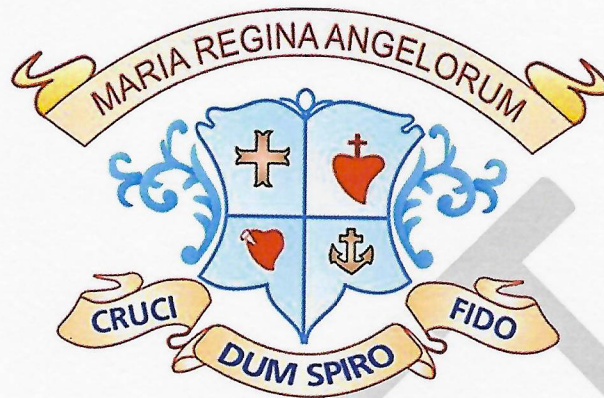


## LORETO EASTERN AFRICA PROVINCE



### Children and Vulnerable Adults Safeguarding Policy

This policy provides guidelines for all Sisters, Staff employed in Loreto Institutions; administrative, teaching, non-teaching, volunteers, work experience trainees, members of the board of management, consultants and school committees, contractors and everyone providing outsourced services.

**2023 REVISED EDITION**

“Let the children come to me, and do not stop them for the Kingdom of God belongs to them”  
(Matthew 19:14)



“Our generation will show that it can rise to the promise found in each young person when we know how to give them space. This means that we have to create the material and spiritual conditions for their full development; to give them a solid basis on which to build their lives; to guarantee their safety and their education to be everything they can be; to pass on to them lasting values that make life worth living; to give them a transcendent horizon for their thirst for authentic happiness and their creativity for the good; to give them the legacy of a world worthy of human life; and to awaken in them their greatest potential as builders of their own destiny, sharing responsibility for the future of everyone.

If we can do all this, we anticipate today the future that enters the world through the window of the young.”

- Pope Francis



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*Progitaw*

## LIST OF ABBREVIATIONS AND ACRONYMS

UNCRC	United Nations Convention on the Rights of the Child
IBVM	Institute of the Blessed Virgin Mary
MB	Management Board
CVASO	Children and Vulnerable Adults Safeguarding Officer
IRF	Incident Reporting Form
KCCB	Kenya Conference of Catholic Bishops
LEAP	Loreto Eastern Africa Province
PSO	Province Safeguarding Officer
SCCO	Sub County Children's Officer
SSC	School Safeguarding Committee
VA	Vulnerable Adult
TSC	Teachers' Service Commission
CCI	Child Care Institutions
PSC	Province Safeguarding Committee

*Shirley*



## FOREWORD

This document constitutes the written policy on keeping children and vulnerable adults safe within all the schools and ministries under the jurisdiction of the Loreto Sisters in the Eastern Africa Province. The Province includes Kenya, Tanzania, and Ghana.

In the spirit of the Gospel and in accordance with the values that the Loreto ethos places on pastoral care, all Loreto ministries in the Province of Eastern Africa are committed to safeguarding the rights, security, and total well-being of Children and Vulnerable adults.

This Policy applies to Loreto schools and ministries, sisters, persons in formation (postulants and novices), all staff and other representatives (including volunteers, consultants, short-term contractors, visitors, members of press). Loreto Sisters working outside Loreto Institutions are also required to ensure they follow the recommended safeguarding practices in this policy. Further, a Memorandum of Understanding will therefore be signed with the Body/Partners/Collaborators that engage Loreto sisters to ensure full commitment and protection and safeguarding of children and vulnerable adults within the two entities. LEAP Formation houses are also required to follow this Policy in regards to protecting and safeguarding children and vulnerable adults.

This document has been reviewed and approved by the Province Leadership team, and is regarded as its official child and Vulnerable Adult safeguarding policy. The responsibility for managing the policy lies with the Province Child and Vulnerable Adult Safeguarding Officer, supported by the Province Leadership.

Each school and ministry will appoint a designate Children and Vulnerable Adults Safeguarding Officer. The policy will be appropriately publicized, promoted, and distributed in all LEAP schools and ministries. Implementation of the policy will be evaluated annually, while the review of the policy will be carried out after at least every three years.

Approved by: REV. SR. MARY GITAU I.B.V.M

Designation: PROVINCE LEADER LORETO EASTERN AFRICA

Signature: Smg'itau

Date: 13 MARCH 2024

Smg'itau

## **1.0 PREAMBLE**

### **POLICY STATEMENT**

We, the Loreto Sisters of the Eastern Africa Province (LEAP) are at all times committed to promoting practices in all our ministries and schools that protect children and vulnerable adults from all forms of harm.

### **VISION**

Create and maintain an environment in all LEAP schools and ministries where the children and vulnerable adults are aware of their rights and are safeguarded from abuse.

### **MISSION STATEMENT**

To promote child and vulnerable adult safeguarding in all LEAP schools and ministries by creating greater awareness of children's rights, responsibilities and possible abuses and thus creating a safer environment for all.

### **PURPOSE OF THE POLICY**

The purpose of this policy is to provide guidelines on safeguarding of children and vulnerable adults within LEAP ministries. The guidelines outlined in this document show the commitment of LEAP to do all they can to prevent abuse from occurring, and where an allegation is made or abuse is discovered that it may be handled in a just and lawful way as outlined herein.

### **SCOPE OF APPLICATION**

This safeguarding policy provides guidelines to all the members of the various Management Boards (MB) of LEAP, Sisters, those in formation (postulants and novices) the teaching staff, non-teaching staff, volunteers, trainees on work experience, contractors, consultants, visitors, members of press, those providing outsourced services and any other person coming into contact with children in LEAP.

All the above persons are obliged to recognize, accept, and submit to the implementation guidelines as laid out in this policy document and are required to read the Policy and sign the Safeguarding Declaration Form (*Appendix 1*) and the Statement of Commitment (*Appendix 2*).

For Sisters engaged in non-LEAP ministries, their Organizational leadership or Board will sign the Partners/Collaborators consent form/Memorandum of Understanding (*appendix 3*) committing to adhere to appropriate safeguarding practices within those organizations.

*Signature*



## 2.0 POLICY BASIS

The LEAP Children and Vulnerable Adults Safeguarding Policy is in line with and informed by national/civil law and relevant policies in Kenya, Tanzania and Ghana; United Nations Convention of the Rights of the Child (UNCRC); African Charter on the Rights and Welfare of the Child and Canon law.

The Policy is also based on the following principles:

- a. All children and vulnerable adults have equal rights to protection from harm.
- b. Everybody has a responsibility to support the safeguarding of children and V/A.
- c. Organizations have a duty of care to children and vulnerable adults with whom they work, are in contact with, or who are affected by their work and operations.
- d. All actions on child and Vulnerable adult safeguarding are taken in the best interest of them, which is paramount.

## 3.0 OPERATIONAL DEFINITION OF TERMS

This Policy adopts the following terminologies:

**Abuse:** Any form of maltreatment of a child/vulnerable adult caused by an action or failure to act to prevent harm to the child/vulnerable adult. It includes physical abuse, sexual abuse and non-physical forms of ill-treatment such as emotional abuse and neglect.

**Allegation:** A claim of abuse that is yet to be substantiated.

**Alleged respondent:** A person against whom an allegation of abuse has been made

**Child:** A person below Eighteen (18) years of age

**Concern:** Any suspicion or worry regarding the safety or welfare of a child or a vulnerable adult

**Minor:** Includes children and adolescents under 18 years, but also persons with mental, cognitive, and other disabilities that may limit their defense mechanisms.

**Safeguarding:** The responsibility to make sure staff (organization representatives), operations and programmes do no harm to children and adults nor expose them to abuse or exploitation. This includes preventing inappropriate behaviour such as bullying, harassment or other behaviour stipulated in civil laws.

*Singh*

**Survivor:** A child or an adult who is the subject of abuse

**Vulnerable adult:** A person over the age of eighteen (18) who, for different reasons, is unable to either take care of himself/herself or make his/her own decisions and judgment. This Policy considers two categories: adults who could only become vulnerable by power abuse of another person. The second consists of adults with physical, mental, or emotional disabilities.

#### **4.0 LEAP SAFEGUARDING STANDARDS**

This policy document contains Four Standards and each captures the essential components of safeguarding. Implementation of the standards ensures that children and vulnerable adults, organization staff and associates are protected, and that the reputation of LEAP is safeguarded. The standards are as follows:

Standard 1: Policy

Standard 2: Safe People & Safe Environments

Standard 3: Procedures

Standard 4: Accountability

#### **4.1 STANDARD 1: POLICY**

##### **4.1.1 A WRITTEN POLICY ON SAFEGUARDING**

This document constitutes the written policy on keeping children and vulnerable adults safe within all the schools and ministries under the jurisdiction of the Loreto Sisters in the Eastern Africa Province.

Each ministry/school is required to adopt and customize the specifics of this Policy in their work.

In addition, a copy of the full Children and vulnerable adults Safeguarding Policy for LEAP Province and its summary version shall be readily available for reference at the office of the school head, Manager or Administrator. A copy of the safeguarding policy that is appropriate to children will also be made available.

Further, the Policy will be reviewed after 3 (three) years, in order to update the content in line with changes in national/civil legislation and Canon Law and to align it with the practical realities of its implementation as will have been gathered by that time.

*Shig'itu*



#### **4.1.2 POLICY COMMUNICATION AND AWARENESS**

A copy of the Policy Safeguarding Statement is posted on a public space within LEAP ministries and schools, offices and websites to make the public aware of our commitment to safeguard the wellbeing of children and vulnerable adults we get into contact with.

On the Statement, contact details of the designated Safeguarding Officer are displayed. In addition, a copy of this Policy and local resources, national help lines and emergency contact details (e.g., police and social services) are readily available to anyone that might need them.

Messaging materials such as brochures, posters, pamphlets and stickers with child/vulnerable adult safeguarding messages will be made readily available in a language that can easily be understood by all stakeholders.

### **4.2 STANDARD 2: SAFE PEOPLE & SAFE ENVIRONMENTS**

#### **4.2.1 TRAINING AND FORMATION**

Everyone who comes into contact with children and vulnerable adults within LEAP has a role to play in their protection. As part of their induction into the ministry or school, members of Management Boards, sisters, those in formation (postulants and novices), staff, teachers, non-teaching staff, volunteers, trainees on work experience, contractors, consultants, visitors must be given training on the ministry's/school's safeguarding policy. Each school/ministry shall make efforts to provide on-going training in safeguarding. More attention should be given to the personnel with specific responsibilities such as those involved in:

1. recruiting and selecting staff,
2. dealing with complaints,
3. disciplinary processes, and
4. designated Safeguarding Officers

#### **4.2.2 SAFE RECRUITMENT**

It is important to take all possible steps to prevent unsuitable people working with or interacting with children and vulnerable adults in the ministries and schools through good recruitment and selection procedures (*Appendix 4*) to screen out those who are not suitable from holding positions of trust.

*Shirley*

### 4.2.3 CODES OF CONDUCT/BEHAVIOUR

Members of Management Boards, staff, sisters, volunteers, consultants and collaborators in LEAP institutions must avoid actions or behavior that is abusive or could be construed as poor practice or potentially abusive. And while these persons are required to adhere to the Code of Conduct (*Appendix 5*) in their interaction with children and vulnerable adults, they are also encouraged to go beyond the expected standards of behaviour and do everything possible to create a safe environment for children and vulnerable adults.

Further, as part of their holistic formation, children are given guidance on the expected and acceptable code of behaviour while within the LEAP schools. To this end, each school/ministry will develop its code of conduct for adults and children including an anti-bullying and anti-discrimination policy.

### 4.2.3 SAFEGUARDING PERSONNEL

#### **Province Safeguarding Officer**

The Province leader will appoint a designated Province Safeguarding Officer (PSO) to be responsible for the safeguarding Policy implementation in the Province. Specifically, the PSO will conduct training of Safeguarding Officers (SO) in all LEAP ministries and schools, promote safeguarding awareness, and ensure that the policies and procedures safeguarding are in place, and support those who may have concerns. The PSO must be informed of all safeguarding concerns reported in ministries/schools throughout the Province regardless of the nature of the concerns.

The current Province Safeguarding Officer (PSO) is **Sr. Jackline Mwongela, IBVM**; contact address is (email).....and (phone).....

#### **Ministry/School Safeguarding Officer (SO)**

Every LEAP ministry/school must have a designated Safeguarding Officer (SO) and their contact details must be easily accessible to all staff, children and vulnerable adults. Regular training opportunities and refresher courses should be availed to the SO.

#### **Safeguarding Advisory Committees (SAC)**

Safeguarding Advisory Committees (SAC) will be appointed at the Province and ministries/school levels. These committees will consist of no fewer than three members who collectively provide the expert support and advice to the PSO/SO and the respective leadership i.e. province/ministries/school leaders. The members shall, where possible, have competencies in areas such as canon law, civil law, the caring professions and pastoral experience.

*Smg'au*



#### **4.2.4 RISK ASSESSMENTS**

Risk assessment assists with managing both health and safety issues, and the welfare of children and vulnerable adults. LEAP ministries/schools will consider potential hazards that may lead to risks to children/vulnerable adults, and to the adults who work with them. Consideration of how to control, manage, and mitigate hazards will be done by assessing risks related to:

1. Staff
2. Internal environment
3. External environment
4. Services and programmes
5. Information and communication

#### **4.3 STANDARD 3: PROCEDURES**

##### **4.3.1 REPORTING ALLEGATIONS AND CONCERNS**

Every LEAP ministry/school must ensure their designated Safeguarding Officer's (SO) contact details are easily accessible to all staff, children and vulnerable adults to encourage reporting.

All persons within the scope of this policy are obligated to report all cases of abuse, suspected or alleged, to the Province/ministry/school Safeguarding Officer (SO) immediately. Failure to report, and actual breaches of confidentiality, in the process, will be subject to investigation, and to disciplinary procedures. Where the report is received by a person other than the designated safeguarding officer, such a person must refer the matter to the designated officer immediately or as soon as is reasonably practical. Only the designated safeguarding officer has authority to deal with reported concerns.

Any person with concerns, allegations or information regarding an abuse of a child or a vulnerable adult should report to the Province/ministry/school safeguarding officer as appropriate. The report can be made verbally or in a written format. When the report is verbally made, it must be reduced into writing for records purposes. The SO will record the allegation in the Incident Form (*Appendix 6*).

A reporting flowchart (*Appendix 7*) should be available on public notice boards to aid everyone in making reports as when needed.

##### **4.3.2 RESPONDING TO ALLEGATIONS AND CONCERNS**

Only the designated safeguarding officer has authority to deal with reported concerns.

*Smg'tau*

Upon receiving a report and filling the Incident Form, the Safeguarding Officer should immediately inform the Provincial/ministry head/school head/project manager and together with the Safeguarding Committee identify the best approach to handle the report.

However, where the report involves the ministry head/school head/project manager as the case may be, then the safeguarding officer should inform the next in authority.

It is important to note that reports of sexual abuse and cases involving physical injuries are beyond the mandate of the safeguarding officers as these are criminal in nature and must be reported immediately to the police or other relevant civil authorities. However, the safeguarding officer and the appropriate leadership must make an effort to preserve evidence, witness statements and other information as may be required in the processing of the case by the authorities.

#### **4.4 STANDARD 4: ACCOUNTABILITY**

The province/schools/ministries will set aside adequate funding to finance the implementation and evaluation of the safeguarding procedures in their respective jurisdictions in the province.

The PSO shall ensure that a review and audit process (*Appendix 8*) is conducted every year to monitor the level of implementation of the policy and guidelines and to update their content in line with changes in legislation and growing public sensitivity to the issues within the region.

The Province leadership through the nominated PSO will demand that each institution through its CSO return a compliance form (*Appendix 9*) to the Province Office at the end of the year on an agreed date. The compliance form is used as a monitoring and evaluation tool and contains amongst other things the number of incidents of abuse and the number of complaints made within the year.

The Province leader will further demand that all funding applications to donors for each institution under the authority of Loreto be approved and accompanied with an endorsement of a letter from the province leader indicating that the institution fully meets the requirements of policies and practices that conform to this Province Policy.

*Sregtau*