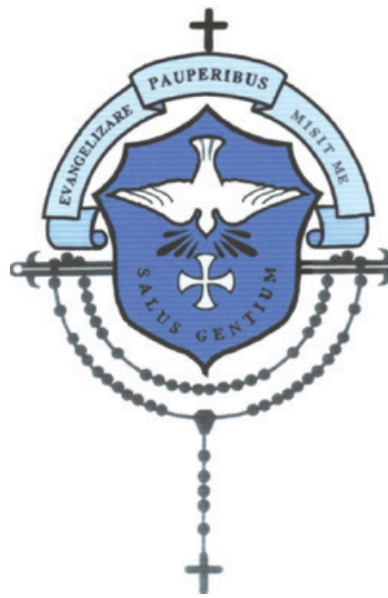
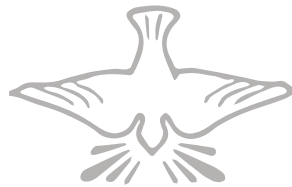




MINORS AND VULNERABLE ADULT SAFEGUARDING POLICY

MISSIONARY SISTERS OF THE HOLY ROSARY



SEPTEMBER 2025



MISSIONARY SISTERS OF THE HOLY ROSARY

GENERALATE HOUSE

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Website: www.mshr.org

Charity Number: 3628

Title	Safeguarding Document: Children and Vulnerable Adults
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Author (Responsible)	Safeguarding Committee & Safeguarding Advisor
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Frequency of Review	Every three years
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Related Policies & Procedures	Detailed within this Policy

Message from the Congregational Leader

I am delighted to present this **revised** Congregational Document on the Safeguarding of Children and Vulnerable Adults. This document emphasises the importance of safeguarding, reflecting Jesus' love and care for vulnerable people. Jesus speaks of them as 'little ones' who belong to the Kingdom of God (Lk 18:16). This connects deeply with our Congregation's motto: "Sent to share the good news with the poor." This document is intended for personal prayer and reflection, as well as for use in community, ministries and at regional meetings. By doing so, it aims to help us respect the dignity of every person, especially children and vulnerable adults, while acknowledging the seriousness of abuse in any form.

I encourage every Region/Mission Unit, Ministry, Community, and Formation House to study this document and use it to review their own Safeguarding Policies and Procedures. Each sister has signed the Code of Conduct. This also needs to be reviewed and signed annually. In today's context, it is critical to reflect on and evaluate our use of power at every level. Each Region and Mission Unit will now include in its annual safeguarding progress report to the Congregational Leadership Team (CLT) its evaluation of the individual and corporate use of power in our communities and ministries. It is also essential for each sister to pay close attention to the section on bullying in this document, as it can affect us all. Together, we can make a difference! Regions and Mission Units need to have all necessary procedures in place, such as action plans, risk assessments, and annual safeguarding progress reports, to foster a culture of safeguarding within our Congregation and our broader contexts.

A Congregational Resource Person for safeguarding has completed a program at the Centre for Child Protection (CCP) in Rome and is available to assist any region in developing their own Action Plan for safeguarding in communities and ministries. There are also other safeguarding resource persons available in the Regions and Mission Units. They are equally available to assist any region that needs such assistance. In addition to using this document, it is crucial to comply with your country's safeguarding policies.

As we stand in solidarity with our Sisters and Brothers who are healing from abuse, let us work as a missionary family to implement the principles and practices in this document to prevent abuse of any form in our communities, ministries, and the world.



With Affection,

Sr Franca Onyibor

Franca Onyibor
Congregational Leader



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Glossary/Definitions

Associated Persons: employees/paid staff, volunteers, consultants, and visitors to our communities and ministries.

Canon Law: In the Catholic Church, canon law is the system of laws and legal principles made and enforced by the church's hierarchical authorities to regulate its internal organisation and government, and to order and direct the activities of Catholics toward the mission of the church.

Child/Children: Means everyone below the age of eighteen years (regardless of cultural norms). *Often referred to in Canon Law as a minor, one who is below the age of majority recognized by Canon law as eighteen years of age (can. 97 § 1).*

Child abuse: Any form of maltreatment of a child caused by abuse or neglect of a child by inflicting abuse or by failing to act to prevent abuse, commercial or labour exploitation of a child.

Children with specific needs: This term is used to cover the specific or unique, out-of-the-ordinary concerns created by the child's medical, physical, mental or developmental condition or disability. Additional services are usually needed to help a person in one or more of the following areas (among others): thinking, communication, movement, interaction with others, and taking care of oneself.

Church Authority: This term does not appear in canon law. In relation to MSHR, this term includes Congregation leader, Regional/Unit Leader.

Church personnel: The term 'church personnel' is used to define those who work (voluntarily or paid) for MSHR. This includes sisters, volunteers, and employees(staff).

CLT: Congregational Leadership Team (MSHR).

Complainant: This is a term used to describe a person who has made an allegation of abuse.

Employees/Staff: a person who is hired to do a particular job for salary/pay.

Grooming (Child): Refers to a pattern of behaviour aimed at engaging a child as a precursor to sexual abuse. It includes establishing a 'special' friendship/relationship with the child. Grooming can include the conditioning of parents and other adults to think that the relationship with the child is 'normal' and positive.

Grooming (Adult): Is the predatory act of manoeuvring another individual into a position that makes them more isolated, dependent, likely to trust and more vulnerable to abusive behaviour.

Mandatory reporting: Mandatory reporting refers to the legal obligation under legalisation that one is required to report any knowledge, belief, or reasonable suspicion that a child is being abused, or is at risk of being abused. This is applied, by law, in some jurisdictions.

Where the requirement of civil law demands it, when it has been established that abuse has taken place, the responsibility for mandatory reporting demands that leaders co-operate with civil authority to the extent that civil law demands. (cf. VELM 20).

MSHR: Missionary Sisters of Our Lady of the Holy Rosary

Respondent: (Subject of the Complaint) This is the term used for the alleged person about whom there are child/person with vulnerabilities suspicions, concerns, knowledge or allegations.

Glossary/Definitions

Safeguarding: This is a term that describes the measures taken to protect people's health, well-being and rights, particularly children and adults at risk. These measures allow all people to live in freedom from abuse and harm, especially those who may not be able to protect or advocate for themselves. Safeguarding encompasses the prevention of abuse, neglect, maltreatment and exploitation of children and adults at risk.

Statutory Authorities: These include the relevant authorities in the country of residence.

Threshold for reporting; is where we know, believe, or have reasonable grounds to suspect, on the basis of information that he/she has received, that a child or person with vulnerabilities;

- Has been harmed.
- is being harmed
- is at risk of being harmed

shall, as soon as practicable report that belief or suspicion to the Safeguarding Person or Regional/District Leader.

UNCRC: United Nations Convention on the Rights of the Child- An international convention which outlines in 54 articles the fundamental rights of those under 18 and the obligations of States which signed the Convention to uphold the rights it contains.

Volunteers: People who volunteer and who are giving their time and expertise at the service of mission within the Congregation for a defined period of time under contractual obligations with the Congregation

Vulnerable Adults (also known as vulnerable persons, adults at risk of harm, persons with vulnerabilities, persons in vulnerable situations): are aged 18yrs or over who are

- At risk of experiencing abuse, neglect or exploitation by a third party and
- Lacks mental or physical capacity to protect themselves from harm at this time in their lives
- Susceptible to abuse of power (i.e. improper use of a position of influence, power or authority over another person)

Key Message

Why do we have this policy? 	Missionary Sisters of the Holy Rosary's (the Congregation) Safeguarding Policy sets out our commitment to keeping people within our Communities and Ministries safe from any abuse. It specifically recognises the power imbalances that can exist due to the nature of our living together and service, and how these can create opportunities for abuse to occur. The policy equally recognises the specific considerations and our commitment to ensuring children and vulnerable adults are safe and protected. This Policy therefore sets out how we put this into practice.
To whom does this policy apply?	Congregation representatives including members of our leadership structure, Sisters of our Congregation and associated persons in both their personal and professional lives.
How will the Units use this, Policy?	Congregational Leadership Team (CLT) expect that all Regions will develop and implement Safeguarding Policies for Children & Vulnerable Adults. The Region Policy will comply with the standards outlined within this Policy and will adhere to the local civil laws and Church structures.
What are the key things I need to know?	Expected behaviour of Congregation Sisters and associated people: ➤ Recognising risks and situations that would make people more vulnerable to abuse and ensuring safeguarding strategies are in place ➤ Definitions of abuse and exploitation ➤ Mandatory duty to report and how to report.
What are the key things I need to do?	1. Model and promote respectful behaviour 2. Identify risks within our Communities and Ministries that may give rise to abuse 3. Promote an environment that is open to hearing allegations 4. Report any allegations without delay to the Safeguarding Person/Safeguarding Local Person
Where can I find more information? 	Further information on this Policy can be found by contacting Sr. Ruth Chetambe, Email: cltdevelopment@mshr.org Phone: +353 89 961 2288 Website: www.mshr.org

Introduction

As Missionary Sisters of Our Lady of the Holy Rosary (MSHR), we collaborate with others in sharing in Christ's mission of love; going beyond the boundaries of our countries and cultures, we also stretch the boundaries of our hearts to meet Christ in the most vulnerable and in those who seem different. We recognise the fundamental right of children and vulnerable adults to be respected, cared for and protected. This right is embedded in the Gospel as well as the civil laws of different nations. It is also enshrined in the United Nations Convention on the Rights of the Child and in Church Documents. With increased awareness, it is well known that sadly, there are situations of abuse of children and vulnerable adults in different forms: sexual, physical, emotional, psychological and spiritual including neglect.

Purpose of the Policy

This policy provides guidelines for the protection of children and vulnerable adults with whom we have contact in our ministries and communities so that all have a safe environment to grow and mature.

This document also expresses our commitment to follow best practice for responding to allegations or suspicions of abuse. It outlines procedures to follow, in case one of our members is accused of abuse, or witnesses a situation of abuse, whether in our ministry, in our formation houses or in our communities.

Guiding principles for this document:

are derived from:

- Gospel Value
- Bishop Shanahan's Vision for Children
- Pope Francis; *Motu Proprio Vos estis Lux Mundi 2023, Fratelli Tutti 2021 and Vos estis Lux Mundi 2019*
- International Law
- Consideration for the local context – The Civil Law of the Country where we live and work

Gospel Values

The Gospel values of love, dignity, and justice, as demonstrated by Jesus, remind us that the safeguarding of all, and especially children and persons with vulnerabilities, is an integral part of the life and ministry of the Church. Therefore, the sources of this policy are to be found first and foremost in Gospel values, Church documents and in the canonical norms of the Church, inspired by the principles of justice, equity, and charity (cf. can. 1311 §2).

Bishop Shanahan's Vision For Children

For Our Founder, Bishop Shanahan a child is:

- ◆ a temple and an instrument of the Holy Spirit
- ◆ full of the life of God
- ◆ carrier of the presence of God
- ◆ tiny apostle for sharing the good news of God's love

Bishop Shanahan saw the school as a place where children and young people would be encouraged to develop their God-given gifts needed to transform their families and society. In 1928, he wrote to the Missionary Sisters of the Holy Rosary:

"It is the children of Nigeria who are responsible for the amazing things that have happened, and the unbelievable rapidity with which God's church has branched and blossomed in a few short years."

He had a deep compassionate concern for sick children. In 1923, he wrote: ***"Then there are the sick, the multitudes of little children that die on the first day of their existence for various reasons....."*** The Sisters would be available to care for these children and for the children who were unable to attend school.

Pope Francis on Safeguarding

Message of the Holy Father, Pope Francis to the Participants at the Plenary Assembly of the Pontifical Commission for the Protection of Minors, March 2025:

Your work... it advocates for safeguarding through a formation that educates, measures that prevent, and listening that restores dignity. When you establish prevention policies, even in the remotest communities, you are making a promise: that every child, every vulnerable person, will find a safe environment in the ecclesial community. This is the driving force of what should be for us an integral conversion.

In his 2021 encyclical, *Fratelli Tutti*, the Pope states, “Every human being has the right to live with dignity and to develop integrally; a dignity based on the intrinsic worth of their being, precious in God’s eyes. Unless this basic principle is upheld, there will be no future for the survival of humanity” (FT 107).

Pope Leo XIV

in his public remarks and leadership actions clearly underscore his support for zero-tolerance policies, victim-centred dialogue, and the importance of transparency in the Church’s safeguarding mission.

International Law

Our approach to safeguarding is also guided by several key international principles and standards as set out in the following:

- The Universal Declaration of Human Rights (UDHR), 1948.
- The UN Convention on the Rights of the Child (UNCRC), 1989.
- The UN Convention for the Elimination of all forms of Discrimination Against Women (CEDAW), 1979.
- The UN Convention on the Rights of Persons with Disabilities (CRPD), 2006.
- African Charter on the Rights and Welfare of the Child (1990)

Considerations for Local Context

The Congregation works in a variety of geographical locations where significant variations in understanding and arrangements for safeguarding can exist.

The Congregation is committed to giving clear guidance to all, and other organizations, including donor organizations, on how this safeguarding policy will be adapted and applied in different locations. As such, this policy will therefore be applied in ways that are sensitive to different cultures but without condoning practices that are abusive to children and vulnerable adults. It is emphasised that the local culture in any country is subject to the civil law of the land. When a country enacts a law, that law takes precedence over any existing cultural practices.

(Further details can be found in Appendix 5)

Policy Statement

We, the Missionary Sisters of the Holy Rosary (hereafter MSHR), value and encourage the participation of children and vulnerable adults in activities in our different ministries/ communities that enhance their spiritual, physical, emotional and social development. We recognise the dignity and rights of all children and vulnerable adults and are committed to their protection and support. We envision a way of living that celebrates the connectedness of all God’s creation in an inclusive world where the dignity and diversity of all life is honoured and protected. Our Congregation undertakes to do all in its power to create a safe environment for all and to ensure their protection from neglect, physical, emotional and sexual abuse.



Note to Regions:

Regional and Ministry Policy Statement will end with name and contact of the Safeguarding Person for the Ministry and the name of the Regional contact person. [This is also a requirement for Miseen Cara.]

Fundamental Principles underlying this policy statement:

- Safeguarding is everyone's responsibility.
- Every MSHR must have a zero tolerance for any form of abuse.
- The duty to report safeguarding concerns rests with the person who has the concerns. It is important to ensure the immediate safety of the minor/ vulnerable adult at risk of abuse.
- Safeguarding is founded on an approach where the minor / vulnerable adult is at the centre of all decisions and actions.

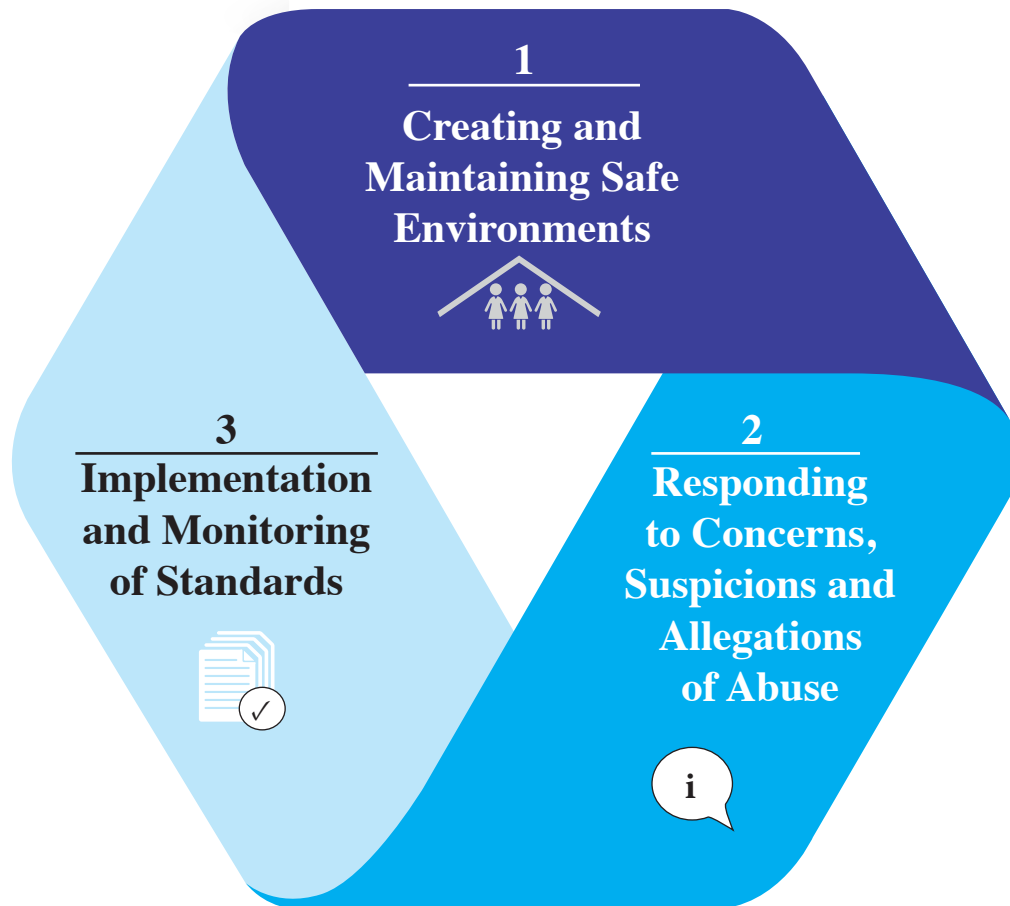
Safeguarding Responsibilities for All

- Know, understand, and comply with all aspects of this safeguarding policy.
- Create atmospheres of care, nurturance, safety and well-being in their sphere of activity.
- Attend safeguarding awareness/training session every year.
- Participate as appropriate in local networks of human rights promotion and/or abuse prevention.
- Be aware of local legislation/regulations regarding abuse of children and vulnerable adults as well as any particular risk area pertinent to local/national contexts (e.g., in some areas child labour may require more vigilance than in other.

For roles and responsibilities of safeguarding personnel and leadership see Appendix 1

Standards of Practice

There are three core standards to our Safeguarding Policy:



Standard 1

Creating and Maintaining Safe Environments (includes safeguarding awareness and communicating the safeguarding message).

Standard 2

Responding to Concerns, Suspicions and Allegations of Abuse (includes care/support of the victims and management of the respondent – in line with Civil and Canon Law requirements).

Standard 3

Implementation and Monitoring of Standards.

STANDARD 1

CREATING AND MAINTAINING SAFE ENVIRONMENTS





What is this Standard?

- ◆ The creation and maintenance of a culture of safety which includes a safe environment for all, with special consideration for children and adults at risk.
- ◆ Outlines the procedures for safeguarding training.
- ◆ The methods used to communicate the safeguarding message.

The MSHR will promote a culture of safeguarding and the wellbeing of all through their participation in the ministry of the Church. The MSHR will create and maintain environments that uphold all human rights and that create nurturing, caring conditions where all can flourish in faith and love. Through fostering a culture of care all will feel safe and looked after, and in turn will look out for each other.

The criteria for ensuring the successful implementation of Standard 1 are as follows:

Safe Environment:	➤ Every Region/ Mission Unit will appoint Safeguarding Officer/s who will ensure the implementation of this policy. ➤ All sisters and associated persons will receive the necessary induction/ training regarding the safeguarding policy and procedures of the MSHR, and specific policies and procedures for their Region, area of work. ➤ All sisters and associated persons will sign the commitment form indicating their commitment to implement this policy and follow procedures fully. (Appendix 2) ➤ There are agreed procedures for recruiting and vetting of sisters, employees and volunteers ➤ There are written guidelines for appropriate standards of behaviour towards children and vulnerable adults. ➤ The MSHR encourages a culture where all, including children and vulnerable adults are listened to and respected as individuals. ➤ There are clear ways by which all can raise concerns about unacceptable behaviour towards children and vulnerable adults. ➤ There are comprehensive risk assessments carried out when working with children and vulnerable adults. ➤ Ensuring that children and vulnerable adults are adequately supervised and protected within the environment of the MSHR. ➤ The MSHR implements best practice for the appropriate use of information technology including social media. ➤ The MSHR implements best practice in relation to capturing, using, and storing images of children and vulnerable adults.
Training:	➤ Personnel are trained and supported in all aspects of safeguarding relevant to their role. ➤ All sisters and associated persons are inducted into the safeguarding policy. ➤ All sisters and associated persons are provided with opportunities to learn how to recognize and respond to concerns about abuse. ➤ Every Regional Leader together with the safeguarding committee and safeguarding personnel annually reviews training needs and develops a training plan based on this ➤ Children/vulnerable adults and their parents/guardians/carers are informed of safeguarding and their rights and responsibilities.



Communication:

- ➡ The CLT in consultation with the Regional Leaders, will ensure that all sisters and associated persons are aware of the MSHR policy and procedures.
- ➡ The Regional Leader will communicate the name/contact of the Safeguarding Officer/s to all in their Region.
- ➡ All will work to ensure that the message is communicated to those whose first language is not English, as well as to people who have specific needs.
- ➡ This Safeguarding Policy will be openly displayed and available to everyone.
- ➡ Children/vulnerable adults will be made aware of their right to be safe from abuse, and the person to whom they should speak if they have concerns.
- ➡ The MSHR will establish links with other local/national organisations to promote a safe and caring community and to share best safeguarding practices.
- ➡ Information about the MSHR's commitment to keeping children and vulnerable adults safe, is openly displayed and available to the public. See Safeguarding Poster (Appendix 6)

Procedures for Standard 1

The Procedures for ensuring the successful implementation of Standard 1 are as follows:

(All supporting safeguarding tools and guidance to assist with the implementation of safeguarding practices can be found on www.mshr.org)



Safe Recruitment

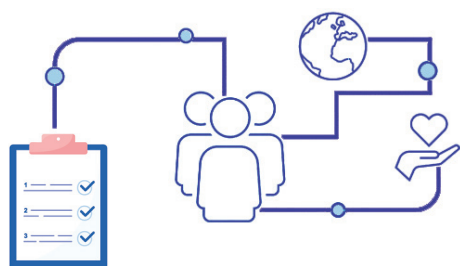
The MSHR ensures that appropriate steps are taken during recruitment and selection of sisters, employees, and lay volunteers.

The MSHR will not knowingly engage, directly or indirectly, anyone who poses a risk to children and vulnerable adults and will take all reasonable steps to eliminate from the recruitment process applicants who might pose a risk to children and vulnerable adults.

The MSHR is committed to safe recruitment and vetting practices which seek to prevent those who pose a known risk to children and vulnerable adults from gaining employment or being taken on as volunteers. It will follow best practice during recruitment interviews and follow up on all letters of recommendation. It will require of employees and volunteers to complete and sign a form declaring any previous disciplinary procedures regarding inappropriate behaviour. Anyone who lies or fails to make a disclosure during the recruitment process will be summarily dismissed. They will sign a commitment to comply with and implement the policy. The Safeguarding Policy will be explained to sisters, employees and volunteers, and each will be given a copy of the relevant document or where more appropriate a summary of the policy.



Code of Conduct (See Appendix 1)



The MSHR code of conduct is an integral component of safeguarding and forms part of the contractual terms and conditions of all. The code of conduct applies both in professional and personal life in relation to safeguarding. Special considerations are made to safeguarding children and vulnerable adults and to preventing the sexual exploitation and/or abuse of any individual.

By signing the code of behaviour, all those 'to whom this policy applies' commit themselves to:

- Work actively to promote the best interests of all and specifically children and vulnerable adults and act in line with the MSHR's safeguarding policies and relevant guides;
- Encourage children and vulnerable adults to feel comfortable to point out attitudes and behaviour they do not like.
- Know where and how to make a complaint, when necessary.



Risk Assessment And Safe Ministry

A risk assessment will be carried out regularly (at least annually) within each community and ministry, under the direction of the person in charge with support from the safeguarding personnel. The risk assessment will include planning on how to mitigate against any possible risk and putting controls in place to create and maintain a safe environment for all.

Media and Technology



The use of photos/videos on websites and in other online/hard copy publications can pose direct and indirect risks to all and specifically children and vulnerable adults. It is important that all follow the correct procedures when taking and using photos/videos. Where applicable, comply with local data protection laws.

We will seek to keep children and vulnerable adults safe by:

- always asking for written consent from a child/vulnerable adult and their parents or carers before taking and using an image
- always explaining to the child, vulnerable adult and their parents'/guardians'/carers what the images will be used for, how they will be stored and what potential risks are associated with sharing images of children/vulnerable adults
- making it clear that if a child/vulnerable adult or their family withdraw consent for an image to be shared, it may not be possible to delete images that have already been shared or published
- never publishing personal information about individual children/vulnerable adults and disguising any identifying information (for example the name of their school/school uniform with a logo or service center)
- reducing the risk of images being copied and used inappropriately by:
 - ➔ only using images of children/adults at risk in appropriate clothing (including safety wear if necessary)



- avoiding full face and body shots of children/adults at risk taking part in activities such as swimming where there may be a heightened risk of images being misused
- using images that positively reflect person's involvement in the activity.
- provide a clear brief for photographers about what is considered appropriate in terms of behaviour.



Safeguarding Awareness and Training

Raising awareness and providing appropriate training are crucial for improving safeguarding practices. It is essential that all sisters and associated persons are aware of the safeguarding standards and their obligations to implement them.

All Sisters and staff, volunteers should be offered training in Safeguarding to maintain high standards and good practice.

- All those responsible for the drawing up, implementation and monitoring of Safeguarding Policies should ensure that all personnel, Sisters and associated persons, are inducted into Safeguarding Policies and procedures when they begin work within an institution or ministry.
- Everyone who comes into contact with children/vulnerable adults has a role to play in their protection. To carry out this role confidently and effectively they need to have the necessary skills and knowledge to keep all safe.
- All personnel should be provided the opportunity to regularly update their skills and knowledge.
- Additional training is provided to those who have responsibility in such areas as recruiting and selecting staff, dealing with complaints, disciplinary processes, managing risk, acting as the Safeguarding Officer/s in the Region or as the Local Safeguarding Contact Person in a specific institution. Training in Safeguarding should be part of all initial Formation Programmes throughout the Congregation.

The following initiatives are in place to ensure that all sisters and associated persons are equipped with the necessary knowledge and skills to implement the safeguarding policy:

- ✓ The Congregation's induction programme covers the safeguarding policy and procedures.
- ✓ A training workshop will provide information on the relevance and impact of the safeguarding policy and the accompanying guidance documents.
- ✓ Those with special roles and responsibilities in safeguarding will receive specialised training.
- ✓ All relevant documentation for the Safeguarding Policy and Procedures, accompanying forms and tools will be accessible on the Congregation's website: www.mshr.org.

The Safeguarding Program will include:

- raising awareness of the need for the safeguarding of children /vulnerable adults
- raising awareness of the fundamental rights of children/vulnerable adults
- UN Convention on the Rights of the Child.
- Civil Law of the Country in relation to Safeguarding of children
- Canon Law in relation to the Safeguarding of Children.
- Encouraging co-responsibility and commitment in the implementation of policies, guidelines, and procedures.
- Cultural Issues including appropriate touch



Communicating the Safeguarding Message

Communication materials about the Safeguarding Policy, such as posters, will contain the following information:

the policy statement (see Appendix 6);

how to make a complaint about abuse, exploitation and/or harassment.

Safeguarding material will be available in a language appropriate to the country in which this policy applies.

All relevant documentation for the Safeguarding Policy, accompanying forms and tools will be accessible on the Congregation's website: www.mshr.org

STANDARD 2

RESPONDING TO CONCERNS, SUSPICIONS AND ALLEGATIONS OF ABUSE



What is this Standard?

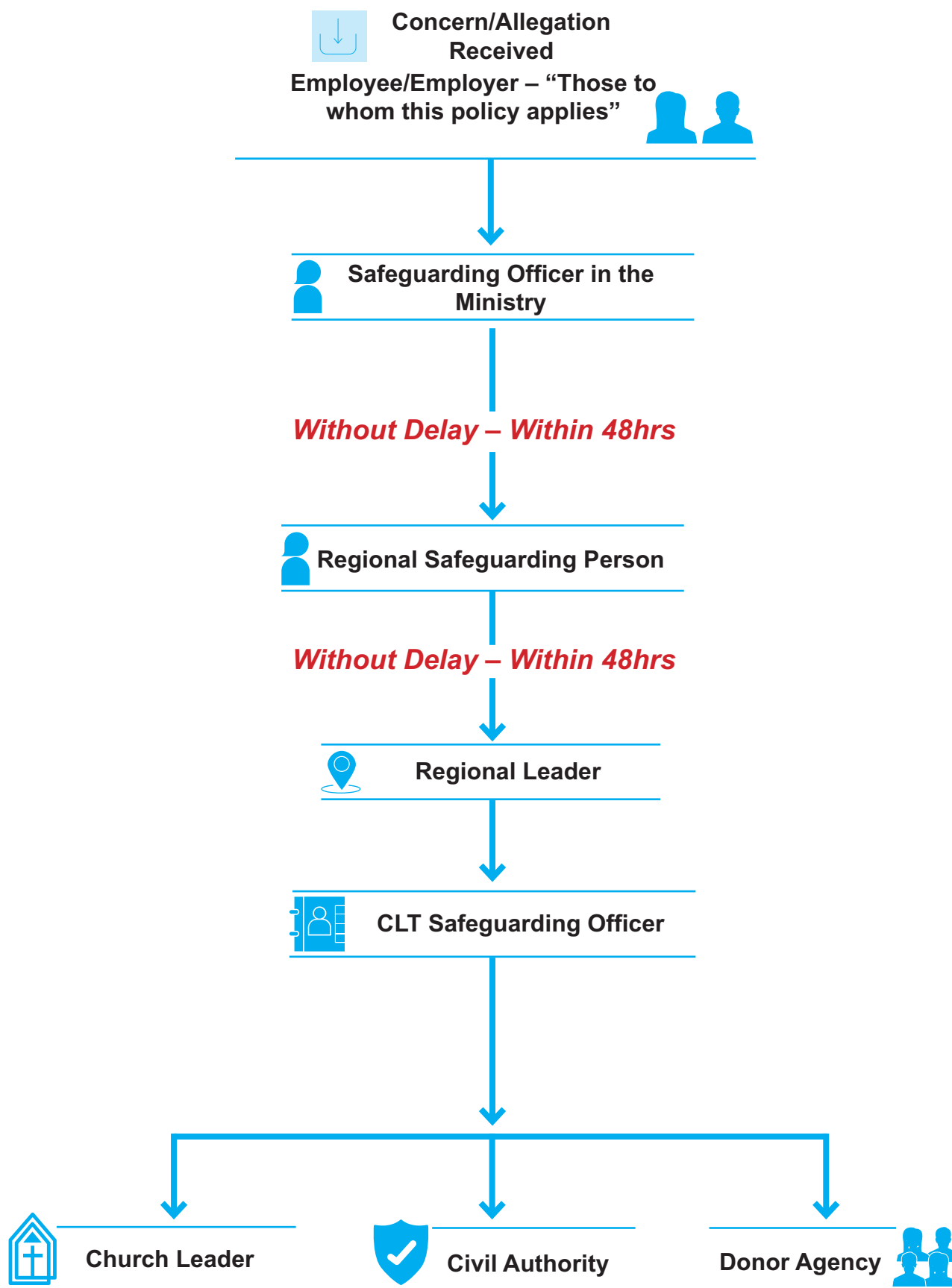
Responding to allegations of abuse; adherence to Civil and Canon Law; caring for complainants and victims; and ensuring a just process of inquiry.

Criteria for the successful implementation of Standard 2

- ✓ There are clear procedures in place that provide step-by-step guidance on what action to take if allegations are received relating to the safety or welfare of a child or vulnerable adult.
- ✓ The procedures are available to everyone (including children, vulnerable adults, parents/ guardians/carers). Consideration is given to making sure that the information provided is easily understandable.
- ✓ The procedures are consistent with the Guiding Principles (Gospel Values, Canon Law, Civil Law and International Law) and best practice in the protection of children and vulnerable adults. They also take account of issues that arise because of different local contexts.
- ✓ There is a process for recording allegations and referrals, as well as systems to ensure this confidential information is securely stored.
- ✓ There is guidance on confidentiality and information sharing.
- ✓ Support is available for victims/complainants, respondents, sisters, employees and volunteers which may include the offer of the accompaniment of a support person during and following an incident or allegation of abuse or a complaint. The Congregation may need to refer people to relevant specialist services.
- ✓ The rights under civil and canon law of a respondent will be upheld. A presumption of innocence will be maintained unless evidence of guilt is clear. All respondents will be offered pastoral and legal support.



REPORTING FLOWCHART



Procedures for the Implementation of Standard 2

CARING FOR PEOPLE INVOLVED IN A COMPLAINT

MSHR believes it has a duty to ensure advice and support are available to help people to play their part in safeguarding children and vulnerable adults. In the context of MSHR's work in a wide range of Regions, it recognises that parents/carers/children/vulnerable adults need someone to turn to when children and/or vulnerable adults are being abused.

When a Child/Vulnerable Adult discloses abuse, the following guidelines are followed:

- The safety of the child/vulnerable adult should always be paramount. If urgent action is required to protect the child/vulnerable adult, then it may be prior to the reporting procedure e.g. If the child/adult needs urgent medical attention, arrange to get the child/adult to the nearest health facility and inform the medical personnel of your concerns, making them aware that this is a safeguarding and protection issue.
- If applicable, the allegation should be reported to the appropriate civil authorities i.e. police, social services, etc. immediately.
- If an allegation is made against a Sister, an employee, staff or co-worker, inform the immediate leader who then reports to the MSHR Regional Safeguarding Officer/s immediately for further investigation.
- The allegation must be recorded **in writing**. This will include insofar as is possible, the exact words used by the child/adult making the report. Any recorded information must be kept confidential. Sharing of information, which could identify a child/adult or an alleged respondent, should be purely on a "need to know" basis. The Regional Safeguarding Officer needs to sign this report.
- If a child/adult reports abuse to you, be as calm and natural as possible. Do not panic. Remember you have been approached because you are trusted and possibly liked. (Whenever possible a second adult should be present).
- Be aware that the disclosure can be very difficult for the child/adult.
- Listen to what the child/adult has to say. Do not pressurise the child/adult. Allow him or her to disclose at their own pace and in their own words.
- Be careful when asking questions. Avoid asking about intimate details (in the case of abuse of a sexual nature) or suggesting that something else could have happened other than what you have been told. Keep your questions to a minimum so that there is a clear and accurate understanding of what has been said. The child/adult must not be led or ideas suggested to her or him during the questioning. Such questions and suggestions could complicate later investigations.
- Assure the child/adult that you believe him/her. Remember, false disclosures or allegations are not common.
- Do not promise to keep secrets, but that you will inform people who need to know. At the earliest opportunity tell the child/adult that you acknowledge that they have come to you because they trust you and that there are secrets which are not helpful and should not be kept because they make matters worse. Such secrets hide things that need to be known if people are to be helped and protected from further ongoing hurt.
- It is important that the child/adult differentiates in his/her own mind between the person who carried out the abuse and the act of abuse itself. The child/adult, quite possibly, may love or strongly like the alleged respondent while also disliking what was done to him/her.
- It is important to avoid expressing any judgement on, or anger towards, the alleged respondent while talking with the child/adult.

Guidelines contd.

- It is important to avoid expressing any judgement on, or anger towards, the alleged respondent while talking with the child/adult.
- It may be necessary to reassure the child/adult that your feelings towards him or her have not been affected in a negative way because of what was disclosed.
- It might help to let the child/adult know what you are going to do next and that you will let them know what happens.
- Avoid confronting or challenging the alleged person directly. Do not rush in to investigate or inform the parents or guardians of the child.

When an Adult Suspects or Witnesses Abuse of a Child/Adult:

- Every Sister, employee, volunteer working with children/vulnerable adults who suspects that a child/vulnerable adult in MSHR care or community has been abused is obliged to relay their concern to the designated Regional Safeguarding Officer as a matter of urgency.
- Depending on the law in the particular country, it may be necessary for the Regional Safeguarding Officer to report the allegation to the Police, Child Welfare Officer or Health Management Staff.
- Remember that at this stage, any reported or suspected abuse is an allegation until it is proved or disproved.

Self-Reporting and other Possible Abuse Scenarios

1. If a Sister recognizes in herself a weakness, a tendency, or actual inappropriate behaviour and feels guilty, then let her speak to the Regional leadership or to the Congregational delegate and seek appropriate professional help and legal advice, if necessary. Whilst self-reporting may remain confidential, in most instances this cannot be guaranteed where personal difficulties raise concerns about the welfare or safety of children/vulnerable adult.
2. If a Sister in a “vulnerable” position is asked to enter into inappropriate behaviours, let her speak to the Regional Leader.
3. Anyone who hears about an allegation of abuse against a fellow sister is **duty bound** to report this to the leadership. Information should be treated sensitively and in confidence, in order to protect the reputations of all concerned. **To do nothing is not an option!**
4. In all decisions, the welfare of the victim must remain the paramount consideration. **The victim needs a safe environment and the protection of Congregation. The MSHR wish to contribute fully to answer to these needs in appropriate ways. It is important to consider how to approach the family and relatives,** when some behaviour seems inappropriate, and so collaborate in advising both parties.

Guiding Principles in Case of Alleged or Proven Abuse of a Child/Vulnerable Adult by a MSHR

1. **Establishing the truth:** The honest quest for truth and justice is the best response we can provide in case of any abuse of a child or a vulnerable adult by a MSHR. There is the need to establish the facts with a spirit of fairness in every case, to ensure justice to the victim and his/her family, (in case of a proven abuse) and to the Sister accused (in case of allegation/false accusation).
At the level of the Congregation this task will be done by the appointed Regional Safeguarding Officer.
2. **Care for the victim and his/her family:** In the case of a proven abuse, MSHR owes the victim and his/her family our compassion, protection, justice and even restitution.
This role will be carried out by an appropriate qualified support person.
This person will be appointed by the local leadership.
3. **Care of the Implicated Sister:** The alleged, accused or proven guilty Sister remains indeed our Sister. We owe her a fair hearing and the help she may need, considering the feelings of loss, confusion and shame she may undergo in facing such a situation.
All the way, every step should be taken to ensure fairness, truthfulness and compassion. This role will be carried out by an appropriate qualified support person. This person will be appointed by the local or Regional leadership.
4. **A move towards justice:** Abuse of children or vulnerable adults is not just a canonical offence or a breach of a Code of Conduct internal to an institution, whether it be religious or other. It is also a crime prosecuted by civil law. Therefore, we have the duty to cooperate with state authorities in our MSHR response to the abuse of children and vulnerable adults. Although relations with civil authority will differ in various countries, nevertheless, it is important to cooperate with such authorities within their responsibilities.
5. **Need for Integrity in our Ministries:** To give room for investigations and to prevent or at least to limit the repetition of abuse, the Sister accused or proven of abuse of a child or a vulnerable adult should not engage in the kind of ministry that involves children or vulnerable adults regardless of whether she has received professional help or not. In order to ensure that the decision be applicable later, written and signed records need to be kept.

Management and support for person (s) allegedly causing the harm:

MSHR has in place a fair process for investigating and managing safeguarding concerns. When the threshold for reporting has been reached, a system of support and monitoring for the person (s) allegedly causing the harm is provided.

- ➡ MSHR has access to appropriately trained personnel – lay, religious or clergy – whose clearly defined roles are to listen to and represent the pastoral needs of the person allegedly causing the harm. This is done in consultation with the person.
- ➡ MSHR has arrangements in place to inform the person that an allegation has been received about them

If the person allegedly causing the harm is a Sister (non-ordained Religious):

- Initially the Regional Leader will open and suspend by decree the preliminary investigation/ collection of proofs until completion of the statutory/civil investigation into the allegation of abuse.
- MSHR has a procedure (including a risk assessment) for deciding whether an interim management plan needs to be put in place for the sister.
- When the statutory/civil authority investigations and assessments have been completed, MSHR resumes by decree the preliminary investigation/collecting the proofs as provided for in Canon 695 (non-ordained Religious).
- MSHR has suitable arrangements in place for the monitoring of the sister, where there is a case to answer, until (and if) MSHR no longer has responsibility for monitoring the person.

STANDARD 3

IMPLEMENTATION AND MONITORING OF SAFEGUARDING STANDARDS



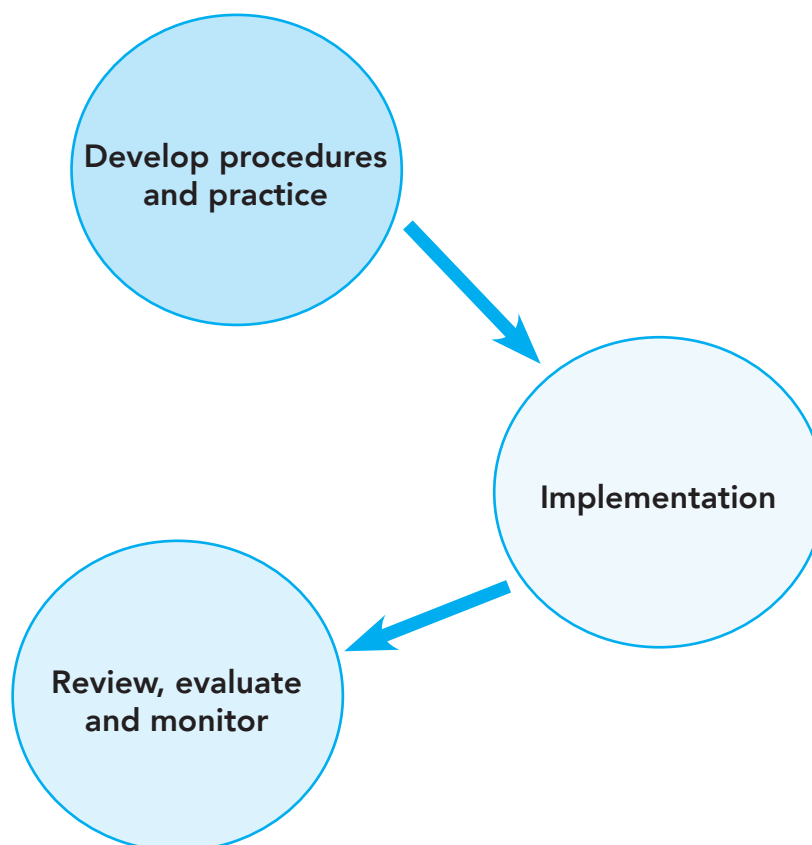


What is this Standard?

Compliance with this policy and the implementation of safeguarding standards will be monitored on an ongoing basis.

The criteria for ensuring the successful implementation of Standard 3 are as follows:

- There is a written plan showing what steps will be taken to keep all parties safe, who is responsible for implementation and when these actions will be completed.
- Human and financial resources necessary for implementing the plan are made available.
- All incidents, allegations of abuse and complaints are responded to in line with this policy.
- Monitoring of compliance with the Safeguarding Policy is carried out on a regular basis by each Regional office.
- An annual audit of compliance with the MSHR Safeguarding Policy is carried out by Regional Leader.
- An external evaluation of compliance and implementation of this Policy will be carried out every three years. The CLT will decide on the manner of this external evaluation.
- After the External Evaluation, Congregational/Regional/ Mission Unit Policies and practices are reviewed. To prepare for this review, wide consultation with parents/ guardians, children, and vulnerable adults will be carried out.





Procedures for Standard 3

(All supporting safeguarding tools and guidance to assist with the implementation of safeguarding practices can be found on www.mshr.org.)

The MSHR will be accountable for this Standard through the following procedures:

- 1** The Safeguarding Officer on the CLT will compile an Annual Report on safeguarding. This Report will be presented to the CLT.
- 2** There will be an annual meeting of safeguarding personnel and leaders – to discuss and share learning on safeguarding.
- 3** CLT, together with the Regional Leadership, will monitor the implementation of this policy during their visitations.
- 4** All will implement these standards in all pastoral activities, where applicable.
- 5** CLT, in collaboration with the MSHR Safeguarding Committee, will approve this Policy and review it every three years, after an external evaluation.





To keep children/vulnerable adults safe, policies, procedures and plans **must** be implemented across the Congregation and in every Region.

Checks must be in place in each Region and at Congregational level to ensure that policies and safe practices are **implemented and monitored**. Implementation and monitoring are essential to putting safeguarding policies and standards into practice.

This may include:

- Regular meeting for all staff members, professional and non-professional
- Conferences/webinars
- On-going training
- Appropriate use of professional agencies
- Reviewing and updating of all policy documents
- Annual report sent to Congregational Leadership Team (CLT).

It is the responsibility of the Regional Leader, Regional Safeguarding Officers, Local Safeguarding Contact Person and Safeguarding Committees to ensure that Safeguarding Policies are implemented and monitored at all levels throughout the Region and in each ministry owned and/or managed by the Missionary Sisters of the Holy Rosary.

A report on implementation and monitoring of Safeguarding Policies and Practices throughout the Region is sent annually to the Congregational Leadership Team (CLT) included in the Annual Regional Report.

Note: *Sisters who are in ministry in areas other than MSHR run or managed ministries should abide by the Safeguarding Policies and procedures of the areas where they minister. If no such policies are in place, such Sisters should, at all times be guided by and act according to the policies and procedures for MSHR Ministries.*

These Policies and Procedures for Safeguarding are to be implemented in every Region of the Congregation of the Missionary Sisters of the Holy Rosary as well as the Generalate. It is the responsibility of each Regional Administration to ensure that the Civil Law of the country in relation to Safeguarding is fully represented in these Policies and Procedures and that all are aware of these laws. Where necessary these Policies and Procedures may be amended to include the requirements of Civil Law.

PREVENTION OF BULLYING POLICY

The Missionary Sisters of the Holy Rosary are committed to working together to maintain an environment free of bullying in all our Communities and Ministries. We value the God-given dignity of every person. Therefore, we treat everyone with respect and compassion. All Sisters and our co-workers, as well as our Religious Communities, have the responsibility to uphold this Anti-Bullying policy outlined below.



WHAT IS BULLYING?

Bullying in the workplace or in the community is the repeated and persistent direct or indirect, verbal, physical, or emotional undermining of an individual's God-given dignity, resulting in psychological pain to the person. Bullying can be conducted by one or more persons against another or others.

Bullying also includes behaviours like verbal utterances, written insults, gestures, jokes, displaying pictures, flags/emblems, graffiti, or other material, which state/imply prejudicial attitudes that are offensive to a person or a group.

Other examples of bullying behaviour include:

- ➔ Insults and name calling
- ➔ Persistent unjustified criticism and sarcasm
- ➔ Public or private humiliation
- ➔ Shouting at staff or a fellow Sister in public and/or private
- ➔ Sneering
- ➔ Instantaneous rage, often over trivial issues
- ➔ Unfair delegation of duties and responsibilities
- ➔ Setting impossible deadlines
- ➔ Unnecessary work interference
- ➔ Making it difficult for staff or Sister to have access to necessary information
- ➔ Aggression
- ➔ Not giving credit for work contribution
- ➔ Continuously refusing reasonable requests without good reason
- ➔ Intimidation and threats in general
- ➔ Carrying rumours
- ➔ Silence/exclusion
- ➔ Projecting blame/guilt trips/tears

An isolated incident of the behaviours described above may be an affront to dignity but as a once off incident, is not considered to be bullying.

Am I acting as a bully, and how do I know this? I am a person who bullies if I persistently and repeatedly act towards someone in any of the following ways:

- ➔ Ridiculing a person
- ➔ Criticising someone or a group unduly e.g. those in Leadership roles, the elderly, the vulnerable
- ➔ Disrespecting lay employees and making unreasonable demands on them, while ignoring the role of the leader
- ➔ Rejecting and isolating a person in my community, workplace, Ministry
- ➔ Misusing my power, particularly if I am in a recognised leadership/managerial role
- ➔ Withholding information, to my own advantage, that should be shared with others

- ➔ Monopolising shared resources
- ➔ Engaging in hurtful and unwanted teasing that is focused on one member of the group who shows that she experiences discomfort with the teasing/jokes
- ➔ Name-calling or rumour mongering
- ➔ Engaging in pervasive resistance by absolute silence when spoken to
- ➔ Invading the private space or affairs of other people
- ➔ Deliberately obstructing important decisions, in spite of having engaged in dialogue
- ➔ Sending offensive emails or text messages
- ➔ Using painful put-downs that hurt others
- ➔ Controlling others by my tears
- ➔ Shouting at those who do not agree with my opinions
- ➔ Making unreasonable demands for funds or other resources
- ➔ Demanding that I have my own way during a decision-making process



PROCEDURE FOR ADDRESSING BULLYING

- ◆ Informal method
- ◆ Formal method

Informal Procedure

It is preferable for all concerned that complaints of bullying are dealt with informally whenever possible. This is likely to produce solutions that are speedy, effective, and minimise embarrassment and the risk of breaching confidentiality.

Thus, in the first instance, a person who believes that they are the subject of bullying should ask the person responsible to stop the offensive behaviour. If the person finds it difficult to approach the alleged perpetrator directly then a person should seek help and advice on a confidential basis from the Local Leader/Regional Leader.

Having consulted with the Local Leader/Regional Leader the complainant may request the assistance of the Local Leader/Regional Leader in raising the issue with the alleged perpetrator(s). In this situation the approach of the Local Leader/Regional Leader should be by way of a confidential, non-confrontational discussion with a view to resolving the issue in an informal low-key manner.

A complainant may decide, for whatever reason, to bypass the informal procedure. Choosing not to use the informal procedure should not reflect negatively on a complainant in the formal procedure.

It is recognised that it may not always be practical to use the informal procedure particularly where the bullying is serious or where the people involved are at different levels in the organisation. In such instances, the employee or Sister should use the formal mechanism set out below.

Formal Procedure

Where formal complaints have been made by an employee, then the employee should contact the local Safeguarding Officer. Where this is not working, the employee should contact the Regional Leader. A sister who has a formal complaint contacts the Regional Leader.

The person making the complaint will be required to put their allegations in writing. In the interests of natural justice, the alleged bully will be notified in writing of the nature of the

complaint, given a copy of the allegation, informed of his/her right to representation and will be given every opportunity to rebut the detailed allegations made.

The complaint should be subject to an initial examination by a member designated by the Local leader/Regional Leader, who can be considered impartial, with a view to determining an appropriate course of action. An appropriate course of action at this stage, e.g., could be exploring a mediated solution or a view that the issue can be resolved informally. Should either of these approaches be deemed inappropriate or inconclusive, a formal investigation of the complaint should take place with a view to determining the facts and the credibility or otherwise of the allegation(s).

Whilst it is desirable to maintain utmost confidentiality, once an investigation of an issue begins, it may be necessary to interview other staff or Community members. If this is so, the importance of confidentiality will be stressed to them. Any statements taken from witnesses will be circulated to the person making the complaint and the person alleged for bullying for their comments before any conclusion is reached in the investigation.

When the investigation has been completed, both parties will be informed as to whether or not the complaint is being upheld.

Both parties should be given the opportunity to comment on the findings, before any action is decided upon by Local Leader/Regional Leader.

All complaints received will be treated seriously, confidentially and dealt with as soon as practicable.

Strict confidentiality and proper discretion will be maintained, as far as is possible, in any necessary consultation to safeguard both parties from innuendo and harmful gossip.

A record of all relevant discussions that take place during the course of the investigation will be maintained by Local leader/Regional Leader.

Both parties will be given an opportunity to comment on the conclusions of the investigation team. Both parties will be given a copy, in writing, of the conclusions reached by the investigating team.

Action Post Investigation

Where a complaint is upheld a disciplinary hearing will take place. The disciplinary action to be taken will be in line with the Region's/Ministry disciplinary policy. Should a case of bullying be proven, then the Region/Ministry would take appropriate disciplinary action up to and including dismissal. Records of any warnings for bullying will remain in the person's file and will be used if any further offences of the same or similar nature occur in the future.

Regular checks will be made by the person investigating the complaint to ensure that the bullying has stopped and that there is no victimisation. Retaliation of any kind against an employee or Sister for complaining or taking part in an investigation concerning bullying is a serious disciplinary offence.

Malicious Complaints

If a complaint is found to be malicious, then the appropriate disciplinary action up to and including dismissal will be imposed.

Further Information

All questions relating to the execution or interpretation of this policy should be referred to the Regional Leader.

SEXUAL HARASSMENT

can be defined as words, gestures, production, display or circulation of materials and conduct towards another person that is sexual in nature, or has a sexual dimension, and is unwelcome to the recipient.

Examples of this type of harassment include:

- ☛ Sexual gestures
- ☛ Displaying sexually suggestive objects, pictures, calendars
- ☛ Sending suggestive and pornographic correspondence including faxes, text messages or e-mails
- ☛ Unwelcome sexual comments and jokes
- ☛ Unwelcome physical conduct such as pinching, unnecessary touching, etc.

Reporting Sexual Harassment

A similar procedure (as in bullying above) is to be followed for reporting sexual harassment. In the case of a Temporary professed Sister, she may choose to share first with her Temporary Professed Directress/Reference Person.

APPENDIX 1:

ROLES AND RESPONSIBILITIES



Congregational Leadership Team (CLT)	
Responsibilities	
➤ Develop and keep updated a comprehensive written Safeguarding Policy that outlines good practice, reinforces international standards of care, and complies with Church and Civil Law. ➤ Ensure congregation-wide dissemination of the policy to all sisters, employees and volunteers as well as to Regions within the congregation. ➤ Appoint and supervise competent personnel with specific responsibilities to implement various facets of this policy. ➤ Define a structure and process for review and accountability throughout the MSHR. This will include effective communication processes and channels between the CLT and all authority levels across the congregation. ➤ Oversee and review that each authority level of the MSHR has competent regional, national, local policies that are made known and implemented. ➤ Obtain legal and other expert consultation for the congregation when required. ➤ Prepare an annual report to be made available to Regions on the status of safeguarding across the congregation. It may include statistics on allegations and resolutions, any significant developments, special situations that have arisen, ongoing training and formation activities, etc. ➤ Contact The Holy See as appropriate. ➤ Where a Canonical Process is undertaken to ensure that it is carried out in accordance with the appropriate Canon Law. ➤ Co-operate, contribute to and assist any investigation being undertaken by civil authorities or by the Safeguarding Officer.	

Congregational Leadership Team Safeguarding Officer	
Responsibilities	
➤ Liaison person for CLT in matters pertaining to Safeguarding. ➤ Liaise with the Regional Leaders and Safeguarding Personnel on the implementation of the safeguarding policy ➤ Will be a member of the Congregation Safeguarding Committee and report to the Congregation Leader and Leadership Team ➤ To receive any allegations from Regional Leaders and to co-ordinate the MSHR response to any Safeguarding issues.	

MSHR Safeguarding Committee	
Responsibilities	
➤ Appointed by the CLT to ensure oversight of the implementation of the safeguarding policy. ➤ Offer advice on a confidential basis collectively and in their respective disciplines, when required. ➤ Will report to the Congregation Leader.	

Regional Leadership Team
Responsibilities
➤ Ensure appropriate safeguarding structures and personnel are in place across the Region. ➤ Ensure there are adequate resources for the development, implementation and monitoring of the safeguarding policy. ➤ Oversee and monitor the implementation of the Safeguarding Policy in one's Region. ➤ Ensure and review local policies on safeguarding as is relevant to the structures within the Region. ➤ Support the Safeguarding Persons in dealing with all concerns and allegations of abuse. ➤ Cooperate with any investigations by the civil authorities. ➤ Inform the Church Authority (to comply with Canon law) and Safeguarding Officer on CLT. ➤ Appoint safeguarding personnel (e.g., Safeguarding Persons, Safeguarding Committees, etc.) to assist the Region in overseeing and implementing this policy and all safeguarding issues within the Region. ➤ Prepare an annual report for CLT on the status of safeguarding in the Region. It may include statistics on allegations and resolutions, the status of local policies and formation, any significant developments, etc. ➤ Oversee effective integration of this policy and its principles within any areas in which the MSHR cares for those who may be at risk due to necessary dependence on others. This would apply to care of aging and/or infirm sisters as well as to younger persons in formation. ➤ Know the requirements of the MSHR Safeguarding Policy. ➤ Develop, disseminate and keep updated (every three years or when necessary) a safeguarding policy in their realm of authority that corresponds to the MSHR and Regional policies and ensures compliance with civil law and local regulations of reporting. ➤ Develop an annual training plan following a training needs analysis for all sisters, staff and volunteers. Training is to include updated pedagogy and practice in all areas of children's rights and human rights. ➤ Ensure there are structures of accountability in place and that evaluations take place of issues related to abuse. ➤ Submit an annual report on the adherence to the Safeguarding Policy within the Region.

Regional Safeguarding Committee <i>Every Region will have a Safeguarding Committee. Their role is primarily to support the Regional Safeguarding Officer in creating, maintaining and monitoring safe practices related to children/ vulnerable adults at every level within the Region.</i>
Responsibilities
➤ Appointed by the Regional Leader to ensure oversight of the implementation of the safeguarding policy. ➤ The committee will consist of the Regional Safeguarding Person/s, the Regional Safeguarding Officer and external experts. ➤ The committee will report to the Regional Leader.

Regional Safeguarding Officer/s

Every Region of the Congregation will have a Safeguarding Officer/s. The person should be widely identified so that everyone knows who to go to with concerns about the safety of a child/vulnerable adults. The role of the Safeguarding Officer should also be widely circulated. There should be no ambiguity between the role of the Local Safeguarding Contact Persons and the Regional Safeguarding Officer.

Responsibilities

- Assist and direct the implementation of the Safeguarding Policy, including awareness raising and training on safeguarding within the Region.
- Act as a resource person for the Region providing support and guidance in matters related to safeguarding of children/vulnerable adults.
- Support the Local Safeguarding Contact Person/s in implementing the safeguarding policy and procedures.
- Receive all reports of concerns and/or allegations of abuse and report these to the Regional Leader and, where applicable, to the civil authorities. Take responsibility for managing the response to that concern, disclosure or allegation from start to finish. This would include:
 - the preliminary internal inquiry
 - referral to civil authorities
 - any subsequent internal investigations
- Develop an annual training plan following a training needs analysis for all sisters, staff and volunteers. Training is to include updated pedagogy and practice in all areas of children's and human rights.
- To conduct an annual audit of safeguarding practices within the Region and to prepare the safeguarding annual report.
- Cooperate with any investigations by the civil authorities.

Local Safeguarding Contact Person/s

Each institution (school, hospital/clinic, projects, etc.) involved in working with children/vulnerable adults will have a Safeguarding Contact Person. The position is voluntary, but the designated person will be provided with appropriate induction, support and training. The role will normally be assumed by an existing member of staff, either a Sister or a lay member of staff.

Responsibilities

- To promote the safeguarding of children/vulnerable adults by raising awareness of what "safeguarding" is.
- To disseminate information on safeguarding children/vulnerable adults.
- To ensure that any activities run by or within the institution are done in a manner which ensures the safety and well-being of the children/vulnerable adults involved.
- To keep the issue of safeguarding children/vulnerable adults high on the agenda of the institution /community.
- To report concerns or allegations of abuse that are brought to her/him to the immediate leader or the Regional Safeguarding Officer.
- To know and follow all procedures that are detailed in this document related to concerns, allegations, and disclosures of abuse.
- The Local Safeguarding Contact Person must not act as an Advisor or a Support Person to either the person bringing the allegation or the person against whom the allegation is made. Neither must she/he investigate the matter. The responsibility for this resides with the Regional Safeguarding Officer.

APPENDIX 2:

CODE OF CONDUCT

The Codes below provide clear guidelines that protect the rights and dignity of children and vulnerable adults so that every interaction will be characterised by transparency, safety and respect of all involved.

Conduct for Sisters and Associated Persons



Sisters and associated persons who have contact with children and vulnerable adults must:

- treat children/vulnerable adults with dignity and respect;
- speak to children/vulnerable adults in a way that conveys respect for their dignity;
- plan and organise events in a manner which reduces risk of harm or abuse;
- ensure the rights and responsibilities of children/vulnerable adults are adhered to;
- treat all children and vulnerable adults fairly;
- provide an example of good conduct;
- be visible to others when working with children and vulnerable adults;
- challenge and report potentially abusive behaviour;
- foster a culture where children and vulnerable adults can talk about their discomforts openly;
- respect each child and vulnerable adult'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 sense there is a problem;
- respect and listen to the opinions of children and vulnerable adults;
- be positive and approachable;
- maintain confidentiality about sensitive information;
- encourage an anti-discriminatory approach;
- identify and address the needs of challenged children/vulnerable adults;
- operate within MSHR principles and procedure outlined in this policy;
- ensure the safety of all children and vulnerable adults by using safe methods at all times;
- maintain professional relationship with minor/vulnerable adult;
- foster a culture of transparency and mutual accountability;
- record and report incidents of alleged abuse and poor practice to the designated person;
- as far as possible, not to be alone with child/vulnerable adult.



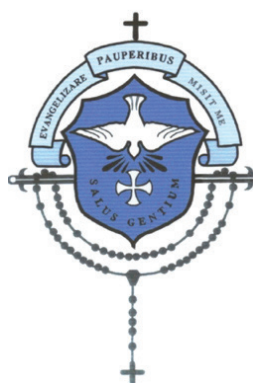
Sisters and associated persons who have contact with children and vulnerable adults must never:

- hit, physically punish, assault or physically abuse children/vulnerable adults;
- develop sexual relationship with children/vulnerable adults;
- develop relationship with children/vulnerable adults which could in anyway be deemed exclusive, exploitative or abusive;
- act in ways that may place a child/vulnerable adult at risk of abuse;
- allow any rough or dangerous play;
- allow bullying or permit abusive peer activities;
- use sanctions that humiliate or shame a child/vulnerable adult;
- condone rule violations;
- spend excessive time alone with a child/vulnerable adult away from others;
- take children or vulnerable adults to their home, especially where they will be alone with you;
- use language, suggestion or advice that is inappropriate, offensive or abusive;
- behave physically in a manner which is sexually provocative;
- sleep in the same room or bed as child/vulnerable adult with whom they are working;
- do things of a personal nature for a child/vulnerable adult that they can do for themselves;
- condone, or participate in behaviour which is illegal, unsafe or abusive;
- tell jokes of a sexual nature in the presence of children/vulnerable adults.

Breaches of the Code of Conduct

If a sister or an associated person, has a concern about the practice of a colleague which may constitute a breach of the “Code of Conduct”, this should be reported to the ministry safeguarding contact person. The safeguarding contact person would then report to the Regional Safeguarding Officer who takes on the investigation. This would be the case, for example, if the concern related to poor practice rather than abusive behaviour. Abusive behaviour would be reported using the procedure for responding to allegations of abuse.

Breach or non-compliance of the code of conduct, may result in sanctions.



COMMITMENT FORM

Missionary Sisters of the Holy Rosary

I confirm that I have read and understood the code of conduct and I agree to abide by the safeguarding policies and procedures of the MSHR/Region.

I also authorize the verification of the information provided on this form and the appropriate and necessary sharing of this information.

I confirm that I have read and fully understand the following:

- Please tick:
- Local Safeguarding Policy ☐
 - Code of Behaviour ☐
 - MSHR Safeguarding Policy ☐

I agree to accept, abide by and apply the above Safeguarding Policy and Code of Behaviour in their entirety.

Signed: _____

Role: _____

Printed name: _____

Date: _____

Example of a Code of Conduct for Children/Vulnerable Adults (It would be important that this is done in consultation with the children and vulnerable adults)

- Treat all fellow children/vulnerable adults with respect, and do not bully them.
- Be fair and do not tell lies about other children or adults.
- Abide by the rules as set out in your school, catechism classes, etc.
- Respect your school, church premises and promote good behaviour.
- Do not spread rumours.
- Do not harm other children or damage property.
- Do not keep unnecessary secrets, especially if they have caused or could cause harm.
- Do not use violence in dealing with others.
- Never cheat or steal.
- Talk to the person in charge if you have a problem of any kind.
- Do not use or bring dangerous substances or instruments to the Church, school, hospital or wherever you may be.
- Do not engage in sexual activity with a fellow child or vulnerable adult.

Best Practice: Persons with Special Needs

- Children and vulnerable adults with special needs or disabilities may depend more on adults for their safety and care than other children/adults. For this reason, sensitivity and clear communication are particularly important.
- Where it is necessary to carry out tasks of a personal nature for a child/adult with special needs, this should be done with the consent of parents or guardians and with the utmost discretion.
- Be aware that vulnerable children and adults may be more likely than other children/adults to be bullied or subjected to other forms of abuse, and they may be less clear about physical and emotional boundaries.
- It is particularly important that children/adults with special needs and all vulnerable persons be carefully listened to because they may have difficulty expressing their concerns. On no account must what they have to say be underestimated or dismissed in any way.

It is essential that all in our care be familiar with these policies and guidelines. It is expected that they will be willing to respect and abide by them.

The Responsibility of Parents/Guardians/Carers

- The MSHR will take very seriously its responsibilities and obligations with regard to ensuring, to the greatest possible extent, the safety and security of the children and vulnerable in their care. The same expectation applies to the parents and guardians of the children/carers of vulnerable adults. Succeeding in this goal, therefore, requires the partnership and cooperation of parents and guardians.
- On no account must parents/guardians abandon their child be it in the school, hospital, church or other settings without providing the adequate care and attention they need.
- Parents must instruct and educate their children at home on issues related to safety.

APPENDIX 3:

TYPES OF ABUSE

Type of Abuse	Child	Vulnerable Adult
Emotional	Is normally to be found in the relationship between a parent/carer and a child rather than in a specific event or pattern of events. It occurs when a child's developmental need for affection, approval, consistency, and security are not met.	Includes emotional abuse, threats of abuse or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks.
Neglect	Can be defined in terms of an omission, where the child suffers significant abuse or impairment of development by being deprived of food, clothing, warmth, hygiene, intellectual stimulation, supervision and safety, attachment to and affection from adults, and the failure to access appropriate medical care or treatment.	Neglect and acts of omission include ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services and/or the withholding of the necessities of life such as medication, adequate nutrition and heating.
Physical	Is actual or likely physical injury to a child such as hitting, kicking or shaking, throwing, burning, scalding, or otherwise causing physical abuse to a child. Physical abuse, as well as being a result of an act, can also be caused through omission or the failure to act to protect.	Includes hitting, slapping, pushing, kicking, misuse of medication, restraint or inappropriate sanctions.
Sexual	Occurs when an individual uses a child for his or her gratification or sexual arousal, or for that of others. May include contact and non-contact sexual offending.	Includes rape and sexual assault, or sexual acts to which the person/s in vulnerable situation/s has not consented, or could not consent, or into which he or she was compelled to consent.
Institutional	Abuse may occur within residential care and acute settings and any other in-patient settings, and may involve poor standards of care, rigid routines and inadequate responses to complex needs	Abuse may occur within residential care and acute settings including care homes, acute hospitals and any other in-patient settings, and may involve poor standards of care, rigid routines and inadequate responses to complex needs.
Discriminatory	Discriminatory abuse is the unequal treatment of a person based on age, disability, gender and gender reassignment, marriage, pregnancy, race, religion and belief, sex or sexual orientation.	Discriminatory abuse is the unequal treatment of a person based on age, disability, gender and gender reassignment, marriage and civil partnership, pregnancy, race, religion and belief, sex or sexual orientation.

Type of Abuse	Child	Vulnerable Adult
Online	Online abuse is any type of abuse that happens on the internet, whether through social networks, playing online games or using mobile phones. Children and young people may experience cyberbullying, grooming, sexual abuse, sexual exploitation, and/or physical or emotional abuse.	Online abuse is any type of abuse that happens on the internet, whether through social networks, playing online games or using mobile phones.
Bullying	Bullying can be defined as repeated aggression – whether it is verbal, psychological or physical – that is conducted by an individual or group against others.	
Sexual Harassment	Affects personnel (associated persons) and is defined as any unwelcome conduct of a sexual nature that might reasonably be expected or be perceived to cause offense or humiliation. Sexual harassment may occur in the workplace or in connection with work.	
Spiritual Abuse	Means abuse of a person that invokes a person's religious beliefs and faith to perpetrate harm. Spiritual abuse can occur as a secondary experience of abuse when abuse is perpetrated by someone in a position of spiritual authority and trust within the Church and can negatively impact a person's spirituality. Spiritual Abuse is defined as an abuse of power, often done in the name of God.	
Abuse of Power	Means the abuse of position, function or duty to take advantage of another. This can take many forms and include situations where a person has power over another person by virtue of their relationship (e.g. employer and employee, teacher and student, coach and athlete, parent or guardian and child, clergy/ religious and parishioner) and uses that power to their advantage.	
Trafficking	Often referred to as human trafficking, is the illegal act of recruiting, transporting, transferring, harbouring, or receiving individuals through force, coercion, fraud, or exploitation. The primary purpose of trafficking is to use people for forced labour, sexual exploitation, or other forms of involuntary servitude.	

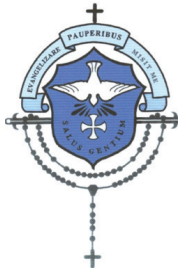
APPENDIX 4:

REPORTING FORM

This form should be completed when someone becomes aware of an incident, complaint or concern regarding the abuse or exploitation of a child/adult who is participating or benefiting from a congregational programme/project/ministry or in the event of an alleged breach of our Safeguarding Policy or Code of Conduct.

The completed form should be given to the Local Safeguarding Contact Persons or Regional Safeguarding Officer.

Please only complete the details that are known to you at the time of receiving or becoming aware of the incident, complaint or concern. If forwarding by email, please ensure that the document is password protected and the receiver is advised of the password by means other than email e.g., phone, WhatsApp, text.



REPORTING FORM MISSIONARY SISTERS OF THE HOLY ROSARY

ABOUT THE DISCLOSURE/CONCERN

Date of disclosure/concern: D M Y Time of disclosure/concern:

How was the information received? (Attach any written information to this form)

Please circle: Letter Email In Person

DETAILS OF PERSON MAKING DISCLOSURE/RAISING CONCERN

Name (please print): _____

Address: _____

Tel: _____ Mobile No: _____

If not person to whom concern relates, does the person reporting know the person and how?

DETAILS OF CHILD / ADULT TO WHOM THE CONCERN RELATES TO

Name (please print): _____ DOB: D M Y

Address: _____

Gender: _____ Ethnic Origin: _____ School: (if applicable) _____

Language (is interpreter/signer needed?): _____ Yes ☐ No ☐

DETAILS OF PARENT/ CARER (WHERE APPROPRIATE OR KNOWN)

Name (please print): _____

Address (if different from above): _____

Tel: _____ Mobile No: _____

Are they aware of the allegation, suspicion, or complaint? Yes ☐ No ☐

DETAILS OF ALLEGED RESPONDENT (PERPETRATOR/ SUBJECT OF THE COMPLAINT)

Name: _____ Occupation: _____

Address: _____

Relationship to child or adult (if applicable): _____

DETAILS OF CONCERN, ALLEGATION OR COMPLAINT

(Include dates/times, location of incident(s) occurred, witnesses if known. Include complainant's words where possible. Does the child or adult know this concern is being raised?)

NAME OF PERSON COMPLETING THIS FORM:

Print Name: _____

Signature: _____

Mobile No: _____

Email: _____

Date: _____

NAME OF SAFEGUARDING CONTACT PERSON/REGIONAL SAFEGUARDING OFFICER WHO RECEIVED THIS FORM:

Print Name: _____

Signature: _____

Mobile No: _____

Email: _____

Date: _____

Has the Regional Leader been informed? Yes ☐ No ☐ Is this programme/project/ministry funded by donors? Yes ☐ No ☐

APPENDIX 5:

LIST OF RELEVANT AND RELATED DOCUMENTS & INFORMATION ON INTERNATIONAL AND CANON LAW



Missionary Sisters of the Holy Rosary

- ◆ Constitutions of MSHR
- ◆ Congregational Data Protection Policy, 2025
- ◆ Whistleblowing Policy
- ◆ Risk Policy & Risk Register

Others:

- ◆ The Code of Canon Law especially *Book II (CIC 1983)* and the *Revised Book VI (promulgated 8 December 2021)*
- ◆ Universal Guidelines Framework, Tutela Minorum, Pontifical Commission for the Protection of Minors (March 2024)
- ◆ Ethiopian Catholic Church Child Nurturing and Protection Policy (2018)
- ◆ Child Protection Policy for the Catholic church in Ghana (2018)
- ◆ Safeguarding Children, Policy and Procedures, Kenya Conference of Catholic Bishops (2014)
- ◆ Catholic Bishops' Conference of Liberia (CABICOL) guidelines on Child Protection and Sexual Abuse (2023)
- ◆ Draft Policy on Safeguarding Minors & Vulnerable Persons, Nigeria, (2023)
- ◆ The Child & Vulnerable Adults Safeguarding Policy, ECM, Malawi (2023)
- ◆ Safeguarding Our Children, The Southern Africa Catholic Bishops Conference (2021)
- ◆ The ZCCB Child Protection Policy, Zambia (2017)
- ◆ Charter for the Protection of Children and Young People (USA,2002)
- ◆ A Safe and Welcoming Church – Child Safeguarding Policy and Standards for the Catholic Church in Ireland, 2024
- ◆ National Safeguarding Policy, Catholic Safeguarding Standards Agency, England & Wales (2023)
- ◆ Pastoral Care for Victims of Sexual Abuse, National Conference of Bishops, Brazil (2019)
- ◆ The Dóchas Guide to Ethical Communications (Ireland, 2023)

International Law

- ◆ United Nations Convention on the Rights of the Child (UNCRC), 1989
- ◆ African Charter on the Rights and Welfare of the Child, 1990
- ◆ UN Convention on the Rights of Persons with Disabilities (UNCRPD), 2006
- ◆ The Universal Declaration of Human Rights (UDHR), 1948
- ◆ The UN Guiding Principles on Business and Human Rights, 2011
- ◆ European Convention on the Exercise of Children's Rights, 1996

The UNCRC (1989) is ratified in 196 states (except the United States, which has signed the Convention but is yet to ratify it). The four general principles of the UNCRC are:

- Survival and development;
- Non-discrimination;
- Child participation and the right to be heard;
- Best interests of the child.

Of the 54 articles contained within the UNCRC, the most relevant statements are detailed below:

- Article 2** Children have the right to protection against discrimination.
- Article 3** All adults should always do what is best for a child.
- Article 6** Children have the right to survive and develop.
- Article 12** Children have the right to an opinion and for it to be listened to and taken seriously.

- Article 19** Children have the right to be protected from being hurt or badly treated.
Article 34 Children have the right to be protected from all forms of sexual exploitation and sexual abuse.

Where children are the main participants of activities ‘those to whom this policy applies’ should discuss the specific child safeguarding provisions that need to be put in place. These provisions should be rights-based, considering the provisions of the UNCRC and rights enshrined in national legislation.

The Universal Declaration of Human Rights (UDHR) is a milestone document in the history of human rights. The Declaration was proclaimed by the United Nations General Assembly in Paris on December 10, 1948. It sets out, for the first time, fundamental human rights to be universally respected and protected, in particular:

- Article 3** Everyone has the right to live, to be free, and to feel safe.

This policy outlines procedures to prevent and respond to potential incidents of exploitation and abuse of children and adults at risk and fulfills our commitment to a “do no harm” approach. Do no harm refers to an organization’s responsibility to take all measures to prevent harm and to mitigate the harm it may inadvertently cause because of its communities, ministries and organizational activities.

Canon Law

Canon Law: In the Catholic Church, Canon Law is the system of laws and legal principles made and enforced by the Church’s hierarchical authorities to regulate its internal organisation and government, and to order and direct the activities of Catholics toward the mission of the Church.

Collecting the proofs: As defined in *Canon 695 §2* – part of the process of dismissal is to gather facts, on the imputability of the offence.

Delict: A crime in Canon Law; an external violation of a law or precept gravely imputable by reason of malice or negligence (cf. *can. 1321 §2*).

Preliminary investigation: This is a canonical term, which refers to the process by which a Church Authority determines whether an alleged delict, which has reached the threshold of a semblance of truth, is not manifestly false or frivolous and remains a case to answer, by investigation about the facts, circumstances and imputability of the alleged delict. (cf. *can. 1717 §1*).

SST: *Sacramentorum Sanctitatis Tutela* defines the Church’s grave delicts or crimes against the faith and sacraments for which the Dicastery of the Doctrine of the Faith has exclusive authority for prosecution and judgement.

VELM: *Vos Estis Lux Mundi* is a motu proprio first issued in May 2019 by Pope Francis *ad experimentum* and, which has since March 2023, been confirmed by Pope Francis as a stable document for safeguarding procedures. It established new procedural norms to combat sexual abuse and ensure that Bishops and their equivalents are held accountable for their actions.

The Code of Canon Law: especially *Book II (CIC 1983)* and the *Revised Book VI (promulgated 8 December 2021)* concerning sanctions in the Church. *Can. 1390* on the offences against human dignity and liberty states:

§ 1. A cleric is to be punished with deprivation of office and with other just penalties, not excluding,

where the case calls for it, dismissal from the clerical state, if he:

1° commits an offence against the sixth commandment of the Decalogue with a minor or with a person who habitually has an imperfect use of reason or with one to whom the law recognises equal protection;

2° grooms or induces a minor or a person who habitually has an imperfect use of reason or one to whom the law recognises equal protection to expose himself or herself pornographically or to take part in pornographic exhibitions, whether real or simulated;

3° immorally acquires, retains, exhibits or distributes, in whatever manner and by whatever technology, pornographic images of minors or of persons who habitually have an imperfect use of reason.

§ 2. A member of an Institute of Consecrated Life or of a Society of Apostolic Life, or any one of the faithful who enjoys a dignity or performs an office or function in the Church, who commits an offence mentioned in § 1 or in can. 1395 § 3 is to be punished according to the provision of can. 1336 §§ 2-4, with the addition of other penalties according to the gravity of the offence.

The Church's penal process is found in Can. 1717-1731 of the Code of Canon Law.

The ***Motu Proprio Sacramentorum Sanctitatis Tutela (2001)***, (current version 2021), promulgated the ***Normae de Gravioribus Delictis*** and grants the Dicastery for the Doctrine of Faith the exclusive competence to treat cases of the most grave delicts including the sexual abuse (which includes pedopornography) of a minor under the age of eighteen or with a person who habitually has an imperfect use of reason by a cleric (cf. SST art. 6, nn. 1-2)

The Motu Proprio Vos estis Lux Mundi (March 2023), which confirms the previous VELM (2019), issued *ad experimentum*, indicates that the first responsibility for the implementation of the norms of safeguarding falls on ecclesiastical authorities (that is bishops and superiors) and encourages co-operation with civil authority especially in reporting of abuse to civil authorities when required by Civil Law (VELM, art. 20).

The Normae de Gravioribus Delictis (2021), provides in article 10, for the manner of acting when a delict is alleged to have been committed. It states:

§1 Whenever the Ordinary or Hierarch receives a report of a more grave delict, which has at least the semblance of truth, and after having completed the preliminary investigation according to the norm of can. 1717 CIC and can. 1468 CCEO, he is to communicate the matter to the Congregation for the Doctrine of the Faith which, unless it calls the case to itself due to particular circumstances, will direct the Ordinary or Hierarch how to proceed further.

§2 The Ordinary or Hierarch may impose, from the beginning of the preliminary investigation, those measures which are established in can. 1722 CIC or in can. 1473 CCEO.

§3 If a case is referred directly to the Congregation without a preliminary investigation having been undertaken, the initial steps of the process, which fall by common law to the Ordinary or Hierarch, may be carried out by the Congregation itself, which will provide for those matters either directly or through its Delegate.

Vademecum on certain points of procedure in treating cases of sexual abuse of minors committed by clerics (June 2022).

APPENDIX 6:

SAFEGUARDING STATEMENT / POSTER



Safeguarding Policy Statement

Missionary Sisters of the Holy Rosary

We, the Missionary Sisters of the Holy Rosary (hereafter MSHR), value and encourage the participation of children and vulnerable adults in activities in our different ministries/ communities that enhance their spiritual, physical, emotional and social development. We recognise the dignity and rights of all children and vulnerable adults and are committed to their protection and support. We envision a way of living that celebrates the connectedness of all God's creation in an inclusive world where the dignity and diversity of all life is honoured and protected. Our Congregation undertakes to do all in its power to create a safe environment for all and to ensure their protection from neglect, physical, emotional and sexual abuse.

If you have a Safeguarding concern, please contact:

Name: _____



Telephone Number: _____



Email address: _____

Alternatively, you can report your concern directly to the Civil Authority.



Safeguarding Policy Statement

Missionary Sisters of the Holy Rosary

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If you have a Safeguarding concern, please contact:

Name: *Sr. Ruth Chetambe*



Telephone Number: +353 89 961 2288



Email address: *cltdevelopment@mshr.org*

Alternatively, you can report your concern directly to the Civil Authority.



MISSIONARY SISTERS OF THE HOLY ROSARY

Generalate House, Keadue Lane, Cavan, H12 YX53

Charity Number: 3628

www.mshr.org