

CONGREGATION OF CHRISTIAN BROTHERS

AFRICA PROVINCE



POLICY FOR SAFEGUARDING OF VULNERABLE PERSONS

Policy and Procedures

Revised 2020

This document has been approved by the Africa Province Leadership Team as its official Safeguarding policy. It is based on *Safeguarding Children*, the official publication of the National Board for Safeguarding Children in the Catholic Church, Ireland (September 2008).

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FOUNDATIONS FOR THIS POLICY

This document constitutes the written policy on Safeguarding Vulnerable Persons within the ministries and communities under the jurisdiction of the Christian Brothers in Africa. In developing and implementing this policy, the Africa Province is guided by the following:

1. The Gospel

Children have a key place in the heart of Jesus who said: *'Whoever does not receive the kingdom of God like a child shall not enter it'* (Luke 18:17). This places a sacred obligation on all our Ministries to ensure that all vulnerable persons as defined by this policy are welcomed, cherished and protected in a manner consistent with their central place in the life of the community.

2. International and National Law

The United Nations Convention on the Rights of the Child (UNCRC) outlines the fundamental rights to be implemented in national law by signatories to the convention. Full realisation of these rights will ensure that children will be *'brought up in a spirit of peace, dignity, tolerance, freedom, equality and solidarity'* (Preamble to the United Nations Convention on the Rights of the Child, 1989):

States, Parties [and other organizations responsible for the care, development and wellbeing of children] shall take all appropriate legislative, administrative, social and educational measures to protect the child from all forms of physical or mental violence, injury or abuse, neglect or negligent treatment, maltreatment or exploitation, including sexual abuse, while in the care of parent(s), legal guardian(s) or any other person who has the care of the child (Article 19 United Nations Convention on the Rights of the Child).

This Convention has world-wide recognition and support and is the foundation of the rights of all children. We confirm our commitment to upholding these rights for all children.

The African Charter on the Rights and Welfare of the Child further underpins the importance of the safety and security of the child:

States, Parties to the present Charter shall take specific legislative, administrative, social and educational measures to protect the child from all forms of torture, inhuman or degrading treatment and especially physical or mental injury or abuse, neglect or maltreatment including sexual abuse. Protective measures under this Article shall include effective procedures for the establishment of special monitoring units to provide necessary support for the child and for those who have the care of the child, as well as other forms of prevention and for identification, reporting, referral, investigation, treatment, and follow-up of instances of child abuse and neglect. The African Charter on the Rights and Welfare of the Child (1990), Article 16.

3. The Catholic Church

As stated by Pope Francis: *The crimes of sexual abuse offend Our Lord, cause physical, psychological and spiritual damage to the victims and harm the community of the faithful. In order that these phenomena, in all their forms, never happen again, a continuous and profound conversion of hearts is needed, attested by concrete and effective actions that involve everyone in the Church, so that personal sanctity and moral commitment can contribute to promoting the full credibility of the Gospel message and the effectiveness of the Church's mission. This becomes possible only with the grace of the Holy Spirit poured into our hearts, as we must always keep in mind the words of Jesus: "Apart from me you can do nothing" (Jn 15:5). Even if so much has already been accomplished, we must continue to learn from the bitter lessons of the past, looking with hope towards the future.*

SAFEGUARDING POLICY STATEMENT OF THE AFRICA PROVINCE

The Africa Province of the Christian Brothers is committed to championing the safety and wellbeing of children and other vulnerable persons in all situations, in line with its commitment to the Gospel of Jesus Christ, to the promotion of human rights and to the integral development of society.

The Christian Brothers Africa Province and the ministries and communities under its jurisdiction will vigorously promote awareness of the rights of all persons, especially those who are vulnerable because of age, developmental factors or other reasons. It will promote a culture of respect for these rights and the practice of respectful behaviours in order to reduce the risks of harm to all vulnerable persons and their exploitation.

As part of its safeguarding of vulnerable persons, the Province Leadership Team appoints for each country in which the Province has communities or ministries an In-Country Safeguarding Officer (ISO) to undertake special responsibilities for keeping vulnerable persons safe. He/she is offered time and resources to access specialist advice, support, and information on safeguarding issues. Each ministry site under the control of the Province will appoint an On-Site Safeguarding Officer (OSO).

The Province hereby commits to the implementation of the structures and procedures described in this document and its companion Resource document, in order to actively foster safeguarding of vulnerable persons, and to respond in a timely and responsible way to any reports of possible abuse within its ministries and projects.

This policy supersedes the previous Province policy “Keeping Children Safe”. This policy refers to the safeguarding of all vulnerable persons of whatever age, and so includes the safeguarding of children and others who may be vulnerable for reasons of disability, social status, etc.

This policy should be read in conjunctions with other Province policies regarding the Prevention of Sexual Exploitation, Abuse and Harassment (PSEAH), and Ethical Living (which includes procedures for Dealing with Allegations of Sexual Misconduct Between a Brother and Another Adult).

TYPES OF ABUSE

(For more details cf. **Resource 1**)

PHYSICAL ABUSE

This includes any actions that cause physical harm to vulnerable persons.

It also involves the failure to act to protect vulnerable persons.

EMOTIONAL ABUSE

Involves any persistent emotional ill-treatment of vulnerable persons.

SEXUAL ABUSE

This involves forcing, enticing or accepting the invitation of a vulnerable person to take part in sexual activities.

NEGLECT

Any omission whereby a vulnerable person suffers significant harm or impairment to development.

All these forms of Abuse could also take place in a Cyber Environment.

Every cultural practice needs to conform to the Law of the relevant country, and the rules, regulations and norms of the specific ministry site.

DEFINITIONS

1. **VULNERABLE PERSON** – means an individual in need of special care, support, or protection because of age, disability or risk of abuse. This could be a person who is a child, a student or a vulnerable adult:
 - 1.1 **CHILD** – any person who is under the age of 18.
 - 1.2 **STUDENT** – a student in one of the ministries run by the organization of the Christian Brothers or is part of the Edmund Rice Network. He may be a child (under 18) or over that age. In either case, a student can be vulnerable because of his/her status.
 - 1.3 **VULNERABLE ADULT** – any adult who is vulnerable due to a power imbalance resulting from infirmity, physical or mental disability, or deprivation of personal liberty which, in fact, even occasionally, limits their ability to understand or to resist the offence. For adults who may be vulnerable due to other forms of power imbalance, cf. the Policy on Prevention of Sexual Exploitation and Harassment (PSEAH).
2. **ON-SITE SAFEGUARDING OFFICER (OSO)** – **Resource 2**
The person appointed by the Ministry Leader to be responsible for overseeing Safeguarding at that ministry. Each ministry must have at least one OSO.
3. **IN-COUNTRY SAFEGUARDING OFFICER (ISO)** – **Resource 3**
The person appointed by the Province Leadership Team (PLT) to be responsible for overseeing the implementation of this policy in a particular country.
4. **PROVINCE SAFEGUARDING OFFICER (PSO)**
The PSO is appointed to oversee Safeguarding of Vulnerable Persons within the Africa Province. The PSO should, if possible, be a member of the PLT.
5. **MINISTRY LEADER** – the person duly appointed by the Christian Brothers leadership to lead and direct that ministry. He/she may be known locally as a Principal, Director, etc.
6. **PERSONNEL**
 - 6.1 **STAFF** – All those who are on the pay roll of the ministry
 - 6.2 **VOLUNTEERS** – Any adult who offers free services to the ministry site
 - 6.3 **CONTRACTORS** – Any person who is contracted to the ministry to provide a service for any length of time, but is not directly on the payroll of the ministry site.
7. **RESPONDENT**
The person who has to respond to an allegation, suspicion or charge of abuse against a vulnerable person.
8. **COMPLAINANT**
The person who makes an allegation of abuse or suspected abuse. The complainant may be the victim of the abuse, or a third party.

STANDARD 1: Safeguarding of Vulnerable Persons

Ministry to vulnerable persons is an essential and integral part of the Christian Brothers' mission. As part of the Church community, the Christian Brothers and their colleagues in ministry give support to parents and guardians who have primary responsibility for the safety and well-being of children and vulnerable persons.

A basic responsibility of the PLT is the appointment of a Province Safeguarding Officer (PSO), preferably a member of the PLT, to oversee safeguarding on behalf of the Province (cf. p.10 below). The PLT also appoints suitably trained In-country Safeguarding Officers (ISO), and at least one Deputy ISO in each country, who can act in the event that an ISO cannot deal with a case because of conflict of interest, or he/she is unavailable for some reason.

It is a requirement of the Christian Brothers Africa Province that each ministry site over which the Christian Brothers have direct jurisdiction has a site-specific Policy on Safeguarding of Vulnerable Persons. This should include all the provisions of this Province Policy, with whatever adaptations are necessary for local circumstances. The site policy must also contain the names and contact details of relevant contact people.

Where the provisions of the on-site policies differ from that of the Province Policy, the Province Leadership Team, through the Province Safeguarding Officer (PSO), must be satisfied that the policy is consistent with the Province Policy, and authorize any such variations.

Institutions where the jurisdiction is indirect or where there is no jurisdiction, are encouraged to develop such policies for the sake of the vulnerable persons in it.

As a condition of service, all personnel within each place of ministry must accept that this policy for safeguarding vulnerable persons is binding on them and they will be made aware that everyone has to play a part to ensure the highest standards of safeguarding. No one in a ministry site can abdicate the responsibility to be vigilant and to report any suspicion or concerns about the welfare of a vulnerable person in the manner required by legislation and best practice.

As part of their induction and training, the personnel in all the ministries will be made familiar with the site policy for safeguarding and with the understandings and definitions of abuse outlined in **Resource 1**. This will include the staff member signing a declaration that he/she knows the policy and commits to upholding it. Staff Codes of Conduct will include safeguarding in their provisions.

All staff members, volunteers and contractors or consultants working on site are required to report any breach or suspected breach of the policy to the OSO or the ISO as soon as possible.

In addition to the site policy, at least one copy of this Province Policy, *Safeguarding of Vulnerable Persons*, shall be readily available at each site to all staff, volunteers, contractors, children, other clients and parents and guardians. Each ministry has the responsibility of educating its community about the provisions of its Safeguarding policy and raising awareness among beneficiaries, students, parents and guardians of safeguarding issues.

Each ministry should display on its premises clear and easily accessible information about its policy, including the names and details of the On-site Safeguarding Officer(s) and the In-country Safeguarding Officer (ISO), so that any stakeholder can make a complaint. This might include notices in local language(s) and child-friendly versions of the information.

A process of review of this policy will be conducted **every three years**. This is to allow for monitoring and evaluating the level of implementation of the policy and guidelines and to update the content in line with changes in legislation and growing public sensitivity to the issues.

Each ministry site is required to return a compliance form to the In-Country Safeguarding Officer (ISO) by October 31 each year (**Resource 4**).

STANDARD 2: Responding to Allegations and Concerns

Vulnerable Persons have the right to be listened to and to be heard, and in particular they have the right to a prompt and effective response to allegations and suspicions about their safety and welfare. The Christian Brothers of the Africa Province policy is to report these allegations and suspicions to the appropriate authority, including civil and Church authorities as appropriate, using reporting procedures to meet all legal requirements.

There is a process in place for dealing with complaints about unacceptable behaviour towards vulnerable persons (cf. below, What Happens When Abuse is Reported or Alleged).

In relation to information received, those making allegations or complaints are advised from the beginning that the protection of the vulnerable person is the most important consideration, and that it takes priority over an individual's request for confidentiality.

On the next pages are: an outline of the Structures and the Personnel with special responsibilities in Safeguarding in the Province (**cf. also Resources 2, 3**), as well as a step-by-step summary of the process for dealing with allegations or suspicions of abuse within the ministries of the Africa Province. Complaints may refer to current or historical issues. The same broad process is followed in regard to historical allegations, with appropriate modifications (**cf. Resource 5**).

Each ministry site appoints at least one On-site Safeguarding Officer (OSO). This person is appointed by the Ministry Leader with the approval of the In-Country Safeguarding Officer (ISO). Any OSO should have completed training in safeguarding approved by the Province. The appointment is preceded by an interview with the ISO to ensure the appointee's readiness to accept the role, and his/her familiarity with all dimensions of the role.

The OSO keeps records relating to each case in a secure place, and the ISO keeps a copy of every case file. Informed by relevant professional advice, provision is made to store reports securely, so that confidential information is protected, and relevant legislation is complied with. Once a case is closed, the file is passed to the PSO so it can be kept securely by the Province. Safeguarding files are kept indefinitely.

Similarly, the Province appoints an ISO for each country. This person is appointed by the Province Leader with the approval of the Province Safeguarding Officer (PSO). Any ISO should have completed training in safeguarding approved by the Province. The appointment is preceded by an interview with the PSO to ensure the appointee's readiness to accept the role, and his/her familiarity with all dimensions of the role.

The Province Safeguarding Officer (PSO) is appointed by the Province Leadership Team (PLT). The PSO should have completed training in safeguarding approved by the Province, preferably at an advanced level. The appointment is preceded by an interview with the Province Leader to ensure the appointee's readiness to accept the role, and his/her familiarity with all dimensions of the role.

STRUCTURES AND PERSONNEL

On-site Safeguarding Officer (OSO) – cf. also Resource 2

- Raises awareness with all personnel at the ministry site, including vulnerable persons.
- Works with ministry leadership to create and maintain a safe environment, and to integrate safeguarding into the culture of the ministry.
- Disseminates information on *The Policy for Safeguarding of Vulnerable Persons*, including regular training and updating of staff and beneficiaries.
- Monitors all activities of the local centre for compliance with Safeguarding policies.
- Publicizes contact details of the In-Country Safeguarding Officer (ISO), and local civil and psycho-social support services, including police and sources of legal advice available to complainants (cf. **Resource 9**).
- ***In the event of an incident, the OSO immediately informs the ISO and follows the procedures on the pages below. It should be noted that the role of the OSO is NOT one of investigation.***

In-country Safeguarding Officer (ISO) – cf. also Resource 3

- Raises awareness with the On-site Officers and disseminates information on *The Policy for Safeguarding of Vulnerable Persons*
- Ensures that OSOs in that country are adequately trained for their role, and organizes regular training sessions for OSOs.
- Monitors all ministry sites of that country for compliance with policies and donor guidelines.
- Collates and circulates information about resources in the wider community, e.g. sources of legal advice; child protection organisations; etc.
- ***In the event of an incident: Receives the report of suspected abuse from the OSO and collaborates with the OSO and PSO to implement the steps mentioned on the pages below. The ISO has overall responsibility for managing the case and the case file.***
- ***For further information on the role of the ISO in dealing with a complaint, cf. Resource 3.***

Province Safeguarding Officer (PSO)

- Oversees the implementation of this policy in all parts of the Province.
- Authorizes any variations to the Policy in the on-site policies developed by ministries.
- Coordinates the activities of the In-country Safeguarding Officers who report to him directly.
- Ensures that ISOs have been adequately trained for their role and are provided with regular in-service training.
- ***Collaborates with ISOs in handling complaints and allegations, in accordance with the procedures described below.***
- If a complaint or allegation is received by the PSO, he informs the relevant ISO and/or OSO.
- Monitors compliance with the policy via the annual compliance audit (cf. **Resource 4**).
- Keeps the PLT updated about Safeguarding issues, and about progress in the implementation of this policy. This includes reporting to the PLT each year on the results of the compliance audit and about any concerns arising.

Advisory Panel – cf. also Resource 8

An ad hoc panel of persons independent of the case, with relevant professional expertise (e.g. civil law, canon law, social work, psychology) and knowledge of safeguarding issues, which acts in a supervisory and advisory role in the conduct of investigations.

- Provides advice to the PSO and ISO on the processing of the complaint according to this policy.
- Ensures support is provided to the alleged victim(s) and those making the complaint.
- Judges the need for the respondent to stand aside from his/her position.
- Advises on how to uphold the rights of a respondent.
- Advises on risk assessment in relation to the respondent.
- Ensures the needs of the wider community are served.

WHAT HAPPENS WHEN ABUSE IS REPORTED OR ALLEGED?

Informant/Complainant referred immediately to OSO, **OR** OSO is notified so he/she can speak with the informant/complainant and record the complaint on the form provided (**cf. Resource 6**). **Resource 7** gives behavioural guidelines for the person hearing a complaint, especially if that person is the alleged victim. The OSO should explain to the informant/complainant the procedures for addressing the allegations.

The details should be recorded as soon as possible after speaking with the informant, and before the end of that day. The form should be signed and dated by the OSO. This form becomes the basis of the Case File, which includes a log of actions taken, events and information received. Copies of any documents or written records made by other persons in relation to the complaint should be kept in this file. Managing each case file is the responsibility of the ISO.

In the situation where the complaint is about the OSO, the informant/complainant should be referred to the Ministry Leader, who then follows the procedures below, with the OSO standing aside from the matter and the Ministry Leader assuming his/her role. In such a case, the ISO should involve the PSO immediately in overseeing the case:

OSO (or Ministry Leader) immediately informs the ISO and Ministry Leader of the complaint. Within 24 hours, the two consult and plan what steps are immediately necessary:

- Safety and support of the alleged victim(s) or other potential victims. If there appears to be a risk of immediate harm, referral to civil authorities or services may be needed. Support may involve emotional support such as counselling or arranging a Support Person (**cf. below and Resource 10**), medical care, access to legal advice.
- Immediate action in respect of the accused to be discussed with the Ministry Leader, e.g. suspension during the investigation? In the case of such a suspension, local employment legislation should be observed.
- Notification of relevant parties: civil authorities; PSO; diocese (where relevant); donors (as per donor requirements). If the police or welfare authorities instigate investigations, written updates about the progress and outcomes of these should also be kept in the file.
- Notification of parents/guardian/family of the alleged victim(s).

ISO and PSO plan and launch a response to the complaint, including careful attention to:

- The need to convene an Advisory Panel (**cf. below and in Resource 8**) in order to get external advice about the handling of the case.
- Informing the accused person (the respondent) of the complaint and hearing his/her response (**cf. Resources 3 and 12**). This response should be recorded and the written record signed and dated by the respondent.
- Gathering and recording evidence to determine if a breach of the safeguarding policy occurred. Care is needed not to take on the role of criminal investigation. Where appropriate, such matters should be referred to the police for investigation.
- Offer of ongoing support for the informant and/or alleged victim(s), including updating the complainant and/or alleged victim(s) about the progress of the case (**cf. Resources 3 and 10**).
- Offer of ongoing support/pastoral care for the respondent (**cf. Resources 11 and 12**), and ongoing communication about the case with him/her as appropriate.

ISO and PSO consult together to:

- Inform the Province Leader and PLT about the case.
- Consult the Ministry Leader and OSO about the evidence from the inquiry, including the Panel's advice, and formulate findings and recommendations for action.
- If appropriate, get the response of the Province Leader to the proposed actions.
- Work with the Ministry Leader to implement the agreed actions, including communicating with the alleged victim and complainant.
- Action steps at the end of a case might need to include further training of staff, revision of ministry procedures, or other measures to address systemic factors that may have allowed the abuse to occur.

ISO and PSO arrange an independent review of the case if the complainant or alleged victim is not satisfied with the response.

STANDARD 3: Access to Advice and Support

The Africa Province of the Christian Brothers recognises its duty to ensure that advice and support are available to help personnel to play their part in protecting all vulnerable persons, and to ensure that such advice and support are available to all involved in any incident of abuse, particularly victim(s), complainants and accused person(s).

This policy affirms the right of those who have suffered abuse to receive a compassionate and just response. Children and vulnerable persons need someone to turn to if they are being abused. Often, they do not know where to go for help. Considering the age of child beneficiaries, and their potential reluctance as compared to adults not to speak up about abuse, extra care should be taken to inform them of their rights and the avenues available to report a breach. Training classes and child-friendly workshops should be held that inform beneficiaries of their rights and the Province's zero tolerance towards abuse, and build the confidence of children so they feel empowered to access reporting avenues. Child-friendly information and signage is necessary, including signage in local language.

The ISO is informed by clear guidelines (**cf. Resource 7**) about the manner in which he/she listens and responds to a vulnerable person reporting abuse, whether that abuse is by someone within Province ministries or in the wider community, including family members or peers .

The ISO should offer the alleged victim(s) access to appropriate personal support while the complaint is being dealt with, such as emotional support through counselling, arranging a Support Person (cf. below and **Resource 10**), medical care, access to legal advice.

In historical cases of alleged abuse, as soon as the ISO is informed of the name and contact details of persons who is alleged to have experienced abuse, the ISO will contact them to offer appropriate personal support while the matter is being processed, cf. **Resource 5** for Historical Complaints.

The respondent, the person accused of perpetrating abuse, is also offered appropriate personal support while the matter is being dealt with through an Adviser, cf. **Resources 11 and 12**.

Through the ISO, contacts are established at a national and/or local level with the relevant child protection/welfare agencies, and other sources are identified that can provide information, support, and assistance to vulnerable persons who have been abused.

STANDARD 4: Preventing Harm to Vulnerable Persons

Safeguarding is not just processing complaints and investigating allegations. Pro-active prevention of harm is fundamental, and an important part of this is building a “culture of safeguarding”. This begins with recruitment and vetting of new employees, and continues with their induction. Ongoing awareness-raising and training and updating of staff in Safeguarding should be a regular part of every ministry’s operations. Sensitising can extend beyond staff and volunteers to the wider “community” of the ministry – parents and guardians, the local community, and so on.

In all the ministries of the Province, care is taken to develop a culture of safety that minimises risk to vulnerable persons by having reliable recruitment and vetting practices to prevent those who pose a risk to those who are considered vulnerable from holding positions of trust. While the vast majority of people who want to work with vulnerable persons are well-motivated, good recruitment and selection procedures are required to screen out those who are not suitable. In addition, such procedures enhance the prospects of identifying the best person for the post.

In the recruitment and induction processes, attention is given to the need for those considered vulnerable to have good role models they can trust, and who will respect and nurture their spiritual, physical, and emotional development.

The procedures for recruitment to all the ministries of the Christian Brothers Africa Province engaged with vulnerable persons follow agreed methods for recruiting (**Resource 13**) including the use of standard templates for applicant declarations and references (**cf. Resources 14 and 15**)

In the induction period of personnel, clear guidelines are presented that set out the norms of acceptable behaviour as an essential part of upholding the safeguarding policy. Guidelines are provided on the personal/intimate care of those particularly made vulnerable by age or their disabilities, including appropriate/inappropriate touching (**Resource 16**).

Healthy behavior management policies and procedures should not involve physical punishment or any other form of degrading or humiliating treatment. Work may be needed with staff and volunteers to develop healthy alternatives to physical punishment and other forms of authoritarian discipline.

As part of their formation, vulnerable persons are given guidance on acceptable forms of behaviour towards each other. In particular, such education and training needs to be done regularly with children so that a culture of respect is developed and any form of bullying eliminated. Through continuing development programmes, staff and volunteers are made aware that discriminatory behaviour or language is not acceptable in regard to race, culture, age, gender, disability, religion, sexuality or political views. In **Resource 17** suggestions for the development of anti-bullying and anti-discrimination policies are provided.

Each ministry centre will draw up guidelines for the use of information technology (such as mobile phones, email, digital cameras, websites, the Internet) to ensure that those who are vulnerable are safeguarded from abuse and exploitation. **Resource 18** gives suggestions for developing a policy of On-line Practices. This includes obtaining consent before taking or using photographs, and commitment to the sensitive and respectful use of photographs taken. **Resource 19** contains guidelines and a suggested Consent Form for the taking and use of photos and images.

Resource 20 and 21 contain guidelines for the care of vulnerable persons when taking them for off-

site activity or on trips involving overnight stays.

Pastoral care programs for all concerned are an essential element in the development of a caring community where everyone is cherished and valued. These programs will include awareness-raising with beneficiaries, as well as information about how they can speak confidentially about any concerns they have with those who hold positions of authority.

Awareness-raising and ongoing education are also provided for staff and volunteers. This also provides an opportunity for staff and volunteers to can raise concerns and suspicions about unacceptable behaviour towards vulnerable persons in the ministry

In a ministry that caters for those with particular special needs, care must be taken that those needs are fully catered for in a respectful way, including the physical environment. This would include in the manner in which they are cared for and the environment in which they are housed.

STANDARD 5: Training and Education

It is very important to establish a culture within the ministries of the Africa Province whereby those considered vulnerable feel they can have open and honest discussions about anything that is worrying them. Everyone who comes into contact with vulnerable persons has a role to play in their protection, which means they have a role to play in building this positive culture. To develop this type of culture it is important to have ongoing education and training of staff, including the positive behaviours and attitudes that will foster a climate of trust. Staff and volunteers need to be reminded that the task of safeguarding applies not just to children. The needs of other vulnerable persons in that ministry should be considered.

As part of their induction program into ministry, personnel are familiarised with the site policies on safeguarding of vulnerable persons and with how the standards are applied within the particular ministry in which they work. To carry out their roles confidently and effectively, they need to be aware of safeguarding issues and to have the necessary knowledge and skills to keep all vulnerable persons safe.

All personnel within the ministries of the Africa Province who are involved in either providing or overseeing activities with vulnerable persons should be provided with appropriate safeguarding training. Specialised training is provided to those who have a designated safeguarding/welfare role such as the On-site Safeguarding Officer (OSO) and In-country Safeguarding Officer (ISO). For places where there are no local agencies providing such specialized training, there are courses available online that can be used. The PLT and the Province Safeguarding Officer (PSO) have the responsibility of ensuring that ISOs are adequately prepared for their role.

For the ongoing training of personnel, use is made of the training programmes provided by appropriate agencies, especially for those staff with specific responsibilities such as recruiting staff, dealing with complaints, disciplinary processes, managing risk or acting as On-site Safeguarding Officer

Resource 22 contains elements for programs for on-going formation and development of personnel.

STANDARD 6: Communicating the Safeguarding Message

Each ministry of the Africa Province of the Christian Brothers is concerned in playing its part in maintaining the integrity of the Church and its mission by making clear its commitment to keeping vulnerable persons safe, and by modeling best practice. Staff show by word and example that all are welcomed, cherished and protected. Each ministry should display its Safeguarding message in a prominent way and in a form that is comprehensible to staff, beneficiaries and visitors. Copies of the policy should be available on request.

In the development of the life of the ministry, styles of leadership and communication are encouraged which reflect a commitment to transparency and openness. In particular, vulnerable persons, as part of their formation within the community of the ministry centre, are made aware of their rights and responsibilities to be safe from abuse and informed as to whom they should speak if they have concerns.

Everyone in the ministry should know who the On-site Safeguarding Officer (OSO) is and how to contact him/her. Each person is also made aware of the local child protection services. Each ministry, either alone or as a network through the ISO, establishes links with statutory 'child protection' agencies to develop good working relationships in order to keep vulnerable persons safe.

Educational material such as brochures, fliers and posters are to be made readily available with relevant, easily understood information and the details of contact persons. Where appropriate these should be in the local languages. Child-friendly versions of this material should also be considered. A list of useful contact details should be displayed in the Ministries, **cf. Resource 10**.

The OSO at each site is to ensure that staff, parents, volunteers and the beneficiaries are made and kept aware of Safeguarding policies and procedures. The OSO and ministry staff make use of opportunities to sensitize the wider community about the Safeguarding message, e.g. it would be desirable to engage the local Police and education authorities in training that is taking place.

STANDARD 7: Implementing and Monitoring the Policy

Adequate funding to finance the implementation and evaluation of the safeguarding procedures needs to be made available in each country by the Province.

Each ministry site is required to return a compliance form to the In-Country Safeguarding Officer (ISO), who in turn sends it on to the Province Safeguarding Officer (PSO) by October 31 each year. This contains, amongst other things, the number of instances of abuse and the number of complaints **(Resource 5)**.

To ensure effective safeguarding, the implementation of policies, procedures, and plans across all the ministries that serve vulnerable persons will be regularly monitored, including compliance with donor requirements in this area. The views of those involved inside and outside the ministries are sought in order to improve the effectiveness of the safeguards put in place.

To carry out this monitoring, the In-Country Safeguarding Officer (ISO) ensures that a review and audit process 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 best practice guidelines.

The Province Safeguarding Officer, (PSO) shall obtain from the ISOs written results of the review and audit processes conducted at each site. The PSO shall give a written report annually to the Province Leadership Team on the level of compliance with the provisions of this policy, highlighting any failures to comply and making recommendations for action.