

SAFEGUARDING POLICY



LORETO EASTERN AFRICA PROVINCE

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Revised Edition 2024

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.

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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
SO	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

FOREWORD

This document constitutes the written policy on keeping children and vulnerable adults safe within all the projects, 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 (with appropriate adaptations) to Loreto projects, 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 safeguarding policy. The responsibility for managing the policy lies with the Province Safeguarding Officer, supported by the Province Leadership.

Each project, school and ministry will appoint a designate Safeguarding Officer. The policy will be appropriately publicized, promoted, and distributed in all LEAP projects, 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: 

Date: 12-4-2024

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 projects, schools and ministries that protect children and vulnerable adults from all forms of harm.

VISION

Create and maintain an environment in all LEAP projects, schools and ministries where the children and vulnerable adults are protected and safeguarded from abuse.

MISSION STATEMENT

To promote safeguarding practices in all LEAP projects, 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 projects, schools and 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 and vulnerable adults 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.

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 (ACRWC) and Canon law, specifically *Vostis Estis Lux Mundi* (VELM) 2023 and the Code of Canon Law, Revised Book VI (2021).

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.

Subject of concern: A person against whom an allegation/concern/suspicion of abuse has been raised

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 projects, schools and ministries under the jurisdiction of the Loreto Sisters in the Eastern Africa Province.

Each project, school and ministry are required to adopt and customize the specifics of this Policy in their work.

In addition, a copy of the full Safeguarding Policy for LEAP Province and its summary version shall be readily available for reference at the office of the school head, project 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.

4.1.2 POLICY COMMUNICATION AND AWARENESS

A copy of the Policy Safeguarding Statement is posted on a public space within LEAP projects, schools and ministries, 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 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 projects, schools and ministries, 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 projects, schools and ministries' safeguarding policy. Each project, 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 schools, projects and ministries through good recruitment and selection

procedures (*Appendix 8*) to screen out those who are not suitable from holding positions of trust. All open positions must be publicly advertised and applicants fill an Application Form (*Appendix 9*).

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 projects, schools and ministries, 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 projects, schools and ministries 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) jacklinesiz7@gmail.com and (phone) +254704893791

Project, Ministry/School Safeguarding Officer (SO)

Every LEAP project, school and ministry 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 Project, School and Ministry 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/Project/Ministry/School Leader. The members shall, where possible, have competencies in areas such as canon law, civil law, the caring professions and pastoral experience.

4.2.4 RISK ASSESSMENTS

Risk assessment assists with managing both health and safety issues, and the welfare of children and vulnerable adults. LEAP projects, schools and ministries 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

4.2.5 PARENTAL CONSENT FOR ACTIVITIES AWAY FROM THE SCHOOL/PROJECT SITE

Parents should be required to give prior written consent (*Appendix 11*) before their children can be allowed to participate in activities taking place away from the school/project premises.

4.2.6 DATA PROTECTION & CONFIDENTIALITY

In line with international data regulations and the Kenyan Data Protection Act (2019), the collection and processing of personal data will be guided by the principles of right to privacy, lawfulness, fairness and transparency. The data shall be collected for a specified and legitimate purpose, after obtaining consent from the data subjects. Data subjects within the Project are the children, parents, project staff and volunteers, partners and other individuals with whom the Project may interact with from time to time.

The Project will require all the data subjects to sign an appropriate Data Protection Consent Form (*Appendix 15*) and a Media Release Form (*Appendix 12*) in respect of data collected in form of photographs, videos, print materials and other media.

Subject of Concern's (SOC) right to privacy shall be respected by ensuring confidentiality of data relating to reports of abuse/concerns by keeping the physical copies under lock and key; securing computer records by use of passwords and giving access to the information on a need-to-know basis only.

4.3 STANDARD 3: PROCEDURES

4.3.1 REPORTING ALLEGATIONS AND CONCERNS

Every LEAP project, school and ministry 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/project/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 4*).

A reporting flowchart (*Appendix 6*) should be available on public notice boards to aid everyone in making reports as and when needed.

4.3.2 RESPONDING TO ALLEGATIONS AND CONCERNS

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

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.

Where a case has been referred to the police or any other service provider (e.g. to another agency or a Civil Society Organization), the SO must fill the Referral Form (*Appendix 13*) and file it appropriately for future reference.

4.4 STANDARD 4: ACCOUNTABILITY

The province/project/school/ministry 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 SO 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.

5.0 ACCESS TO ADVICE AND SUPPORT

The Loreto Province leadership shall make available an Adviser to the respondent/subject of a concern and a support person to the person making the report or the alleged survivor. Under no circumstances

should the respondent and complainant have the same individual acting as advisor and support person.

APPENDICES

SAFEGUARDING POLICY STATEMENT

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

Should you have or know of any safeguarding concern/complaint, kindly contact the Province Safeguarding Officer (PSO) Sr. Jackline Mwongela, IBVM through (email) jacklinesiz7@gmail.com and (phone) +254 704893791.

APPENDIX 1: Safeguarding declaration form

Name:..... ID NO.....

Gender M..... F.....

Any other name that you were previously known by.....

Date of Birth:.....Place of Birth:

Tel No.....Mobile No.

E-mail Address:

Name and address of previous employer:

Tel No. Mobile No.

E-mail Address:

After reading the LEAP Safeguarding Policy, is there anything in your background would make you be considered unsuitable to work with children and vulnerable adults?

Yes

No

If yes, please outline the reason(s) on the back of this sheet.

NB: Please attach a current certificate of good conduct/a criminal clearance certificate from the appropriate national body in your country of residence.

Have you ever been convicted of a Criminal Offence? YesNo

If yes, please state the nature and date(s) of the offence

(s).....

If YES please state below the nature and date(s) of the charge or offence(s) and the national judicial body responsible for dealing with the matter and the outcome:

Nature of Offence: _____ Date of offence: _____

National Judicial Body handling the matter: _____ Signed: _____

For all new Staff, Volunteers members of Boards of Management, Advisory Committees, Consultants, Partners etc

Outcome: _____ Date: _____

I declare that to the best of my knowledge the information I have given on this form is true and correct and I understand that false information or deliberate omission of information is a violation of the Loreto Eastern Africa Province (LEAP) Policy.

Signed:Date:

APPENDIX 2: Statement of commitment

I, (name).....of ID NO.

Confirm that I have read and understood the standards and guidelines outlined in the LEAP Safeguarding Policy and agree with the principles contained therein and accept the importance of implementing child safeguarding policies and practices.

Signature:Date:

Witness:Date:.....

APPENDIX 3: Partners/Collaborators consent form/ Memorandum of Understanding (MOU)

The Loreto Province of Eastern Africa (LEAP) has in place a Safeguarding Policy as a sign of its commitment to protect children and vulnerable adults from all forms of harm.

LEAP Sisters working with and for non-Loreto institutions are required to abide by the LEAP Safeguarding Policy as well as that of the partner/institution/s that she is engaged/partnered with.

LEAP thus requires the collaborating partners/institutions ensure full commitment and protection and safeguarding of children and vulnerable adults within their own operations. entities.

By this Memorandum of Understanding between LEAP leadership and the partner/institution, the latter commit to and have in place Minimum

Safeguarding Standards, namely:

1. A written safeguarding policy
2. Training and awareness raising on safeguarding measures for its people
3. A clear and accessible procedure for reporting and managing safeguarding concerns
4. A framework for accountability whereby the partner/institution regularly monitors and reviews safeguarding measures

The partner/institution accepts to customise the safeguarding measures to the local legislation, regulations and circumstances regarding reporting, confidentiality, and compliance.

FOR Loreto Eastern Africa Province (LEAP)

Signature.....Date.....

REV. SR. MARY GITAU I.B.V.M

PROVINCE LEADER LORETO EASTERN AFRICA

Collaborating Partner/Institution (Name).....

Name of Official & Designation.....

Signature of Official.....Date.....

APPENDIX 4: Incident reporting form

Incident Report Form for Use by the SO/ PSO

Name.....Gender

Date of BirthParent/Guardian

Contact

Date of Incident.....Time of Incident

Place of Incident.....

Name of alleged Respondent.....age (over/under 18 years).....

Details of incident

Action taken and by whom

Name of person reporting:

Date: Signature:.....

APPENDIX 5: 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 prescribed Code of Conduct 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.

Everyone in contact with children and vulnerable adults in the Loreto institutions in the Eastern Africa Province have to:

1. Treat all children and vulnerable adults with respect
2. Provide an example of good conduct for others to follow (role model)
3. Operate within State and Church principles and guidelines
4. Be visible to others when working with children /VA whenever possible
5. Challenge and report potentially abusive behaviour to relevant designated persons
6. Develop a culture where children/VA can talk openly about their contacts with staff and others
7. Respect children's individual boundaries and help them to develop an awareness of their rights and what to do if they have a problem
8. Be sensitive to the fact that comments of a sexual nature are inappropriate. Only age-appropriate language, media products and activities should be used with children. In particular, erotic or pornographic material is never acceptable.
9. Respect the physical integrity of the child or vulnerable adult and not engage in inappropriate physical contact of any kind. They need to be sensitive, in this regard, to what might be unacceptable to children from different cultural backgrounds
10. Be respectful of the privacy of Children and Vulnerable Adults particularly in changing-rooms, showers and toilets

11. Ensure relevant personnel are aware of specific considerations when working with children/VA who have a disability; including behavioral and communication issues, intimate-care needs, access to buildings, range and choice of activities, and any other relevant matters that may need addressing. Where appropriate, the Management Board members will strive, within the limitations imposed by school resources, to ensure that appropriate specific training, including disability awareness and safeguarding training, is undertaken by the relevant personnel.

Staff, sisters, volunteers and collaborators in Loreto institutions must avoid actions or behavior that is abusive or could be construed as poor practice or potentially abusive. Staff should never:

1. Hit or otherwise physically assault or physically abuse children or vulnerable adults
2. Develop sexual relationships with children or vulnerable adults
3. Develop relationships with children or vulnerable adult which could in any way be deemed exploitative or abusive
4. Act in ways that may be abusive or may place one at risk of abuse
5. Give alcohol, tobacco or illegal substances to children or vulnerable adult
6. Be under the influence of alcohol while they are in charge of children
7. Use language, make suggestions, or offer advice which is inappropriate, offensive, or abusive
8. Behave physically in a manner which is inappropriate or sexually provocative
9. Have a child or vulnerable adult with whom they are working to stay overnight at their home unsupervised
10. Sleep in the same room or bed as a child/VA with whom they are working
11. Do things for children/VA of a personal nature that they can do for themselves
12. Condone, or participate in, behaviour of children/VA which is illegal, unsafe, or abusive
13. Act in ways intended to shame, humiliate, belittle, or degrade a child/VA
14. Discriminate against, show different treatment of, or favour

particular children/VA to the exclusion of others

15. Engage in, or tolerate, any behaviour towards children/VA, that is either verbally or psychologically demeaning or culturally inappropriate
16. Spend excessive time alone with children/VA
17. Take children to one's own home without permission
18. Be alone with a child/VA without the necessary professional safeguards
19. Show favour to a child or vulnerable adult by, for example, giving gifts in secret.
20. Give lifts in their cars to individual children/VA. However, if there is one adult, there should be a minimum of two children present for the entire journey. In exceptional circumstances, when it becomes necessary to make a journey or part of a journey alone with a child, the school head and/or the child's parent/guardian should be informed as soon as possible.

Children's Code of Conduct

As part of their holistic formation, children are given guidance on the expected and acceptable code of behaviour while within the LEAP school. Each school will develop its code of conduct for children which may include:

1. Respect all in authority, the staff, volunteers and other children.
2. Respect self by maintaining good personal hygiene, modest clothing, tidy room, and premises.
3. Refrain from using inappropriate language and demonstrate good manners at all times.
4. No physical or emotional abuse of others, staff, and volunteers.
5. No sexual relationships, no alcohol, no smoking, no theft, and no illegal drugs.
6. No requesting funds or favours from the visitors to the school/ministry
7. Take all medicines as prescribed
8. Maintain good study skills and accept your responsibility as a learner.
9. Avoid any form of destruction or inappropriate use of school facilities.
10. Accidental damage to property should be reported to school authorities as soon as possible.
11. Seek permission to leave school/ministry premises

12. Complete your assigned chores.
13. Attend the school spiritual and pastoral activities
14. Seek guidance on communication with relatives and friends
15. Ensure to be at the right place at the right time.
16. Participate in the development of self and wellbeing of others

Anti-bullying and Anti-Discrimination Policies

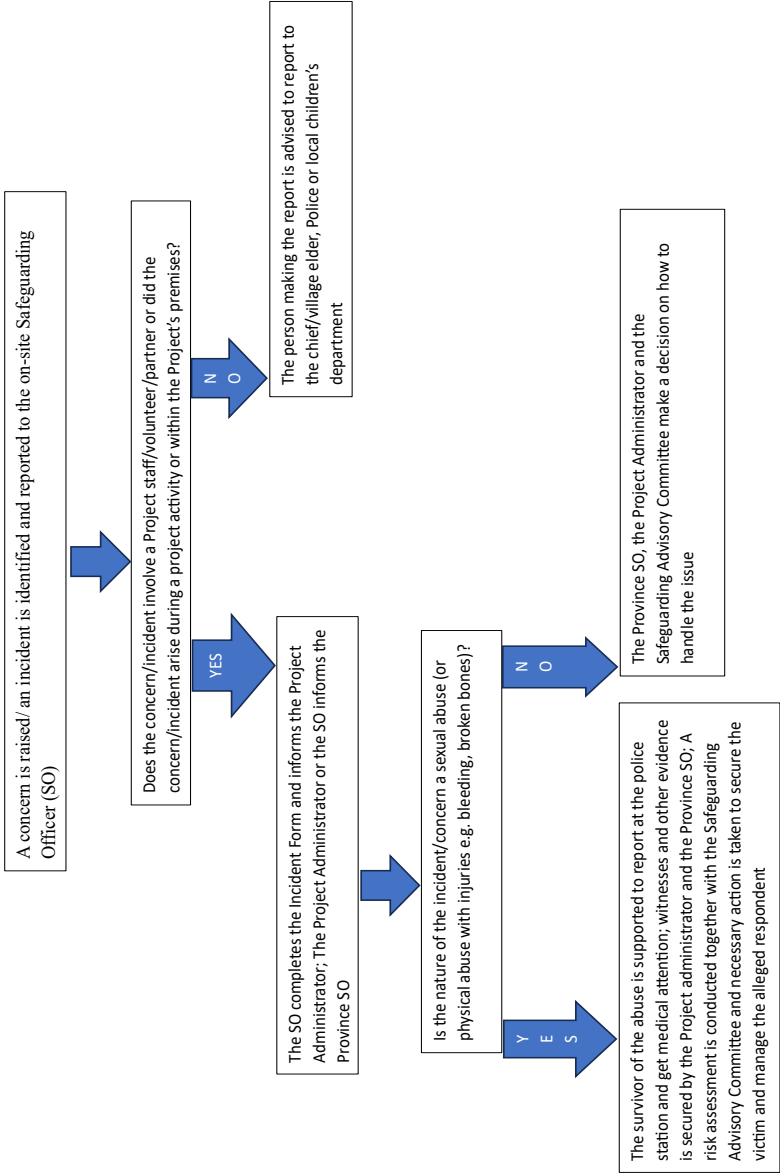
The learning institutions should further develop anti-bullying and anti-discrimination policies which provide guidelines on sanctions and actions taken in case of such incidences. Loreto schools in Eastern Africa Province further understand that issues of child abuse could occur not only between adults and children but also among the children themselves. The most common form of child-to-child abuse that happens in the learning institutions is bullying. On this account all learning institutions for LEAP should put in place an anti-bullying policy. The anti-bullying and anti-discrimination policy guidelines are to be developed in consultation with children in order for them to own and implement them.

The following are some examples of issues that may be captured in the anti-bullying and anti-discrimination policy:

1. Name calling
2. Fighting/kicking/punching
3. Making suggestive comments
4. Intimidation
5. Threatening
6. Ignoring/excluding
7. Damaging property
8. Using vulgar language
9. Spreading rumours
10. Sending abusive text messages
11. Posting abusive messages on the internet or social media

This list is not exhaustive, and the children may have many other points to add on the list based on their experiences within a particular school and ministry. Each school will develop sanctions for students who act against the code of conduct. These will be guided by child rights and the best interest of the child.

REPORTING FLOWCHART (APPENDIX 6)



APPENDIX 7: Annual Compliance Form

Requirements for the Loreto Eastern Africa Province Name of school/
Ministry: Name of the Lead/Incharge:

Name of Child and Vulnerable adult Safeguarding Officer:

Child and Vulnerable adult Safeguarding Policy

1. Does this Institution/project have a safeguarding Policy which incorporates the minimum requirements of the Loreto Eastern Africa Province? Yes No.
2. (a) Has it been amended in the past 12 months? Yes No
(b) If so, were copies sent to the Province office? Yes No
3. (a) Has a workshop/seminar/staff meeting/ training on child and vulnerable adults safeguarding happened in the past 12 months? Yes No
(b) If 'yes' when was this held?
(c) If 'no' when is one scheduled?
4. Does each staff member have a copy of the child safeguarding policy? Yes No
5. Were all new staff familiarized with the policy as part of their induction procedures? Yes No
6. Do all staff know who the contact person is if a complaint is made? Yes No
7. Is there an anti-bullying policy? Yes No
8. Do all children & vulnerable adults know how they can safely make a complaint? Yes No
9. (a) Were any complaints lodged concerning child abuse in the past 12 months? Yes No
(b) If yes, please append a summary of the allegation and subsequent actions taken.

Code of Conduct

Does this Institution/project have a Code of Conduct which includes the minimum requirements of the Loreto Eastern Africa Province? Yes No

Signed: _____

Date: _____

Signed: _____

Date: _____

Principal/School head/Incharge Child and Vulnerable adult
Safeguarding Officer

Verified as an accurate report

Signed: (Province Child and Vulnerable adult Safeguarding Officer).

Confirmation of Review and Audit:

I confirm that a review and audit of the above school was conducted within the last twelve months between and (Dates) and that I have sent a written report to the SO. The review and audit was conducted by:
Signed: Date: (Province Child & Safeguarding Officer).

This form is to be completed annually and returned to the Province Office: Safeguarding desk by 30th October each year (Copied to Province Leader and Principal/ school head/Incharge).

APPENDIX 8: Good recruitment and selection procedures

1. Employment vacancies will be openly advertised
2. A clear job description will be developed by the management of the institution in relation to the needs
3. Applicants must complete the Application Form (Appendix 7), and upon employment fill the Declaration Form (Appendix 1), and Statement of Commitment (Appendix 2)
4. Applicants must provide a National or Passport Identification
5. Applicants must submit names of two referees (not family members) who can provide references.
6. References must be received in writing. Verbal contact from previous employer must be made for all applicants.
7. A certificate of good conduct from the Police or an equivalent criminal clearance from the relevant national authorities will be required of each applicant
8. Documents supplied by applicants must be verified as authentic
9. Up-to-date files in respect of all personnel are to be kept in the institution filing system. The file for each candidate would include application forms, references and other relevant personal documentation
10. All interviews will take place with at least two interviewers present plus the Safeguarding Officer
11. All new personnel must be given induction safeguarding training.
12. Assurances on the good character of volunteers will be gained from relevant agencies.

APPENDIX 9: Sample Employment Application Form

Loreto Institution: _____ Position You are Applying For:

Surname of Applicant: _____ First Name: _____ Address: _____

Date of Birth: _____ Tel No _____ Email: _____

Past Employment History:

Employer _____ Position/Nature of the job _____

1. Employer _____ Position/Nature of the job _____

2. Employer _____ Position/Nature of the job _____

Have you previously been involved in voluntary work

Yes No

If yes please give details _

Have you previously received safeguarding training

Yes No

If yes please give details _

Please provide the names and addresses of two people (not relatives) whom we should contact for a reference:

Name _____ Address _____ Tel : _____

No _____ Email _____ Name _____

Address _____ Tel No _____ Email _____

LEAP Safeguarding Policy

The Loreto Sisters of the Eastern Africa Province (LEAP) are at all times committed to promoting practices in all our projects, schools and ministries that protect children and vulnerable adults from all forms of harm. Therefore, our selection process includes background checks which reflect our commitment to the protection of children from abuse. This includes production of a certificate of good conduct or a criminal clearance certificate from the relevant national authorities. Further, our members, staff, volunteers, consultants and partners are required to abide by the safeguarding policies in place.

Applicant's Declaration:

I declare that the information I have provide above is true and that I agree to abide by and accept the terms and conditions of participation in the selection process. I also accept to abide by the code of conduct as outlined in the Loreto Eastern Africa safeguarding Policy.

Signed: _____ Date: _____

APPENDIX 10: self audit tool

Read the following statements and decide whether, for your organization, each Standard is:

A. in place B. working towards C. not in place

Tick the A, B or C box as appropriate

STANDARD 1: POLICY

A B C

The school/Ministry has a written child and vulnerable adult safeguarding policy, Approved by the relevant management body, to which all staff and associates are required to adhere, scope of policy is clear

The UN Convention on the Rights of the Child, the respective country Constitutions, Guidelines and Policies pertaining to children/VA inform the policy of Loreto Schools

The Policy is written in a way that is clear and easily understandable and is publicized, promoted, and distributed widely to all relevant stakeholders, including children and vulnerable adults The policy is clear that all children have equal rights to protection and that some children face particular risks and difficulties in Getting help because of their disability.

The policy addresses safeguarding children and vulnerable adults from harm through Misconduct by staff, associates and others, from poor practice, and from its operational activities where these may harm children or put Them at risk due to poor design and or delivery.

The organization makes clear that ultimate responsibility for ensuring the safety of children and vulnerable adults rests with senior executives (School head, Province Child and vulnerable adult Safeguarding Officer, Province Leader)

STANDARD 2: PEOPLE

A B C

There are written guidelines for behaviour (Code of Conduct) that provides guidance on appropriate/ expected standards of behaviour towards children/ VA and of children towards other children.

All members of Sisters, staff, volunteers and associates have training on child safeguarding which includes an introduction to the organization’s safeguarding policy and procedures and learning on how to recognize and respond to concerns about child and vulnerable adult abuse.

The school is open and aware when it comes to child safeguarding matters so that issues can be easily identified, raised and discussed. Staff, partners and associates have access to advice and support where concerns or incidents arise. The staff are also able to identify sources of support for children and their families.

Children are made aware of their right to be safe from abuse and provided with advice and support on keeping themselves safe including information for children, parents/carers about where to go for help.

The school has designated key people at different levels as “focal points” with clear defined responsibilities, to champion, support, and communicate on child safeguarding, and for effective operation of the child safeguarding policy.

STANDARD 3: PROCEDURES

A B C

The school requires local mapping exercises to be carried out that analyse the legal, social welfare and

child safeguarding arrangements in the context in which it works.

There is an appropriate process for reporting and responding to safeguarding incidents and concerns that fits with the local systems for dealing with incidents of child and VA abuse

The identification and mitigation of safeguarding risk is incorporated into risk assessment processes at all levels, i.e. from identification of corporate risks through to planning an activity involving or impacting on children and vulnerable adults.

Adequate human and financial resources are made available to support development and implementation of child and VA safeguarding measures.

There are clear procedures in place that provide step-by-step guidance on how to report safely which are linked to the organizations disciplinary policy and procedures.

Child and vulnerable adult safeguards are integrated with and actively managed into existing business processes and systems (strategic planning, budgeting, recruitment, programme cycle management, performance management, procurement, etc.) to ensure safeguarding is a feature of all key aspects of operations.

STANDARD 4: ACCOUNTABILITY

A B C

Arrangements are in place to monitor compliance with and implementation of child safeguarding policies and procedures through specific measures and/or integration into existing systems for quality assurance, risk management, audit, monitoring and review.

There is a system of regular reporting to key management forums, to track progress and performance on child safeguarding, including information on safeguarding issues and child safeguarding cases.

External or independent bodies such as Management Board and oversight committees are used to monitor performance in this area and hold leaders to account in relation to child safeguarding.

Opportunities exist for learning from practical case experience to be fed back into organisational development.

Policies and practices are reviewed at regular intervals and formally evaluated every three years. Progress, performance and lessons learnt are reported to key stakeholders and included in organisations' annual reports.

APPENDIX 11: Activity Permission/Parental consent

Activity Permission Form for Children

Name of School _____

Venue/Activity/Group/Event _____

Date/Time _____

Name of Group Leader/Person Responsible _____

Name of Child _____

Address

Date of Birth

Give details of any medical condition of which the Organizers ought to be aware. Please include details of any medication which has to be taken or any dietary requirements. (This information will be treated with confidence.)

I have read all the information provided concerning the programme of the above activity. I hereby give permission for my child to participate in the above activity.

Signed _____ Date _____

Parent / Guardian Address _____

If different from above _____

Any additional telephone numbers available during the period of the activity _____

APPENDIX 12a: Media release/consent form

I _____ of _____

(Print Name) *(Address)*

Hereby consent and give permission to, a Loreto Eastern Africa Province (Project/School/Ministry)* to take and use my photographs/films/interviews while in the Project/School/Ministry* premises or while taking part in any activity organized by them whether inside or outside their premises.

Further, I consent to use of the photographs/films/interviews for purposes of keeping memories, promotions and marketing of the Project/School/Ministry* on their website, print, online channels and other media. I agree that the photographs/films/interviews may be combined with other images, text and graphics and be cropped, altered or modified in any way that the institution deems appropriate, as long as the changes are not offensive in nature.

I consent to the provision of this form and the details within it to the Project/School/Ministry*, and to their storing these on a database.

Further, I understand that by signing this form, I grant the Project/School/Ministry* the consent to take and use photos/films/interviews from time to time as the need arises, without the need to further consult me.

Finally, I understand that I may cancel this consent in writing at any time, and that Project/School/Ministry* will take all reasonable steps to ensure that the photographs/films/interviews are withdrawn from future use.

I further understand that I shall receive no remuneration or compensation for the use of the photographs/films/interviews.

By appending my signature to this form, I hereby release you, your employees, affiliates, licensees, agents and assignees, from any and all claims, demands and suits that I may have arising out of the photography, publication, filming, or this agreement.

Signature:	Print Name:
Email/Telephone	Date:

For and on behalf of Loreto School/Institution

Signed:	Print Name:
Designation:	Date:
Witness Name:	Signature:

*Circle the appropriate entity

APPENDIX 12b: Media release/Consent form for children (below 18 years) & vulnerable adults

I _____ of _____

(Print Name) *(Address)*

Hereby consent and give permission to, a Loreto Eastern Africa Province (Project/School/Ministry)* to take and use photographs/films/interviews of **(name of the child/V/A)**while in the Project/School/Ministry* premises or while taking part in any activity organized by them whether inside or outside their premises.

Further, I consent to use of the photographs/films/interviews for purposes of keeping memories, promotions and marketing of the Project/School/Ministry* on their website, print, online channels and other media. I agree that the photographs/films/interviews may be combined with other images, text and graphics and be cropped, altered or modified in any way that the institution deems appropriate, as long as the changes are not offensive in nature. I understand that the child's/VA name will not be given to the press or the public without my consent.

I consent to the provision of this form and the details within it to the Project/School/Ministry* and to their storing these on a database.

Further, I understand that by signing this form, I grant the Project/School/Ministry* the consent to take and use photos/films/interviews from time to time as the need arises, without the need to further consult me.

Finally, I understand that I may cancel this consent in writing at any time, and that Project/School/Ministry* will take all reasonable steps to ensure

that the photographs/films/interviews are withdrawn from future use.

I further understand that I shall receive no remuneration or compensation for the use of the photographs/films/interviews.

By appending my signature to this form, I hereby release you, your employees, affiliates, licensees, agents and assignees, from any and all claims, demands and suits that I may have arising out of the photography, publication, filming, or this agreement.

Parent/Guardian

Signature:	Print Name:
Email/Telephone	Date:

For and on behalf of Loreto Project/School/Ministry

Signed:	Print Name:
Designation:	Date:
Witness Name:	Signature:

*Circle the appropriate entity

APPENDIX 13: referral form

Has the matter (child/VA abuse) been referred to civil authorities?

Yes No

If Yes, Date _____ Time: _____

To whom was it referred? Name: _____ Designation

Address _____ Tel: _____ Email: _____

Has the matter been referred to a Church authority?

Yes No

If Yes, Date: _____ Time _____

To whom was it referred? Name: _____ Designation:

Address _____ Tel _____ Email: _____

Other person/s or authority the matter has been referred to:

Name: _____ Time: _____

Designation:Address: _____ Tel: _____ Email: _____

APPENDIX 14: Sample risk assessment template

AREA OF RISK	RISK DESCRIPTION/ RISK FACTOR	RISK SIGNIFICANCE	MITIGATING ACTION	RESPONSIBILITY	DATE TO BE COMPLETED	REMARKS
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Risk Significance Levels:

High Highly likely to happen and significant impact on child

Medium Either highly likely to happen or significant impact on child

Low Less likely to happen and less of an impact on child

Sample Data Protection Consent Form (Children)

XXXX School is committed to protecting the privacy and data rights of all individuals involved in its educational ecosystem. This data protection consent form is part of its commitment to responsible data handling and the measures being implemented to ensure the security, confidentiality, and integrity of personal data. The school respects inherent dignity and right to privacy.

I,
 (Name of Parent/Guardian) of IDNo.(where applicable.....parent/guardian to.....
 (name of the child) acknowledge that I have read and understood the contents of this Data Protection Consent Form. I consent to the collection and processing of personal data as outlined in this form and in accordance with the school's Data Protection Policy.

This data collection and processing of personal data shall be on the following basis:

1. The collected and processed personal data will be for the following purposes depending on the data subject it is collected from:
 - a. Admission and Enrolment: To facilitate the admission and enrolment process of students. This includes information uploaded into the National Education Management Information System (NEMIS)

- b. Academic Records: To maintain and update academic records for educational purposes.
 - c. Health Information: To provide necessary healthcare and support to students.
 - d. Disciplinary Records: To address and document disciplinary matters.
2. The school shall maintain the privacy of my data through: Limited sharing with third parties only for legal obligations or with consent, anonymisation or deletion of data when no longer necessary for processing, continuous staff training on data protection best practices and ensuring physical and digital security measures to safeguard data.
 3. The collected and processed personal data shall be accessible only to the authorized persons in the user departments.
 4. The collected and processed personal data may be used on the school's Website, school noticeboards, newspaper publications, school prospectus and monthly publications for visibility, sponsorship and other purposes for the benefit of the Organization, the data subject and their parents or guardians and/or relatives.
 5. The school shall regularly update the data in their possession to ensure that it is accurate and has no bias that can lead to discrimination.
 6. The school shall continuously revise and update its data protection policies and procedures after conducting annual audits to assess the effectiveness of data protection safeguards against loss, damage, and unauthorized access.
 7. The CCTV cameras shall be used for security purposes only, not to surveil the privacy of the data subjects.
 8. The processed data shall be retained only for as long as necessary and for the purposes for which it was collected.
 9. The school's data protection policy shall be available on the website and a hard copy can be provided upon request by the data subject.
 10. In the event of a data breach, the school will report it to the relevant authority and notify affected individuals/data subjects through the contact information in their possession within 72 hours of becoming aware of the breach.

I agree to be bound by these terms.

Signature of Data Subject: _____ **Date:** _____

Sample DATA PROTECTION CONSENT FORM (Employees/ Volunteers)

XXXX School is committed to protecting the privacy and data rights of all individuals involved in its educational and employment ecosystem. This data protection consent form is part of its commitment to responsible data handling and the measures being implemented to ensure the security, confidentiality, and integrity of personal data. The Employment system in the school respects inherent dignity and right to privacy for all persons. Pursuant to the Data Protection Act, the school requests your prior informed consent before it can collect or process your personal data. Personal data means any information relating to an identifiable natural person.

I,.....(Name of Employee), of
Payroll Number.....and of.....IDNo.....
attached to.....(department) as.....
(Position/Designation) acknowledge that I have read and understood
the contents of this Data Protection Consent Form. I consent to the
collection and processing of personal data as outlined in this form and
in accordance with the Institution's Data Protection Policy.

This data collection and processing of personal data shall be on the following basis:

1. The collected and processed personal data will be for the following purposes (depending on the data subject it is collected from):
 - a. **Recruitment records:** To be able to select the best suited candidate for open vacancies. This will cover information contained in Curriculum Vitae, academic certificates, testimonials, recommendation letters and other job application related documents.
 - b. **Employment Contract:** To manage employee records and payroll information.
 - c. **Academic Records:** To maintain and update academic records for promotions, redeployments and job allocations.
 - d. **Labour records:** To comply with Employment and labour laws

for minimum wages, hours of work register, leave days, place of work, occupational safety and others of the same kind.

- e. **Security purposes:** Keep track of people entering and leaving the institutions
 - f. **Health Information:** To provide necessary healthcare support to employees.
 - g. **Disciplinary Records:** To address and document employee disciplinary procedure.
 - h. **Statutory Obligations:** To fulfil legal obligations such as NSSF, KRA, NHIF, NTSA, Public Health and others of the same kind.
2. The school shall maintain the privacy of my data through: Limited sharing with third parties only for legal obligations or with consent, pseudonymization, anonymisation or deletion of data when no longer necessary for processing, continuous staff training on data protection best practices and ensuring physical and digital security measures to safeguard data.
 3. The collected and processed personal data shall be accessible only to the authorized persons in the user departments.
 4. The school shall regularly update the data in their possession to ensure that it is accurate and has no bias that can lead to discrimination.
 5. The school shall continuously revise and update its data protection policies and procedures after conducting annual audits to assess the effectiveness of data protection safeguards against loss, damage, and unauthorized access.
 6. The processed data shall be retained only for as long as necessary and for the purposes for which it was collected.
 7. The school's data protection policy shall be available on the website and a hard copy can be provided upon request by the data subject.
 8. In the event of a data breach, the school will report it to the relevant authority and notify affected individuals/data subjects through the contact information in their possession within 72 hours of becoming aware of the breach.
 9. The school reserves the right to amend or modify this consent form at any time and any such amendment or modification shall remain effective from the date of notification.

I agree to be bound by these terms.

Signature of Data Subject: _____ Date: _____

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