

Second Edition

Safeguarding Children and Vulnerable Adults

Policy and Procedures

Congregation of Christian Brothers in India

June 2017

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Children and Vulnerable Adults



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RESENCE COMPASSION LIBERATION



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AT THE MEETING OF THE COUNCIL (GOVERNING BODY) OF THE CONGREGATION OF CHRISTIAN BROTHERS IN INDIA, IN WHICH A PROPER QUORUM WAS PRESENT, HELD AT ST. JOSEPH'S COLLEGE, 69, BOW BAZAR, KOLKATA ON THE 8TH September 2012.

A certified copy of the resolution passed by the Governing Body is given below:

“The Governing Body of the CCBI resolves that the Child Protection Document drawn up, be implemented in all its Institutions governed by the CCBI and its centers of activity.”

Sd/-

Br. P. Henriques cfc

**CHAIRMAN
CONGREGATION OF
CHRISTIAN BROTHERS
IN INDIA**



CCBI Society registered under the Societies Registration Act XXI of 1860 under S/7897/289 Registered Office: St. Joseph's College, 69, Bow Bazar Street, Kolkata – 700 012



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AT THE MEETING OF THE GOVERNING COUNCIL OF THE CONGREGATION OF CHRISTIAN BROTHERS IN INDIA, IN WHICH A PROPER QUORUM WAS PRESENT, HELD AT ST. JOSEPH'S COLLEGE, 69, BOW BAZAR, KOLKATA ON THE 24TH APRIL 2017.

A certified copy of the resolution passed by the Governing Body is given below:

“The Governing Council of the CCBI resolves to mandate the implementation of the second edition of its child protection policy-Safeguarding Children-Policy and Procedures, duly amended as ‘Safeguarding - Children and Vulnerable Adults’ read along with its Handbook, incorporating the prevention, prohibition and redressal of sexual harassment in the workplace, as applicable to all its Centres of Activity.”

Sd/-

Br. E. Fernandes cfc

CHAIRMAN
CONGREGATION OF
CHRISTIAN BROTHERS
IN INDIA



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Policy Statement

The Members of the Congregation of Christian Brothers in India (CCBI), imbued with the spirit of their founder, Blessed Edmund Rice, whose motivation for the founding of the Congregation was generated by a deep compassion for poor children, and in accord with Gospel values and the mission and values of the Congregation, are committed to the protection of children and young people from all forms of Abuse. All adults in any Centre of Activity (COA) of the Congregation, whether members of the Congregation or its employees, agents and volunteers, are expected to support the rights of children and young people and to ensure that a child safe environment is maintained.

The Congregation of Christian Brothers is committed to protecting the rights and dignity of children and young people, and to being alert to the potential for or incidents of abuse in whatever form. Hence,

- We examine with promptness every concern or allegation of Abuse of children or young people by members of the Congregation or its employees and volunteers in order to verify its credibility.
- We comply with civil and ecclesiastical laws in dealing with cases of the Abuse of children and young people.
- We stand in solidarity with victims of child Abuse and we provide a pastoral response for victims and their families.
- We practice a preventive system of protection in our work with children and young people to ensure, as far as possible, safe environments for those entrusted to our care.

- We endeavor to educate children under our care to the dangers of Abuse and to give them a voice in situations of abuse by promoting awareness of, and response to abusive behavior.
- We engage parents and staff in the collaborative effort to make them aware of the issues involved in the Abuse of children.

This Policy statement and accompanying Procedures reflect and articulate the conviction of the Congregation of Christian Brothers in India that all forms of abuse of children and young people constitute gravely serious matters. The Congregation is therefore determined to do all it can to prevent such abuse, with special attention to the protection of children from sexual offences, from occurring by creating a child friendly environment. It has established a clear set of procedures for responding immediately to abuse brought to its attention.

The Congregation of Christian Brothers in India acknowledges the possibility that the use of undue influence in a Centre of Activity may make an adult vulnerable to the abuse of their individual rights and dignity. This Policy statement and its accompanying Procedures for dealing with abuse of children and young people will also apply, subject to relevance, to the protection of any such vulnerable adults.

Further, the Congregation of Christian Brothers in India, is committed to putting in place systems to prevent, prohibit and redress, the sexual harassment of women in the workplace.

Sources and Acknowledgments

- 1) An Initial Report on Child Sexual Abuse *Gerard Faulkner cfc, April 1998*
- 2) Child Protection – Guidelines on Child Protection *September 2001*
- 3) Child Sexual Abuse and the Law Maharukh Adenwalla, *India Centre for Human Rights and the Law, 2000*
- 4) Constitutions and Rules for the Educational Institutions of the CCBI *Feb 8678*
- 5) Integrity in Ministry *Catholic Church in Australia, 8676*
- 6) Keeping Children Safe: Protecting Children. *Christian Brothers Child Protection Policy and Procedures, European Province of the Congregation of Christian Brothers, 2010.*
- 7) Protection of Minors: Policy Statement and Guidelines for use in Salesian Institutions *Salesian Provincial Conference of South Asia (SPCSA) 2006*
- 8) Safeguarding Children and Young People: *Child Protection Policy and Guidelines Oceania Province of the Congregation of Christian Brothers.*
- 9) Towards Healing *Catholic Church in Australia, 8663*

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Definitions and Abbreviations

Abuse is any behavior by an individual/s who misuses his or her authority, power, position, seniority to cause harm to another individual especially those to whom he or she has a duty of care.

Accused is the person alleged to have committed abusive behavior provided that the allegation is in the form of a signed statement.

Agent of the CCBI is someone, other than a brother, personnel or a volunteer who has an immediate association with the CCBI by way of a contract for services, such as consultants, researchers, board members and any other individual or group that has contact with the Congregation in a working or volunteer capacity.

Allegation is any disclosure of an act of inappropriate behavior of an abusive nature.

Assist Protection Officer is a member of a non-formal project managed by a COA, designated to perform the duties and report to a PO in that COA.

Assessor is a person responsible for investigating a complaint.

Centre of Activity (COA) is a centre recognized by the CCBI, commonly referred to as a ministry, institution, school, house, program or outreach where members of the society and others, work and administer, whether singularly or collectively, either owned, managed, or in collaboration with other groups. This includes training centres for potential members of the society; or centres that exist on property that belongs or is leased to the CCBI, and are administered by an independent group or individual.

Child is a minor who is a student or recipient of the services, or a visitor of a COA who has not completed eighteen years of age.

Code of Protective Behaviour is a list of helpful and banned actions for all personnel in a particular COA, which are codified through approval of the Ministries Office (MO).

Complainant is an individual who formally reports abusive behavior to a designated Protection Officer (PO).

Complaint is the report tabled with the designated SPO.

Congregation of Christian Brothers in India (CCBI) is a civil Society registered under the Societies Act XXI of 1860 under S/7897/289 and any other registered Society, by whatever name called, whose Governing Body/Council is comprised of at least three or more members of the CCBI for which it assumes responsibility through a resolution of the Governing Council of the CCBI, conditional to the norms as periodically prescribed by the said CCBI.

Contact person is one who receives the statements of the Discloser and PSOA concerned in a verifiable manner.

The Discharger of Contractual Obligations (DCO) is the Chairman, or any other individual duly authorised by him through appointment, to create and fulfil contractual obligations on behalf of the CCBI by virtue of their designated authority.

Disclosure is the revelation of any information, in whatever form, to any personnel of a COA, pertaining to the occurrence, or to its possibility, of behavior that is of an abusive nature.

Duty of Care is a legal obligation imposed on an organization or individual requiring that they adhere to a standard of reasonable care while performing any of their duties.

Facilitation is the process by which agreement is reached between the victim and the employing authority regarding the resolution of a complaint.

G.O.I. is Government of India.

Governing Council (GC) is the members of the said CCBI, who hold the position of Trustee.

Harm is any detrimental effect of a significant nature caused to a child, young person or vulnerable adult's physical, psychological or emotional well being.

Internal Committee refers to the committee as envision and mandated by SHOWW.

Internal Complaints Committee (ICC) is the group of individuals set up by the Discharger of Contractual Obligations to deal with any complaints arising within their jurisdiction, from any women alleging an act of Harassment of a Sexual nature in the Workplace within the scope of the law namely 'The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013'.

Media officer is a person appointed by the Coordinator of the PEC, in consultation with the Chairman of the CCBI, who is solely authorised to officially interact with the media.

Members are those who by their religious profession belong to the Congregation of Christian Brothers.

Ministry Head (MH): is the individual appointed by the Governing Body to lead a Centre of Activity.

Ministries Office (MO) is the group of individuals mandated through appointment, by the Governing Body of the CCBI, to oversee the operation and administration of all COAs.

Peers are individuals of an equal status, as in fellow students, colleagues who are in close age proximity.

Perpetrator is an individual who has committed any form of abusive behavior.

Personnel of the CCBI shall be limited to its vowed members, employees, agents or volunteers of a COA, as applicable.

POCSO refers to the Act of 2012 of the Indian Parliament, applicable legally, namely the Protection of Children from Sexual Offences

Presiding Officer (PrO) Is an individual duly appointed by the Discharger of Contractual Obligations after due consultation with the MO, who shall coordinate the activities of an ICC and ensure they are in compliance with the law as laid out in SHOWW Act 2013.

Professional Ethics Commission (PEC) is a group of individuals set up by the Chairman of the CCBI to assist the SPO in his task of Safeguarding Children and Vulnerable Adults in any COA's where its Policy is applicable.

Protection Officer (PO) is a member of a COA appointed by the SPO to ensure that all protective measures for safeguarding children and young people are in place and implemented.

PSOA is a person subject of an allegation.

Report is a formal, signed communication of a discloser to a designated PO.

SHOWW refers to the Act of 2013 of the Indian Parliament, applicable legally, namely the Sexual Harassment of Women at the Workplace (Prevention, Prohibition and Redressal)

Society Protection Officer (SPO) is a member of the CCBI appointed by its Chairman who has been delegated the responsibility and authority to act in his name, in all matters related to Safeguarding Children and Vulnerable Adults and to coordinate the activities of the Professional Ethics Commission.

Step Aside is a precautionary measure so as to manage risks and is not a disciplinary procedure, that will require a PSOA to abstain from all duties and situations where he/she comes into contact with children,

young persons or vulnerable adults, subject to the context of the allegation, pending the due procedure and will be at full benefits.

Victim is an individual against whom abusive behavior has been directed.

Volunteer is any person who gives freely of his or her time and experience to participate in activities initiated by the CCBI for the furtherance of its mission.

Vulnerable Adult is any individual employee subject to the individual being under the official authority of the PSOA in a COA.

Young Person is any student or recipient of the services of a COA, who is above eighteen years of age.

Scope

All Personnel working in a COA of the CCBI either as a vowed member, employee, agent or volunteer are required, as a condition of service, to abide by this policy and procedures.

Any other organization made up primarily of members of the CCBI are deemed, in the absence of any other written understanding, to have consented to the implementation, inclusive of the training and monitoring by the CCBI, of this policy.

All other organizations working with the CCBI, either temporarily or permanently are expect to have a policy of their own comparable with this one. In the absence of such a policy, they are deemed to have consented to the implementation of a comparable policy by virtue of their association with the CCBI.

Objectives

The aims of *Safeguarding Children and Vulnerable Adults: Policy and Procedures* are to achieve the highest level of protection for children and young people, and good practice by all within the Congregation and its COAs who come into contact with children and young people. The guidelines articulate the steps that will be taken in meeting the Congregation's commitment to protect and care for children and young people.

Safeguarding Children and Vulnerable Adults: Policy and Procedures provides a framework for the Congregation's communities, individual brothers, personnel and agents to:

- reduce the risk of harm to children and young people and to provide guidance on how to respond to concerns and allegations of child abuse and neglect; and
- create an open and transparent environment in which concerns for the safety and wellbeing of a child, young person or vulnerable adult can be raised and managed in a fair and just manner, thereby protecting the rights of all.
- To acknowledge and respect the obligations we have under the law towards the protection of children, young people and vulnerable adults.

Principles

The following principles underpin *Safeguarding Children and Vulnerable Adults: Policy and Procedures* and the CCBI's commitment to safeguarding children and young people:

- Each child and young person shall be cherished and affirmed as a gift from God with an inherent dignity and right to respect and safety which shall be nurtured and protected.
- The *United Nations Convention on the Rights of the Child* is the universal foundation for child protection. The fundamental principle of the Convention is that children have their own indivisible rights.
- The right of a child and young person to safety and care is paramount.
- The value of the family unit and cultural sensitivities are to be respected, but not to the detriment of the wellbeing of the child, young person or vulnerable adult.
- All decisions regarding the welfare and protection of children and young people will be made based on the "Best Interests of the Child Principle". This principle refers to decisions to ensure that the child receives maximum possible benefit from services provided, and that the positive impacts of any course of action outweigh any negative impacts.
- Children and young people have a right to an environment free from abuse and neglect.
- They also have a fundamental right to justice and freedom, and a right to be listened to and heard.
- Children and young people deserve good role models whom they can trust fully, and who will respect them and nurture their spiritual, physical and emotional development.
- Each person working within the Congregation has a responsibility to provide a safe, caring environment.

- Any form of child abuse and exploitation is unacceptable and will not be tolerated.
- All children and young people should be protected equally and assisted regardless of their gender, nationality, religious or political beliefs, family background, economic status, physical or mental health, or criminal background.
- Each person within the CCBI and its COAs must:
 - familiarise him/herself with the laws and child protection provisions of the country/state in which he/she is living and working;
 - be aware of his/her obligations in reporting suspected abuse of children and young people under international, civil and church law;
 - adhere to the country's/state's legislation with regard to the reporting of allegations of abuse and cooperate fully and swiftly with the appropriate civil and church authorities.
- Complaints or concerns of child abuse will receive a prompt response.
- When responding to a complaint of abuse all care will be taken to ensure that the proper processes of law are neither interfered with nor hindered and the rights of both Complainant and Accused are protected.
- Each person who has access to information regarding suspected or disclosed abuse has an obligation to observe confidentiality and manage information accordingly.
- Adherence to *Safeguarding Children and Vulnerable Adults: Policy and Procedures* is mandatory for all communities, individual brothers, personnel and agents of the CCBI working with children and young people and they will be made aware of the guidelines and their responsibility to implement them.

Chapter 1

Creating a

Child Friendly Environment

All COAs of the CCBI are to strive to create an atmosphere that promotes safety and growth of those entrusted to their care so that they can gradually assume the responsibility for their own growth as human beings and persons of faith.

The CCBI will facilitate the creation of such an environment, to the best of its ability, within its COAs by:

1.1 Infrastructure

- 1.1.1 Ensuring that buildings are child friendly with adequate space, lighting, ventilation and a structural design that facilitates supervision.
- 1.1.2 Ensuring that sufficient space is be provided for the children to give vent to their energy, develop their talents and learn the basics of social living and a life of faith through sports, music, drama, academics, religious instruction and prayer.

1.2 Behaviour

- 1.2.1 Challenging discrimination of any kind, based on age, gender, religion, status, caste, social background and sexual orientation.
- 1.2.2 Establishing Codes of Best Practice in the areas of Protection, Discipline and Peer Respect which are aimed at creating a healthy environment and preventing harmful behaviour of any kind. These Codes of Best Practice are to be reviewed periodically.

1.3 Information

- 1.3.1 Providing information about the rights of every individual.
- 1.3.2 Developing printed material on the nature of abusive behavior and ensuring that the information is disseminated appropriately.
- 1.3.3 Keeping in the public space of the Centre, information of the procedures for reporting known or suspected abuse.

1.4 Reporting

- 1.4.1 Appointing a Protection officer in every COA, with a clearly defined role and responsibility for protecting children and encouraging an atmosphere of openness.
- 1.4.2 Establishing and ensuring that Procedures for responding to alleged abuse are in place and acted upon.
- 1.4.3 Establishing a Professional Ethics Commission to examine and evaluate all reports of abusive behaviour.

Chapter 2

Establishing a

Code of Protective Behaviour.

The common law concept 'Duty of Care' refers to the responsibility of an organization to provide children and young people with an adequate level of protection from harm.

The CCBI recognizes that there are a number of potential risks to children and young people in the delivery of its programs and initiatives. In all states in which the CCBI has COAs involved in direct work with children and young people, it will act to assess and reduce the risk of harm to children and young people. This is achieved by examining each program and its potential impact. Programs which involve direct work with children and young people are considered a higher risk, and therefore require more stringent procedures. However, as children and young people are part of every community in which the CCBI is involved, the CCBI is always alert to potential risks.

Safe environments do not just happen; they require ongoing planning, commitment and maintenance. All COAs will develop risk management strategies to prevent and minimize risk to all who access their services. These will provide a clear and consistent framework to guide and support those who work directly with children and young people. Such risk management strategies are to be assessed and reviewed annually by responsible, delegated authority.

The risk assessment process involves mapping out the type of contact with children and young people and the protection measures that are already in place, and identifying any gaps. The assessment high lights risks to children and young people, in term of potential child abuse and how such risks are to be managed. Strategies are then developed to reduce and eliminate risks.

The CCBI outlines the following requirements of a Code of Protective Behaviour, which each COA, given its local activities, is required to develop. As a means of identifying the risks, the following questions need to be considered:

- What are the practical details of the program? (Describe the program)
- What could go wrong? (Identify the risks)
- What is the likelihood of something going wrong? (Analyse the risks)
- What might the consequences be and how might they be addressed? (Impact & Response)

2.1 Every COA, acting through its Head, will develop a Code of Protective Behaviour in consultation with the Professional Ethics Commission.

2.2 It is a requirement of the CCBI that all individuals, whether members, employees, agents or volunteers, are familiar with and abide by the Code of Protective Behaviour, developed specifically for their COA.

2.3 The Code of Protective Behaviour is designed to encourage all individuals in a COA to be conscious of their own behaviors, and how this behavior is perceived by others. It provides the member of the CCBI, its employees, agents and volunteers, with guidance on how to conduct themselves and to guard against any form of allegation.

2.4 The Code of Protective Behaviour, should address the following broad areas:

2.4.1 Respect for children and young people.

2.4.2 Provision for a welcoming, inclusive, safe environment for children and young people.

2.4.3 Respect for cultural and religious difference.

2.4.4 Expedient and professional reporting of concerns and allegations of abusive behavior.

2.4.5 Transparency and accountability in relation to travel, use of money and all equipment.

2.4.6 Appraisal of role performance and professional supervision of all personnel.

2.5 The Code of Protective Behaviour caters specifically to the following HIGH RISK Areas:

2.5.1 Locations which are:

- a) isolated
- b) disaster areas
- c) overcrowded
- d) secluded or inaccessible
- e) boarding and residential facilities
- f) school-based

2.5.2 Activities which involve:

- a) one-to-one contact
- b) physical contact
- c) personal hygiene tasks e.g. when toileting and bathing younger children
- d) swimming, bathing, changing
- e) staffing by volunteers
- f) retreats and camps for children and young people.

2.5.3 Inadequate Supervision which:

- a) may be informal, minimal or even non-existent.
- b) does not address the risk of staff and volunteers working alone

2.6 Among the issues to be addressed by the Code of Protective Behaviour are the following:

- Physical contact and touching
- Supervision of toileting and bathing
- Sleeping arrangements
- Discipline
- Respect for privacy
- Cultural sensitivity
- Language
- Adult-child ratio
- Signing in and out procedures
- Use of cameras
- Favoritism
- Dual relationships
- Transport
- Cell phone use
- I.T. use
- Social networking sites
- Use of CCBI computers
- Confidentiality
- Perceptions and appearances
- Out of hours contact

2.7 The Code of Protective Behaviour requires that all members of the CCBI its employees, agents and volunteers, when dealing with children and young people attending a COA, are **NOT** to:

- 2.7.1 engage in behavior that is intended to shame, humiliate, belittle or degrade;
- 2.7.2 use inappropriate, offensive or discriminatory language;
- 2.7.3 use coarse language;
- 2.7.4 do things of a personal nature that a child can do for itself, such as assistance with toileting or changing clothes;
- 2.7.5 take children to their own home or place of residence or sleep alone with a child in the same room or bed;
- 2.7.6 smack, hit or physically assault;
- 2.7.7 develop sexual relationships of any kind;
- 2.7.8 engage in any sexual conversation or discuss sexual behaviour, unless it is part of a legitimate lesson and discussion approved for teaching;
- 2.7.9 show sexually oriented or inappropriate printed materials such as magazines, videos and films.
- 2.7.10 behave provocatively or inappropriately;
- 2.7.11 condone or participate in behavior that is illegal, unsafe or abusive;
- 2.7.12 act in a way that shows unfair and differential treatment;
- 2.7.13 photograph or video without parental/guardian consent;
- 2.7.14 hold, kiss, cuddle or touch in inappropriate, unnecessary or culturally insensitive ways;
- 2.7.15 seek to make contact and spend time with outside program times;
- 2.7.16 hire minors as domestic labour;
- 2.7.17 transport without parental/guardian written consent except in the event of an emergency;
- 2.7.18 use, possess or be under the influence of alcohol or illegal drugs;

2.7.19 supply alcohol or illegal drugs .

2.7.20 use inappropriately electronic equipment such as computers, cell phones, video and digital cameras.

2.8 A Code of Protective Behaviour is to include in its coverage the proper use of cyber technology. It should cover such issues as:

2.8.1 unauthorised communication with children and young people through the use of the internet, social networking sites, online chat rooms, instant messaging, camera phones, video and digital cameras;

2.8.2 contact with children and young people with whom one has a working relationship through social networking sites and posting one's personal details to them via the internet;

2.8.3 electronic transmission of messages or files which are sexually explicit, offensive or contain inappropriate jokes;

2.8.4 possession, distribution or display of pornographic material;

2.8.5 using a work computer to access inappropriate material via the internet or email;

2.8.6 using a cell phone provided for work commitments to access or send inappropriate material;

2.8.7 promoting electronically or otherwise images of children and young people in undignified and disrespectful poses;

2.8.8 sending inappropriate emails;

2.8.9 using web cameras illegally.

2.9 The Code of Protective Behaviour developed by a COA becomes operational on receipt of the approved and certified copy from the Ministries Team.

2.10 The Professional Ethics Commission, acting through the Ministries Team, may impose a Code of Protective Behaviour on a particular COA, if in its mind the safety and best interests of children and young people are not being served.

Chapter 3

Procedure: Step 1

Reporting Abusive Behaviour.

All members of the CCBI, its employees, agents or volunteers who are aware of any abuse of children or young people by any of their conferees are to report the matter to the designated PO.

It is important that all personnel in a COA of the CCBI be on alert to recognize warning signs of the abuse of children and young people. Warning signs may not be indicative of actual abuse, but it is important to identify such signs in order to maintain a healthy and safe environment for children and young people.

Anyone who is aware of such signs should bring it to the notice of the designated Protection Officer of the concerned COA. Making such a disclosure is not an accusation of abuse, but rather a precaution to protect children and young people.

3.1 Procedure: Reporting

3.1.1 When and to Whom to Report.

- 3.1.1.1 Any personnel who observe a child whom he or she reasonably suspects has been a victim of child abuse, must report the matter to the designated Protection Officer.
- 3.1.1.2 Any personnel who have a reasonable suspicion that any of their colleagues has committed an act of abuse on a child, young person or vulnerable adult, should report the matter to the designated Protection Officer.
- 3.1.1.3 Personnel who receive a disclosure or allegation of any kind that claims that a member of the CCBI, its employee, agent or volunteer presently serving in any COA of the CCBI is currently abusing a child, young person or vulnerable adult or has done so in the past reports the matter to the designated Protection Officer of the COA. If the alleged

perpetrator is serving in another COA or if the alleged victim is no more under the care of that COA, the matter is to be reported to the SPO.

- 3.1.1.4 Whenever a child, young person or vulnerable adult discloses abuse, the matter is to be reported to the designated Protection Officer by the person who receives it.
- 3.1.1.5 Whenever the Protection Officer is the accused PSOA the matter is to be reported to the designated Head of the relevant COA.
- 3.1.1.6 All children and young persons in a COA will be made aware of the role of the Protection Officer.
- 3.1.1.7 Suspicious behavior in the use of cyber technology by personnel of the CCBI in a COA is to be reported to the designated Protection Officer.
- 3.1.1.8 In a professional relationship any disclosure of current ongoing abuse that is criminal in nature cannot be regarded as confidential.
- 3.1.1.9 Under no circumstances shall there be any attempt to intimidate a complainant or to dissuade a complainant from proceeding with a complaint or disclosure.
- 3.1.1.10 Any personnel of a COA who becomes aware of abuse perpetrated on a child, young person or vulnerable adult outside the COA by any CCBI personnel is obliged to inform the relevant Protection Officer.
- 3.1.1.11 Any personnel of a COA who becomes aware of abuse perpetrated on a child, young person or vulnerable adult of that COA by anyone (Family member or general Public) is obliged to inform the relevant Protection Officer.

3.1.2 Dealing with a Child, Young Person or Vulnerable Adult who discloses Abuse.

- 3.1.2.1 Accept what is said without making a judgment on its accuracy.
- 3.1.2.2 Do not seek information beyond what the child has disclosed.
- 3.1.2.3 Let them know that you need to tell someone else in authority. Do not promise confidentiality but explain that the matter has to be reported to the appropriate authority so that adequate steps can be taken to prevent any repetition. The need to protect children and young people overrides the need to keep confidentiality.
- 3.1.2.4 Reassure them that they are not to blame for the abuse.
- 3.1.2.5 Be aware that children may have been threatened.
- 3.1.2.6 Reassure them that they did the right thing by speaking and that you believe them.
- 3.1.2.7 Assure them that there will be an appropriate follow-up.
- 3.1.2.8 Make notes as soon as possible, dating and noting down as accurately as possible what was said.

Chapter 3

Procedure: Step 2 **Responding To Abusive Behaviour.**

3.2 Procedure: Responding

3.2.1 The Protection Officer shall expeditiously forward a copy of the complete signed report of the alleged Abusive Behaviour to the Society Protection Officer who shall now treat it as an official Complaint.

3.2.2 Duty of the Society Protection Officer.

3.2.2.1 On receipt of a Complaint the SPO will:

3.2.2.1.1 Satisfy himself that appropriate measures have been taken to address issues of safety, medical care and confidentiality.

3.2.2.1.2 Make a file note of an Anonymous Complaint.

3.2.2.1.3 Confirm the validity of a signed complaint.

3.2.2.1.4 Refers the matter to the PEC for further action.

3.2.2.1.5 Satisfies himself that the proper process is expeditious.

3.2.2.2 On receipt of a decision from the PEC the SPO will:

3.2.2.2.1 Deliver the findings to the Head of the relevant COA for appropriate action.

3.2.2.2.2 Inform the MT of the findings and the action taken by the relevant COA when decided.

3.2.2.2.3 Participate in a facilitation step of the process to bring the matter to resolution.

3.2.3 Professional Ethics Commission.

3.2.3.1 The PEC appoints the Contact person and the Assessor.

3.2.3.2 The Contact person will initiate interaction with both the Complainant and the PSOA, so as to see to the completion all reports in a verifiable manner and to invite any further statements.

3.2.3.3 The Assessor will, in case of any dispute of the complaint, arrive at an opinion after due investigation as to the truth of the matter in a fair and just manner to all parties concerned.

3.2.3.4 The PEC receives the Assessor's report and recommendation and delivers its findings to the SPO who in turn delivers them to the employing authority who then communicates the findings to both the PSOA and to the parents and guardians of the victim.

3.2.3.5 The PEC audits annually the performance of the SPO in the exercise of his duties.

3.2.4 Process of Facilitation

3.2.4.1 On receipt of the findings the SPO initiates and participates in a facilitation process with the parents or guardians of the victim to bring the matter to a resolution.

3.2.5 Review

3.2.5.1 Should either a complainant or PSOA be dissatisfied with the findings of the PEC or the outcomes of the facilitation process, a request for review may be lodged with the Governing Body of the CCBI who will appoint an independent review panel to address the issue.

Conclusion

Edmund Rice the founder of the Christian Brothers was deeply committed to the protection and care of children and young people and of other vulnerable members in society. The Congregation of Christian Brothers following in the footsteps of its founder has always been and remains committed to the same. It aims to ensure that all individual personnel working with children, young people and vulnerable adults, in all its Centres of Activity are aware of their obligations and responsibilities for protecting them from all foreseeable risk of harm and safeguarding them from all forms of abuse. It wishes to ensure that its members, employees, agents and volunteers always remain educated and updated in this very important matter. The Congregation therefore acknowledges its responsibility to initiate and give effect to any and all such means to the imparting of sound knowledge on child abuse.

It is our sincere hope that this Policy document and the accompanying Handbook which contains information to assist in understanding the nature of abusive behavior and guidelines for dealing with it will go a long way towards safeguarding children and vulnerable adults. We are confident that with God's help this is possible, to Whom, we dedicate all our efforts to promote the well-being of children and young people.

Schedule

Centres of Activity of the CCBI, to which this Policy applies.

1. St. Joseph's College, 69, Bow Bazar Street, Kolkata – 700 012
2. St. George's School, 69, Bow Bazar Street, Kolkata – 700 012
3. St. Mary's Orphanage and Day School, 103, Dum Dum Road, Kolkata – 700 030
4. St. Patrick's High School, Asansol – 713 301
5. St. Vincent's High School, Asansol – 713 301
6. St. Vincent's Industrial Training Centre, Asansol – 713 301
7. Goethals Memorial School, Kurseong – 734 203
8. St. Edmund's College, Shillong – 793 003
9. St. Edmund's College, (Higher Secondary Section), Shillong – 793 003
10. St. Edmund's College, (School Department), Shillong – 793 003
11. St. Columba's High School, Ashok Place, New Delhi – 110 001
12. St. John's High School, Sector 26, Chandigarh – 160 019
13. St. Joseph's College, Nanital – 263 002
14. St. Mary's High School, Mount Abu – 307 501
15. Our Lady of Salvation High School, Dadar – 400 028

16. St. Augustine's School, Vasai – 401 202
17. Regina Mundi School, Chicalim, Goa – 403 711
18. St. Joseph's Junior College, Bajpe, – 574 142
(Removed from under the policy w.e.f. 31st May 2017)
19. Jagruti High School, Mandal, Gujarat – 394 650
(Removed from under the policy w.e.f. 1st May 2017)
20. Ane Moriam School, Sangram, Arunachal Pradesh – 791 118
21. Holy Cross High School, Bongera, Jharkhand – 835 211
(Removed from under the policy w.e.f. 31st May 2013)
22. Infant Jesus School, Chalakere, Karnataka – 577 522
(Removed from under the policy w.e.f. 31st May 2015)
23. M.I.Q. Juvenate, St. Edmund's College, Shillong – 793 003
24. The Scholasticate, St. Edmund's College, Shillong – 793 003
25. CCBI Novitiate, Kolar Road, Bhopal – 462 042
26. Mangkara Mission School, Wahrinong, West Khasi Hills, Meghalaya
27. Edmund Rice Study House, Bajpe, Karnataka – 574 142

Kolkata
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