Sisters of Notre Dame de Namur

LIFE TO THE FULL

John 10:10

Congregational Safeguarding Policy Handbook

v.1, March 2026

SISTERS OF NOTRE DAME de NAMUR

CONGREGATIONAL
SAFEGUARDING POLICY HANDBOOK

v.1, March 2026

Sisters of Notre Dame de Namur
Preliminary Committee for Safeguarding
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[1] Cf Catholic Church Safeguarding England and Wales, defined by legislation of Relevant Guidance

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March 2, 2026

Dear Sisters,

The CLT is pleased to share with you our Congregational Policy for the Safeguarding of Children and Vulnerable Adults. So that we are compliant with mandatory canonical[1] and civil requirements, each Unit will now write its own Policy for the Safeguarding of Children and Vulnerable Adults, guided by the Congregational Policy.

As we visit Sisters across the Congregation, we are aware of their commitment to safeguarding and that they desire to learn more. We assure you that all Sisters will receive initial and ongoing training and support for safeguarding and will be supported, as always, by the daily prayer and interest of our elderly and infirm Sisters.

Just as important is the awareness that safeguarding is no stranger to our tradition. Within the context of a vowed life lived in community, St. Julie created a culture of care in the early years of the Congregation, with concern for the wellbeing of all Sisters, in particular young Sisters, those who were studying and those who were taking on significant roles of responsibility. Likewise, she was instrumental in creating a culture of care in all the ministries of the Congregation through her personal preparation of the Sisters and her visits to the ministries. In her own being, St. Julie was an incarnation of care in all its manifestations.

Like St. Julie, our life as vowed religious is about creating a culture of care in all that we do and in all our relationships, in imitation of Jesus' way of relating with people. This is not about meeting every expressed need. Rather, it is about enhancing the inherent human dignity of each person, recognizing its violation, seeing how this can be corrected, and then responding accordingly.

Given the lack of attention to human dignity in many societies today, we are called to continue this work within the legal system and in collaboration with the many agencies with whom we share a vision. Wisdom and experience tell us that we can do infinitely more together than alone for the transformation of society near and far, a transformation to which our 18th General Chapter calls us, and which is the vision behind safeguarding. As women committed to the

[1] The first official and universal requirement by the Vatican that all bishops' conferences and religious Congregations worldwide develop safeguarding policies for the protection of children and vulnerable persons was issued in May 2011 by the Congregation for the Doctrine of the Faith (CDF). The required policies were to be submitted to the CDF within one year. In his Motu Proprio *Vos Estis Lux Mundi (*2019) Pope Francis established universal and legally binding procedures for reporting, investigating and holding Church leaders accountable for failures in safeguarding,

Gospel, the challenge we face is to do this in a way that is creative - in the Biblical sense - and hopefully healing for all concerned. It is the privileged work of reconciliation, of building a society that reflects the Kingdom of God. It is the living out of our Constitutions which express our commitment '*to build community with all those with whom we live and work* [and] *to try to become a vital part of the local churches and of the wider community.*'[2] It is our belief that our engagement with this sacred work will contribute to the transformation of others and of ourselves.

We would like to take this opportunity to thank those who have helped to shape this policy: The UISG/USG Joint Commission for Care and Protection[3] for their inspiring and encouraging formative sessions; Sr. Margaret Mulholland, SNDdeN who attended one of their week-long workshops on our behalf; Br. Brendan Geary F.M.S. who gave us preliminary advice and ongoing encouragement, and kindly allowed us to use some of the administrative resources of the Marist Brothers' Safeguarding Guidelines for their Administrative Units; Tina Campbell, our consultant, for her generous, professional and ongoing assistance to the CLT and the Congregation's Preparatory Safeguarding Committee;[4] the preparatory Committee who provided an initial draft; Sr. Eileen Cassidy SNDdeN, Congregational Safeguarding Contact; and a special thank you to our three readers, Br. Brendan Geary, F.M.S, canonist Sr. Helen Costigan, S.H.C.J. and Tina Campbell; and to our editor, Mary Gautier. Thank you!

In the spirit of our tradition and of the Safeguarding Prayer on the next page which we encourage you to pray regularly, we place ourselves and our efforts in the hands of our good God and ask the Holy Spirit to continue to guide and inspire us as we continue to build a culture of care and protection, inspired by the legacy of care left to us by St. Julie.

Your Sisters,

Sr. Amarachi Ezeonu, SNDdeN

Sr. Evalyne Aseyo SNDdeN

Sr. Lorraine Connell SNDdeN

Sr. Mary Johnson SNDdeN

Sr Miriam Montero SNDdeN

Sr. Amarachi Ezeonu, SNDdeN
Sr. Evalyne Aseyo, SNDdeN
Sr. Lorraine Connell, SNDdeN
Sr. Mary Johnson, SNDdeN
Sr. Miriam Montero, SNDdeN

[2] Constitutions and Directory of the Sisters of Notre Dame de Namur, 1989, c. #38

[3] UISG, International Union of Superiors General (Women's Congregations); USG, Union of Superiors General (Men's Congregations). Together they inspire and form safeguarding personnel throughout the world.

[4] Sisters Ann Howard, Eileen Cassidy, Gail Taylor, Godelieve Ziunga, Helen Darragh, Jannet Tambu, Margaret Astin and Nancy O'Shea

SAFEGUARDING PRAYER

You are holy, Lord God alone, who works wonders.
You are Beauty, You are Protector, You are Guardian and Defender.

You love and care for all your children,
especially the smallest and most vulnerable.
We wish to entrust to you those who have suffered abuse
and whose trust and innocence have been broken.

Make our hearts capable of hearing the muffled cry of fear, shame and suffering,
a heart capable of welcoming and being home to those who seek refuge.

Make our hands capable of touching without grasping and withholding,
hands that know how to sustain and, with the help of Your grace,
to bind up wounds old and new.

Give us eyes capable of seeing the weakness of the little ones,
that we may learn to cherish them in your love,
a gaze that does not judge but sees the tears that bathe every face.

Give us a courageous voice that knows how to cry out
against injustice and defend the weak,
a voice that knows how to transform itself
into gestures of care for the abused and the oppressed.

Give us courageous feet that know how to walk against the wind
and move forward with creativity on the path of justice and love
that seeds of healing and rebirth may sprout.

You are the good, all good, the supreme good,
Lord God living and true, merciful Saviour.

PRELIMINARY NOTES:

This Safeguarding Handbook has 3 parts:

Part 1: The Safeguarding Policy

Part 2: Appendices which accompany the Policy, referred to in the document as A1 etc. References and links to some important resources. (Further resources will be suggested. Units should explore what is available in their own countries and dioceses and are encouraged to share with one another as appropriate.)

Part 3: Optional Templates for materials you will need, referred to as T1 etc. You may already have an equivalent or wish to produce your own version of these.

There are many acronyms in this document. They are explained at the beginning of the Glossary (Appendix 10) and are on a fold-out page at the end of Part 1 to facilitate easy reading. Please familiarize yourself with these before reading the document, with particular attention to the use of the following major designations which are also in the Glossary:

a. ***The Congregation****:* The official body of the Sisters of Notre Dame de Namur.
b. ***Sisters:*** Members with either temporary or perpetual vows, excluding those with limited capacity to understand or make decisions around safeguarding due to physical and/ or cognitive impairment.
c. ***Formation Members***: Aspirants, Postulants and Novices.
d. ***Vulnerable persons****:* Those made vulnerable due to age, diminishment or being in a vulnerable situation. It is a reference to the people-in-their-situations and is not a description of the people themselves. They include:
    i. Children under the age of 18, as defined in Canon Law[5]
    ii. Adults with physical and/or other debilitating diminishments
    iii. Adults in a dependent situation
    iv. Adults who may find themselves in situations of vulnerability, even if only for a short time, due to various forms of what is defined as transient vulnerability because of illness, loss or an imbalance of power. These may include employees, junior staff, students, apprentices, patients, formation members, and junior professed religious, etc.
e. ***Staff****:* All who assist the Sisters of Notre Dame de Namur in any capacity in the context of their life and work. They include paid, compensated and voluntary workers, agency workers, formation members, colleagues, chaplains and regular guests. They may be clergy (seminarians, deacons, priests, bishops), religious women / men of other Congregations, lay people.
f. ***Ministry / Ministries***: Ministries under the management of the SNDdeN.

'*Vulnerable Persons*' will be italicized throughout the document.

[5] Code of Canon Law, Book 1, Title VI, Physical and Juridic Persons, can 97 #1

THE CONTEXT OF THE SAFEGUARDING POLICY

"*Let us seek the truth in all things.*"
(St. Julie Billiart, Letter 1:98)

WHO WE ARE

The Congregation of the Sisters of Notre Dame de Namur was founded in 1804 by St. Julie Billiart who, with her co-foundress Françoise Blin de Bourdon and within the historical context of the French Revolution, established schools for the gratuitous instruction of poor children.[6]

In the spirit of St. Julie and the tradition of the Congregation, and as women of the Church, we see ourselves situated within God's continuing action in history. Our common aim is to express in our time, as Julie did in hers, that God is good.[7] Our 18th General Chapter (2021) expressed this as a call 'to respond within our global realities to those who suffer, and to pray and work for the transformation of the attitudes, structures and systems that cause profound suffering'.[8]

OUR COMMITMENT

As a Congregation we are committed to promoting a culture of care, prevention and protection for all who are involved in our life and mission. We make this commitment in the spirit of our charism, in the belief that all human beings are entitled to live with dignity, respect and in safety, and aware of our call to support and empower those who are denied these, namely the vulnerable of society with whom God identifies.[9] We seek to uphold the highest professional and safeguarding standards, in collaboration with all who are involved with us. The steps to do this are outlined in the standards in this Policy.

PRINCIPLES AND STANDARDS

In our commitment to keeping people safe, we are guided by:

- **Scripture** which tells us that all human beings are made in God's image and likeness and that God identifies with children and the most vulnerable in society.[10]
- **Catholic Social Teaching (CST),** the foundations of which are laid in Pope Leo XIII's Encyclical, '*Rerum Novarum*', 1891, which addresses social and economic issues arising from the Industrial Revolution, within a framework of the dignity and rights of human beings.
- **Canon/Church Law,** particularly Books II and VI which relate specifically to safeguarding in the Church and align our approach to that of civil society and the law. It defines a child as a person under eighteen years of age.[11]

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[6] Constitutions and Directory of the Sisters of Notre Dame de Namur, 1989, c. #6.
[7] Constitutions and Directory of the Sisters of Notre Dame de Namur, 1989, c. #9.
[8] Sisters of Notre Dame de Namur, Calls of the 18th General Chapter, 2021, p.1
[9] 'The wound of the daughter of my people wounds me too (Jer 8:21).' These words express Jeremiah's deep empathy and shared pain with the suffering of his people, the nation of Judah.
[10] 'God created humankind in his image, in the image of God he created them' (Gen 1:28). 'Whoever welcomes one such child in my name welcomes me (Mt 18:5). 'Truly, just as you cared for one of the least of these members of my family, you did it to me' (Mt 25:40-41).
[11] Code of Canon Law, c.97, par 1; Pope Francis, *Vos Estis Lux Mundi (VELM), Title I, Article 1 (a)*

- **International Law** as set out in such as
    1) The Universal Declaration of Human Rights (UDHR), 1948
    2) The UN Convention for the Elimination of all forms of Discrimination against Women (CRDAW), 1979
    3) The UN Convention on the Rights of the Child (UNCRC), 1989
    4) The UN Convention of the Rights of Persons with Disabilities (CRPD), 2006

- **A Gospel Culture**

  When working in situations where cultural practices infringe on the human dignity, safety or wellbeing of any individual, particularly *vulnerable persons,* all Sisters, staff and formation members must abide by Congregational Safeguarding Standards as set out in this Policy. We aim for cultural safety[12] in all our communities and ministries.

- **Collaboration**

  The Sisters of Notre Dame de Namur live and work in 16 countries across 5 continents, and so within a variety of jurisdictions with variations on what constitutes a civil or criminal offense, and with different perceptions of safeguarding.

  The Congregation will guide Sisters, staff and formation members in applying the Congregational Policy to the local/national situations, mindful that in all situations we are committed to congregational safeguarding standards.

  All Sisters, staff and formation members shall become familiar with the safeguarding position of their country. They shall collaborate with the relevant civil authorities and services and with diocesan Safeguarding Coordinators. Dioceses, for example, may operate independently of one another or as a body through the National Conference of Bishops. It is more than likely that they offer safeguarding training.

THE SCOPE OF THE POLICY

The Safeguarding Policy applies to all Sisters, staff and formation members. All shall commit to implementing the Policy and to relevant training. They shall also embrace safeguarding as it affects *vulnerable persons* and anyone who is a victim of abuse as described in A9.

IN SUMMARY

As Sisters of Notre Dame de Namur, our aim is to create environments of goodness wherever we live and serve, so that each person, especially those made vulnerable, can thrive and enjoy a dignified human life. With this experience of the goodness and love of God, they may in turn pass it to others and become part of an expanding network of safeguarding that will contribute to the transformation of our world. This is our vision. This is our hope. This is our call.

[12] Cultural safety is the creation of an environment where individuals feel their cultural identity is respected, and they are safe from racism and discrimination. It goes beyond just being aware of other cultures by focusing on the people's experience, addressing power imbalances in institutions like healthcare, and empowering individuals to have their needs met according to their own cultural perspective. This leads to an environment where people feel valued and can freely share their concerns without fear.

SAFEGUARDING CHILDREN and VULNERABLE ADULTS

Mission Statement

As Sisters of Notre Dame de Namur, we recognize the call of God in a growing consciousness throughout the world of the dignity and value of each person. We work with others to transform unjust structures and systems that deny that dignity and work to create new ways of relating which enable all to experience more fully the goodness of God.[13]

Congregational Policy

This Congregational Safeguarding Policy calls all Sisters, staff and formation members to fully respect every human being, most especially those who are vulnerable, be they children or adults.

Policy Statement and Aims

This Policy is mandatory for all Sisters, staff and formation members. All shall respond in full compliance with Civil and Canon Law in whatever country and context the Congregation is in mission.

Aims:

- To create a safe and loving atmosphere in our communities and ministries, no matter the country or culture.
- To embody the value of respect for the dignity of each person.
- To support and nurture one another by listening to the needs of all and being accountable for our failings with respect to them.
- To be especially attentive to the young and vulnerable among us, whether in community or ministry, and to be prepared to respond compassionately and professionally to all who experience abuse.
- To ensure that safeguarding – creating a culture of care, protection, and prevention – is deeply embedded in our ministries and community life.

Why a Standards Approach to Safeguarding?

Safeguarding Standards are a means of organizing the different areas of the Safeguarding policy. They provide a framework and enable the user to see the overall content of the policy and to access needed information. By laying out within the Standards the procedures to be followed, we want to evidence the need for serious accountability in all aspects of our response to this topic.

Our Safeguarding Policy Standards

Standard 1	What is Safeguarding?
Standard 2	Creating a Culture of Care, Safety, Protection and Prevention
Standard 3	Responding to Concerns and Allegations
Standard 4	Responding to and Care for Victim-Survivors
Standard 5	Management and Support of the Accused
Standard 6	Safeguarding Training and Audits

[13] Constitutions and Directory of the Sisters of Notre Dame de Namur, 1989, ## 20 and 23

STANDARD 1: WHAT IS SAFEGUARDING?

"What does the Lord require of you
but to do justice, love kindness, and to walk humbly with your God" (Mic 6:8 RSV).

1.1 The Principle

Starting from the principle that each person has a right to expect the highest level of protection, love, encouragement and respect, safeguarding means actively protecting a person's right to live in safety, free from abuse, harm and neglect, as detailed in A9.

1.2 Who is most in need of safeguarding?

Those most at risk of abuse today and therefore in need of safeguarding are *vulnerable persons,* as described on page 4: children, vulnerable adults and adults in vulnerable situations.

1.2.1 'Child'[14]

Under Canon Law, anyone under the age of 18 is classified as a child / minor. Consequently, even if local civil laws have different ages of consent, the Church treats any victim under 18 as a child, meaning that abusers may still face canonical procedures and penalties, regardless of civil positions.

1.2.2 'Vulnerable Adult'

The term 'vulnerable adult', sometimes referred to as an 'adult at risk', is a person in a state of infirmity, physical or mental incapacity, or deprived of personal liberty, which even occasionally or for a short time limits their ability to understand, desire or resist an offence. This has been clearly defined in *Vos Estis Lux Mundi* (2023).[15]

Safeguarding also applies to all of us. We must ensure that we maintain safety in all our interactions with *vulnerable persons.*

1.3 The Congregational Commitment to Safeguarding, Protection and Prevention

The Sisters of Notre Dame de Namur are committed to safeguarding all persons from abuse, particularly those who find themselves in vulnerable situations. This commitment directly relates to our mission in making known God's goodness and the church's common belief in the preciousness, dignity and uniqueness of every human being. Towards this all Sisters, staff and formation members will adopt the commonly accepted six key safeguarding principles.[16]

The Six Key Safeguarding Principles

1.3.1 Partnership

In all partnership work Sisters, staff and formation members will commit to the importance of safeguarding permeating all activities. We will also network with

[14] Code of Canon Law, c.97, par 1; Pope Francis, *Vos Estis Lux Mundi (VELM), Title 1, Article 1 (a)*
[15] *VELM,* Title I, Article 1, #2 (b).
[16] The Six Principles of Safeguarding originate in the Care Act, 2014, a piece of UK Government Legislation for the protection and safeguarding of adults. However, they are equally applicable to the safeguarding of children and have been generally accepted as important elements in any good safeguarding policy for any organization, business or community.

other relevant organizations to widen our horizons and provide the best service possible.

1.3.2 Empowerment

We will seek to empower *vulnerable persons* to understand their dignity as human beings and to protect the rights that stem from that dignity.

1.3.3 Protection

We will prioritize a culture of protection, seeking to know the correct protective response to situations and where to get support in cases of uncertainty.

1.3.4 Prevention

Through foresight and careful planning, we will take every care to ensure that all environments and activities are safe and that opportunities for abuse are minimized.

1.3.5 Accountability

All Sisters, staff and formation members will be transparent and accountable in their actions and decisions in relation to safeguarding matters.

1.3.6 Proportionality

We will respond to concerns in a manner proportionate to the situation and to the risk of harm, with priority given to the protection of those who are young and vulnerable to abuse.

1.4 Safeguarding Structures: Roles and Responsibilities

1.4.1 Congregational Leadership Team (CLT)

- Develop and keep updated a comprehensive safeguarding policy that is consistent with international standards of care and complies with Church and Civil Law.
- Ensure Congregation-wide dissemination of the Safeguarding Policy.
- Define a structure and process for review and accountability.
- Ensure that each Unit and ministry of the Congregation has a safeguarding policy which follows and implements Church, national and civil law, and is appropriate to its locality.
- Obtain legal or expert consultation as required.
- Appoint a Congregational Safeguarding Delegate (CSD) and Committee (CSC) with a specific direction and role.

1.4.2 Congregational Safeguarding Delegate (CSD) and Committee (CSC)

- Assist the CLT in the oversight and monitoring of safeguarding policies and practices within the Congregation.
- Receive congregational level safeguarding cases and keep the CLT informed of their progress.
- Advise on relevant training programs.

1.4.3 The Province Leadership Team (PLT) / Trustees

- Ensure that appropriate safeguarding structures and personnel are in place and that there are adequate financial[17] and other necessary resources for the implementation and development of safeguarding within the Unit.
- Cooperate with any investigation by civil authorities.
- Appoint a Unit Safeguarding Delegate (USD) and Committee (USC) to oversee and implement the Unit Safeguarding Policy and all safeguarding matters. If necessary, Units may share a delegate with another SNDdeN Unit.
- Ensure that structures of accountability are in place, including robust financial structures, together with a system for reviewing and updating the Unit Safeguarding Policy.

1.4.4 Unit Safeguarding Delegate (USD)

- Assist the PLT in implementing the Safeguarding Policy and good practice.
- Develop, disseminate and regularly update a Safeguarding Policy that corresponds to the Congregational Safeguarding Policy and is in line with the Civil Law of the Unit and with Canon Law.
- Keep abreast of ecclesial, national and local safeguarding changes and developments.
- Raise awareness of safeguarding and provide information for all on keeping themselves safe and raising safeguarding concerns.
- Ensure safeguarding is included in all recruitment processes.
- Arrange for all Sisters, staff and formation members to receive regular and appropriate training.
- Respond appropriately to allegations, according to the level of concern.
- Assist in any investigation by civil authorities within the expected time frame.
- Oversee the support given to victim-survivors and ensure that their voices are heard in all safeguarding work.
- Ensure the care and support of any person who is accused of abuse.
- Ensure that any person who makes an allegation is kept informed about developments, given police authorization.
- Forge local partnerships with statutory and other appropriate partner agencies.
- Maintain up to date and detailed records in secure systems.
- Regularly brief the PLT/Trustees on all safeguarding issues within the Unit and be accountable for the use of finances.
- Assist the PLT with budgeting for safeguarding.

[17] Budgets should allow for training; professional services, such as fees for consultants, auditors, lawyers and staff; compensation claims; necessary property maintenance to ensure safety; resources and other foreseen expenses.

1.4.5 Unit Safeguarding Committee (USC)

The PLT will appoint a Unit Safeguarding Committee of five people with a specific term of service.

USC Membership

The USD, two SNDdeN and three lay people with relevant expertise, such as in civil and canon law, police and social work, psychology, trauma-based therapy, health care and education.

USC Role

The main role of the USC is advisory to the PLT and the USD, and to support the USD according to need. In addition, they are responsible for:

- ***Risk Assessment Management***

  This will be carried out by a smaller group within the USC, defined as the *Risk Assessment Management Team (RAMT)*, whose membership will be the USD, as chair, and two other members of the USC.

- ***Review of allegations, serious concerns and procedures,*** such as ensuring that Safety Plans are in place for those who have been accused.

STANDARD 2

CREATING A CULTURE OF CARE, SAFETY, PROTECTION AND PREVENTION

"Without the active participation of all the Church's members, everything being done to uproot the culture of abuse in our communities will not be successful in generating the necessary dynamics for sound and realistic change." [18]

Congregational Commitment

In our commitment to creating a safe environment for all *vulnerable persons* with and among whom we minister, we will develop a culture of care, safety, protection and prevention for the people with whom we are involved, the places where we minister and the activities in which people engage. Wherever we are, each community and ministry will create a Code of Conduct which will ensure the implementation of the Safeguarding Policy.

2.1 Safe People

In General

Each person has a role to play in creating an environment in which all *vulnerable persons* can develop and be safe. Towards this, we will strive to build communities of love, care, respect and safety, giving close attention to the prevention of all forms of abuse and harm. We will:

- Foster healthy and professional relationships in all our communities and ministries such that individuals are treated with dignity and respect and each person is valued as a human being.
- Raise awareness of what constitutes healthy and unhealthy relationships and foster the skills required to report the latter to a designated adult.
- Require all who suspect abuse to report it for the sake of the health of the community and the safety of each individual. There is no tolerance for any abuse of children or adults in SNDdeN communities or ministries. Those who find themselves to be bystanders to abuse are called to report any behaviors or situations which suggest abuse.
- Have visible materials available that illustrate and encourage healthy relationships with good boundaries, and which provide procedures for reporting abuse.
- Include 'safe relationships' in the planning and review of programs, including reviews of working sessions with colleagues and all relevant individuals.

In Particular

Our commitment to safeguarding will be evident in all that we do.

- It will be integral to recruitment processes, from advertising to signing the Safeguarding Policy (T1, T2, T3, A2.)[19] It will include awareness of procedures if an allegation of abuse is made.

[18] Pope Francis, Letter to the People of God, 20th August 2028.

[19] Templates 1, 2 and 3 are possible forms for the employment process and admissions procedures. We use them by courtesy of the Marist Brothers. T2 suggests special considerations for receiving novices or professed Sisters from other religious congregations.

- We will provide initial and ongoing safeguarding training for all Sisters, staff and formation members according to their responsibilities and safeguarding updates.
- All will account for their engagement with safeguarding at their annual review.
- Each Unit and ministry will have its own Safeguarding Policy and designated safeguarding personnel whose names and contact details will be publicly displayed in all relevant places, together with clear procedures for reporting abuse or suspected abuse.
- Safeguarding will be a constitutive element of accountability reports at all levels in the Congregation.

2.2 Safe Physical and Online Environments

- All environments where Sisters and formation members live and where they and staff work will promote safety and establish appropriate safeguards to minimize opportunities to either harm *vulnerable persons* or place them at risk.
- Risk assessments will be made for all community, work and ministry situations and contexts (T5).
- Interaction with *vulnerable persons* will take place in an open or visible space, where possible, or within the line of vision of another adult.
- The use of information technology, including social media, will accord with the Congregational Communications Policy. There will be sanctions for their deliberate and inappropriate use and for exposing *vulnerable persons* to such use.[20] Sanctions may include permanent supervision, ministry and /or role restrictions both in the Congregation and public life, restricted access to certain places, criminal prosecution and its consequences.
- The taking and use of photographs will be guided by our interim guidelines (A7).
- Visitors to our places of ministry will be bound by our Safeguarding Policy.

2.3 Safe Activities: Risk Assessment (T5)

A risk assessment will be carried out by the most appropriate person before all activities / events with *vulnerable persons.* It will be written, signed and dated, will include a review date, and will be stored securely.

Steps for Risk-Assessing and Activity or Outing:

1. Using a Risk Assessment Checklist such as T5, identify the risks and the safeguards that need to be in place to address the risks. These are likely to include some of the following:
    - Relevant employees/volunteers
    - Appropriate ratio of staff to *vulnerable persons*
    - Transport and insurance
    - Relevant consent forms and contact telephone numbers
    - Health needs
    - Social Media
    - Risk of harm within the group
    - Other risk areas.

[20] Cf also *VELM,* 2023, op. cit, Title I, Article 1 (a), point 3.
At this point the Communications Policy of the SNDdeN is being updated.

2. Record who is responsible for ensuring that safeguarding is in place.
3. Identify other staff responsibilities during the activity / event.
4. Complete the risk assessment checklist and store it securely.
5. After the event, review the experience and store with the completed checklist.

2.4 **A Code of Conduct**

A Code of Conduct expresses the expectations we have of all Sisters, staff and formation members in terms of creating and maintaining a healthy community that deeply respects all with and among whom we live and work. It addresses how we conduct ourselves, with a view to creating a safe environment where:

- The possibility of abuse is minimized.
- *Vulnerable persons* feel a level of acceptance and security that frees them to grow into the image and likeness of God that is their dignity and identity.
- *Vulnerable persons* learn to protect themselves with appropriate behaviors.

The Code of Conduct applies to all Sisters, staff and formation members and is part of the contract between them and the Congregation. It will be subject to regular review so that it is always up to standard.

Units will write their own Code of Conduct to reflect the Congregational Code (A3).

STANDARD 3

RESPONDING TO CONCERNS AND ALLEGATIONS

"Speak out on behalf of the voiceless . . .
for the rights of all who are vulnerable (Prov. 31: 8-9 NRSV).

3.1 INTRODUCTION

As a Congregation we are committed to responding appropriately to concerns and allegations relating to the abuse of *vulnerable persons.*

Those with responsibility for safeguarding should be familiar with the following as they relate to their respective roles:

- What constitutes a concern and allegation of abuse (3.2 and 3.3 below, and A9).
- What constitutes a criminal offence in their respective countries with respect to safeguarding.
- The procedures for reporting concerns/allegations, both criminal and other, against Sisters, staff and formation members (3.5 below).
- Diocesan procedures for reporting allegations as appropriate.
- The Statutory Authorities to which allegations may need to be reported.
- The social and professional agencies for the support of victim-survivors.
- Civil processes which are available to victim-survivors and those who have been accused, and the means of accessing these.
- The necessity and implications of mandatory reporting (3.4.2).
- How to write a report, maintain records and prepare required communications within the restrictions of confidentiality (3.6 below).

They should also make contact and develop a collaborative relationship with the relevant authorities and agencies.

3.2 CONCERNS

- Concerns can be identified by observing the level of respect that individuals show when they interact with or talk about *vulnerable persons.* They can be identified by worrying signs in the behavior or appearance of a *vulnerable person,* including signs of grooming (manipulation). (See A9).
- In safeguarding, the term 'Red Flags' is often used to raise awareness of concerns, such as grooming (manipulation), which must be addressed, since they may be cumulative in nature and later lead to actual or potential risk of harm.
- All concerns should be reported to the USD for a risk assessment of actual or potential harm. The USD may consider a concern sufficiently serious to refer it to the statutory authorities who are responsible for considering whether to explore it further.
- Concerns which indicate that a *vulnerable person* is at risk or is the subject of abuse or harm are safeguarding matters and should be treated as such.

- Low-level concerns which do not involve risk or harm[21] and are not considered in law as safeguarding matters should be addressed at the local level to protect and strengthen the SNDdeN culture of care, safety and well-being for all. The Unit leader, for example, may require the individual concerned to participate in further training so as to avoid any repeated concerns. Failure to comply should incur appropriate action as identified in the Safeguarding Policy and/or in employment contracts.

3.3 ALLEGATIONS

An allegation is the disclosure of the abuse of a *vulnerable person,* either recent or in the past. It may be made by the victim-survivor or any other individual and may be received by a variety of means: phone call, letter, hearsay, from the police or other civil authorities, or anonymously. It may be made without the knowledge or consent of the victim-survivor.

An allegation is a statement that an individual:[22]

- Has behaved in a way that has harmed or may have harmed a *vulnerable person.*
- Has committed or may have committed a sexual offence against a *vulnerable person.*
- Has created, shared or purchased child abuse images.
- Has forced a *vulnerable person* to view child abuse images.
- Has behaved in a way that poses or may pose a risk of harm to *vulnerable persons.*
- Shows behavior which suggests unsuitability to work with *vulnerable persons.*
- Has behaved in a way that indicates the intention to avoid or interfere with a criminal, civil or canonical safeguarding investigation.

In some countries, certain allegations may not be regarded as criminal and some forms of behavior may be regarded as cultural, despite the civil law being clear that such behavior is a crime. However, all Sisters, staff and formation members will follow the directions of the Church and the Congregation regarding what is criminal and will be guided by the Gospel regarding what is cultural.

3.4 RESPONDING TO AN ALLEGATION

3.4.1 **LISTEN-RESPOND-RECORD-REFER**

- When an allegation is received against Sisters, staff or formation members, the person to whom it is disclosed must follow the Listen – Respond - Record – Refer process as outlined in Standard 4 and A4.
- In preparation for any financial claim, the Unit Leader will inform the insurance provider that an allegation has been made.

[21] Examples: Complaints about alleged unprofessional behaviour, having favourites, being disrespectful.
[22] *VELM, 2023, Title 1, Article 1, Scope of Application*

3.4.2 **MANDATORY REPORTING**

- As a Congregation we accept our legal obligation, confirmed by the Church,[23] to report without delay[24] to the relevant civil and canonical authorities any suspicion or incident of harm/abuse regarding a *vulnerable person,* whether the alleged abuse is current or past, whether the accused is alive or dead, regardless of where the abuse took place and of where the accused may live at the time of disclosure, and irrespective of personal opinion about the suspicion or allegation.
- In the Roman Catholic Church priests to whom a disclosure of abuse is made during the Sacrament of Reconciliation are bound by the seal of the Sacrament. In this situation priests should encourage those disclosing the abuse to report it in person to the police. They may also invite them to make the disclosure outside of the sacramental context, in which case the priests would be free to report.[25]
- Reporting will be done in conformity with local legislative procedures. In any country where sexual abuse of a *vulnerable person* is not considered to be a crime, we will nonetheless proceed with the canonical route.
- We will inform those who make an allegation that the information is exempt from confidentiality regarding reporting: it must be reported.

3.5 PROCESSING ALLEGATIONS

We cooperate with the relevant authorities and meet the requirements of Civil and Canon Law as they relate to allegations against Sisters*,* staff and formation members.

Canonical investigations, if relevant, do not run concurrently with civil investigations. Therefore, if a canonical investigation has been initiated, it will be suspended until the civil investigation is complete.

3.5.1 **Allegations against a Sister or formation members**

- When an allegation is reported against a Sister or a formation member, the person to whom it is disclosed proceeds according to Standard 4. The USD completes the Allegation Reporting Form (ARF, T6) and refers it to the Unit Leader. The Unit Leader will report it to the appropriate civil, diocesan and statutory authorities.
- Guided by Civil and Canon Law, the Unit Leader will decide whether the Sister or formation member who has been accused will be required to restrict the exercise of her rights / duties, including working with

[23] *VELM*, 2023, Title 1, Article 3. Summary: Through this Motu Proprio, Pope Francis has made it mandatory for all Catholic Priests and nuns around the world to report to the Church authorities when they learn or have well-founded motives to believe that a cleric or brother or sister has engaged in sexual abuse of a minor, sexual misconduct with an adult, possession of child pornography, or that a superior has covered up any of these crimes. This decree can be applied retroactively, meaning priests and nuns are now required to report even old cases of sexual wrongdoing and cover-ups and enjoy whistleblower protection for doing so (Dr. Sahayaraj Lourdusamy, *Pope Francis and Canon Law: His Vision of Law and Amendments',* 2020, 122-123).

[24] If possible, within 24 hours of the allegation being made. If the report is not complete within 24 hours, the initial draft should be given to the police so that they know that an allegation has been made. The completed form should be presented to the police as soon as possible.

[25] *VELM, Title 1, Art 3, #1*

vulnerable persons, while civil and/or canonical investigations are underway. This will be done in consultation with the USD and USC, the RAMT, and diocesan and civil authorities.

- The *Sister* or formation member who has been accused will be provided with legal representation, including costs, when there is a statutory or canonical investigation.
- If an allegation against a Sister or formation member is substantiated, the Unit Leader will also put in place for her a Safety Plan (T9) and support system, including a Support Person (A6).

3.5.2 **Against a Unit Leader**

- When an allegation is against a Unit Leader, the USD will complete the ARF (T6) and refer it to the statutory authorities, the Congregational Safeguarding Delegate (CSD) and Committee (CSC), with a copy to the Congregational Leader.
- Guided by the requirements of Civil and Canon Law, the CSD and CSC will decide whether the Sister who has been accused is required to restrict the exercise of her rights/duties while investigations are underway.
- They will also provide her with legal representation, including costs, and put in place a safety plan (T9) and support package, as in *3.5.1* above (See Standard 5, A6 and T9).

3.5.3 **Allegations against *Staff***

When an allegation is against a member of *staff* who is a cleric, a member of a religious congregation or a lay person, the USD will complete the Standard ARF (T6) and give it to the Unit Leader. The Unit Leader will ensure that the case is referred to the appropriate Safeguarding Leads and will confirm with them as to who will manage the case, including the care and support of the victim-survivor and the management of the process regarding the person who has been accused.

3.6 COMMUNICATION and INFORMATION SHARING: PRIVACY and CONFIDENTIALITY

3.6.1 People and Their Identity

We will protect those who raise concerns, in line with *Vos Estis Lux Mundi,* 2023.[26]

3.6.2 Oral and Written Communication, including Public Statements

We will protect the confidentiality of all case-related materials, keep them in a secure place with password protection as appropriate, and make them available, with police clearance, only to those with a right to see them and on receipt of a formal written request. The recipient should sign that they have received identified materials (T11).

[26] *VELM*, Title I, Article 4

We will avoid speculation, conjecture or reference to information or materials irrelevant to cases so as to protect the privacy of the person who has been accused, not to undermine the integrity of the legal process and not to prejudice a just outcome.

3.6.3 Pastoral and Media Statements

We will agree the content of all public statements with the designated communications personnel.

We will prepare pastoral statements, as required, for the relevant communities and others. These will comply with Data Protection Regulations and be limited to what is officially known. Preferably they will be written. They may include contact details for anyone wishing to share relevant concerns or make legitimate enquiries.

We will prepare a media statement, if required by Civil Law, that respects the privacy of individuals and the confidentiality of all information and materials.

STANDARD 4
RESPONDING TO AND CARE FOR VICTIM-SURVIVORS

"Compassion allows you to see reality; compassion is like the lens of the heart: it allows us to take in
and understand the true dimension. In the Gospels Jesus is often moved by compassion. And compassion is also the language of God" (Pope Francis).

4.1 Our Commitment

Mindful of the pain that victim-survivors carry from their experience of abuse and from any past attempts to disclose it, and mindful of others who are affected by abuse disclosures, as a Congregation and as a representative of the Church, we should:

- Receive them with humility, respect and compassion so that they feel heard, supported and sufficiently safe to begin to seek justice and begin/continue the healing process. This is particularly important for those who allege either recent or historical abuse by a Sister, formation member of member of staff in the course of their work and/or ministry.
- Provide appropriate available support to sustain them in the journey forward.
- Inform the insurance provider that an allegation has been made.
- Provide training to ensure that:
    - Sisters, staff and formation members know how to welcome, respond to and support victim-survivors, according to their roles, and to whom information is referred (cf. 4.2 and 4.3 below).
    - Designated listeners are equipped with the required listening skills.
    - There is appropriate support and supervision for listeners.
- Provide relevant printed information for victim-survivors.

4.2 Responding to Victim-Survivors

4.2.1 Contacting Victim-Survivors

On receiving information about allegations of abuse, the USD will contact the victim-survivor with information about the process (T8) and confirm the person with whom they will meet, if other than herself.

4.2.2 Meeting Victim-Survivors

Victim-survivors should always

- Be treated with respect and compassion.
- Be assured that the allegation will be dealt with appropriately.
- Be listened to carefully (A4) and offered information and support.
- Be offered the opportunity to be accompanied by a friend or advocate.
- Be briefed on the process as it unfolds, with police clearance, and supported throughout, while respecting confidentiality (T8).

4.2.3 Initial Response to Victim-Survivors and Time Factor

Preferably within 24 hours[27] of the first meeting, the listener / USD will proceed as follows: *(See A4 for further detail)*

i. ***Listen***
- *Listen* to the victim-survivor's experience.
- Advise them that the Congregation has a legal obligation to report all allegations of abuse to the Police and/or Statutory Authorities. Beyond that, disclosures will be treated with strict confidentiality.
- Talk through the process that will follow.
- Provide information on available relevant services.
- Offer further meetings and check that the person has contact details.

ii. ***Respond***
- Identify and secure immediate needs such as safety and/or medical attention, and take appropriate action, such as calling the relevant emergency services.
- Identify and make appropriate arrangements to meet other needs.
- Provide information about the reporting process.
- Offer a further meeting, as appropriate.

iii. ***Record***
- Write a summary of what has been heard, observed and done, with particular attention to the requirements of the ARF (T6), the guidelines in A4 and the decisions that have been made, with reasons. The listener, for example, may make a decision that goes against what the person wishes, such as not wishing the police to be informed.
- Sign and date the summary and give it to the USD, if other than herself.

iv. ***Refer***
- The USD will complete the ARF (T6) and notify
  - The Police, if an allegation has been made, is criminal and has not yet been reported.
  - Adult or relevant Children's Social Services.
  - Relevant regulatory bodies which may sometimes include the Diocesan authorities.
- The USD will open a case file and securely store all case materials. She will keep a record of all the actions she has taken and decisions she has made and will inform the Unit Leader.

[27] The listener's aim should be to do as much as possible of what is suggested within 24 hours. However, if the task cannot be completed within 24 hours, the listener, through the USD, should submit to the police what has been done so that the police know that an allegation has been made. Further details should be added at the earliest opportunity and the completed form then given to the police through the USD.

4.3 Supporting Victim-Survivors and Others Affected by the Disclosure

In addition to victim-survivors being affected by the abuse disclosure, their families and others are most likely also to be affected. In liaison with appropriate professional agencies the Congregation will offer caring and compassionate support to all.

4.3.1 During the listening process, listeners will be sensitive to the needs of victim-survivors to aid their recovery and the healing process.

4.3.2 The information leaflet given to victim-survivors will contain a range of available support services to address physical, emotional, psychological, spiritual and practical needs.

4.3.3 In liaison with relevant professional agencies and to ensure the best match between needs and services, each victim-survivor will be invited to meet a professional counsellor who will assist in making an appropriate choice of support from what is available, and will offer ongoing advice, as necessary.

4.3.4 The USD will coordinate visits to others affected by the disclosure to determine how best to assist them as they come to terms with what they have learned and, where appropriate, as they try to support the victim-survivor.

4.3.5 The USD will offer or arrange continuing contact with victim-survivors, keeping them abreast of developments within the boundaries of confidentiality and police clearance, and ensuring that they have the support that they need.

STANDARD 5

CASE MANAGEMENT and SUPPORT of the ACCUSED

"Even though I walk through the darkest valley, I fear no evil; your rod and your staff – they comfort me" (Psalm 23:4).

5.1 Introduction

The Unit Leader will oversee the management of the case against the person who has been accused but will assign responsibility for the process to those with appropriate training and expertise: the USD and other members of the USC, in particular the RAMT. The USC may consult relevant professionals, such as a Canon Lawyer and/or Civil Lawyer.

To assist with the management of safeguarding cases, a template checklist, such as T10, should be followed by both the USD, USC and Unit Leader.

5.2 General Principles

The Congregation's aim is not simply to minimize opportunities for abuse or harm, but to maximize opportunities for the growth and flourishing of all individuals, each of whom is on the human journey of 'becoming'.

Hence those against whom allegations are made should always:

- Have their privacy respected throughout the process (Standard 3.6).
- Be treated with respect and compassion.
- Be treated with dignity and without prejudice, as innocent until proven otherwise.
- Be informed, given police authorization, that an allegation against him/her has been referred to the statutory authorities.
- Be informed, given police authorization, of the allegation itself.
- Be advised to consider legal representation.
- Be listened to carefully.
- Be offered information and support.
- Be briefed on the process as it unfolds and be supported throughout, while respecting confidentiality and given police authorization.

5.3 Safety and Support Plans (T9, A6)

5.3.1 For Sisters / Formation Members

Those managing a case will put in place a Safety Plan (T9) and support structure for any Sister or formation member against whom an allegation has been made. This may be done either during an enquiry or at the end of the enquiry stage.

The Safety Plan is a signed agreement between the Unit Leader and the Sister / formation member who has been accused**.** It aims:

- To protect, through appropriate ministry restrictions, all those relevant to the case and the wider public.
- To ensure that the accused Sister / formation member has the spiritual, physical and psychological support that she needs while the case is in process.
- To provide her with the human / pastoral support of an officially appointed support person with a specific role (A6).

- To review at intervals her care and wellbeing.
- To support those impacted by the allegation:
    - The community from which the Sister / formation member is being removed and the community to which she is being assigned.
    - The context where the alleged abuse took place.
    - The family and/or friends of the Sister/formation member.
    - Others who may be impacted by public information about the allegation.

5.3.2 For Staff

Safety Plans and support structures for staff who have been accused should be provided by the appropriate case management teams: e.g., the diocese for clerics or diocesan employees; the regional superior for a religious; HR personnel for other staff.

It would be appropriate for the Congregation to check that these are in place for any staff member who has been accused.

5.4 Conclusion of Civil and Canonical Processes

5.4.1 For a *Sister or Formation Member*

- The accused Sister / formation member will be informed of the outcome of the process and of any implications for her role or conduct.
- If no further action is to be taken, the Unit Leader will manage her return to her community and ministry as appropriate. It is advisable for her to have a full psychological risk assessment by suitable trained professionals and then a phased return to ministry. A return to any form of ministry must include the important elements of support, supervision and regular review.
- If a younger Sister is found guilty, it may be better to help her re-establish herself in secular life, since opportunities for ministry will be severely curtailed as a member of a religious congregation. If an older Sister is found guilty, it may not be possible for her to establish herself in secular life, in which case the Congregation needs to find for her a suitable residence and living situation. Opportunities for meaningful work should be sought that do not involve contact with children or vulnerable groups.
- If a formation member is found guilty, the Unit Leader and Formation Team should help her to re-establish herself in secular life.

5.4.2 For *Staff*

If no further action is to be taken, the Unit Leader will likewise be responsible for the return to ministry of staff, in dialogue with their Case Management Teams. If staff are found guilty, their Case Management Teams will be responsible for appropriate subsequent action.

5.5 Appeals Process

Those who have been accused have the right to appeal against any decisions made as part of a safeguarding or disciplinary process, in line with the relevant employment grievance and /or appeals policies and procedures.

STANDARD 6

SAFEGUARDING TRAINING, REVIEWS and AUDITS

As Sisters of Notre Dame de Namur, our aim
is to create a culture of protection and prevention wherever we minister to others.
"You are safe with me." May this be our motto!

6.1 Introduction

In order to keep abreast of the evolving world of safeguarding and ensure that we reflect best practice in all our safeguarding work, all Sisters, formation members and staff shall have appropriate and adequate initial and ongoing training, and all safeguarding policies, procedures and practices must be subject to regular reviews and continuous update. Therefore,

- Unit Leadership will include training in their safeguarding budgets.
- USDs will identify their Unit's training needs and meet these through professional in-person or virtual training either as individual Units or in collaboration with others.[28]
- Training is mandatory for all Sisters, formation members and staff who will be accountable for their participation.
- USDs and the CSD will keep a record of training provision and participation at their respective levels and will follow congregational guidelines for forwarding this information to those who maintain the congregational database.

6.2 Training Provision

- USDs should provide at least one basic training session each year / as appropriate for new Sisters, formation members and staff, together with at least one ongoing training session each year for all who have completed basic training.
- The framework for all training will be the Gospel, CST, the teaching of the Catholic Church, the Charism and Constitutions of the Congregation, Canon and Civil Law, Civil Conventions and the experience of abuse-survivors, either through personal encounter or case studies. Every effort should be made to weave these into each training unit.

6.3 Training Units

6.3.1 Five Key Areas

With a view to building healthy communities where all feel safe, five key building blocks should be appropriately integrated into training.

- The dignity of the human person and implications for behavior
- Building relationships
- Communication skills, including non-violent communication
- Discernment, decision-making and review/evaluation
- Conversations in the Spirit

[28] With other religious congregations, with their diocese, with other SNDdeN at continental or congregational levels.

Where possible, case studies should be used in training. These allow participants to become aware of the reality of abuse and its impact on victim-survivors and others.

6.3.2 Basic Training for All: General Introduction to Safeguarding

This will include:

- *Definitions*: safeguarding, child, vulnerable adults, etc.
- *The nature of abuse*: Types and indicators; Why abuse happens; The different settings for abuse, including religious communities; Grooming
- *The purpose of safeguarding*: to build a culture of care, consistent with our Gospel commitment to love others, especially those who are vulnerable, so that they are respected, feel safe and know how to keep themselves safe through protective behaviors.
- *Identifying and addressing risks*
- *Safeguarding Structures*, both personnel and procedures
- *Concerns, allegations and disclosures* of abuse, and how to respond

6.3.3 Role-Specific Training

In addition to the basic course above, all safeguarding and leadership personnel will receive initial and ongoing training for their safeguarding responsibilities. Training will include:

- Role-specific safeguarding responsibilities, including administration.
- Budgeting and finance procedures for safeguarding.
- Updates relevant to needs and roles as affected by Church and Civil Law, and relevant statutory bodies.

Individuals/groups that should receive role-specific training include

- Unit Safeguarding Delegates and Committees
- Unit, community and ministry leaders; Formation Personnel
- Staff in their particular roles
- Those who accompany and support victim-survivors
- Those with responsibility for the care, management and support of the accused.

6.3.4 Situation-Specific Training: Formation Members and Professed Sisters

Initial and ongoing formation on all aspects of sexuality and on living a healthy celibate life with a vow of chastity in community. Formation members will have a spiritual accompanier/director throughout initial formation. Professed Sisters will be encouraged to have regular spiritual accompaniment/direction. Areas of this training may be offered to staff (religious, clerics, lay people) as appropriate.

6.3.5 Situation-Specific Training: Elder Care (Sisters, Formation Members, Staff)

Awareness training with reference to elderly or infirm Sisters, particularly those with physical or cognitive impairments. Special attention will be given to an understanding of the impact of different conditions on patients, the specific care needs that flow from the conditions, and how best to respond to the individuals.

6.3.6 Training for *Vulnerable Persons*

Appropriate training should be given to the *vulnerable persons* entrusted to our care so that they know how to keep themselves safe. Given that abuse sometimes occurs in the home, training should be extended, where feasible, to the parents, guardians, and carers of our *vulnerable persons.* This may help to reduce instances of abuse and may extend the network of support for the care of *vulnerable persons.*

Training should help *vulnerable persons*:

- Become aware of their human dignity, of the value of healthy community and of how to build that community through healthy relationships.
- Become more aware of behaviors, boundaries and responsibilities that stem from the dignity of each person.
- Recognize unhealthy relationships.
- Recognize when their human dignity is being neglected, compromised or transgressed and know how to respond and report, should this happen.

6.4 Accountability: The Safeguarding Year, Training, Audits

These are the responsibility of the USD and USC.

6.4.1 Throughout the Year

- Keep a record of training and participation.
- Carefully log all risk assessments, together with follow-up actions and outcomes.
- Record all low-level concerns, allegations and accusations, with procedures taken and outcomes, including the progress of cases. Identify the strengths and weaknesses of structures and procedures. Consider how you might turn weaknesses into strengths.
- Regularly review the Policy and its implementation, following an agreed plan that involves as many appropriate people as possible, and an agreed process. Make relevant amendments in dialogue with the USC and PLT. Keep a record of these reviews.
- Regularly assess the match between training provision and needs in the light of the above and of safeguarding developments. Begin to map a training plan for the following year.
- Keep accurate financial records, making observations as you go through the year for the following year's budget.
- Update the PLT as appropriate.

6.4.2 As Appropriate

- Arrange audits,[29] initially at a five-year interval or as fits with national audits, where these are done.
- Develop an Action Plan that implements the Audit recommendations and supports efforts towards best practice.

[29] Audits assess the Congregation's safeguarding policies and procedures to ensure that they are comprehensive, up to date and in line with legal requirements. National audits are rare, but you should invite a private Audit at appropriate intervals, with a view to always moving towards best practice.

- Calculate costs for the following year to allow for training, professional services, audits, as appropriate, compensation claims, resources etc.

6.4.3 At the End of the Calendar Year: Annual Reporting

- Using a structure that incorporates the above and other relevant information, write a report for the PLT.
- Consider some form of event and / or communication that highlights the safeguarding year and helps communities, staff and others value and embrace safeguarding.

SAFEGUARDING POLICY

DECLARATION OF COMMITMENT

The Congregation of the Sisters of Notre Dame de Namur is committed to creating and maintaining a culture of safeguarding in its communities and ministries, as embodied in Scripture, the teaching of the Catholic Church, CST, Civil and Canon Law, appropriate international conventions, and as outlined in this Safeguarding Policy. We commit to upholding this culture for all people, particularly for *vulnerable persons.*[30]

Observation of the policy is mandatory for all Sisters, formation members[31] and staff. [32]

As a ☐ Siste*r,* ☐ *Formation Member,* ☐ *Staff* member (please select), I declare that:

- ❖ I have read and understand the contents of the SNDdeN Congregational Policy for the Safeguarding of Children and Vulnerable Adults (2026).
- ❖ I will own and uphold the care and protection of all *vulnerable persons* in my work (staff), ministry (Sisters, Formation Members) and community (Sisters, Formation Members), according to the requirements of this policy.
- ❖ I will abide by the Code of Conduct.
- ❖ I will engage in all initial and ongoing training that is relevant to my role.
- ❖ I will be transparent in communicating perceived breaches in safeguarding and areas that call for improvement.
- ❖ I will take part in all evaluations and reviews with a view to continual improvement for our practice.
- ❖ I will take responsibility for my own spiritual, physical, mental and emotional health.

Name: _____

Signature: _____

Date: _____

[30] *Vulnerable persons:* Those made vulnerable due to age, diminishment or being in a vulnerable situation. It is a reference to the people-in-their-situations and is not a description of the people themselves. They include: children under the age of 18, as defined in Canon Law; adults with physical and/or other diminishments; adults in a dependent situation; adults who may find themselves in situations of vulnerability, even if only for a short time, due to various forms of what is defined as transient vulnerability because of illness, loss or an imbalance of power. These may include employees, junior staff, students, apprentices, patients, formation members and junior professed religious, etc.

[31] Formation Members: Those preparing for membership of the Sisters of Notre Dame de Namur.

[32] Staff*:* All who assist the Sisters of Notre Dame de Namur in any capacity in the context of their life and work. They include paid, compensated and voluntary workers, agency workers, formation members, colleagues, chaplains and regular guests. They may be clergy (seminarians, deacons, priests, bishops), religious women / men of other religious congregations, lay people

ABBREVIATIONS

ARF	Allegation Reporting Form.
CLT	Congregational Leadership Team
CSC	Congregational Safeguarding Committee
CSD	Congregational Safeguarding Delegate
CST	Catholic Social Teaching
HR	Human Resources
PCPM	Pontifical Commission for the Protection of Minors (An office of the Holy See).
PLT	Provincial Leadership Team
RAMT	Risk Assessment Management Team
SNDdeN	Sisters of Notre Dame de Namur.
UGF	Universal Guidelines Framework (for Safeguarding), provided by the Vatican's Pontifical Commission for the Protection of Minors (PCPM).
USD	Unit Safeguarding Delegate.
USC	Unit Safeguarding Committee
VELM	*Vos Estis Lux Mundi,* Apostolic Letter of Pope Francis, issued Motu Proprio, 2019, updated 2013.

APPENDIX 1

United Nations Convention on the Rights of the Child (CRC, United Nations, 1989)

The Convention on the Rights of the Child articulates the rights of all children and has been verified by all but one of the 197 member states of the United Nations.

The preamble notes that children need a family environment and an atmosphere of love and understanding for their full healthy development. While this would be a characteristic of our schools and other ministries with children, it always needs conscious attention, given the impact on children of a rapidly changing world.

There are 54 articles in the CRC. The last 12 are about collaboration between adults and governments to make sure that all children can enjoy their rights. A summary of the relevant articles from 1-42 is below. [1]

1. ***The identification of a child***: everyone under the age of 18 has all the rights in the Convention.
2. ***Non*-discrimination**: The Convention applies to all children without discrimination, whatever their ethnicity, sex, religion, language, abilities or any other status, whatever they think or say, whatever their family background.
3. ***Best interests of the child*** must be a top priority in all decisions and actions that affect children.
4. ***Implementation of the Convention:*** Governments must create systems and pass laws to promote and protect children's rights. Safeguarding is one such system.
5. ***Parental guidance and a child's evolving capacities:*** Parents/carers should rear their children to know and enjoy their rights, while recognising the child's increasing capacity to make their own choices.
6. ***Life, survival and development:*** Every child has a right to the development of their full potential.

12. ***Respect for the views of the child.*** Children have a right to express their views, feelings and wishes in all matters affecting them, and to have their views considered and taken seriously.
13. ***Freedom of expressions:*** Children must feel free to express their thoughts and opinions and to access all kinds of information, as long as it is within the law.
14. ***Freedom of thought, belief and religion:*** Children have a right to think and believe what they choose and to practise their religion, as long as they are not stopping others from enjoying their rights. Public bodies must respect the rights and responsibilities of parents to guide their children as they grow up.
15. ***Freedom of association:*** Every child has a right to meet with other children and to join groups and organisations, as long as this does not stop other people from enjoying their rights.
16. ***Right to privacy:*** No child shall be subjected to arbitrary or unlawful interference with his/her privacy, family or correspondence, nor to unlawful attacks on his/her honor or reputation. A child has the right to the protection of the law against such interference or attacks.
17. ***Access to information from the media:*** Every child has a right to reliable information from a variety of sources but should be protected from information that could harm them.
23. ***Protection from violence, abuse and neglect:*** Children must be protected from all forms of violence, abuse, neglect, maltreatment or exploitation by their parents, carers or others.

[1] From the website of UNICEF, United Nations' International Children's Emergency Fund

24. ***Children with a disability –*** have a right to live a full life with dignity and independence, as far as possible, and to play an active part in the community.
25. ***Health and health services:*** Every child has a right to the best possible health, including a healthy environment and education on health and wellbeing.
26. ***Review of treatment in care:*** Children in care or an equivalent have a right to regular reviews.
29. ***Right to dignity:*** In school and equivalent situations, discipline should be administered in a way that respects the child's dignity and conforms with the Convention.
30. ***Goals of education:*** Education must develop every child's personality, talents and abilities to the full and must encourage the child's respect for human rights, for their parents, for their own and other cultures and for the environment.
31. ***Children from minority or indigenous groups*** have the right to learn and use the language, customs and religion of their family, even as minorities in the country where they live.
32. ***Leisure, play and culture:*** Every child has the right to relax, play and take part in a wide range of cultural and artistic activities.
33. ***Child labor:*** Children must be protected from economic exploitation and work that is dangerous or might harm their health, development or education.
34. ***Drug abuse:*** Children must be protected from the illegal use of drugs and from being involved in the production or distribution of drugs.
35. ***Sexual exploitation:*** Children must be protected from all forms of sexual abuse and exploitation.
36. ***Abduction, sale or trafficking:*** Governments and other relevant parties must protect children from all other forms of exploitation prejudicial to any aspects of children's welfare.
37. ***Other forms of exploitation:*** Children must be protected from all other forms of exploitation which are prejudicial to any aspect of the child's welfare, for example exploitation for political activities, by the media or for medical research.
40. ***Recovery from trauma and reintegration:*** Children who have experienced neglect, abuse, exploitation, torture or who are victims of war must receive special support to help them recover their health, dignity, self-respect and social life.
43. ***Knowledge of Rights:*** Agencies must actively work to make sure that children and adults know their rights as identified in the Convention.

A Note on the Protection of Adults in Vulnerable Situations

Adults in vulnerable situations must be given the same protection as children. The *Convention on the International Protection of Adults* (also known as the *Hague Convention* of 2000) provides a legal framework for protecting vulnerable adults in international situations (c2b94b6b-c54e-4886-ae9f-c5bbef93b8f3.pdf). While this convention is a key international instrument, national laws and policies also play a crucial role in safeguarding vulnerable adults. For example, in the UK, the *Care Act 2014* (Care Act 2014) provides a statutory framework for adult safeguarding.

Each Unit should research its local and/or national services for the best information, resources and advice.

APPENDIX 2

Receiving Candidates to the SNDdeN and Sisters or Novices from other Religious Congregations.

Each Unit of the Congregation will have its own admissions procedure for those who wish to discern their vocation with the Sisters of Notre Dame de Namur, and its own transfer procedure for those seeking admission from another religious congregation. Given the commitment of the Congregation of the Sisters of Notre Dame de Namur to Safeguarding, Units are advised to make appropriate adjustments to established procedures, as necessary.

The following, regarding Safeguarding, might require careful consideration:

Considerations For Admission to the Sisters of Notre Dame de Namur, Including for Sisters/Novices Coming from Another Congregation

a. A psychological report.
b. Appropriate references.
c. Information about their experience and understanding of spiritual direction and prayer.
d. Evidence that they understand that Safeguarding is a shared responsibility for all members of the Congregation.
e. Confirmation of no legal proceedings in place.

APPENDIX 3

CONGREGATIONAL CODE OF CONDUCT

INTRODUCTION

Our recognition of the dignity and value of each person, race and nation, and our awareness of the obstacles to the practical realization of this truth calls us to continual personal and communal conversion, insofar as we share responsibility for social divisions. We, therefore, strive to awaken in ourselves and in those with whom we work a conscience which recognizes sin in its individual and social manifestations, and we commit ourselves to that action for justice which makes real and credible the message of the Gospel. We work with others to transform unjust structures and systems as we participate in creating new ways of relating which enable all to experience more fully the goodness of God.[2]

The above articles from the Constitutions of the SNDdeN express our commitment to strive for the transformation of relationships and the creation of a Kingdom of God community in which each individual is loved and respected. The Code of Conduct as outlined below expresses the expectations we have of all Sisters, formation members and staff towards this goal. It addresses how we conduct ourselves, with a view to creating a safe environment where

- The possibility of abuse is minimised.
- *Vulnerable persons* feel a level of acceptance and security that frees them to grow into the image and likeness of God that is their dignity and identity.
- *Vulnerable persons* learn to protect themselves.

Observation of the Code is essential to effective safeguarding and is, therefore, part of the safeguarding contract between the Congregation of the SNDdeN and all Sisters. formation members and staff. It applies to all areas of our life and in a special way to our engagement with *vulnerable persons.*

The Policy and Code will be subject to regular review so that they are always up to standard.

THE CODE

Aware of the positive and negative influence of human behavior on others, all Sisters, formation members and staff will maintain a professional relationship with those with and among whom they minister, whether in community, with others or with *vulnerable persons.*

1) They will treat all people, particularly *vulnerable persons,* with the respect, compassion, dignity and equity that communicates God's universal love and fosters the innate dignity of all as images and likenesses of God.
    a) They will be professional in their presence and appearance, and avoid scandals caused by inappropriate dress and language, and the use and/or approval of inappropriate substances.
    b) In all situations they will
        i) Avoid being alone with *vulnerable persons,* if possible.
        ii) Respect their own boundaries and the boundaries of others and encourage all to do likewise.

[2] Constitutions of the Sisters of Notre Dame de Namur, 1989, ## 20-23

iii) Encourage all to be aware of their rights in this regard and to develop strategies to safeguard them.

iv) Be sensitive to and avoid any action/touch that may humiliate another, be misconstrued by the other or play into his/her vulnerabilities.

v) Use language that is constructive rather than destructive in tone and content.

vi) Avoid all forms of harassment and any behavior that may shame, humiliate, belittle or degrade children or *vulnerable persons.*

vii) Avoid inappropriate topics of conversation, such as conversations with a sexual orientation, unless pertinent to the situation.

viii) Avoid taking photographs of *vulnerable persons* for public use without their consent or the consent of their parents/guardians, as appropriate.

ix) Treat as confidential all that is shared, unless this involves self-harm or the harm of another.

2) They will strive to raise awareness of the negative impact of pornographic materials on self-perception, the perception of the human body and consequent behavior, and the perception of other people.

3) They will observe practices that are conducive to dignity, respect and safety when transporting vulnerable people and/or making short-term living arrangements for them. When this involves minors, they will dialogue with the parents/guardians and keep them fully informed of arrangements.

4) In situations where one-to-one meetings are necessary, they will

   a) Use a place that allows the other to be in the direct line of vision of another adult.
   b) Avoid anything that reflects a conflict of interest.

5) They will be familiar with the SNDdeN Safeguarding Policy and Code of Conduct and will adopt appropriate measures to hone their safeguarding awareness and practices. These may include:

   a) Confidential anonymized record keeping, when necessary.
   b) Using the Safeguarding Policy and Code of Conduct for regular self- and peer- evaluation.
   c) Regular supervision.
   d) Sensitivity to their own vulnerabilities and doing all that is necessary to take care of their own wellbeing.
   e) Taking appropriate action to report any concerns of abuse.

APPENDIX 4

LISTENING TO VICTIM-SURVIVORS

1: THE IMPORTANCE OF LISTENING

Many, if not most, victim-survivors will have been carrying their experience of abuse for months, if not years. For some it may be so deeply buried and tightly guarded that they will struggle to articulate it. Some may have tried already to report the abuse but found unsympathetic listeners. Some may have found themselves accused of initiating the abuse. Some may have had their self-esteem so deeply shaken that they now carry self-doubt, if not self-loathing. Many will no longer be able to conceive of a loving God and may have abandoned the Church, religion and everything associated with them.

The way in which victim-survivors tell their stories may be as varied as the stories themselves: they may ramble or say very little, speak with emotional rage or hurt, speak clearly or with confusion, or lapse into long and perhaps tear-filled silences.

As a listener your role is to be present to the person and their story with compassion which can be healing. *Your focus is to understand the perspective of the speaker without judgement or interpretation*. So, accept the communication in whatever way it comes; give speakers control over what they share and the pace of their sharing; listen with respect; use the speaker's words to convey that they have been heard; be non-intrusive and refrain from interpretation; show concern for the impact of the abuse on the speaker. These will communicate that you are there as a listener and not an inquisitor. It may be that a speaker will experience some sort of healing just from BEING HEARD and being accepted.

It is essential that, as a listener, you take your role seriously. You must gather information relevant to the allegation, but your role does not include investigation. You are primarily there to enable the person to feel sufficiently safe and supported to engage with the process, to begin or continue the journey of recovery, and to seek justice.

2: LISTENING AND RESPONDING: FOUR STEPS

You will need to take notes of essential points as you listen (**Step 1**). Ask permission and say that you will show the speaker the notes at the end of the session, if they wish to see them. This helps to establish trust. Be sure to capture the information required for the ARF (**'Step 4'**). Do not record on a mobile device.

STEP 1: LISTEN – OBSERVE - BE SENSITIVE

a) Be calm and reassuring.
b) Be clear that confidentiality cannot be held on disclosures of abuse, but that it will be reported only to the appropriate authorities.
c) Be sensitive to the person's age and level of understanding as you listen.
d) Be patient: Allow the person to set the pace; allow silences; encourage the speaker to be sensitive to what's going on in the silences, without necessarily having to share that with you.
e) Listen and acknowledge what is being said without judgement, without minimizing or exaggerating the information, without intrusive or leading questions.
f) If necessary, use open questions or other recognized means of becoming aware of the impact of the alleged abuse on the speaker.

g) Use the person's own words in feedback to let them know that they have been heard and/or when you wish to seek clarification on something that the speaker has said. Do not offer an interpretation.
h) Listen for what support the person may wish/need. If they are unsure, suggest that they get in touch once they have had some time to think. If they ask for spiritual accompaniment, counseling or another therapy, ask them to share how they think these may help them.
i) Be sensitive to any underlying damage to the victim-survivor from the alleged abuse, whether physical, psychological or other, and be attentive to any signs of potential physical abuse.

STEP 2: RESPOND

a) Consider the immediate safety of the victim-survivor and take appropriate action, particularly if a child. Call the relevant emergency services or the police if someone is at immediate risk of harm or in need of medical attention.
b) Provide information about appropriate support services, while respecting the person's free response.
c) Give the speaker a sense of the next steps in the process, preferably in print.
d) If the victim-survivor asks questions you cannot answer, say you will find out and let them know. Avoid promises you may not be able to fulfil.
e) Arrange another meeting, as appropriate, and/or give your contact details.

STEP 3: RECORD

a) Mindful of safety and confidentiality (**Standard 3.6)**, complete your notes as soon as possible after the meeting, conscious of accuracy, dates and times. Your focus should be:
    a. The conversation (date, time, venue, those present)
    b. The alleged abuse (Who? The abuse? Where? When? Others present?)
    c. Indications / signs of potential physical abuse. Use a body sketch.
    d. Previous attempts to disclose the abuse, if relevant, and whatever details the person may remember.
    e. If a decision is made to act against the wishes of the individual or without their consent, include this in the report. It may be, for example, that a victim-survivor does not wish the police to be informed, for fear of repercussions.
b) Sign and date the notes. Give them to the USD, who will open a case file and store them securely in full compliance with civil requirements and with **Standard 3.6.**
c) Note:
    a. Your notes assist the police in processing the current case and in recognizing any potential pattern of abuse by the same abuser on others.
    b. It is an offense to withhold evidence from the police or other designated authorities. It is also an offense to destroy the written record.

STEP 4: REFER

The USD will complete an ARF **(Template 6)** and give it to the Unit Leader, the police, other relevant civil and canonical authorities, as appropriate.

The USD will keep a secure record of all decisions relating to the case and ensure that the Unit leader, victim-survivor and the person who has been accused are kept informed, as permitted by the police.

APPENDIX 5

RECORDING ALLEGATIONS and SUSPICIONS OF ABUSE and FOLLOW UP PRODEDURES: GUIDELINES[3]

Note:	*Everything that you hear, say, receive and give, including every contact you make whether in person, by letter, email or telephone, MUST be recorded in the relevant case file. Each entry must say where and how the contact took place, with date and time, and should be signed by the author.*
1	Using the Allegation Reporting Form, create a Child/Vulnerable Adult Protection Case File for every referral that includes a log of actions, and the information that was received. Entries should be made as soon as possible after the event but before the end of the day. They must be timed, dated, and signed by the author.
2	Take possession of any written records made by any person in connection with the case and place them in the case file. This includes printed copies of email communication.
3	Explain the procedures for addressing the allegations of abuse to the person who has raised the issue. Note that consent may not be required to make referrals to the authorities.
4	Ensure support structures are put in place to protect the victim-survivor. A support person may be appointed to accompany the victim-survivor, and professional counseling may be offered. As permitted, keep the victim-survivor informed of what is happening as the investigation continues.
5	Inform the person who has been accused of the details of the allegation, as permitted by the police, and record the content of her response. The content should be agreed with the accused.
6	If the Unit Safeguarding Delegate seeks advice from the Police or a support service, such as the Health Service, on whether to make a referral, she should keep a record of the outcome of the consultation.
7	In order to monitor the case, maintain, as far as professionally permitted, a dialogue with the person conducting an independent investigation. Details of contacts made should be recorded chronologically in the case file and dated.
8	Ask the Police or Support Service in writing for an update on the outcome of their investigations, as far as professionally permitted.
9	Detailed records should be kept of the progress of the investigation. These should not be given to the person who has been accused.
10	It is a legal obligation to retain all paper-based records, both created or received. Nothing should be destroyed. Everything must be stored securely and be accessible only to assigned personnel. Those wishing access to anything in the case file must provide a written request and sign for the receipt of requested materials. It should be noted that provision of documentation is not automatic even when a written request has been submitted.

[3] Courtesy of the Marist Brothers.

APPENDIX 6

ROLE OF SUPPORT PERSON FOR AN ACCUSED SISTER OR FORMATION MEMBER

Introduction

The Major Superior appoints a Support Person for a Sister or formation member who

- Is subject to a criminal investigation or against whom serious allegations have been reported to the police for investigation.
- Has been arrested and charged with sexual or any other offenses.
- Is on restricted ministry because of an historical allegation of abuse or a pattern of behavior which is not compatible with her vocation.

The appointment of a Support Person is part of the Safety Plan (an imposed or agreed arrangement, **Template 9**) which may be amended and adapted according to the needs of each individual situation.

1. The Support Person

The support person may be a priest, a religious woman or man, a laywoman or layman. The appointment is made in dialogue with the Sister or formation member who has been accused and who may nominate someone she can trust. However, it is the Unit Leader's responsibility to confirm the suitability and appointment of the nominee.

a. If a priest, he must have been ordained for a minimum of 15 years, be in good standing with the respective Bishop and have the Bishop's approval.
b. If a religious, the person must have been finally professed for 15 years and be in good standing with their major superior.
c. If a layperson, s/he should be a mature person who shows stability at professional, personal and spiritual levels.

2. Qualities of the Support Person:

The Support Person should

a. Be trustworthy, discreet, honest and wise.
b. Have a rigorous understanding of Safeguarding policies and procedures.
c. Have good pastoral gifts and be a living example of Gospel values.
d. Be a person of prayer and compassion who can respond with both empathy and firm boundaries in his/her interactions with others.
e. Know how to identify risk-taking behavior and suicidal ideation.
f. Not have been subject to any Safeguarding concerns at any time.
g. Declare any real or potential conflict of interest at any time in role.

3. Tasks of the Support Person

The Support Person will:

a. Make a formal commitment by signing an agreement with the Unit Leader and reviewing this commitment every 6 months or more frequently, as necessary.
b. Meet the person who has been accused on a regular basis:

i. Offer emotional support within agreed boundaries and ensure that the meetings are supportive and held in a safe place.
ii. Encourage the person who has been accused in her spiritual life and prayer, but neither as a spiritual director nor, if a priest, as a confessor.
iii. As needed, explore with the person who has been accused any practical issues of care and safety which can be addressed by the Religious Congregation.
iv. Attend meetings with the Sister/formation member in a supportive capacity, if requested.

c. Keep an appropriate and professional record of all meetings and contacts, knowing that the record is the property of the Religious Congregation.

d. Observe strict confidentiality about everything, with the following exceptions:
i. If the Support Person or the accused Sister/formation member has any concerns, these must be shared with the USD as soon as possible.
ii. If the accused Sister/formation member makes any admission of guilt or discloses other criminal activity, the Support Person must share these with the USD and make a statement to the police.
iii. In the event of either of the above, the Support Person will explore with the accused Sister/formation member any practical issues of care and safety and then share these with the USD as soon as possible.

e. Do what is necessary for personal care while in a support role:
i. Attend regular professional external supervision.
ii. Attend annual Continual Professional Development Training.

f. Carry out all of the above within professional boundaries.

4. Tasks Which Are Not the Remit of the Support Person

The Support person must not:

a. Speak on behalf of the accused or be an intermediary contact with either the USD, Superior, civil authorities, the Press, Social Media or any other legal systems.

b. Act as a 'Canon Lawyer' for the accused, even if qualified. When this is necessary, a Canon Lawyer can be resourced in consultation with the accused Sister/formation member.

c. Act in the role of Spiritual Director for the accused person or of Confessor, if a priest.

d. Assume any advocacy role or respond personally or on behalf of the accused to any communication addressed specifically to the accused.

e. Provide any therapeutic or psychiatric services to the accused, even if professionally qualified.

5. Termination of the Role of Support Person

If at any time the Support Person finds the tasks of the role too burdensome or costly at an emotional or psychological level, s/he is allowed to terminate the agreement. This should be done with due notice so that alternative arrangements can be put in place.

The Support Person should be offered a debrief and feedback session and a final supervision appointment. Equally if the Support Person is unable to fulfil her/his duties or maintain professional boundaries, the decision might be made by the Unit Leader to terminate the agreement/contract.

APPENDIX 7

TAKING AND USING PHOTOGRAPHS[4] : (Interim[5] Policy)

Aim: To safeguard the identity of individuals in publications[6] which use photographs.

The guidelines below for taking and using photographs of *vulnerable persons* may seem extremely limiting for those who work in the field of communications, given that on most occasions when photographs are used there are no negative consequences. Unfortunately, however, there are also occasions when this is not the case.[7]

We know, for example, that some people collect photographs and pass them to others for abusive purposes. There is also evidence that the identification of *vulnerable persons* in photographs exposes them to potential risk of harm/abuse. Hence these guidelines with which all who wish to take photographs should be familiar.

1) General Guidelines

a) No individual or group photographs of *vulnerable persons* should be taken or published without their written consent. Legal action may be taken against an individual and the Congregation if a photograph is published without the written consent of those in the photograph.

b) Where possible, generic photographs should be used.

c) If a situation demands[8] the use of specific photographs, follow the guidelines below.

2) *Photographs of Vulnerable Persons:*
Children (under the age of 18) and Vulnerable Adults/Adults in Vulnerable Situations

a) No individual or group photograph may be taken of *vulnerable persons* without the written consent of a parent or guardian. This applies particularly to children in care. A Consent Form must be completed and given to the designated person.

b) No individual or group photograph may be taken of children wearing a school uniform, while at the same time showing the name of the school/institution which they attend or anything in the photograph that will identify its location.

c) The name and location of the school/institution must be omitted in accompanying communication.

d) A school/institution/center etc. may authorize photographs to be used if they have already received the written permission of parents / guardians for photographs to be taken and published. Any written confirmation of this, including by email, should be retained as hard copies.

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[4] Photographs include still images and video clips.
[5] Currently the Congregation's Communications Policy is being updated.
[6] Publications include printed and digital publications and all social media platforms, including Facebook, LinkedIn, Twitter, Instagram, TikTok, YouTube, WhatsApp, snapchat et al.
[7] Take the case of a mother and her family who, following a very traumatic divorce, relocated to be beyond the reach of the father who was under a court order not to contact his family. He found out where they were living through the publication in a local newspaper of his daughter's class when on a school outing. The consequence of this innocent action was that the mother and her children were 'at risk'.
[8] 'Demands' means that it is necessary, not that it is preferable.

e) Vulnerable adults may sign the Photograph Consent Form themselves, if they have the capacity to do so. Without this capacity, the written consent of their carer/guardian must be sought, and the Consent Form signed and returned to the designated person.

f) Photographs should be taken only by an authorised person and for a specific purpose.

g) All photographs that are taken must be 'appropriate' and should not compromise in any way the dignity of the people being photographed. They should focus on the activity/event in which the individuals are engaged, rather than on the individuals, unless pertinent to the event.

h) The cautions above regarding identifying factors apply equally to photographs of vulnerable adults / adults in vulnerable situations.

3) Taking Photographs of Non-Vulnerable Persons

a) Non-vulnerable individuals must also give consent for their photographs to be taken and used, either as individuals or as part of a group. This may be done:

   i) By signing the Photograph Consent Form for each occasion.

   ii) By signing the Consent Form to cover a period of time and /or for specific or general occasions. Teachers, for example, may give consent for their photograph to be taken and used only as part of a group, only in their place of work, which includes venues for school outings, and over an academic year.

b) If individuals indicate that they do not wish to be photographed either as an individual or in a group, their choice must be respected, and arrangements made for them to withdraw from the group before photographs are taken.

4) Using Photographs

a) When using photographs, be sensitive to facial expression and body positions. It may be advisable to write a caption when posting photographs to help others understand the context of the event.

b) No part of the name of a child or vulnerable person may be published as part of or alongside their photograph, unless essential to the publication.

c) If identification is essential to the publication,

   i) The aim should be for anonymity by using a pseudo name or a description like *The year 5 student, The visitor to the school, Pupils from a neighboring parish*, etc.

   ii) If a photograph does not make sense without a name, use only the first name.

d) Group photographs are preferable to individual photographs. When using the former,

   i) If possible, omit names.

   ii) If names are required for meaning, they should be listed alphabetically so that no individual can be identified.

e) Arrangements regarding 'publicity' photographs must be agreed before any public event.

5) Storing Photographs

Photographs of people belong to their personal data and so are subject to GDPR regulations. They should not be stored on personal computers, for example. Their storage may be time sensitive.

APPENDIX 8

SELF-AUDIT TOOL [9] (*Interim*)

The self-audit tool is an ideal way to measure how far (or near) the Congregation is from meeting the standards on making children and adults in vulnerable situations feel safe, and where we need to improve.

Using Checkpoints

The checkpoint questions are designed to identify the minimum requirements for all agencies committed to safeguarding. However, given the uniqueness of each situation, not all may seem equally relevant, in which case some may be deleted, while others may be added. Begin, then, by making the adjustments, and then print and date the questionnaire, ready for use.

The self-audit tool asks you to think about six different areas regarding Safeguarding:

1. The Congregation's care for children and adults in vulnerable situations.
2. Policies and Procedures.
3. Preventing harm to children and adults in vulnerable situations.
4. Implementation of the Policy and training of all who are involved.
5. Information and Communication
6. Monitoring and Review

Within each area there are six statements. Read each statement and decide whether it is:

A: In place
B: Partially done.
C: Not in place

Tick the appropriate box.

[9] This tool is based on the work of George Varnava with the former British National Children's Bureau. With permission from the authors, the British National Society for the Prevention of Cruelty to Children adapted the material for use as an audit tool for child protection. We use it by courtesy of the Marist Brothers.

	The Congregation's Care for Children and Adults in Vulnerable Situations	A	B	C
1	The Congregation/Unit is very clear about its responsibility to protect children and makes this known to all with whom it comes into contact.			
2	The way in which Sisters, formation members and staff behave with children and *vulnerable adults* suggests that they are committed to protecting children from abuse.			
3	There is a good awareness of the rights of children as in the UNCRC and of the rights of *vulnerable adults,* and these are regarded as basic to our care for both.			
4	Managers and senior staff ensure that children and *vulnerable adults* are listened to and consulted and that their rights are met.			
5	The Congregation/Unit makes it clear that all children and *vulnerable adults* have equal rights to protection.			
6	The Congregation/Unit manages the behavior of children and *vulnerable adults* in ways which are non-violent and are neither degrading nor humiliating.			

	Policies and Procedures to Help Keep Safe Children & *Vulnerable Adults*.	A	B	C
1	The Congregation/Unit has a Safeguarding Policy for the protection of children and *vulnerable adults*.			
2	The policy has been approved at the appropriate levels.			
3	The policy has to be followed by everyone.			
4	There are clear protection procedures in place that provide step-by-step guidance on what action to take if there are concerns about the safety or welfare of a child or *vulnerable adult*.			
5	There is a named safeguarding person with a clearly defined role and responsibilities.			
6	The protection procedures also take account of local circumstances.			

	Preventing Harm to Children and *Vulnerable Adults*	A	B	C
1	There are policies and procedures for recruiting staff and assessing their suitability to work with children and/or *vulnerable adults*, including police and reference checks.			
2	There are written guidelines for acceptable and unacceptable behavior.			
3	The consequences of breaking the guidelines on behavior are clear and linked to Congregational / Unit / Ministry disciplinary procedures.			
4	There is clear guidance on the appropriate use of IT such as the internet, websites, digital cameras etc. to ensure that those who are vulnerable are not at risk.			
5	There are clear guidelines for all activities and events for the supervision and protection of children and *vulnerable adults*.			
6	There are well published ways in which Sisters, formation members and staff can raise concerns, confidentially, if necessary, about unacceptable behavior by other Sisters, formation members and staff.			

Implementation and Training		A	B	C
1	There is clear guidance to Sisters, formation members, staff and ministries on how children and *vulnerable adults* will be kept safe.			
2	Protection for children and vulnerable adults will be applied in ways that are culturally sensitive on condition that they do not go against Gospel values.			
3	There is a written plan showing what steps will be taken to keep safe both children and *vulnerable adults*.			
4	All Sisters, formation members and staff have training on the protection of children and *vulnerable adults* when they join and/or are employed by the Congregation. This includes an introduction to the Congregation's / Unit's Safeguarding Policy.			
5	All Sisters, formation members and staff have training in how to recognize and respond to concerns / allegations of abuse.			
6	Work has been undertaken with all partners to agree good practice expectations based on our safeguarding standards.			

Information and Communication		A	B	C
1	Children and *vulnerable adults* are made aware of their right to be safe from abuse.			
2	All Sisters, formation members and staff know which named person has special responsibilities for keeping safe children and *vulnerable adults*, and how to contact them.			
3	Contact details are readily available for local child and vulnerable adult protection resources, safe places, national authorities and emergency medical help.			
4	Children and *vulnerable adults* are provided with information on where to go for help and advice in relation to abuse as described in Appendix 9.			
5	Contacts are established at a national and/or local level with the relevant protection / welfare agencies as appropriate.			
6	Sisters, formation members and staff with special responsibilities for keeping safe children and vulnerable adults have access to specialist advice, support and information.			

Monitoring and Review		A	B	C
1	Arrangements are in place to monitor compliance with the protection measures put in place by the Congregation / Unit and their ministries.			
2	Steps are taken to regularly seek the views of children, *vulnerable adults*, parents, guardians and carers on safeguarding policies and practices and their effectiveness.			
3	The Congregation / Unit / Institution uses its safeguarding practice to influence the development of both the policy and practice.			
4	All incidents, allegations of abuse and complaints are recorded and monitored.			
5	Policies and practices are reviewed at regular intervals, ideally every three years.			
6	Children and *vulnerable adults,* together with parents, guardians and carers, are consulted as part of a review of safeguarding policies and practices.			

APPENDIX 9 [10]

TYPES of ABUSE and EXPLOITATION

INTRODUCTORY NOTES

Abuse is a form of maltreatment and can either be self-inflicted or inflicted by others. It can take place in any physical, online or virtual environment such as social media or gaming apps. It can occur in any relationship at any time, within any community, culture or religion. It may significantly harm the person subjected to abuse.

An abuser can be anyone, but they are often known by the *vulnerable person*. They may make every effort to build a trusting relationship with the *vulnerable person* and will often befriend or seek to gain the respect of their family, friends and colleagues. This is grooming behavior.

Proof of Abuse: Evidence of any one indicator from the lists below should not be taken on its own as proof that abuse is occurring. However, it should alert us to make further assessments and to consider other associated factors. The lists of indicators and examples of abusive behavior are not exhaustive, and people may be subject to more than one type of abuse at the same time.

Spiritual abuse is not typically recognized as a distinct, standalone criminal offense in most civil legal systems. However, it is increasingly recognized as a form of coercive control, emotional or psychological abuse, or financial exploitation, each of which is an actionable offense in civil and family law. Likewise, spiritual abuse is not yet explicitly defined as a distinct, standalone crime in the Code of Canon Law. However, it is recognized as a grave moral issue which is often handled under related offenses. The Vatican has created a study group to formally classify it as a crime.

The table below describes in some detail many types of abuse and exploitation. These have been arranged under 10 recognised categories of abuse.[11] Though ***spiritual abuse*** is not yet formally recognised as a distinct category, it has been added to the 10 categories.

1) Domestic Violence and Abuse
2) Physical Abuse
3) Psychological and Emotional Abuse
4) Sexual Abuse/Exploitation
5) Financial and Material Abuse
6) Neglect/Acts of Omission
7) Discrimination
8) Organizational or Institutional Abuse
9) Modern Slavery
10) Self-Neglect

    Noteworthy for Today's World

11) Spiritual Abuse

[10] Most of this appendix is taken from the SCIE, Social Care Institute for Excellence, London (www.scie.org.uk).

[11] The categories are taken from presentations by the RLSS, the Religious Life Safeguarding Service, England, and are used with permission. (https://religioussafeguarding.org).

1: DOMESTIC VIOLENCE or ABUSE

Definition:

Domestic violence or abuse is a pattern of controlling, coercive or threatening behavior between adults (those aged 18 or over) who are or have been intimate partners or family members, regardless of gender or sexuality. The abuse can be physical, sexual, financial, or psychological / emotional. Stalking has recently been added as a characteristic of this form of abuse.

Behaviors include

- Physical assault, threats, humiliation, intimidation, isolating a person from sources of support, preventing a person from escaping abuse, coercive control over a person's everyday behavior, movements and activities.
- 'Honor-based' violence,[12] FGM (Female Genital Mutilation),[13] forced marriage.[14]
- All forms of sexual abuse and exploitation (see 4 below), including rape, attempted rape and all forms of non-consensual sexual activity particularly with a person who lacks capacity to give consent.
- Financial exploitation of resources and/or money (See 5 below).
- Stalking.

Signs of abuse include

- Low self-esteem, self-blame for the abuse, fear of outside intervention, fear of being followed, being isolated from friends and family, public humiliation.
- Physical evidence of violence such as bruising, cuts, broken bones.
- Damage to home or property.
- Limited access to money.

Signs of sexual abuse include

- ***Physical signs:*** bruising, particularly to the thighs, buttocks and upper arms; marks on the neck; unusual difficulty in walking or sitting; genital bleeding, pain, itching, infections or unexplained discharge; foreign bodies in genital or rectal openings; sexually transmitted diseases; pregnancy in a woman who is unable to consent to sexual intercourse; incontinence not related to any medical diagnosis; self-harming.
- ***Other signs:*** Uncharacteristic use of explicit sexual language; changes in sexual behavior or attitude; poor concentration, sleep disturbance; excessive fear/apprehension of relationships or social withdrawal; fear of receiving help with personal care; reluctance to be alone with a particular person.

[12] Crimes committed to protect or defend the family's honor or that of the community.

[13] A procedure which intentionally alters or causes injury to the female genital organs for non-medical reasons. According to a 2020 report, 92 countries are known to practice FGM, but only 51 have specific laws criminalizing it. Even where it has been criminalized, enforcement varies. Internationally FGM is a human rights violation (UN Convention on the Elimination of All Forms of Discrimination against Women, 1979).

[14] When someone is forced into a marriage without their consent and where violence or threats are used in the form of coercion to this end. This practice is illegal in many countries.

2: PHYSICAL ABUSE

Definition:

A non-accidental physically aggressive act towards a vulnerable person which may be intentional
or the inadvertent result of physical punishment.

Behaviors include:

- Any form of physical assault, including physical punishments and rough handling.
- Deliberately making someone uncomfortable (e.g. opening a window and removing blankets).
- Inappropriate use of restraint, involuntary isolation or confinement.
- Misuse of medication (e.g. over-sedation), force-feeding, withdrawal of food.

Signs include:

- Inexplicable injuries or injuries inconsistent with a person's lifestyle.
- Inconsistency in accounts of what happened.
- Bruising, cuts, welts, burns and/or marks on the body, or loss of hair in clumps.
- Frequent injuries and/or unexplained falls.
- Signs of malnutrition.
- Subdued or changed behavior in the presence of a particular person.
- Failure to seek medical treatment or frequent changes of GP.

3: PSYCHOLOGICAL or EMOTIONAL ABUSE

Definition

Inappropriate verbal/symbolic acts and a failure to provide adequate non-physical or emotional nurture.

Behaviors include**:**

- *Enforced social isolation:* preventing someone from accessing services, educational and social opportunities and from seeing friends; preventing someone from meeting their religious and cultural needs.
- *Neglect*: Removing mobility or communication aids or intentionally leaving someone unattended when they need assistance; preventing stimulation, meaningful occupation or activities.
- *Emotional / Psychological Control*: intimidation, coercion, harassment, threats of harm or abandonment; bullying, including cyber-bullying, swearing or verbal abuse;
- *Disrespect*: Preventing the expression of choice and opinion; failure to respect privacy; addressing a person in a patronising or infantilising way.
- *Enforced exposure to abuse*

Signs include

- An air of silence when a particular person is present.
- Low self-esteem; withdrawal or change in the psychological state of the person; signs of distress such as tearfulness, anger.
- A change of appetite; weight loss/gain; insomnia; uncooperative and aggressive behavior.
- Trauma triggered by exposure and re-exposure to abuse.
-

4: SEXUAL ABUSE/EXPLOITATION [15]

Definition:

The use of power, money, force or authority to involve a vulnerable person in any form of unwanted or illegal sexual activity. It includes adult pornography, child abuse images and can involve no contact offenses. It can also occur across electronic devices or social media. Sexual assault through any form of coercion or abuse of authority is a criminal offense.

Behaviors *include*

- Rape, attempted rape or sexual assault; inappropriate touch anywhere; non-consensual masturbation of either or both persons; non-consensual sexual penetration or attempted penetration of the vagina, anus or mouth; any sexual activity to which a person lacks the capacity of consent.
- inappropriate looking, sexual teasing or innuendo or harassment; sexual photography, forced use of pornography[16], or witnessing of sexual acts; indecent exposure.
- 'Sexting': Sending a sexually explicit message (image, video, or words) to another person via a mobile device. In many countries it is illegal to share/distribute such images of a person under the age of 18. There are also criminal offenses in regard to adults posting sexual images of other adults in certain circumstances.

Signs *include*

- ***Physical signs:*** bruising, particularly to the thighs, buttocks and upper arms; marks on the neck; unusual difficulty in walking or sitting; genital bleeding, pain, itching, infections or unexplained discharge; foreign bodies in genital or rectal openings; sexually transmitted diseases; pregnancy in a woman who is unable to consent to sexual intercourse; incontinence not related to any medical diagnosis; self-harming.
- ***Other signs:*** Uncharacteristic use of explicit sexual language; changes in sexual behavior or attitude; poor concentration, sleep disturbance; excessive fear/apprehension of relationships or social withdrawal; fear of receiving help with personal care; reluctance to be alone with a particular person; self-harming; avoiding help with personal care.

5: FINANCIAL or MATERIAL ABUSE

Definition

- "The illegal or improper use or mismanagement of a person's money, property or resources".[17]

Behaviors *include*

- Theft of money or possessions, fraud, forgery, embezzlement, forced changes to a will, inappropriate removal of a person's decision-making powers, misuse of power of attorney or other legal authority.
- Preventing a person from accessing their own money, benefits or assets.
- Employees taking a loan from a person using their service.

[15] The deliberate maltreatment, manipulation or abuse of power and control over another person usually, but not always, for personal gain. It includes forcing another person to do the same.

[16] Printed or visual material containing the explicit description or display of sexual organs or activity, intended to stimulate sexual excitement.

[17] Pontifical Commission for the Protection of Minors, *Glossary from the New Universal Guidelines Framework* (UGF), Rome March 2024

- Undue pressure, duress, threat or undue influence put on the person in connection with loans, wills, property, inheritance or financial transactions.
- Arranging less care than is needed to save money in order to maximise inheritance.
- Denying assistance to manage/monitor financial affairs and/or access benefits.
- Misuse of personal allowance in a care home, of benefits or direct payments in a family home.
- Moving into a person's home and living rent-free without agreement or under duress.
- False representation, using another person's bank account, cards or documents.
- Exploitation of a person's money or assets, e.g. unauthorised use of a car.
- Rogue trading, e.g. unnecessary or overpriced property repairs, failure to carry out agreed repairs, poor workmanship.

***Signs** include*

- Missing personal possessions; unexplained lack of money or withdrawal of funds from accounts; rent arrears and eviction notices; disparity between the person's living conditions and their financial resources, e.g. insufficient food in the house; unnecessary property repairs.
- Failure to provide receipts for shopping or other financial transactions carried out on the person's behalf; signs of financial hardship in cases where the person's financial affairs are being managed by a court-appointed deputy, attorney or LPA (Lasting Power of Attorney); a lack of clear financial accounts held by a care home or service.
- The family or others show unusual interest in the assets of the person; the person allocated to manage financial affairs is evasive and uncooperative; recent changes in deeds or title to property.

6: NEGLECT / ACTS of OMISSION

Definition:

Failure to provide the basic physical, emotional and developmental needs of *vulnerable persons.*

***Behaviors** include*

- Ignoring people's privacy and dignity by providing care in a way that they dislike; by preventing them from making their own decisions; by ignoring their cultural, religious or ethnic needs and their educational, social and recreational needs; by putting such as their glasses, hearing aids and dentures out of reach.
- Inadequate food, shelter, clothing, heating, stimulation and activity, personal and appropriate medical care.
- Denied access to visitors, and being ignored or isolated.

***Signs of neglect** include*

- A dirty or unhygienic environment.
- Poor physical condition and/or personal hygiene; untreated injuries and medical problems such as pressure sores or ulcers, malnutrition or unexplained weight loss;
- Inconsistent or reluctant contact with medical and social care organisations; inappropriate or inadequate clothing; uncharacteristic failure to engage in social interaction; accumulation of untaken medication.

7: DISCRIMINATION

Definition

Unequal treatment in relationship to 'protected characteristics' as identified in the Equality Act 2010 (Equality Act 2010). These include age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

***Behaviors** include*

- Verbal abuse, derogatory remarks, harassment, inappropriate use of language
- Deliberate exclusion as a result of a protected characteristic
- Denying access to communication aids such as an interpreter, signer or lip-reader
- Denying basic rights to healthcare, education, employment and criminal justice
- Substandard service provision

Signs include

- Appearing withdrawn, isolated, angry, frustrated, afraid or anxious
- Inappropriate provision for a person's individual needs in terms of his/her protected characteristic.

8: ORGANISATIONAL or INSTITUTIONAL ABUSE

Definition:

Abuse/poor care within an institution or specific care setting.

Behaviors

- Abusive and disrespectful attitudes towards people using the service; lack of respect for their dignity and privacy; not providing adequate food and drink, or assistance with eating; not offering choice or promoting independence; failure to provide care with dentures, spectacles or hearing aids; not taking account of individuals' cultural, religious or ethnic needs; discouraging visits or the involvement of relatives or friends; interference with personal correspondence or communication.
- Inappropriate response to abuse; failure to manage residents with abusive behavior; inappropriate use of restraints.
- Authoritarian management or rigid regimes; lack of leadership and supervision; insufficient staff or high turnover resulting in poor quality care, for example; failure to respond to complaints; a run-down or overcrowded establishment.

***Signs** include*

- Poor standards of care: lack of flexibility and choice for people using the service; people being hungry or dehydrated, lack of personal clothing and possessions, communal use of personal items, unnecessary exposure during bathing or using the toilet, public discussion of personal matters, absence of visitors, and few social, recreational and educational activities.
- Lack of management overview and support; inadequate staffing levels; inadequate procedures; poor record-keeping; missing documents, absence of individual care plans.

9: MODERN SLAVERY

Definition

- The coercion of individuals into forced labor, domestic servitude, prostitution, drug running etc

Behaviors include

- Human trafficking, forced labor, domestic servitude
- Sexual exploitation, such as escort work, prostitution and pornography
- Debt bondage: being forced to work to pay off debts that realistically can never be cleared

Signs include

Signs of physical or emotional abuse; appearing malnourished, unkempt or withdrawn; always wearing the same clothes; living in dirty, cramped or overcrowded accommodations and/or living and working at the same address.

- Isolation from the community; seeming to be under the control or influence of others; lack of personal effects or identification documents.
- Avoidance of eye-contact; appearing frightened or hesitant to talk to strangers; fear of law enforcers.

10: SELF-NEGLECT

Definition

Self-neglect is a complex behavioral condition where an individual, intentionally or unintentionally, fails to care for their own basic needs—such as hygiene, health, nutrition, or safety—leading to dangerous living conditions and severe health consequences. It involves neglecting personal care, hoarding, and deteriorating home environments.

Behaviors include

- Living in very unclean and unsafe conditions; neglecting household maintenance; hoarding; poor diet and nutrition; social isolation; poor management of finances; refusal of medical or community support; refusing access to health and/or social care staff and other organisations with an interest in the property.

Signs of self-neglect *include*

- Poor personal hygiene; unkempt appearance; body odor and dirty clothing.
- Unsafe living conditions: unsanitary or hazardous environments, such as homes filled with clutter, animal hoarding, lack of basic utilities.
- Neglecting Health Needs: Failure to seek medical attention, non-compliance with prescribed treatments, neglecting to take medications.
- Malnutrition and Dehydration: Not eating properly or drinking enough fluids, leading to weight loss or other health issues.
- Social isolation: Withdrawal from social activities and relationships, feelings of loneliness and disconnection.
- Refusal of help from family, friends, or professionals, believing that they do not need help.

NOTEWORTHY FOR TODAY'S WORLD

ADDICTION

Initially called substance abuse and now regarded as a mental illness, addiction is the inability to stop a particular behavior (alcohol, drugs, gambling etc) which can impact relationships, health, finances and career. *It often occurs with other issues and can make people vulnerable* to coercion and/or mental health problems.

CHILD ABUSE (*Any abuse a child. Embraces different types of abuse.)*

'All forms of physical and/or emotional ill treatment, sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the child's health, survival, development or dignity in the context of a relationship of responsibility,

trust or power. (https://aifs.gov.au/resources/policy-and-practice-papers/what-child-abuse-and neglect).[18]

Child abuse and neglect is commonly divided into five types: Physical; Emotional / Psychological; Neglect; Sexual; Exposure to family violence. Within the Catholic Church, it is also important to recognize Spiritual abuse, even of children and young people, as an additional type of abuse.

BULLYING AND CYBER/ONLINE BULLYING *(Prevalent today. Embraces different types of abuse)*

A pattern of behavior by an individual or group that intentionally hurts another individual or group either physically or emotionally**.** It can also happen online, across social media networks, when gaming or using mobile phones. It strongly associated with an increased risk of suicidal thoughts, attempts, and completed suicide among children and adolescents. Victims experience significantly higher rates of depression, anxiety, and loneliness, with some studies indicating that cyberbullying is more strongly associated with suicidal ideation than traditional, in-person bullying.

Behaviors include:

- *Physical bullying*, verbal bullying (Name calling, gossiping or threatening someone), non-verbal abuse (Hand signs or text messages)
- *Emotional abuse* (Threatening, intimidating or humiliating someone)
- *Exclusion* (Ignoring or isolating someone, undermining, constant criticism or spreading rumors, controlling or manipulative behavior, making silent, hoax or abusive calls)
- *Hate crimes*
- *Racial, sexual, transphobic or homophobic bullying* – which are criminal offenses
- *Online bullying* (Posting offensive material, sending threatening or abusive text messages, creating or sharing embarrassing images or videos, spreading rumors, trolling, encouraging self-harm, sexting, excluding others from online groups, pressuring someone to engage in sexual conversations

Signs Mental health problems, depression, anxiety, fewer friendships, wary and suspicious of others, change in behavior, losing confidence, being secretive, distressed or withdrawn, insomnia.

CHILD on CHILD ABUSE

The abuse of one child by another through bullying, sexual/physical abuse, issues online, youth produced sexual images, etc.

ELDER ABUSE *(Vulnerable adults)*

A single or repeated act or lack of appropriate action, within any relationship where there is an expectation of trust, which causes harm or distress to an older person. It can be physical, financial, psychological etc.

GROOMING *(A calculated prelude to abuse)*

Actions deliberately undertaken to befriend and establish an emotional connection with a child, or to lower a child's inhibitions in preparation for sexual abuse with the child. It may also be aimed at elderly people with a view to financial abuse, or to an institution with a view to some kind of personal benefit.

ABUSE OF CONSCIENCE *(A particularly destructive abuse of power)*

This damages the conscience as the seat of freedom of judgement and as the place of encounter with God and self. It is an act of manipulation, control and domination which

[18] World Health Organisation. Sourced from the Australian Institute of Family Studies.

transgresses all boundaries, especially the boundaries of moral autonomy and responsibility, so as to have others serve the perpetrator's interests at the cost of the development of the victim's consciousness.

ABUSE OF POWER *(An all-embracing form of abuse, including in religious life)*

Abuse of one's position, function, or duty to take advantage of another. It frequently occurs in situations where one person has power over another by virtue of their relationship (e.g. employer /employee, teacher/student, coach/athlete, parent-guardian/child, partners (marriage/relationship; clergy/religious and parishioner. It is a failure to respect the dignity, autonomy, freedom and responsibility of others, especially those who are vulnerable. It can include emotional blackmail. *All abuse is an abuse of power.*

SPIRITUAL ABUSE

Any person of any belief system is capable of perpetrating spiritual abuse, just as any person of any belief system can be a victim of spiritual abuse. It can feature in the relationship between religious leaders and adherents, in same-faith / inter-faith / inter-denominational marriages or relationships, and in marriages or relationships where only one partner practises his/her faith.

Definition:

Spiritual abuse is a form of emotional and psychological abuse characterised by a systematic pattern of coercive and controlling behavior in a religious context. It is the abuse *of a person that invokes a person's religious beliefs and faith to perpetrate harm. It 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"*.[19] It includes the misuse of scripture and Church teaching.

Behaviors** include**:

1) Manipulation
2) Exploitation
3) Coercion to conform
4) Requirement of obedience to the abuser
5) Enforced accountability
6) Censorship of decision-making
7) Imposed secrecy and silence
8) Control using sacred texts or teaching
9) Suggestion that the abuser has a 'divine' position
10) Isolation as a means of punishment, superiority and elitism

Within a marriage/partner relationship:

1) Ridicule or insult of a partner's religious or spiritual beliefs.
2) Preventing a partner from practising his/her religious or spiritual beliefs.
3) Raising children in a faith with which the partner disagrees.
4) Using a partner's beliefs to manipulate and shame them.
5) Using religious texts or beliefs to minimize or rationalize behavior.

[19] Pontifical Commission for the Protection of Minors, *Glossary from the New Universal Guidelines Framework* (UGF), Rome, March 2024

APPENDIX 10

GLOSSARY[20] of ABBREVIATIONS and SPECIALIZED TERMS

Note: The list below excludes types of abuse which can be found in Appendix 8.

ABBREVIATIONS

ARF	Allegation Reporting Form.
CEDAW	The United Nations Convention on the Elimination of all forms of Discrimination Against Women,1979
CLT	Congregational Leadership Team
CRPD	The United Nations Convention on the Rights of Persons with Disabilities, 2006
CSC	Congregational Safeguarding Committee
CSD	Congregational Safeguarding Delegate
HR	Human Resources
PCPM	Pontifical Commission for the Protection of Minors (An office of the Holy See).
PLT	Provincial Leadership Team
RAMT	Risk Assessment Management Team
SNDdeN	Sisters of Notre Dame de Namur.
UDHR	The Universal Declaration of Human Rights, 1948
UGF	Universal Guidelines Framework (for Safeguarding), provided by the Vatican's Pontifical Commission for the Protection of Minors (PCPM).
UNCRC	The United Nations Convention on the Rights of the Child, 1989
USD	Unit Safeguarding Delegate.
USC	Unit Safeguarding Committee
VELM	*Vos Estis Lux Mundi,* Apostolic Letter of Pope Francis, issued Motu Proprio, 2019, updated 2013.

TERMINOLOGY

Abuse:	Child and vulnerable adult abuse.
Adult	Any person of 18 years or more.
Allegation	An unverified complaint asserting that someone has abused a vulnerable person.
Aspirant	Someone in the first stage of initial formation towards membership of the Sisters of Notre Dame de Namur.
Audit	A mechanism to assess how the Congregation is implementing the Safeguarding Policy.
Bishop	Senior cleric of a diocese / governmental unit of the Catholic Church.

[20]Most of this is from the Pontifical Commission for the Protection of Minors, *Glossary from the new Universal Guidelines Framework* (UFG), Rome, March 2024

Canon Law The revised code of Canon Law, 1983.

Canonical Offense

Canonical crimes of sexual abuse committed by clerics and /or religious, as stated in Art. 1 #1 a) of *VELM.*

- Forcing someone, by violence, threat or abuse of authority, to perform or submit to sexual acts.
- Performing sexual acts with a *vulnerable person.*[21]
- The production, exhibition, possession or distribution of pornography, including by electronic means, as well as the recruitment or inducement of a *vulnerable person* to participate in pornographic exhibitions.

Children Individuals under 18 years of age.

Church Authority

The competent authority exercising the ministry of governance in the Church and for religious institutes in accordance with their Constitutions.

Clergy Bishops, priests and deacons.

Cleric Includes bishops, priests and deacons.

Cognitive Impairment

The condition of experiencing difficulty in remembering, learning new things, concentrating, or making decisions that affect everyday life. Some causes of long-term or permanent cognitive impairment include dementia, stroke, or brain injury.

Conflicts of Interest

Situations (perceived or actual) where a conflict between a person's official duties and their private interests could influence the performance of those official duties.

Cultural safety

An environment that is safe for people of all ethnic and cultural identities.

Diocese An area of jurisdiction in the Latin and Eastern Churches, described as a diocese, archdiocese, ordinariate or personal prelature in the former and an eparchy in the latter.

Formation A period of training for those who wish to become members of the Congregation of the Sisters of Notre Dame de Namur.

Formation Member

A person in training to become a Sister of Notre Dame de Namur: an aspirant, postulant or novice.

Formation Program

A program preparing individuals for ordination or profession of vows and a life committed to living the Gospel message, within the life of the Church.

Good Standing

A person in good standing is regarded as having complied with all safeguarding obligations, and is not subject to any form of allegation, disciplinary process, sanction or suspension.

[21] Definition of *vulnerable person* as stated in Art. 1#2 b) of Vos Estis Lux Mundi: *"means: any person in a state of infirmity, physical or mental deficiently, or deprivation of personal liberty which in fact, even occasionally, limits their ability to understand or to want to otherwise resist the offense".* This definition is captured by the term 'Vulnerable Adult' within the UGF

Guardian A person with legal authority to care for the personal and property interests of another person.

Lay Person Members of the Catholic Church other than bishops, priests, deacons and religious.

Ministry Any authorized activity within or conducted by a Church Body, which carries out the mission of the Catholic Church.

Novice A person in the third stage of initial formation towards membership of the Sisters of Notre Dame de Namur.

Perpetual Vows
A lifelong commitment by a member of a religious congregation to dedicate her/his entire life to God in the Congregation to which they belong.

Personnel (Church personnel)
Clerics, religious or other persons who are employed by the Church Body or engaged on a contract, subcontract, voluntary or unpaid basis.

Postulant Someone in the second stage of initial formation towards membership of the Sisters of Notre Dame de Namur.

Priests In these guidelines the term 'priests' refers to both bishops and priests.

Professional/pastoral supervision
A professional activity in which personnel are engaged in reflection and learning, under the guidance of a supervisor.

Protective Behaviors Program
A type of abuse prevention program which equips *vulnerable persons* with the skills and knowledge to enhance their personal safety.

Religious Institute / Congregation
A Church Body within the Catholic Church whose members commit themselves through religious vows to lead a life of poverty, chastity and obedience.

Religious A member of an Institute of Consecrated Life or a Society of Apostolic Life.

Review An internal self-assessment of the Church Body's implementation of the UGF. A review can also be an assessment towards continuous improvement which occurs when following up recommendations made during an audit.

Risk Profile An assessment against key safeguarding risk factors.

SNDdeN Sisters of Notre Dame de Namur

Safeguarding Committee
A committee established to advise and support the relevant authority on all matters relating to safeguarding. Committee members need relevant and varied professional expertise in relation to safeguarding. They include lay women and men.

Safeguarding Culture
A culture in which safeguarding is embedded into every aspect of the life of the Church or Religious Congregations. In promoting this culture, *vulnerable persons* will understand that they will be listened to, supported, and protected.

Safeguarding Commitment Statement
A statement which describes a group's commitment to keep children and adults safe from harm. It informs the Church Body's safeguarding culture.

Safeguarding Delegate

An individual who champions safeguarding and coordinates the implementation of Safeguarding Policies within the Church body and within Religious Congregations.

Safeguarding Implementation Plan

An official plan which describes actions to be taken to ensure safeguarding practices are in place. It includes actions, strategies, responsibilities, delegations, and accountabilities, and tracks review and progress. It is overseen by the Safeguarding Committee.

Safeguarding Policies and Procedures

Policies and procedures address elements of safeguarding *vulnerable persons.* For example: recruitment, risk management, complaint handling, acceptable use of online applications.

Seminarian A student in a theological formation/education center preparing for ordination as a priest.

Sister A Sister of Notre Dame de Namur with perpetual or temporary vows.

Staff All who assist the Sisters of Notre Dame de Namur in any capacity in the context of their life or work. They include paid, compensated, voluntary and agency workers, formation members (aspirants, postulants, novices), colleagues, chaplains and regular guests. They may be clergy (seminarians, deacons, priest, bishops), religious women/men of other religious congregations or lay people.

Substantiated Complaint

An allegation of abuse, under the civil standard of proof, for which the investigator finds sufficient evidence to believe that the alleged conduct more likely than not occurred.

Temporary Vows

Commitments made for a limited period, allowing those wishing full membership of the SNDdeN to live the vowed life and engage in ministry while continuing to discern a lifelong commitment.

Transient Risk

Short-term risk, experienced at different stages in life: e.g. when vulnerable due to grief, bereavement, relationship breakdown, homelessness, unemployment, financial hardship.

Trauma-informed Support

Trauma-informed support helps individuals understand and process traumatic memories without re-traumatizing them. It adapts standard cognitive behavioral techniques to specifically address trauma and helps people manage their traumatic reactions. It is a message of hope and optimism that recovery is possible.

Vulnerable Persons

Those made vulnerable due to age, diminishment or being in a vulnerable situation. They include: children under the age of 18; adults with physical and/or other debilitating diminishments; adults in a dependent situation; adults who may find themselves in situations of vulnerability, even if only for a short time, due to what is defined as transient vulnerability due to illness, loss, an imbalance of power. These may be employees, junior staff, students, apprentices, patients, those in formation and junior professed religious.

Vulnerable Adult

Any person over 18 years who is at increased risk of abuse, such as people who are elderly, have a disability or suffer from mental illness, have diminished capacity or cognitive impairment, have suffered previous abuse, are experiencing transient risks, are subject to a power imbalance in their ministry, identify as First Nations and/or Indigenous, are from a culturally and linguistically diverse background, are of diverse sexuality, have any other impairment or adversity that makes it difficult for them to protect themselves from abuse.

APPENDIX 11: BASIC RESOURCES

BOOKS

With apologies that all of these are in English. Perhaps Sisters from Belgium South and France, Brazil, Congo, Japan and Peru could research suitable reading material in their languages.

1. Belcher, Kimberley Hope and David A. Clairmont, *Accountability, Healing and Trust: Interdisciplinary Reflections for Ministry in the Midst of the Catholic Sex Abuse Crisis,* Liturgical Press 2025, ISBN 978-0-8146-8897-7
2. De Lassus, Dom Dysmas, *Abuses in the Religious Life and the Path to Healing*, Sophia Institute Press, NH, 2020, ISBN 978-1-64413-534-1
3. Geary, Brendan and Edmund Montgomery, *Adult Bullying,* Kevin Mayhew Ltd, 2009, ISBN 978-1-84867-127-0
4. Geary, Brendan and Jocelyn Bryan, *The Christian Handbook of Abuse, Addiction and Difficult Behavior,* Kevin Mayhew Ltd., 2008, ISBN 978-1-84867-033-4
5. Geary, Brendan and Jocelyn Bryan (Eds), *Pastoral Challenges and Concerns: A Christian Handbook for Leaders,* Kevin Mayhew 2018, ISBN 978-1-84867-937-5
6. Geary, Brendan and Alison Moore, *Sexual Dynamics in Ministry,* Kevin Mayhew Ltd, 2011, ISBN 978-1-84867-404-2
7. Harper, Rosie and Alan Wilson, *To Heal and Not to Hurt: A Fresh Approach to Safeguarding in Church*, DLT 2019, ISBN 978-0-232-53394-1
8. Holmes, Dez (Ed), *Safeguarding Young People: Risk, Rights, Resilience and Relationships,* Jessica Kingsley Publishers 2022, ISBN 978-1-78775-359-4, eISBN 978-1-78775-360-0
9. Oakley, Lisa and Justin Humphreys, *Escaping the Maze of Spiritual Abuse: Creating Healthy Christian Cultures,* SPCK 2019, ISBN 978-0-281-081318, eISBN 978-0-281-081325
10. P.C.P.M., *Culture of Healing: Developing a culturally sensitive approach to listening and responding to those who have been sexually abused in the Church*. LAS Rome, 2022. ISBN 978-88-213-1545-9
11. UISG, USG, PCPM, *A Culture of Care and Protection: New Challenges for Consecrated Life*. Pauline Media 2023. ISBN 978-88-315-5491-6 (A very good starting point)

VATICAN DOCUMENTS

The linked documents are in all of our congregational languages, except Japanese. According to the internet, they are available in Japanese through the Japanese Episcopal Conference. Numbers 12, 13 14 and 15 should be read.

12. *Vatican* (All Vatican materials on abuse, including those below)
13. *Vos estis lux mundi (*2019 motu proprio, updated 2023).
14. *Vademecum* (Points of procedure in treating cases of sexual abuse of minors by clerics (2020, updated 2022). Essential Reading.
15. *Universal Guidelines Framework* (Pontifical Commission for the Protection of Minors (PCPM): Their Universal Guidelines Framework (2024). Essential Reading.
16. *Book VI of the Code of Canon Law* (Updated Penal Code Concerning Abuse)
17. *Tutela Minorum* (PCPM's Website. It provides general Information about the Work of the Commission; has the Vatican's key safeguarding documents; advertises relevant publications, with open access to some; the Vatican's Annual Report on Safeguarding for the Church across the World; and has a series of podcasts. You can sign up for its newsletter.

DOCUMENTS from the UNITED NATIONS

These will probably be available on the relevant websites in different languages.

18. *The Universal Declaration of Human Rights (UDHR), 1948*
    Universal Declaration of Human Rights | United Nations
19. *The UN Convention for the Elimination of all forms of Discrimination against Women (CRDAW), 1979.*
    Convention on the Elimination of All Forms of Discrimination against Women New York, 18 December 1979 | OHCHR
20. *The UN Convention on the Rights of the Child (UNCRC), 1989.*
    Convention on the Rights of the Child | UNICEF; Children's version of the Convention on the Rights of the Child | UNICEF
21. *African Charter on the Rights and Welfare of the Child, 1990*
    African Charter on the Rights and Welfare of the Child | Refworld
    AULO-ACRWC_Child_Friendly_Booklet-Final-EO-ENG-Jun22.pdf (ENGLISH)
    AULO-ACRWC_Child_Friendly_Booklet-Final-EO-FRE-Jun22.pdf (FRENCH)
22. *The UN Convention on the Exercise of Children's Rights, 1996*
    CETS 160 - European Convention on the Exercise of Children's Rights
23. *The UN Convention of the Rights of Persons with Disabilities (CRPD), 2006.*
    Convention on the Rights of Persons with Disabilities | OHCHR
24. *The UN Guiding Principles on Business and Human rights, 2011*
    GuidingPrinciplesBusinessHR_EN.pdf

TEMPLATE 1

Confidential Application Form
Paid and Voluntary Staff

For which position are you applying?

Personal Details:

Surname: ***First name:***

Address:

Date of Birth: ***Tel. No.*** ***Mobile No:*** ***Email***:

Are you (please tick): ☐ Employed ☐ Unemployed ☐ Student ☐ Homemaker ☐Retired ☐ Other?

Work Related

1) Previous Work Experience in recent years:

2) Have you previously been involved in voluntary work? ☐Yes ☐No
   If yes, please give details:

3) Why are you applying for this position?

4) Have you previously received training for working with children? ☐ Yes ☐ No
   If yes, please provide details.

5) Have you previously received training for working with vulnerable adults? ☐ Yes ☐ No

If yes, please provide details.

Other Relevant Information?

Suitability

Is there a medical or other reason why you may be deemed unsuitable to work with children, young people or vulnerable adults? ☐ Yes ☐ No If yes, please give details.

Referees:

Please provide the names and addresses of two people (not relatives) whom we may contact for a reference, preferably people who are familiar with your work with children and/or vulnerable adults.

Name _____ Name _____

Address _____ Address _____

_____ _____

Tel. No. _____ Tel. No. _____

Email _____ Email _____

Declaration:

I declare that the above information is true and that I am fit to serve in paid employment or as a volunteer in the position for which I have applied. I agree to abide by and accept the terms and conditions of participation and accept and abide by the policies of the Sisters of Notre Dame de Namur. I will also provide photo ID and comply with Police requirements for working with children and/or vulnerable adults.

Signed: _____ Date: _____

By courtesy of the Marit Brothers who adopted it with permission from: Our Duty to Care: The Principles of Good Practice for the Protection of Children and Young People, Dept. of Health and Children, Dublin, Stationery Office 2001.

TEMPLATE 2

Confidential Reference Form
Paid and Voluntary Staff

_____ has expressed an interest in working for the Sisters of Notre Dame de Namur as a _____ and has nominated you as a referee.

The position involves substantial access to children / young people / vulnerable adults, and, as a Congregation committed to the welfare and protection of children / young people / vulnerable adults, we would like to know if you have any reason to be concerned about this person's suitability to work these categories of people. ☐ Yes ☐ No

If you have answered Yes, we will contact you in confidence.

If you complete this reference, the contents will remain confidential and will be shared only with the applicant's immediate supervisor. We would appreciate complete candor in your response to the questions below.

Thank you.

1) How long have you known this person and in what capacity?

_____

_____

2) List the applicant's attributes which make you consider him/her suitable for the position?

_____

_____

_____

_____

_____

_____

3) How would you describe the applicant's personality?

_____

_____

_____

_____

4) Do you have any reservations about the Applicant for this work? ☐ Yes ☐ No. If you have answered Yes, please comment.

_____

_____

_____

_____

_____

5) Please rate this person on the following:

	Poor	Average	Good	Very Good	Excellent
Responsibility					
Maturity					
Self-motivation					
Ability to motivate					
Energy					
Trustworthiness					
Reliability					

Signed: _____ Date: _____

Position: _____

TEMPLATE 3

Confidential Declaration Form

Paid and Voluntary Staff

To be completed by Sisters, Formation Members and Associated Persons

PERSONAL INFORMATION

Surname: _____ First Name: _____

Address: _____

_____

Tel. _____ Mobile: _____

DOB: _____ Place of Birth: _____

Previous Addresses in the last three years:

_____

_____

_____

Any other name by which you are/have been known? _____

SAFEGUARDING INFORMATION

Have you ever been the subject of a police investigation or ever been investigated for a criminal offense? ☐ Yes ☐ No

If yes, please continue below and state the nature and dates of the offence(s).

Year	***Nature of the Offense(s)***	***Outcome***?
_____	_____	_____
_____	_____	_____

Do you have any prosecutions pending? ☐ **Yes** ☐ **No**

If yes, please state below the nature and date(s) of the offense(s), the court responsible for dealing with the matter, and the appropriate date of the court hearing.

Nature of the offense: _____

Date of offense: _____

Court: _____

Court Date: _____

Signed: _____

Date: _____

TEMPLATE 4

CODES of CONDUCT

The Congregational Code of Conduct for the SNDdeN can be found in Appendix 2.
The sample congregational code below has a different style from the SNDdeN Code. It may be that Units prefer the style below for their Unit Code of Conduct.

1. A Sample Congregational Code of Conduct

- I will actively promote a welcoming and respectful environment where all persons are treated with dignity and value, and where any form of abuse, bullying, or harassment is neither tolerated nor allowed to take place.
- In all that I do, I will seek to use my position, power and authority prudently and humbly to make our fraternal communities a safe place where all sisters feel respected and cared for.
- In the service of my authority, I will use my responsibility for the benefit of those in my care and not to take advantage of them or to exploit them.
- I will respect, love, and treat with integrity people of every position, status, race, religion, ethnicity, gender and age.
- I will keep all my relationships free from inappropriate, unwanted physical contact and maintain my boundaries.
- I will report to the proper authorities known or suspected cases of physical, sexual, or emotional abuse or neglect of minors or vulnerable adults.
- I will support those who disclose any kind of abuse in a way that empowers the person who seeks help.
- I will maintain and uphold confidentiality appropriately, which means I will hold in confidence whatever information is not mine to share.
- I will ensure that funds for which I am responsible, or which are under my control are used for their intended purposes, hence acting with transparency, and appropriate accountability.
- This Safeguarding Policy expresses our commitment to live and work according to the Gospel ideals, Charism and values articulated in our Constitutions and the teachings of the Church.

2. A Sample Code of Conduct for Adults Involved in Contact with Children, Young People and Vulnerable Adults

YOU MUST:

- Operate within the Congregation's principles, guidance and any particular procedures of our Institute.
- Treat everyone equally and with respect.
- Engage and interact appropriately with children, young people and adults at risk.

- Challenge unacceptable behavior and provide an example for good conduct you wish others to follow – an environment which allows bullying, inappropriate shouting or any form of discrimination is unacceptable.
- Respect the sacred dignity of each individual and their right to personal privacy.
- Recognize that particular care is required in moments when you are discussing sensitive issues with children and young people e.g. maintain appropriate boundaries.
- Avoid situations that compromise your relationship with children and young people and are unacceptable within a relationship of trust. This rule should apply to all such behaviors including those which would constitute an illegal act.
- Meet with a child or vulnerable adult in an open and observable environment.
- Remember that words and actions might be misinterpreted.
- Be confident in both challenging and reporting abusive behaviour.
- Ensure that children and vulnerable adults know and understand what to do if they have a Safeguarding concern.

YOU MUST NOT:

- Engage in inappropriate behavior with anyone at risk – physical, verbal or sexual.
- Discuss topics or use vocabulary with children and young people that could not be used comfortably in the presence of parents or another adult.
- Arrange an overnight trip with a child or young person without ensuring that another approved person will be present.
- Take a chance when common sense suggests another more prudent approach.
- Physically, emotionally or sexually abuse or exploit any child, vulnerable adult or any other person.

3. A Sample Code of Conduct for Children and Young People

This Code of Conduct will be used in all our activities.

- I will respect and take care of others and not hurt or frighten anyone.
- I will be polite to all I meet.
- I will respect and take care of things that belong to the community and others.
- I will listen to and try to understand others' opinions.
- I will behave in a way that allows all to enjoy the group/activity.
- I will be quiet when asked to by the activity leaders.

This Code of Conduct has been written to provide a happy, safe and nurturing environment for your child when attending a congregation children's activity. We hope that parents/guardians will discuss this Code of Conduct with their child to help them understand the importance of following it.

TEMPLATE 5

RISK ASSESSMENT CHECKLIST

Assessment Checklist	What Safeguarding Needs to Be in Place? *Note: Not all are relevant to all activities*	Who is Responsible?	Date
Safe Recruitment	☐ Have the relevant employees/volunteers been fully vetted through safe recruitment? ☐ If required for the role, do they have the relevant Police Clearance? ☐ Have the employees/ volunteers attended Safeguarding training?		
Transport	☐ Who is providing the transport? ☐ Is it a private arrangement or Church run or Institution? ☐ Is ***insurance*** in place? ☐ Has the driver been fully vetted through safe recruitment?		
Ratios	☐ Employees / Volunteers: Children Take into consideration the needs of the Children or vulnerable adults and the activity before deciding on ratios.		
Consent	☐ Have the relevant ***consent forms*** for the outing been completed by a parent, guardian or appropriate person? ☐ Has the ***Media Consent Form*** been completed by a parent, guardian or appropriate person? ☐ Have any objections from a parent, guardian or appropriate person about the outing been noted? ☐ Are ***emergency telephone numbers*** available to the group leaders? ☐ Are ***dietery requirements*** noted? ☐ Have ***allergies*** been noted? ☐ Have special requirements due to ***disability*** been noted? ☐ Have ***medical requirements*** been noted, with doctors' contact numbers?		

Assessment Checklist	What Safeguarding Needs to Be in Place? *Note: Not all are relevant to all activities*	Who is Responsible?	Date
Health and Safety	☐ Have physical hazards been identified? ☐ Has appropriate action been taken to resolve these hazards?		
Social media e.g. photography, ***Video, mobile phones, social networking sites, text and email***	☐ Have photo consent forms been received? ☐ What rules are in place regarding other photographs and use of Mobile Phones?		
Insurance	Has the following insurance been put in place where applicable? >> Private >> Business >> Travel >> Transport >> Premises >> Injury		
Risk of Harm by Employees/ Volunteers or by one Child to another Child or by one Vulnerable Adult to another Vulnerable Adult	☐ Are policy ratios in place? ☐ ***Special requirements*** of child/vulnerable adult adhered to? ☐ Employees/Volunteers have been ***fully recruited with*** Police (or equivalent) Checks? ☐ Employees/Volunteers have attended ***Safeguarding Training?***		
Other Identified Risks	☐ _____ ☐ _____ ☐ _____		
Overall Responsibility	**Name**:		
Particular Responsibilities	1.. . . 2. . . .		

Name: ……

Signed: ……

Position: ……

Date: ……

Review Date: ……

TEMPLATE 6

Allegation Reporting Form (ARF)

SECTIONS 1-7:
To be Completed by the person who met with the vulnerable person

1: About the Disclosure / Concern

The disclosure / concern was made on _____ (Date) at _____(Time)

The information was received by ☐ Telephone ☐ Letter ☐ Email ☐ In person

2: Who Made the Disclosure?

Name: _____

Address:

Tel: _____ Mobile: _____

Email: _____

Relationship to vulnerable person: _____

3: The Alleged Victim

Name: _____ DOB: _____ Male/Female: _____

Address:

Tel: _____ Mobile: _____

Email: _____

Language: _____ Requires interpreter? ☐ Yes ☐ No

Disability: _____ Special Needs: _____

If applicable: Parish _____ Religious Congregation _____

4: Parents / Guardians of Alleged Victim (where appropriate)

Name: _____

Address: _____

_____

Tel: _____ Mobile: _____

Email: _____

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

5: The alleged perpetrator?

Name: _____

Address: _____

_____

Tel: _____ Mobile: _____

Email: _____

Relationship to vulnerable person *(e.g. parent, teacher, etc.)* _____

Position: _____

Address at time of incident(s) _____

_____

Current contact with vulnerable person (e.g. School Governor, runs activities etc.)

Additional information:

6: Details of concern / allegation / complaint

(Include dates, time, location where the alleged abuse took place; witnesses, if known/

Does the vulnerable person know this referral is being made? ☐ Yes ☐ No

If more space is needed, please attach further details on a separate sheet.

7: Details of person who completed this section of the form

Name: _____

Tel: _____ Mobile: _____

Email: _____ Position: _____

Form was completed on: Date _____ at Time _____

Signed: _____

SECTIONS 8-15:
To be Completed by the Safeguarding Delegate
if different from the person who met the vulnerable person

8: About the Referral

Unit Leader/Delegate ***became aware of*** disclosure on (Date) at (Time)

Unit Leader/Delegate ***received*** this form on (Date) at (Time)

9: Action Taken

Has the matter been referred to the POLICE? ☐ Yes ☐ No

If yes, when? Date: _____ Time: _____

To whom was it referred?

Name: _____ Position: _____

Email: _____

Tel: _____ Mobile: _____

If No, please explain why: _____

_____

Has the matter been referred to any EXTERNAL ORGANIZATION? ☐ Yes ☐ No

If yes, when? Date: _____ Time: _____

To whom was it referred?

Name: _____ Position: _____

Email: _____

Tel: _____ Mobile: _____

If No, please explain why: _____

_____

_____

Has the matter been referred to another STATUTORY AUHTORITY? ☐ Yes ☐ No

If yes, when? Date: _____ Time: _____

To whom was it referred?

Name: _____ Position: _____

Email: _____

Tel: _____ Mobile: _____

If No, please explain why: _____

_____

10: Victim Support

The vulnerable person was offered support on _____ (Date)

Detail of all support that was offered:

11: Child Protection Concerns

If there are any immediate protection concerns, please record them below and state what actions have been taken to address them and by whom.

Concern 1: _____

Action:

Taken by: _____

Concern 2: _____

Action:

Taken by: _____

Concern 3: _____

Action:

Taken by: _____

12: Accused Person

Has the accused person been informed of the allegation? ☐ Yes ☐ No

If yes, when? Date: _____

Has the accused person been offered support, e.g. counseling ☐ Yes ☐ No

If yes, when was the offer made? Date: _____

13: Investigation

Details of Person investigating the allegation:

Name: _____

Position: _____

Tel: _____ Mobile: _____

Email: _____

When was the investigator appointed? Date:

What was the outcome of the investigation? ☐ Sustained ☐ Not Sustained

Further details, if required:

14: Further Referral

As a result of the finding, has the matter been referred to another Statutory Authority?

☐ Yes ☐ No

If yes: Date: _____ Time: _____

To whom was it referred?

Name: _____ Position: _____

Email: _____

Tel: _____ Mobile: _____

If No, please explain why: _____

_____

_____

15: Details of the Person Completing this Section of the Form

Name: _____

Tel: _____ Mobile: _____

Email: _____

Position: _____

The form was completed on Date: _____ at (Time) _____

Signed: _____

TEMPLATE 7

Checklist for Responding to Disclosures of Abuse from Victim-Survivors

RESPONDING TO DISCLOSURES OF ABUSE: CHECKLIST		
ACTION	**YES/NO: REASON(S)**	**SIGNATURE DATE (and Designation)**
Please note that not all actions will be required for each situation and the list is not necessarily sequential. It should be completed by both the Safeguarding Delegate and the Unit Leader accordingly.		
Ensure Privacy and Safety	• **Create a Private Space**: Find a quiet, private area where there are no third parties present to allow for a confidential conversation. • **Prioritize Safety**: Assess the immediate physical and emotional safety of the person.	*Where*?
Listen with Empathy.	• Listen without judgment, but with undivided attention, concern and genuine interest. • Validate their experience. Explicitly state that it was not their fault. • Challenge self-blame and acknowledge their feelings. • If necessary, use a professional interpreter, rather than friend or family member. Use their preferred words.	
Assess and Respond to Risk.	• Ask about safety: Ask what they would like to happen and if they feel safe. • Find out if there are others at risk, children or adults. Take appropriate action, contacting the police and/or other services, e.g., medical.	
Provide Information and Resources (Victim Support Leaflet)	• Offer information, ***not directives***, about available resources and services. • Refer them to local specialist services, such as domestic abuse agencies or sexual assault crisis centers.	
Handle Confidentiality	• Inform them about the confidentiality of the discussion and any potential limitations, such as mandatory reporting to protect children or other vulnerable adults.	
Follow-Up	• Arrange for appropriate follow-up and ensure continuous risk assessment is undertaken.	

TEMPLATE 8

WHAT NEXT? INFORMATION for VICTIM-SURVIVORS

It is important that victim-survivors know what happens after they have made an allegation of abuse. Given that they may not be able to remember what is said to them during their conversation with the Safeguarding Delegate or another listener, it would be helpful to have a leaflet with the possibilities that were discussed and any additions that you would like to make.

The leaflet should contain at least the following information:

- *The process that follows the reporting of the allegations.*
- *The resources that may be available from the congregation.*
- *The resources and services that may be available locally and potentially outside of a Church context.*

It may be that you need time to identify the appropriate resources and services. In this situation, advise victim-survivors that you will send them as quickly as possible, and preferably by a particular date. Keep a copy of what you send. Sign and date it.

The template should be adapted according to your own context and resources.

1. **Thank You**
   We appreciate your courage in coming to talk about the abuse you have suffered. We take all allegations of abuse seriously and report all allegations to the police and other appropriate authorities. The information below is a reminder of what we said during our conversation.

2. **Next Steps**
   The process will begin now / has already started. (*Amend as appropriate regarding the accused) It* may be a long process, but we will update you as much as we possibly can, if this would be helpful. The initial steps are ……..

3. **What We Can Offer**

   a. **The leaflet**
      There are a variety of services available to help your journey forward from this experience, as indicated in this leaflet. We liaise with professional agencies to try to ensure that you get the most appropriate support available. You may wish to consider these and then meet with one of our professional colleagues to talk through your inclinations and/or be guided in your choice.

      Please let us know if you would like further information about these offers.

   b. **Financial Compensation/Redress/Assistance**
      If you would like further information, please let us know.

   c. **Information about Accompaniment and/or Spiritual Direction**

TEMPLATE 9

Safety Plan for the Accused

This Safety Plan Template can be amended for any religious/formation member who has been:

- Accused of abuse, other forms of harm or criminal activity.
- Placed on restricted ministry whilst under investigation according to either Civil or Canon Law.
- Released from a custodial sentence following a judicial trial.

1: THE AGREEMENT

Safety Plan Agreement

Between _____

and Sister _____ (Unit Leader / COfM Liaison)

on behalf of the _____ Unit of the Sisters of Notre Dame de Namur.

The agreement is for the benefit of both …… and the members of the community where she will live, to protect vulnerable persons from risk. It is also intended to protect the wider community and prevent any further harm or abuse.

2: INFORMATION and CONFIDENTIALITY

The following people have been made aware of the contents of this agreement:

>> The Bishop (if appropriate)
>> The Unit Leader
>> The Local Leader
>> The Unit Safeguarding Delegate
>> Unit Lawyer (if appropriate)
>> The Police / Civil Authorities
>> Others?

They will help to ensure that the agreement is met with full compliance and is reviewed regularly.

3: SUBJECT of the AGREEMENT

Full Name: _____ Date of Birth: _____

will be resident at _____,

starting on (Date) _____until the foreseeable future. _____

is forbidden to have any contact with the victim(s) or anyone related to or in connection with the same.

4: TERMS of the AGREEMENT

Access to the Sacraments: _____ may celebrate

Eucharist: at _____ Church

Sacrament of Reconciliation: at _____Church or on regular visits to her confessor.

Life Within the Community: _____

a) Will be given specific duties within the community house.

b) Will maintain good and frequent contact with the Superior and the appointed Support Person.

c) Will not engage in any pastoral duties which include contact with *vulnerable people*.

d) Will not have any contact with the victims she has allegedly harmed.

e) Will not have any contact with anyone else involved in the alleged abuse/harm or other criminal activity.

f) Will participate in the life of the community, as appropriate.

g) May pray the Liturgy of the Hours with the community if there are no others present.

Holidays, Retreats, Time Away

a) These must always happen with the permission of the Unit Leader, and _____ must share all details of location and duration with the local Superior.

b) _____ is forbidden to return to the location(s) where the alleged abuse / harm is said to have taken place.

c) In some instances, the civil authorities / police may be required to receive this information.

Dress: _____ is not allowed to wear a religious habit, to avoid being compromised in any potential situation where she may be expected to engage in pastoral ministry.

Support Person: _____ will have a Support Person allocated to ensure that support is provided to help her live according to Gospel values and the charism and rule of the Congregation. The Support Person will be made fully aware of the reasons why _____ is not in ministry. *(See Appendix 6 on the role of the Support Person).*

Spiritual Accompaniment: _____ is expected to have regular Spiritual Accompaniment, but not from the Support Person.

5: Other Requirements

The psychological and physical health and wellbeing of _____ are important.

a) If _____ has any medical needs, these will be met with the knowledge of the local Leader.

b) If therapy and/or external supervision has been recommended, this must also be fulfilled.

c) In the event of additional concerns, these must be monitored and _____ should agree to attend the respective services / sessions / meetings.

d) If _____ indicates any suicidal ideation, this must be acted upon and taken seriously with referral to the appropriate medical services.

6: Review of the Agreement

This agreement will be reviewed regularly, at least annually, in consultation with the Safeguarding Delegate, together with the respective Leader/Superior and others as required.

Signed:_____ Date: _____

Signed:_____ Date: _____

TEMPLATE 10

Case Management Checklist for a Sister/Formation Member Who Has Been Accused

CASE MANAGEMENT OF THE ACCUSED		
ACTION	**YES/NO: REASON(S)**	**SIGNATURE DATE (and Designation)**
Please note that not all actions will be required for each situation and the list is not necessarily sequential. It should be completed by both the Safeguarding Delegate and the Unit Leader accordingly.		
Care and Management of the Accused		
Accused removed from Ministry		
Accused relocated to another community, if appropriate.		
Safety Plan agreed and signed.		
Support system in place, agreed and signed.		
Appropriate response, if accused is deceased.		
Support for family and friends of the accused.		
Support for Community from which she has been removed.		
Support for community to which she has been relocated.		
Support for context where the abuse took place.		
Mandatory Reporting		
Allegation(s) reported to Police / Statutory Authorities.		
The Local / Provincial Superior informed.		
Safeguarding Delegate has been informed.		
Safeguarding Team meeting.		
Other relevant agencies or personnel informed.	*Name agencies /personnel, e.g. Bishop, Director of Education:*	

CASE MANAGEMENT OF THE ACCUSED		
ACTION	**YES/NO: REASON(S)**	**SIGNATURE DATE (and Designation)**
Please note that not all actions will be required for each situation and the list is not necessarily sequential. It should be completed by both the Safeguarding Delegate and the Unit Leader accordingly.		
Preliminary Investigation opened and paused:		
Good record keeping.		
Appointed link with Police.		
Canon Law advice.		
Legal advice.		
Insurance Company informed.		
Bishop/Diocesan Safeguarding Lead informed.		
Communication		
Media Statement prepared		
Media link person		
Communication with community?		
Communication with Province?		
Any other communication?	*Name them.*	
Planning Ahead		
Trial?		
Custodial / Non-Custodial Sentence.		
No Further Action.	☐ Psychological Risk Assessment ☐ Phased Return to Ministry	
Financial Compensation		
Lawyer(s)		
Trial?		
Reopening Preliminary Investigation		

TEMPLATE 11

Receipt for Case Materials

Sisters of Notre Dame de Namur: (Unit) _____ Safeguarding Office

Address

Telephone: Email:

Name: _____

ID: _____

Tel: _____ Email: _____

From which Service: _____

I, the undersigned, received the materials listed below from the Safeguarding Office of the Sisters of Notre Dame de Namur at the above address.

01 _____

02 _____

03 _____

04 _____

05 _____

06 _____

Signed: _____ _____

Recipient *SNDdeN*

Date: _____ _____

Time: _____ _____

TEMPLATE 12

MINORS, VULNERABLE ADULTS, ADULTS

PHOTO, VIDEO and MEDIA CONSENT FORM[1]

Sharing our Mission: As Sisters of Notre Dame de Namur, we joyfully share the life, mission, and activities of the Congregation through our print and digital publications, on our websites (congregational and province), on social media, including Facebook and YouTube, and in promotional materials such as posters, banners, advertising. We do this in conformity with our Photographic Policy, which is attached. This means that at times, and unless we are asked not to do so, we identify people who feature in these publications by using their personal data, if relevant and necessary: an identifiable image, their name, location and ministry.

Data Protection and Safeguarding Regulations: In recent years data protection and safeguarding regulations have been put in place to protect people's privacy and safety, particularly around communications. We value your privacy and safety and accept regulations which protect the personal information of all those with and among whom we live and work.

We Need Your Permission: So as to continue sharing congregational news in total compliance with data protection requirements, we must ask *all who are part of the SNDdeN life and mission*[2] for written consent to use your *photographic and other data*[3] in our publications as identified in the first paragraph above. We may not use all the materials that we receive, but we may retain them for archival purposes.

Who will make decisions about the use of your data? The SNDdeN, as the "data controller", determine for what purposes and by which means data is used. The SNDdeN is also obliged to process and store this data securely in accordance with European data protection regulations.

Your Rights:

- You have a right to request a copy of the information that we hold about you.
- If you change your mind about permission to use your photographs etc., you can request SNDdeN, in writing, to stop using your materials. They will not be used in future publications.
- You may also request, in writing, corrections or deletions of information that we hold or is no longer required. However, please note that we cannot control materials already published nor can we recall them.

Please direct all requests and questions to the Congregational Communications Coordinator (meg.glendon@sndden.org).

Please carefully consider the options below, indicate your preferences, and sign the form.

Thank you.

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[1] With gratitude to the School Sisters of Notre Dame for allowing us to adapt one of their forms for our own purposes.

[2] **All who are part of the SNDdeN life and mission:** All Sisters, formation members, students, staff; all for whom we have a responsibility of care; all who participate in projects, events and activities organized and/or initiated by the SNDdeN and/or their authorized colleagues.

[3] **Photographic and Other Data**: The SNDdeN print and digital communications use photographs, videos, audio, text and/or creative expressions taken during events, and may identify persons by name, ministry and location, if relevant and necessary for an understanding of the communication.

Statement of Consent

Participant Information (Please PRINT):

Full Name: _____

Email Address: _____

Tel: _____ Mobile: _____

Parent/Guardian Name
for those below age of 18): _____

Consent Preferences (Please check all that apply):

☐ **Digital & Print Publications:** The SNDdeN and authorized 'others' may take and use photographic images of me, including reproductions or adaptations, for publicity in support of the mission of the Congregation and/or for archival purposes:

☐ **Alone** ☐ **Only as part of a group** ☐ **Not in a private capacity**

☐ **Online and Social Media**: The SNDdeN may take and use video filming, audio, text and / or creative expressions involving or created by me for use as above, with the same preferences.

☐ **Identity**: The SNDdeN may identify me by name, country of origin, school/ministry.

☐ **Anonymity Preference:** If an identifiable image of me is used, I request that my name **NOT** be published alongside my image.

☐ **I DO NOT CONSENT:** I do not wish my image or likeness to be used in any public materials. (We will do our best to ensure you are seated in "photo-free" zones during recorded events.)

☐ **Ownership:** I cede to the SNDdeN ownership of my photographic and other data, together with decisions about their use, within the stated purpose and my preferences.

☐ **Compensation:** I expect no compensation from the SNDdeN for the use of my photographic/ video data.

☐ **Claims/Demands:** I will not sue the SNDdeN and will not ask them for money, even if I feel harmed, as long as they have used my data to support the mission of the SNDdeN and according to my preferences, or have obtained my permission for a different use.

☐ **Terms of Agreement**
I understand that this consent is voluntary and can be revoked at any time by contacting the Communications Coordinator (meg.glendon@sndden.org) in writing.

I understand that revoking consent will apply to future publications but cannot undo materials already printed or distributed.

This consent will be valid for **three (3) years** from the date of signing unless revoked sooner.

Signature:

Signature of Participant
(or Parent/Guardian if minor): _____

Date: _____

TEMPLATE 13

Safeguarding Record Keeping
Guidance for Religious Congregations[4]

Content:

1. Introduction
2. How to use this template
3. Record keeping in relation to various aspects of safeguarding
    a. Records regarding safeguarding allegations and concerns
    b. Statements
    c. Disclosure of confidential information and record keeping regarding children
    d. Record keeping and Safeguarding Training
    e. Records should also include . .
    f. Recording of training session: this would primarily apply to Webinars
4. Storage of Information
5. Maintaining Audit Trails
6. Retention of Records

1) Introduction

Often the Church has been recognized as lacking a professionally robust system for record keeping. However, as this changes, record keeping in relation to the safeguarding of children and the vulnerable should be regarded as a priority.

Good record keeping is an important part of professional accountability. It will assist Designated Safeguarding Leads within Provinces or COfMs to meet their key responsibilities in responding appropriately to all concerns and allegations.

2) How to use this template

This is a **template** which can be adapted for your own context and in line with civil law, Data Protection and Canon Law. It offers guidance on the key areas which should be included when developing or updating your Safeguarding Record Keeping Policy.

It is critically important that you refer to your own context and seek professional advice, if you are unsure, before you adapt and then adopt this Record Keeping Template.

[4] Courtesy of Tina Campbell, Safeguarding Consultant, June 2023

3) Record keeping in relation to various aspects of safeguarding

a) Records regarding safeguarding allegations and concerns:

i) ***When to Start:***
Records should be made at the very start of any concern or allegation being made, including if it is made by letter or email and even if anonymous. Do not delay staring the record. Even if lack of time is a factor, make a brief note of key points which can be written up soon afterwards

ii) ***Content:***
The content, in terms of recording the information, should be factual, accurate, relevant. It should **not** include any judgments or personal views regarding what you have heard. A good way of expressing the content might be "the person stated that…" or "the person reported that…" In some instances the person making the disclosure and any other witnesses who provide information are coded rather than identified by name.

iii) ***Dating***: Each entry should be dated and signed

iv) ***Handling Evidence***:
Additional evidence provided by those making an allegation, such as letters, cards, photographs, should be preserved securely before being given to statutory authorities. Likewise, if an allegation is made by letter or email, even if anonymous, these should also be retained safely.

v) ***Date, Sign, Secure Storage:*** Each entry should be dated and signed and records should be stored securely with limited access.

b) Statements

i) In some contexts, culturally and legally, safeguarding personnel might ask a victim or any other person making a disclosure of abuse or raising a concern to provide a statement.

The statement may be received verbally, noted by the person receiving the information (or an appointed secretary), and then checked for accuracy by the victim who will sign each page.

Alternatively, the person making the disclosure of an allegation or concern might prepare a written statement beforehand and submit this to the safeguarding personnel.

ii) In other contexts, within Church safeguarding, it is sufficient for notes to be taken of the disclosure which are then passed onto the police or other statutory authorities. It would then be the responsibility of the statutory authority who will lead the formal investigation to take a formal statement. The reason for this is that the taking of a formal statement by safeguarding personnel might be regarded as investigative.

c) Disclosure of confidential information and record keeping regarding children

(*It is important to note here that there will be regulations and statutory guidance within educational settings regarding safeguarding files which relate to children*.)

The law permits the disclosure of confidential information necessary to safeguard a child.

The information may relate to either a child protection or safeguarding concern or to an accumulation of concerns about a child's welfare which are outside the usual nature of concerns about children.

d) Record Keeping and Safeguarding Training

Formal records should be kept regarding the Safeguarding Training practice of the Religious Congregation. See example below.

DATE	TITLE OF SAFEGUARDING TRAINING	DURATION (e.g.2 hours)	IN-PERSON ONLINE-WEBINAR	NAME Trainers & ORGANIZERS	NUMBERS ATTENDING

e) The records should also include:

- The content of each session
- Names and locations and ministries of those attending
- A note of those who were invited but failed to attend
- Evaluations
- Certificates issued

f) Recording of training sessions: this would primarily apply to Webinars

- This should only happen with the permission of the Trainer(s) and with the full knowledge of those in attendance.
- Recordings should be restricted in terms of access.
- Recordings should only be uploaded to a public online platform with the permission of the Trainer(s).
- Recordings should not include question times or case study discussions.

4) Storage of information

- Records should be stored securely whether as soft or hard copies.
- Access to records is restricted on a need-to-know basis.
- It is important to remain mindful that, if necessary, records can be requested by the police or other authorities, although such requests should be formal and in writing.

5) Maintaining Audit Trails

Keeping a good audit trail within any record is important. It requires skill, commitment and dedication to ensure that records are kept up to date.

Doing so, for monitoring purposes, provides evidence that records do not become static but are reviewed regularly and actions taken as required.

6) Retention of records

- Records must always be kept during a live investigation – ***and*** **-** if an investigation is determined by the police or other authorities to remain 'open'.
- ***The period for retaining records***
    - This may already be stated in the Constitutions of the respective Religious Congregation.
    - In other contexts, the retention time will vary significantly, from between 25 to 100 years, for example.
    - In some contexts there is an agreement that a record should be safely archived after a certain period of 'inactivity'.
    - *It is best to refer to local laws within the country and to seek further advice, if necessary.*