organisations particularly NGOs and Statutory Agencies. Participation in local and national training initiatives that meet recognised standards is encouraged

Each entity should

- complete a training needs assessment annually and develop a plan for meeting these needs. (For a training needs assessment form, see Resource ...).
- **Ensure records are kept of:**
  - **Attendance at information sessions**
  - **Attendance at courses at local and national level**
  - **Training evaluations**
- develop an induction programme **for introducing personnel to the policy**

At Institute level

- An international training will be organized once per mandate for **'Directors of safeguarding'** to ensure policies and implementation are consistent throughout the Institute
- Safeguarding as a topic will be considered in all relevant international formation sessions

## **ROLES OF SAFEGUARDING PERSONNEL IN RELATION TO THIS STANDARD**

### **Province Leader**

In relation to Standard 5, the Church Authority is responsible for:

- Ensuring that those personnel who are in place attend appropriate levels of training.
- Ensuring that a structure for appropriate support is available to all involved with the Church.
- Ensuring that practice and policy on training is compliant with civil and canonical law.

### **Safeguarding Committee**

In relation to Standard 5, the Safeguarding Committee is responsible for:

- Producing a 3 year Safeguarding Plan. Part of this plan will include evidence of training that will be delivered to personnel across the diocese/religious congregation. To do this an annual training needs analysis process needs to be completed;
- Coordinating Trainers and Local Safeguarding Representatives to deliver the training identified through the Training Needs Analysis.

## **Safeguarding Trainers**

In relation to Standard 5, the Safeguarding Trainer is responsible for:

- Delivering training in the congregation;
- Working with the Safeguarding Committee to identify training needs;
- Keeping records of all of those who have been trained;
- Contributing to upholding the 7 Standards in practice and behavior;

## **Local Safeguarding Representative**

In relation to Standard 5, the LSR is responsible for:

- Delivering information sessions (if appropriate) to personnel who have been identified by the Safeguarding Committee. To deliver this training the LSRs must be trained by a Trainer registered with the NBSCCCI;
- Contributing to the Training Needs Analysis carried out by the Safeguarding Committee.

## STANDARD SIX: COMMUNICATING THE SAFEGUARDING MESSAGE

### WHAT IS THE STANDARD?

This policy and its procedures are only effective if all our Sisters, staff, volunteers, the children they care for, their families and any others with whom we interact, understand them and know how to use them. Communicating our policy for Safeguarding Children is crucial then for its effective implementation and ultimately for keeping children safe. The following processes are in place to communicate our Safeguarding Children Policy:

Each entity must

- Ensure their policy is openly displayed and available to everyone.
- Everyone in the organisation knows the name and contact details of the Designated Officer(s), of local child protection services such as Health and Social Services, Police, NGOs etc.
- develop an annual communication plan detailing how the OLA Safeguarding message will be communicated. This plan should indicate how the message is to be communicated in a child friendly manner and to people with special communication needs.
- display clearly their safeguarding policy on their website
- Safeguarding is addressed in our internal newsletters/meeting point.
- have copies of their policy available to share with interested groups.
- Our JPIC coordinators share our policy with interested others

It is important that the following means are used to communicate the message:

- Leaflets and posters detailing contact information and processes for responding to allegations
- Resources and materials that illustrate how OLA is committed to safeguarding including reference to safeguarding policies and codes of behaviours.
- Ways of promoting the OLA Safeguarding policy, including to communities and to children
- Ensure that our Child Safeguarding message is communicated to people whose first language is not English/French, as well as to people who have specific needs and to children

It is also imperative that in all communications about our missionary work, we are sensitive to the use of photographs/videos of children and endeavour to follow the OLA Code of Conduct for the use of images (see resource...).

## **ROLES OF SAFEGUARDING PERSONNEL IN RELATION TO THIS STANDARD**

### **Leadership**

In relation to Standard 6, the Church Authority is responsible for:

- Ensuring that practice and policy with regard to communication is compliant with civil and canon law.

### **Safeguarding Committee**

In relation to Standard 6, the Safeguarding Committee is responsible for:

- Producing a 3-year Child Safeguarding Plan. Part of this plan will include evidence that a Communications Plan is developed and implemented across the diocese or religious order. To do this an annual Child Safeguarding Communications Plan needs to be completed.
- Coordinating Local Safeguarding Representatives in the development of a Communications Plan. This coordination involves consultation with key stakeholders including children and guardians regarding the plan

### **Local Safeguarding Representative**

In relation to Standard 6, the LSR is responsible for:

- Working with the Safeguarding Committee to consult with key members of the community including children, guardians and other personnel who have been identified by the Safeguarding Committee in the compilation of a Communications Plan.
- Checking that methods of communication are in place and are effective. This information should be communicated to the Safeguarding Committee as part of the consultation phase of developing a Communications Plan.

## STANDARD 7 IMPLEMENTATION AND MONITORING

### WHAT IS THE STANDARD?

Appropriate policies, procedures and plans have to be implemented across the Congregation to keep children safe. In order to do this, the necessary human and financial resources must be allocated. Reviews and audits are also needed to ensure that this is happening consistently.

The views of those involved within the Church as well as those in the statutory authorities or in relevant NGOs can help to improve the effectiveness of these measures taken to safeguard children.

Each entity must

- develop a three year plan of action to implement and monitor the effectiveness of the steps it is taking to keep children safe. This action plan is reviewed annually.
- Conduct self-audits annually using the OLA self-audit form. A copy of this self-audit is sent to the generalate
- explore ways of organizing an external review of safeguarding practices every three years (eg peer reviews with other International Congregations...).

### ROLES OF SAFEGUARDING PERSONNEL IN RELATION TO THIS STANDARD

#### **Leadership**

In relation to Standard 7, the entity leadership is responsible for:

- Appointing a Safeguarding Committee and DLP and ensuring that they carry out their function in relation to monitoring effectively.
- Writing to the Generalate to confirm that an Internal Annual Report has been completed, forwarding a copy of the report
- Authorizing any external reviews as necessary.
- Carrying out systematic monitoring of the standards through visits to local areas of responsibility.

#### **Designated Liaison Person**

In relation to Standard 7, the DLP is responsible for:

- Completing a report to the leadership on an annual basis outlining compliance with Standards 2,3 and 4.

## **Safeguarding Committee**

In relation to Standard 7, the Safeguarding Committee is responsible for:

- Producing and reviewing the 3-year Child Safeguarding Plan of how to maintain the 7 Standards across the diocese or religious congregation.
- Liaising with the LSRs to ensure the compilation of a local safeguarding audit and in identifying areas where guidance and support on policy or practice is needed.
- Ensuring that an annual Safeguarding Report on Standards 1, 5 and 6 is made to the leadership.
- Ensuring that records in relation to safeguarding matters are produced and stored securely.

## **Local Safeguarding Representatives**

In relation to Standard 7, the LSR is responsible for:

- Working with the Safeguarding Committee to ensure the completion of the internal safeguarding audit.



