



*Sisters of the Sacred Hearts of
Jesus and Mary*

Protection of Children & Vulnerable Adults



SSHJM CHIN AND WACFO

**SSHJM CHIN AND WACFO
(SISTERS OF THE SACRED HEARTS OF JESUS AND MARY CHILDREN
IN NEED AND WOMEN AND CHILDREN FIRST ORGANISATION)**

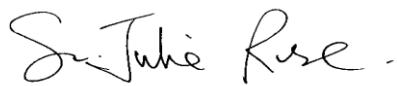
That they may have life to the full

FOREWORD

The safety of the children and vulnerable young people and adults in our care is a priority for us. We are fully committed to protecting all those who are in our care, indeed, care, compassion and preservation of the wellbeing and the dignity of the individual lies at the very heart of our Mission Statement.

‘We Sisters of the Sacred Hearts of Jesus and Mary Urged by the compassion of Christ and responsive to the anguish of people and planet, are called to help shape communities of gentleness, justice and peace that witness to the healing, liberating and empowering love of God’

Our commitment to justice entails a duty to protect the dignity and the rights of all God’s people. The creation of the safe environment which protects and respects the dignity of each person is therefore the responsibility we take seriously those entrusted to our care in our schools, care services and oversees missions are among the most vulnerable of all people. We embrace the measures taken to protect them from all forms of harm and mistreatment. Furthermore, we commit ourselves to promoting and achieving standards of excellence in this key area of safeguarding as well in all other aspects of education and care we provide.



Sr Julie Rose.

Congregational Leader.

UGANDA - 20 – 03 - 2023

The Sisters of Sacred Hearts of Jesus and Mary working in Uganda provide services to children and vulnerable adults in our two missions – Mukono and Pabo. We ensure that all possible measures are taken to protect and respect the dignity of each person. Our procedures for dealing with and reporting allegations of mistreatment follow this policy, and with it the particular guidelines given by the Ugandan Ministry of Gender and Social Development.



Sr Teddy Nankumbi

Uganda Link Coordinator.

Contents

SECTION ONE	6
1.0 CHILD&VULNERABLE ADULT SAFEGUARDING POLICY - UGANDA.	6
1.1 .DEFINITIONS	6
SECTION TWO	9
2.0 POLICY ON CHILD & VULNERABLE ADULT SAFEGUARDING	9
2.1. Guiding principles	9
2.2To whom this policy applies and for whom the policy document is made available	9
2.3 Ongoing training.....	10
2.4 Preventing unsuitable people from working with children and vulnerable adults	10
2.5 Confidentiality	10
2.6 Transparency	10
2.7 Working with Statutory and Local authorities.....	11
2.8 Ownership	11
2.9 Informed consent	11
SECTION THREE	12
3.0 RESPONDING TO ALLEGATIONS.....	12
3.1 Where interviews should be held.....	12
3.2 First level management of disclosures of abuse by the victim - reporting	12
3.3 First level management of disclosures of abuse by an observer - reporting	13
3.4 Action at Project level	13
3.5 Where the alleged abuser is a member of staff.....	13
3.6 Where the alleged abuser is not a staff member	13
3.7 Where the alleged abuse involves a child abusing another child.....	13
3.8 Protection of children with special needs	13
3.9 On-going support for abused children/vulnerable adults.....	14
SECTION FOUR	15
4.0 REPORTING PROCEDURES–PERSONS RESPONSIBLE	15
4.1. Congregational Link Person for Uganda	17
4.2 ROLE DESCRIPTIONS OF OFFICERS WITH RESPONSIBILITY FOR CVASP	17
4.3 Child and Vulnerable Adult Safeguarding Committee.....	18
SECTION 5	19
5.0 RECORD KEEPING.....	19
SECTION 6	19
6.0 WHISTLE BLOWING.....	19
SECTION 7	19
7.0 GUIDELINES FOR SELF PROTECTION BY STAFF	19
7.1 GUIDESLINES FOR SELF PROTECTION FOR CHILDREN.....	20
SECTION 8	20
8.0 SAFE RECRUITMENT POLICY:	20
SECTION 9	21
9.0 SAFE ENVIRONMENT POLICY	21
9.1 Minimising risk situations	21
SECTION 10	22
10.0 CODE OF BEHAVIOR	22
10.1 Ramifications of Misconduct.....	22
SECTION 11	23

11.0 SSHJM’S COMMUNICATIONS GUIDELINES FOR CHILDREN AND VULNERABLE ADULTS	23
SECTION 12	23
12.0. CODE ON HOW TO RUN SAFE ACTIVITIES FOR CHILDREN FOR TRIPS AWAY	23
SECTION 13	25
13.0 GUIDELINES TO INFORM CHILDREN ABOUT HOW THEY SHOULD BEHAVE TOWARDS OTHER CHILDREN	25
SECTION 14	25
14.0 MONITORING PLAN	25
14.1 Reporting	25
14.2 APPENDIXES	27

ACRONYMS

CHIN	Children In Need
CVASP	Child and Vulnerable Adults Safeguarding Policy
PSO	Project Safeguarding Officer
DSO	Designated Safeguarding Officer
NGO	Non- Government Organizations
SSHJM	Sisters of the Sacred Hearts of Jesus and Mary
ULC	Unit Link Coordinator
WACFO	Women & Children First Organization

SECTION ONE

1.0 CHILD&VULNERABLE ADULT SAFEGUARDING POLICY - UGANDA.

The Sisters of the Sacred Hearts of Jesus and Mary (SSHJM) as an organisation working with children and vulnerable adults, both directly or indirectly, has a spiritual, moral and legal responsibility and a duty to protect and safeguard children and vulnerable adults within our care from both intentional and unintentional harm. The Sisters of the Sacred Hearts of Jesus and Mary (SSHJM) endeavour to ensure that all staff are aware of this policy and our commitments in relation to child protection and safeguarding of vulnerable adults.

Background

The Sisters of the Sacred Hearts of Jesus and Mary (SSHJM) is an International Congregation. In Uganda we work with extremely vulnerable people in the North and South East of the country. The Sisters take very seriously their obligation towards the children and adults under their care. Each of our Projects has a designated person to monitor our child/vulnerable adult safeguarding policy. Our commitment to justice entails a duty to protect the dignity and rights of the vulnerable. We commit ourselves to promote and achieve standards of excellence in this area as well as in all other aspects of the education and care we provide. We are committed to work with those who are poor or rejected and to share the love of the Sacred Heart of Jesus, expressed through presence, compassion and liberation, aiming at creating and guaranteeing a safe environment which protects and respects the dignity of each person.

In Uganda we ensure regular training and upgrading in the child and vulnerable adult safeguarding policy for all personnel working with children and vulnerable adults in our two missions – Mukono and Pabo.

Policy and Procedure Statement

The Sisters of the Sacred Hearts of Jesus and Mary working in Uganda provide services to children & vulnerable adults in our two Missions – Mukono and Pabo. All members of the Congregation, staff, associates and volunteers are obliged to raise awareness at local (national and international) level and in the workplaces of what is appropriate and inappropriate behaviour towards children and vulnerable adults.

It is important that all involved are committed to work with the relevant statutory and local authorities and in accordance with the principles laid down in the Ugandan Children's Act (UCA), Ugandan Constitution, (CAP 59) Ugandan National Orphans and Other Vulnerable Children Policy (NOOVCP), the African Child Rights & Welfare Charter (ACRWC), the United Nations Convention on the Rights of the Child, (UNCRC) Children's Rights (a compilation of international, regional and Uganda's Legal and Human Rights Instrument by John Kamya) to ensure that fundamental rights of children & vulnerable adults are respected.

We endeavour to create a safe and nurturing environment where each child and vulnerable adult shall be cherished and affirmed as a gift from God with an inherent right to dignity of life and bodily integrity and will be protected from harm, neglect or abuse.

The policy will be continually updated to reflect current best practice and concentrate on a public commitment to child protection by promoting good conduct and good practice as well as the means to recognise, to report and to respond positively to concerns of child abuse.

1.1 DEFINITIONS

a) Child / Vulnerable child

The UN Convention on the Rights of the Child defines children as persons under 18 years of age. Vulnerability is emotional or mental harm that may result in their human rights not being fulfilled. A vulnerable child is one who is suffering and / or is likely to suffer any form of abuse or deprivation and is therefore in need of care and protection.

b) Adult / Vulnerable adult

An adult is someone over 18. The Universal Declaration of Human Rights (1948), the European Convention on Human Rights, the Human Rights Act 1998 and the UN Convention on the Rights of Persons with Disabilities (2008) all state that adults should be free from abuse. A vulnerable person is a person aged 18

or older who, by reason of mental or other disability, age or illness is, or may be unable to take care of him or herself, or unable to protect him or herself against 'significant harm' or 'exploitation'.

c) Child protection

Child Protection consists of reducing risks to children's holistic well-being, making children's rights a reality, restoring hope and dignified living where abuse has occurred and creating an enabling environment that supports children's positive development.

Child protection entails initiatives that prevent violation of the rights of children in relation to serious risks and hazards. It includes

- Designing and developing appropriate instruments and interventions to protect children with different needs;
- Promoting improved child-friendly legal protection systems, procedures and facilities;
- Sensitizing communities about the rights and responsibilities of children on issues such as inheriting property, cultural and behaviour traits

Protection of the Children is backed by the various publications from the Ugandan Ministry of Gender, Labour and Social Development –*Assessing the effectiveness of approaches, models of care, and interventions for Orphans and other Vulnerable Children and their households in Uganda* (Dec. 2012), *Resource mobilisation strategy for implementation of the national response to vulnerable children* (Nov. 2011), *Advocacy and communication strategy for Orphans and other vulnerable Children 2010/11-2015/16* (Nov.2011) *Monitoring and Evaluation Framework and Plan for National Strategic programme Plan of Interventions for Orphans and other Vulnerable Children 2011/12 -2015/16*(Feb.2012). All these publications are made available to staff working with children in the care of the Sisters of the Sacred Hearts of Jesus and Mary in both Mukono and Pabo.

c) Child Abuse

According to the **World Health Organisation**, "Child abuse" or "maltreatment" constitutes '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. 'Abuse of vulnerable adults can constitute the physical, psychological, emotional, financial or sexual maltreatment or neglect of a vulnerable adult by another person. The abuse may be a single act or repeated over a period of time. It may take one form or a multiple of forms.

The 4 categorical forms of abuse are generally defined as:

- **Physical abuse:** Physical abuse is any form of non-accidental injury or injury which results from wilful or neglectful failure to protect a child. Examples include hurting or injuring a child, inflicting pain, poisoning, shaking or otherwise causing physical harm to a child.
- **Sexual abuse:** Sexual abuse occurs when a child is used by another person for his or her gratification or sexual arousal, or for that of others. This includes direct or indirect sexual exploitation or corruption of children by involving them (or threatening to involve them) in inappropriate sexual activities.
- **Emotional abuse:** Emotional abuse is normally to be found in the relationship between a caregiver and a child rather than a specific event or pattern of events. It occurs when a child's need for affection, approval, consistency and security are not met. Emotional abuse, for example, happens when a care-giver repeatedly rejects children, humiliates them, frightens them or denies their worth and rights as human beings.
- **Neglect:** the persistent failure to meet a child's basic physical and physiological needs. Neglect can be defined in terms of an omission, where a child's health safety, development or welfare is being avoidably impaired by being deprived of food, clothing, warmth, hygiene, intellectual stimulation, supervision and safety, attachment to and affection from adults or medical care.

d) Child Neglect

This constitutes the failure of care givers to provide adequate physical and emotional care for a child; it may also involve the refusal of or delay in seeking care, inadequate supervision, abandonment and expulsion from home or refusal to allow a runaway to return home.

e) Care Giver

This is the individual who takes primary responsibility for the physical, mental and emotional needs and well-being of the child.

f) Child Safeguarding

Child safeguarding' applies particularly to the duty of organisations and individuals associated with children under their care.

g) Disability

Substantial function limitation of daily life activities of an individual caused by physical, sensory or mental impairment and environmental barriers. Disabled children / adults include those with movement, speech, visual, hearing, learning / intellectual, hidden and multiple impairments.

h) Discrimination

These are acts of treating individuals or groups differently in relation to services, privileges, right and benefits.

i) Empowerment

This is a process of giving voice to the disenfranchised and allowing the poor and vulnerable to have access to the tools and materials they need to forge their own destinies by allowing each and every household the possibility of becoming producers of their welfare, rather than consumers of others' charity. It constitutes the process of increasing the spiritual, political and social or economic strength of individuals, families and communities. This process provides the marginalised, powerless, poor and vulnerable individuals and groups with the capacity to address their own needs.

j) Family

A group consisting of one or more parents and their offspring and, in some societies, close relatives that provides a setting for social and economic security, transmission of values, protection and affection for the family members.

l) Human rights

These are inalienable entitlements that are agreed upon through consensus and they can be claimed by anyone based on their needs and aspirations.

m) Rights of a child

The Uganda constitution gives every child the right to: –

1. A name and a nationality from birth;
2. Know and be cared for by his or her parents or to appropriate alternative care when removed from the family environment;
3. Basic nutrition, shelter, basic health care services and social services;
4. Be protected from maltreatment, neglect, abuse or degradation;
5. Be protected from exploitative labour practice.
6. Not be required or permitted to perform work or provide services that – are inappropriate for the child's age; or be a risk to the child's well-being, education, physical or mental health or spiritual, moral or social development;
7. Not be detained except as a measure of last resort, in which case, in addition to the rights a child enjoys under sections 12 and 35, the child may be detained only for the shortest appropriate period of time, and has the right to be kept separately from detained persons over the age of 18 years; and is treated in a manner, and kept in conditions, that take account of the child's age;
8. Not be used directly in armed conflict, and to be protected in times of armed conflict

n) Special Needs:

These include children / people with disabilities, chronic sickness for instance asthma, epilepsy, sickle cells, diabetes, cancer and HIV/AIDS, mentally and physically challenged.

SECTION TWO

2.0 POLICY ON CHILD & VULNERABLE ADULT SAFEGUARDING

SSHJM has ensured that all staff, trainees, volunteers, all other stake holders are aware of the different forms of child and vulnerable adult rights violation, ranging from abuse, harm, neglect, exploitation, extortion, with more emphasis towards persons with disabilities.

To further strengthening of the policy, CHIN and WACFO has ensured a deeper understanding of the policy to all stake holders through;

- Translation of the policy into local languages.
- Capacity building of other staff and stake holders (local leaders, police, probation officers, volunteers, parents and caregivers of children with disabilities).
- Sensitization in local schools and communities through advocating for talking compounds.

So as to ensure quality services delivery and accountability to those who are using or benefiting from them. It is on this note that all staff and other stake holders are responsible and bound to the guiding principles.

2.1. Guiding principles

Our policy has been written to protect from neglect, harm or abuse; to the fullest possible extent, all children and vulnerable adults entrusted to us and to ensure that the following guidelines are adhered to:

- **Best interests of the child**, the welfare of the child is the fundamental consideration. The actions taken to protect a child, including assessment, should not in themselves be abusive or cause the child unnecessary distress.
- **Child participation**, Children have a right to be heard, listened to and taken seriously. Taking into consideration of their age and understanding, they should be consulted and involved in all matters and decisions which may affect their lives.
- **Accountability**, our organization has identified the importance of leadership with clear lines of accountability, without ambiguity about who is responsible at every level, especially for the health, well-being and safety of vulnerable children.
- Early recognition of situations where abuse may occur so that preventative measures can be taken.
- Early identification of abuse where there is evidence or merely suspicion or concerns regarding any child or vulnerable adult under our care
- Awareness raising among all who work with the children and adults entrusted to our care of the symptoms of abuse and identification of particular children and adults who might be vulnerable.
- Taking appropriate action at the right time.
- Cooperating with the statutory and local authorities to ensure the safety and well-being of every child and adult in our care.
- Ensuring that all staff are properly trained and inducted in the implementation of this child protection policy
- Ensuring that all staff are fully aware of their duty to report abuse.
- Reducing discrimination and stigmatisation
- Be guided in the process by the principle of ‘best interests of the child’
- Listen to and take seriously the views and wishes of children
- Work in partnership with parents/carers and/or other professionals to ensure the protection of children.

2.2 To whom this policy applies and for whom the policy document is made available

This policy applies to every person, without exception, who has an appreciable contact with children and adults in our care. This includes:

- All members of the Congregation in Uganda
- All candidates in initial formation in Uganda
- All those employed in our Play Schools, Sheltered Accommodation, other Institutional settings, Community Based Rehabilitation activities for and with Children With Disabilities, all Associates,

Volunteers and students during their induction period, involved in our Projects in Mukono and Pabo, all senior staff in our Projects in Mukono and Pabo.

- consultants, researchers, contractors
- All people in contact with children and the vulnerable persons.

A copy of this policy should be given all above to read or have it read to them who must then sign to say they have read/heard and understood it. Efforts are already in place towards translation of this policy to the local language so that it can be better understood by the local staff. Both Luganda and Luo version are in place only a waiting for validation from Makerere University.

2.3 Ongoing training

Ongoing training and support arrangements are two of the elements we put in place to create a safe environment for each individual entrusted to our care. Therefore:-

- All the above-mentioned persons/ members will be given training in the recognition and prevention of Child and Vulnerable Adult abuse. They will be given specific training on how to identify abuse and how to record their findings.
- They will be sensitized to become aware of the procedures in Uganda that must be followed in relation to actual or suspected abuse.
- They will have regular refresher and updating courses on how to respond to challenging behaviour in children/vulnerable adults.
- Personnel with specific roles related to children and the vulnerable person will be given extra specialised training.
-

2.4 Preventing unsuitable people from working with children and vulnerable adults

It is the policy of the Sisters of the Sacred Hearts of Jesus and Mary to develop a culture of safety within the Ugandan Unit that seeks to minimize risks to children. This will be done by: Having a safe recruitment and vetting process in place. In the case of expatriate co-workers police checks from their country of origin is required. For indigenous; staff, a clearance letter from the local authorities (local councilors, police and responsible persons in government, church etc.) will be required.

- Two references from reputable employers to be verified for the ones who were formerly employed.
- Having in place a code of behavior for dealing with children and vulnerable adults.
- Having a safe environment policy in place for children and vulnerable adults under their care (see appendix 6)

2.5 Confidentiality

Where a child/adult, who is either a victim or an observer, makes a disclosure and asks that the information is not passed on, the child/adult should be advised that the person receiving the disclosure has a responsibility to inform the Designated Project Officer (DPO) who will in turn take the disclosure to the Ugandan Police Child and Family Protection Unit if such action is warranted.

All agencies receiving information in the course of an investigation, should treat it sensitively, although priority must be given to the safeguarding of the child/adult at all times. They should not disclose information for any other purpose without consulting the person who provided it.

2.6 Transparency

Transparency combats / breaks through cultures of silence, taboo, secrecy and fear in which child and vulnerable adult abuse thrives. Therefore:-

- Transparency and the space and opportunity to talk freely shall be created to ensure a preventive and protective environment for children and vulnerable adults;
- Information will be properly recorded, signed and dated, clearly marked as either opinion or fact, whether witnessed by anyone else etc...;

- A clear and standardised process will be in place to minimise confusion and rumour. Our Child and Vulnerable Adult Safeguarding Policy and procedures will be transparent, i.e. everyone should know that they exist and should be clear about what they involve and the consequences of breaching them. However, the actual information that passes through the procedures in particular cases (e.g. names and incidences) will be kept confidential, accessible only to those who need to know.

2.7 Working with Statutory and Local authorities

In Uganda the legal arm for protection, safeguarding and care of children and vulnerable adults is a Unit of the Uganda Police - Ugandan Police Child and Family Protection Unit. The local authorities also have facilities for receiving complaints and either dealing directly with them (where a matter of justice is also involved for example landownership rights) or referring them to the Ugandan Police Child and Family Protection Unit.

Church and NGO bodies are also active in Child Abuse and Gender Based Violence issues. Recognising that it does not have all the skills to deal with the safeguarding of Child and Vulnerable Adults, the Sisters of the Sacred Hearts of Jesus and Mary have established links and collaborate with personnel within all these agencies in order to secure support for the vulnerable as well as develop good practice and avail of opportunities for joint training and development.

This policy targets children and vulnerable adults who are affected by armed conflict; orphans; abused or neglected; affected by HIV/ AIDS or other diseases; in need of alternative family care; affected by disability in hard to reach areas living under the worst form of labour conditions and living on the streets.

2.8 Ownership

As far as possible staff and beneficiaries of CHIN and WACFO will be involved in the formulation and regular updating of the SSHJM CVASP. During the implementation discussions emphasis will be placed on the criteria that will enhance awareness and sensitivity as to what will need to change to develop a culture in line with this policy. The issues that constitute child abuse but at present are culturally accepted as normal practice will be challenged and exposed as bad practices. A risk management approach will be adopted. Attention will be drawn to procedures on the Code of Conduct and the need to provide support to employees and others in order for them to meet the requirements of the policy and **own** it.

2.9 Informed consent

Consent

A process in which an individual educates another, it relates to a person's right to human dignity and authority.

Assent

This is an official agreement or sign approval of any proposed idea, plan or request made to an individual. The assent of parents and child shall be in; verbal approval writing and signed in the presence of two witnesses who affirm that the nature and legal implications of the consent have been fully understood.

SECTION THREE

3.0 RESPONDING TO ALLEGATIONS

Children/vulnerable adults have a right to be listened to, heard and believed. The Sisters of the Sacred Hearts of Jesus and Mary are committed to responding effectively and sensitively to all allegations and suspicions of child and vulnerable adult abuses by thoroughly investigating and documenting any incidence.

Parents.

Upon receipt of an allegation of abuse, CHIN/WACFO and their stakeholders will activate a prompt, thorough and confidential investigation that treats all parties with respect and fairness, in line with the investigation procedures.

All employees.

1. The Program Employees reports the allegations of abuse to the Project safeguarding officer within 24hours.
2. The Programs Manager reports the allegations of abuse to the Designated Child Safeguarding Officer and the Programs Coordinator within 24hours. In case where the person to report to is the subject of the allegations, the responsible person shall report to the higher level of authority for action.
3. The Program Coordinator studies the matter and advises the Designated Child Safeguarding Officer on the next steps as per relevant policy.
4. If an emergency emerges, the child or the Employees can call and ask the Designated Child Safeguarding Officer to be present in the project site immediately. The Designated Child Safeguarding Officer may be at liberty to deploy the representative appropriate to visit the site. CHIN and WACFO through the Programs Coordinator institutes emergency response mechanism for the abused Child.

Police.

If the allegation is a criminal offence, a staff member will be interviewed jointly by the Ugandan Police Child and Family Protection Unit. The staff member may be placed on administrative leave until investigations are complete. Professional confidentiality shall be stringently maintained.

Hotlines

CHIN/WACFO encourages parents and care givers of CWDs to have emergency hotlines in case of any abuse. Among these, CHIN/WACFO recommends Sauti 116. Sauti 116 is the **sustainable Uganda Child Helpline service** which is embedded into society and consistently offering timely and quality services that respond to child protection and vulnerable adult needs.

3.1 Where interviews should be held

All interviews with children should take place in an environment where the child feels safe and comfortable. Interviews in Police Posts are not recommended unless there is a ‘child friendly’ room available.

3.2 First level management of disclosures of abuse by the victim - reporting

Those working in our services should always take seriously any disclosure concerning an allegation of abuse. They should stay calm and try not to show shock. All disclosures should be dealt with in the agreed way.

- Listen to the child/vulnerable adult, do not directly question him or her
- Do not stop the child/vulnerable adult, who is freely recalling significant events - just listen.
- They should be sympathetic and reassure the person that they did the right thing in telling them what happened and they are not to blame. They should be informed that their disclosure cannot be kept secret but has to be reported to the Unit Link Coordinator (ULC)
- They should be made aware of the possibility that medical or other forensic evidence may be required
- Make a note of the discussion, taking care to record the timing, setting and any other personnel present, as well as what was actually said. Prepare a written report within twelve hours and pass it on to the Designated Project Officer (DPO) who will review the disclosure.

3.3 First level management of disclosures of abuse by an observer - reporting

The same process as above will be followed but clarification and greater detail may be demanded. There will not be evidence of abuse in all cases. If there is any concern about the safety of the child/adult, the **incident report form for allegations of abuse** should be completed (see appendix i) and handed on to the DPO. In the event of the ULC and DPO not being available, any appointed officer will be delegated to handle incidences.

3.4 Action at Project level

On receipt of the **incident report form for allegations of abuse**, the PSO, as soon after the event as is practically possible, must make a decision as to:

- Whether the child/ adult in question needs immediate protection from harm?
- Whether the child/adult needs medical treatment/counselling
- Whether the matter should be referred to the Ugandan Police Child and Family Protection Unit and if so take immediate action to arrange for an interview with the child/adult and the designated police officer.

The detailed **Child/Vulnerable Adult Safeguarding Recording Form** shall be completed (see appendix ii) and kept on file when the case reaches this stage the responsibility to **investigate** the allegation rests with the Ugandan Police Child and Family Protection Unit. Any internal reviews of alleged abuse should only take place when the statutory /appropriate authorities have indicated that such reviews would not interfere with their investigations.

Staff members should not attempt to question the alleged abuser. *It is not the responsibility of the PSO or other staff members to investigate the allegation. This is the role of the statutory body – the Ugandan Police Child and Family Protection Unit.*

Once the incident is handed over to the relevant statutory agency, **no further interviewing should take place.** Any relevant information obtained through other channels should then be collected and passed on to the investigating agency. The Unit Link Coordinator (ULC) should be informed immediately. She in turn will inform the Congregational Safeguarding Coordinator.

3.5 Where the alleged abuser is a member of staff

She/he should be interviewed jointly by the Ugandan Police Child and Family Protection Officer and the ULC. The staff member may be placed on administrative leave until investigations are complete. Professional confidentiality shall be stringently maintained.

3.6 Where the alleged abuser is not a staff member

She/he should be interviewed by an Officer from the Ugandan Police Child Protection Unit only. The incident should be recorded on an Incident Report Form (see appendix ii). Professional confidentiality shall be stringently maintained.

3.7 Where the alleged abuse involves a child abusing another child

Both children will be interviewed and appropriate counselling will be given by the DPO with another responsible adult present. The allegation(s) will be discussed in a manner appropriate to the age and mental capacity of the children. A written record of the discussion will be kept.

A judgement will be made regarding the allegation(s) and circumstances and the advisability of calling in the parents or guardians before further action is decided upon. If appropriate the case will be referred to the Ugandan Police Child and Family Protection Officer and responsibility handed over to him/her.

3.8 Protection of children with special needs

Children with Special Needs require extra protection and safeguarding because of the following:

1. They are often unable to tell someone if they have been abused.
2. They may be totally dependent for their physical care by an adult who could abuse them.
3. Society's attitude about disability means that they are not afforded the normal protection granted to children.

The Sisters of the Sacred Hearts of Jesus and Mary pay particular attention and diligence to these very vulnerable people regarding protection and safeguarding. The DPO will have to make a decision whether or not a child with a disability should be formally interviewed. Where an interview is thought not to be appropriate a greater reliance is placed on the Police Service to gather forensic evidence.

3.9 On-going support for abused children/vulnerable adults

The child/vulnerable adult may need to be medically examined or may be required to make further statements. They should be helped and supported through this by the DPO or a person delegated by the DPO for this task.

SECTION FOUR

4.0 REPORTING PROCEDURES–PERSONS RESPONSIBLE

CHIN/WACFO must consider the abuse of children and vulnerable adults in communities to be completely unacceptable. We take all concerns and reports of abuse seriously and act on these reports immediately and in compliance with the mandatory reporting laws.

Individuals representing SSHJM or their stake holders are duty-bound to report concerns or allegations. These concerns may relate to a vulnerable adult, child or parents of children with disabilities and other stake holders namely; Cluster village workers, specialised trainers, and staffs or a concern arising outside of the organisation's programmes.

PROCEDURE	STEP ONE
Allegations Reported	An allegation of child protection violation is reported against a member of CHIN/WACFO staff
	STEP TWO
CHIN/WACFO is Contacted	1. The Project Child and Vulnerable Adults Safeguarding Officer reports the allegations of abuse to the Designated Child and Vulnerable Adults Safeguarding Officer within 24hours. 2. The Designated Child and Vulnerable Adults Safeguarding Officer reports the allegations of abuse to the Director/ Programs Coordinator within 24hours. In case the person to report to is the subject of the allegations, the responsible person shall report to the higher level of authority for action. 3. The Director/Program Coordinator studies the matter and advises the Designated Child and Vulnerable Adults Safeguarding Officer on the next steps as per relevant policy. 4. If an emergency emerges, the child or the Employees can call and ask the relevant Designated Child and Vulnerable Adults Safeguarding Officer to be present in the project site immediately. The Designated Child Safeguarding Officer may be at liberty to deploy the representative appropriate to visit the site. 5. CHIN/WACFO through the Programs Coordinator institutes emergency response mechanism for the abused Child and Vulnerable Adult.
	STEP THREE
Response Determined	1. An Action Plan to respond to the allegations is agreed by the relevant Project Child and Vulnerable Adults Safeguarding Officer, Designated Child Safeguarding Officer and Director/Programs Coordinator. 2. An independent committee of at least 3 and not more than 5 members is set up by the Designated Child and Vulnerable Adult Safeguarding Officer to investigate the allegations. The Project Officer assumes the roles of the Secretary to the Committee

	STEP FOUR
Immediate Action	1. If the accused is an employee, he or she is suspended from duty until the investigation is complete. 2. If it's a criminal case, CHIN/WACFO facilitates the Employee's surrender to authorities for legal action to start. (This is only if CHIN/WACFO have the ability to implement the facilitation) 3. Employee shall continue to receive salary as provided for by relevant country labour laws while on suspension.
	STEP FIVE
Investigation Undertaken	1. The Committee undertakes a full investigation with appropriate evidence / documentation gathered. 2. If a conviction is secured before the CHIN/WACFO investigations are complete, CHIN/WACFO severs the relationship with the employee in line with the Human Resources Policy Manual upon dismissal of any appeal lodged by the accused employee.
	STEP SIX
Decision Taken	1. The investigation is completed and the accused employee is informed. 2. Investigation file with recommended decision is forwarded to the Director/Programs Coordinator for CHIN and WACFO's final decision. 3. Director/Programs Coordinator makes the decision within 7 days and sends the file to the Designated Child and Vulnerable Adults Safeguarding Officer for communication with the employee. 4. The Designated Child and Vulnerable Adults Safeguarding Officer communicates with the employee within 72 hours while allowing the employee to appeal the decision within 7 days. 5. If the Employee appeals, the Director/Programs Coordinator sets up an independent Committee of 3 members that he/she chairs. 6. The Appeals Committee hears the appeals and makes a final recommendation to the Director/Programs Coordinator within 14 days 7. The Director/Programs Coordinator shall make a decision within 7 days 8. An employee has the right to appeal to the Appeals Committee, and shall communicate the matter to the Uganda Mission Development Team (UMDT) within seven (7) days, stating his/her case in writing. 9. The Uganda Mission Development Team shall respond to such appeals as soon as possible and no later than thirty (30) days of receiving the appeal. The disciplinary action already taken by the Director/Programs Coordinator shall remain in effect during the course of appeal, unless the Director/Programs Coordinator chooses to postpone action pending ruling of the appeal. 10. Necessary legal obligations are fulfilled (e.g. informing police, Children's Department, etc.).
	STEP SEVEN
	1. The abused child/vulnerable adult is provided with ongoing counselling as appropriate. 2. The Director/Programs Coordinator provides written report to the Board as appropriate. 3. The Designated Child and Vulnerable Adults Safeguarding Officer communicates with affected community, including child's relatives if appropriate.

SSHJM will report the concerns through the appropriate channels so that SSHJM can ensure appropriate measures are taken.

Any individual, who has observed or was told about behaviour that could be considered abuse, must immediately report the information as outlined below.

Any individual who has concerns about the appropriateness of actions involving child and vulnerable adults, SSHJM or her partners must immediately report their concerns. Concerns include suspected actual or potentially abusive or harmful behaviour towards a child, behaviour or situations that might place a child at risk of harm, or suspected or actual sexual exploitation or abuse of vulnerable people.

No adverse action will be taken against individuals who report violations of this policy in good faith, as described in SSHJM child protection and safe guarding Policy. Any employee who intentionally makes false and malicious allegations will face disciplinary action.

4.1. Congregational Link Person for Uganda

The Unit Link Coordinator (ULC) for Uganda is accountable to the Congregational Safeguarding Coordinator based in UK. She is responsible for the implementation of the Ugandan Unit Child and Vulnerable Adult Safeguarding Policy. She has the responsibility for the monitoring and evaluation of initial and on-going training within Uganda - but is not directly responsible for the management of operational and day to day matters or local training. Submission of half yearly reports to the Congregational Safeguarding Coordinator is also her responsibility.

For cases of abuse that cannot be dealt with in Uganda, in a manner that satisfies the principles and policy of the Congregation, these cases will be referred immediately to the Congregational Safeguarding Coordinator. Also if any media interest is shown in a particular alleged abuse case the matter will be referred directly to the Congregational Safeguarding Officer who should be well informed and acquainted with the allegation through the ULC. The Unit Link Person for Uganda is Sister Teddy Nankumbi.

To support the ULC each Project in Uganda (Mukono and Pabo) will have a Project Safeguarding Officer (PSO) responsible for all matters pertaining to Child and Vulnerable adults safeguarding within the Project. For Mukono (CHIN) the PSO is Iris Nakanobe and for Pabo (WACFO) the designated person is Sister Beatrice Akwero. She will be assisted by Project Offices (PO's). The Project Safeguarding Officer (PSO) with the Project Officers will be responsible for the implementation of the Child/Vulnerable Adults Safeguarding Policy at local level. The PSO will also be responsible for organising training and updating in our Child and Vulnerable Adults Safeguarding Policy at Project level. She/he will be responsible for receiving initial reports of actual or suspected child/adult abuse and completing the necessary documentation and taking appropriate action. She/he will immediately inform the Designated Child and Vulnerable Adults Safeguarding Officer where the case is referred to the Ugandan Police Child and Family Protection Unit. She will be a member of the National Coordinating Committee for Child and Vulnerable Adults Safeguarding Policy in Uganda. The following are the named Safeguarding Officers, Iris Nakanobe, Silaje Nsubuga and Moureen Namuheni for CHIN Mukono, and Christopher Obalo, Tracy Amony for WACFO, Pabo.

4.2 ROLE DESCRIPTIONS OF OFFICERS WITH RESPONSIBILITY FOR CVASP

a) Role of the Designated Child and Vulnerable Adults Safeguarding Officer for the Ugandan Unit

As an integral part of the Congregation's commitment to the protection of children and vulnerable adults. The Designated Child Safeguarding Officer acts as the UCL for Uganda.

The Designated Child and Vulnerable Adults Safeguarding Officer as got the following responsibilities;

- Inform the Congregational Safeguarding Coordinator of all serious abuse issues involving staff or members of the Congregation as soon as an allegations made.
- Inform the Congregational Safeguarding Coordinator immediately where media interest is shown and refrain from making any independent statements.

- Inform the Congregational Safeguarding Coordinator in all matters of Child or Vulnerable Adult allegations of abuse
- a) Ensure adherence to this Child and Vulnerable Adult Protection policy.
- b) Act as liaison with statutory services in matters relating to child protection in support of the Project Designated Officer
- c) Ensure proper records of all reported incidents are filed and kept in a safe place.
- d) Take a supporting role in the reporting and follow up of child protection referrals to the statutory services in both of our Missions in Uganda and ensure that the procedures are followed systematically and thoroughly.
- e) Arrange for regular meetings of the Child and Vulnerable Adults Safeguarding Coordinating Committee. The Committee will comprise of the ULC and the two PSO's. i.e Sr Teddy Nankumbi, Sr Beatrice Akwero.

b) Project Safeguarding Officer's responsibility

The Project Safeguarding Officers Iris Nakanobe in Mukono and Sr Beatrice Akwero in Pabo – will be responsible:

- For overseeing the training of all personnel working in their projects. In particular, the specialised training that should be given to Head teachers/ Managers and others in posts of responsibility.
- In the event of suspected abuse or reported allegation the PSO's shall **immediately act** in accordance with the procedures laid down in the Uganda Unit Child and Vulnerable Adult Safeguarding policy. Matters that require the attention of the Unit Link Coordinator (ULC) should be reported to her within **seventy-two hours of occurrence**.
- The PSO's will have to make a decision whether or not a child with a disability, especially those mentally challenged, should be formally interviewed. Where an interview is thought not to be appropriate a greater reliance is placed on the Police Service to gather forensic evidence.
- Ensure confidentiality and safe keeping of all records dealing with abuse cases.

4. 3 Child and Vulnerable Adult Safeguarding Committee

A Project Committee for CHIN/WACFO will be established to review CVAS procedures in all projects associated with the Sacred Hearts Sisters. This committee will:

- Be composed of the Unit Link Coordinator and Project Safeguarding Officers from Pabo and Mukono.
- Receive reports from the Designated Project Officers of all instances of child abuse dealt with by them through the DSO's from each of the two project areas – Mukono and Pabo.
- Make recommendations to alter the procedures as necessary and make recommendations about further training required.
- Hold quarterly meetings and will have executive authority for Child Protection Procedure. The half yearly report for submission to the Congregational Safeguarding Coordinator will be drawn from reports, recommendations and decisions of this committee.

SECTION 5

5.0 RECORD KEEPING

- a) Any allegations or suspicions of the abuse of a vulnerable child/adult must be recorded as soon as possible within the services recording system. Records should also be placed within the individual's personal file which should be in locked and secure cabinets.
- b) The recording should include an accurate detailed record of what was said to the member of staff/volunteer by the individual. **Records should be made at the time of the disclosure** or other event because it is at that time the memory is accurate and clear.
- c) It is important that the confidentiality of records is maintained with the utmost care. Information should be released only to those in positions of responsibility who have good reason to need it for the protection of children/adults. Individuals are, of course, entitled to access information about themselves.
- d) Records should be retained for a minimum of 100 years for children and 50 years for adults. However, no records are to be destroyed at the end of this time without consultation with the Congregational Safeguarding Co-ordinator.

SECTION 6

6.0 WHISTLE BLOWING

A 'whistle blower' is a person who has concerns about another person in the services and reports this because they fear that such concerns will not be acted upon or that their own situation in the services will be put at risk. The Congregation recommends that if such a person does not feel able to approach the designated officer or if the concern/matter, relates to the designated officer, then they should contact the most senior officer in the Ugandan Unit and if this is not appropriate then the Congregation's Safeguarding Coordinator. The Congregation recognises that this is an acceptable course of action as the safeguarding of children and vulnerable adults entrusted to our care is of paramount importance.

SECTION 7

7.0 GUIDELINES FOR SELF PROTECTION BY STAFF

1. In the event of any injury to a child, accidental or otherwise ensure that it is recorded and witnessed by another adult.
2. If child touches you in an inappropriate place record what happened and ensure that another adult also knows. As it could be totally innocent touch, do not make the child feel like a criminal.
3. Never take children in a car alone.
4. Never take children to your home.
5. If you are in a care situation with children with special needs, try to have another person present when changing nappies or clothing, or bathing a child.
6. Never do something of a personal nature for children that they can do themselves. This includes cleaning bottoms, unbuttoning trouser buttons, or any activity that could be misconstrued.
7. Be careful of how and where you touch children. Never pat a child on the bottom. If you teach young children or children with special needs who sit on your lap, be aware of where you touch them.
8. Be careful of extended hugs and kisses on the mouth from children. This might be particularly relevant to those working with special needs children. Though we want to give love and attention to children, this guideline is important not only for our protection, but for the children and vulnerable adults as well.

7.1 GUIDELINES FOR SELF PROTECTION FOR CHILDREN

a) Train and encourage them:

- Not to talk to strangers
- Tell an adult if there are uncomfortable feelings about the way someone has talked to or touched them
- Do not accept gifts from anyone that they cannot tell their parents / guardians about
- Learn refusal skills. Don't be afraid of saying 'No' and meaning it
- Yell for help if they feel in danger
- If someone has made them feel sad, frightened or uncomfortable, tell an adult that they can trust
- If someone has told them to keep something secret and they do not feel comfortable with that, tell an adult
- Walk together with a group of friends whenever possible. Avoid walking alone
- Learn to be alert and to avoid lonely, dark places
- Don't open the door to strangers
- Know their rights as a child and vulnerable adult.

SECTION 8

8.0 SAFE RECRUITMENT POLICY:

The Sisters of the Sacred Hearts of Jesus and Mary in Uganda have in place an Employment Policy which among other things includes:

- a) An advertising policy – all posts advertised and displayed in public areas over a given period (3-5 days), job description briefly outlined and the responsibility of applicants towards children indicated, the added value of training in childcare and protection expressed;
- b) An interviewing policy -the interview panels will be comprised of experienced and qualified personnel, with a proven ability to extract and explore the information that the candidate has included on the application form;
- c) Reference specifications. As Uganda does not have a system for Police Check/clearance in place for people working with children and vulnerable adults, stress is put on the recommendations of at least three reliable people one of who must be the previous employer;
- d) Referees will be asked to include in their references their view on the applicants suitability to be in direct contact with children;
- e) The requirement that the applicant will sign a declaration that she/he does not have any previous court convictions in relation to child abuse or domestic violence;
- f) Appointments, as far as possible, shall be of only those suitably qualified but in all cases only those who can handle children with respect and competence;
- g) Candidates for employment must fully declare on their application form whether they have any criminal convictions. A false declaration that results in employment, will render the person liable to dismissal without notice;
- h) Interns and volunteers of SHJM will be given a copy of the CVASP and asked to sign a statement of commitment (see Appendix iii);
- i) Upon appointment, SHJM staff will be given a copy of the CVASP and the behavior code of conduct and will be asked to sign a declaration form (See Appendix iv) that they have understood it and agree to be bound by it. This is a contractual obligation within the staff contract.

SECTION 9

9.0 SAFE ENVIRONMENT POLICY

The Sisters of the Sacred Hearts of Jesus and Mary in Uganda have in place

- Regulations regarding visitors other than parents or close relatives
- Guidelines for ensuring the safety of equipment for activities, especially play activities and the supervision regulations
- Provision for adequate supervision for those activities that could result in a young person or persons wandering off and getting into harm's way
- Strategies for correctly identifying risks and taking steps to minimize or prevent them. All those involved in the care of children/ vulnerable adults trained to recognise situation where there is potential for abuse. Appropriate and timely interventions should be made to prevent it for example challenging colleagues where necessary, referral to support groups, respite care, instruction in practical and coping skills
- Guidelines for the safe and secure keeping of each child's records to prevent them being lost and/or getting into the wrong hands. Information is only accessible to a minimum number of people necessary for the functioning of the organisation and there is clear guidance on instances when confidentiality should be breached in the best interests of the child / vulnerable adult
- Where help is not accepted, or other agencies are not able to offer support, the situation to be monitored closely and further action taken if there is deterioration in the situation or any abuse becomes apparent

The Ugandan Unit has a policy on Code of Conduct and all staff are asked to read and sign that they have read and understood it and will follow it throughout their practice. This regulation also applies to the Child Protection and Safeguarding Policy.

9.1 Minimising risk situations

Never

1. Condone or participate in behaviour which is illegal and unsafe
2. Develop physical / sexual relationship with a child
3. Behave physically in a manner that is inappropriate or sexually provocative
4. Engage in or allow sexually provocative games with children and vulnerable adults to take place
5. Do things of a personal nature that a child could do for him / herself, including dressing, bathing and grooming
6. Hit or otherwise assault or physically abuse a child

Do not

1. Use language that will mentally or emotionally harm a child;
2. Suggest inappropriate behaviour or relations of any kind;
3. Act in any way that intends to embarrass, shame, humiliate or degrade a child;
4. Encourage inappropriate attention seeking behaviour, such as tantrums by a child;
5. Show discrimination of race, culture, age, gender, disability, religion, sexuality or political persuasion
6. Allow children and vulnerable adults to engage in sexually provocative games with each other

Try to

1. Be accompanied by a second adult whenever possible
2. Meet with a child in a central, public location whenever possible
3. Immediately note on an incidence report sheet, the circumstances of any situation which occurs which may be subject to misinterpretation by a third party
4. Avoid doing something that could be misinterpreted by a third party

Do

1. Be aware of the power balance between an adult and child, and avoid taking any advantage this may provide;

SECTION 10

10.0 CODE OF BEHAVIOR

Senior staff have a duty to see that:

- All employees working with children and vulnerable adults have had training in child protection and safeguarding
- That copies of the Congregation child and vulnerable adult policy as well as the Ugandan CPP are made available, studied and implemented
- That the guidelines of procedures for responding and reporting disclosures of alleged abuse are followed.
- Mechanisms to deal with bullying, inappropriate/discriminatory language and unacceptable reading materials and images are in place

All employees working with children and vulnerable adults have a duty to:

- Listen to and act on any disclosures of abuse either by the victim or an observer
- Adhere to the guidelines for all staff members, visitors, students, volunteers and others on the use of cameras, mobile phones with camera installed facilities, in the schools or workplaces where children/vulnerable adults might be exploited or used in an unethical manner
- When activities /operations involve taking children out on day or overnight trips, it is the responsibility of all staff to ensure that safe practices are upheld in relation to the transportation of children and that appropriate supervision and consent is available
- Observe a code of behavior that respects privacy for children and young people particularly in changing rooms, toilets and showers

10.1 Ramifications of Misconduct

- If an allegation of a violation of the policies, guidelines, principles or practice of child protection is made concerning a named individual from a verifiable source against any Sister, staff member, intern, volunteer, consultant or contractor they will be suspended on full pay (staff member), or suspended from all activity / association with SSHJM (intern, volunteer, consultant or contractor) pending the outcome of an independent investigation. The decision to suspend must be taken by the ULC and is not open to challenge.
- Depending on the outcome of the independent investigation: ‘If it comes to light that anyone associated with SSHJM commits acts in relation to children and vulnerable adults – whether within or outside the context of SSHJM’s work – which are criminal, grossly infringe children and vulnerable adults’ rights, or contravene the principles and standards contained in this document, *SHJM will take immediate disciplinary action and any other action which may be appropriate to the circumstances*’. This may mean, for example, for:
 - Staff – disciplinary action
 - Volunteers and students during induction period – ending the relationship with SHJM
 - Consultants/ Contractors – termination of contract
 - All - Criminal prosecution/ Reporting

When investigating and determining the concerns or complaints, the process should always be fair and any adverse determination should be open to challenge through an appeals process. This means that if a Sister, staff member, intern, volunteer consultant or contractor has been accused of violating the CVASP and the complaint has been upheld as a result of an investigation, the accused has the right to appeal this decision (for example, they may feel that the original decision was unjust or based on misinformation or a personal grudge of the person who carried out the investigation). An appeal would mean that a second party would re-examine the evidence to double-check that no mistakes have been made. The decision from the appeals process would then be final once and for all.

- The media will be dealt with by the Congregational Safeguarding Co-ordinating in UK in all cases of a serious nature. Otherwise they will be dealt with by the ULC.
- CVASP related incidents will be collated, analysed and fed into the monitoring template.

SECTION 11

11.0 SSHJM'S COMMUNICATIONS GUIDELINES FOR CHILDREN AND VULNERABLE ADULTS

In communications about children and vulnerable adults, the following standards apply:

- Access to print and electronic personal information about children and vulnerable adults be restricted to the minimum number of people who need to know within SSHJM or those representing SSHJM. Personal and physical information that could be used to identify the location of a child within a country and cause them to be put at risk should not be used on the organization's computer system in any other form of communication for internal or public purposes. Where it is necessary to be used in case studies to highlight the work of SSHJM, names of children and vulnerable adults will be changed;
- Within its fundraising and publicity materials, SSHJM will sometimes be required to use text and imagery from its projects around the world. In so doing, it recognizes that it has a responsibility to the children and vulnerable adults that are portrayed. To this end, SSHJM looks on all children and vulnerable adults as human beings with rights and we will respect these rights at all times. We accept our responsibility not to portray a manipulated or sensationalized depiction of a child's life and circumstances;
- Children and vulnerable adults must be presented as human beings with their own identity and dignity preserved. This must be applied to written, photographic and filmed materials;

SSHJM will avoid the following:

- a) Language and images that could possibly degrade or victimize or shame children and vulnerable adults;
- b) Making generalizations which do not accurately reflect the nature of the situation;
- c) Discrimination of any kind;
- d) Taking or using pictures out of context (e.g. pictures should be accompanied by an explanatory caption where possible and should be relevant to any accompanying text).
- e) In images, children and vulnerable adults should not be depicted in any poses that could be interpreted as sexually provocative.
- f) Informed consent should always be sought from the child/children and vulnerable adults themselves before taking photographs, except under exceptional circumstances, based on the *child/children and vulnerable adults' best interests*, where this may not be possible or desirable.
- g) To the greatest extent possible, SHJM will acquire informed consent of the child, child's guardian/parents, before using any image, experience or story for publicity, fundraising, awareness raising or other purpose. The purpose should be made clear to the consent giver.
- h) Individuals or organizations that request the use of SHJM resources, such as photographs, will be required to sign an agreement with the organization as to the proper use of such materials.

SECTION 12

12.0. CODE ON HOW TO RUN SAFE ACTIVITIES FOR CHILDREN FOR TRIPS AWAY

Supervision

The Group leader is responsible overall for the group at all times. In delegating supervisory roles to other adults in the group, it is good practice for the group leader to:

- Allocate supervisory responsibility to each adult for named children
- Ensure that each adult knows which children they are responsible for
- Ensure that each child knows which adult is responsible for them to ensure that all adults understand that they are responsible to the group leader for the supervision of the children assigned to them
- Ensure that all adults and children are aware of the expected standards of behaviour.

It is good practice for each supervisor to:

- have a reasonable prior knowledge of the children including any special learning needs, medical needs or disabilities

- Carry a list/register of all group members, regularly check that the entire group is present and directly supervise the children in the group.
- have a clear plan of the activity to be undertaken and its objectives
- have the means to contact the group leader/other supervisors if needing help
- have prior knowledge of the venue – the group leader should normally have made an exploratory visit where this is possible
- anticipate a potential risk by recognising a hazard, by arriving, where necessary, at the point of hazard before the children do, and acting promptly where necessary
- Continuously monitor the appropriateness of the activity, the physical and mental condition and abilities of the group members and the suitability of the prevailing conditions, e.g. heat, cold, rain etc.
- Be competent to exercise appropriate control of the group, and to ensure that children abide by the agreed standards of behaviour. Group leaders should trust their own knowledge of the young people and use their own professional judgment. This may include challenging or intervening to prompt a change of plan.
- Away trips can be a good opportunity for staff to get to know children better. But the group leader should resist any temptation to accept lower standards of behaviour;
- The different hazards that children may be exposed to away from the SSHJM premises will require group leaders to observe standards of behaviour that are at least as high as, or higher than, in the SSHJM's premises;
- Always have a Plan B if activities or itineraries need to change.
- Clearly understand the emergency procedures and be able to carry them out. Have appropriate access to First Aid

Each child /young person should

- know who their supervisor is at any given time and how to contact him or her
- have been given clear, understandable and appropriate instruction
- rarely if ever be on their own
- alert the supervisor if someone is missing or in difficulties
- have a meeting place to return to, or an instruction to remain where they are, if separated
- understand and accept the expected standards of behaviour.

Overnight stays

The following guidelines relates to overnight stays:

- Sleeping accommodation, shower rooms, toilets and other sensitive areas must be gender-specific;
- The above sensitive areas must be supervised in a gender-specific way;
- Supervisors should sleep in close proximity to the children they are supervising, but not in the same dormitory or room;
- Supervisors must be able to enter the dormitories or rooms of children if a problem arises, but they should have a second person of the appropriate gender with them;
- Doors and windows should be secured against intruders, but children must be able to exit the sleeping areas in case of fire or other emergencies;
- Where possible, sleeping areas should be reserved for the group alone to avoid confusion in supervision.

Emergency procedures

- Ensure that all members of the group know what action to take if there is a problem;
- Ensure that at least one adult has up-to-date training in First Aid and CVAP and that the First Aid kit is properly stocked and accessible;
- Ensure that staff are aware of all children's known medical needs and that they are competent to handle them.

Transport

Where the organisation has responsibility for transporting children to or from a venue:

The group leader will ensure:

- That the vehicle is as roadworthy and is adequately insured;
- Where available all should use seatbelts
- That the driver is licensed to drive the vehicle and that he / she is not under the influence of alcohol or drugs;

- there is adequate supervision at all times when travelling and supervisors are reserved seats that allow them to supervise properly
- luggage is securely stored and emergency exits are pointed out to the passengers and are kept clear;
- head counts are carried out when getting off or onto transport and children are supervised when boarding or leaving the vehicle.

The driver should be instructed that he / she is:

- Expected to drive safely at all times and breaking the speed limit will not be tolerated;
- Should report any mechanical problems with in the vehicle;
- Should not drive an overcrowded vehicle;
- A driver cannot safely drive and supervise children at the same time;
- Not permitted to smoke, take alcohol or drugs in the vehicle;
- There are adequate rest stops especially during long trips.

SECTION 13

13.0 GUIDELINES TO INFORM CHILDREN ABOUT HOW THEY SHOULD BEHAVE TOWARDS OTHER CHILDREN

It is good practice to ensure that all staff and children understand the standards of behaviour that apply at all times, not just during activities.

- Bad behaviour may be reduced by ensuring that all children are signed up to agreed standards of behaviour at SSHJM premises. Bullying should be defined and children made aware that it is unacceptable. The measures to be taken for breach of standards should be adhered to in a consistent manner
- Reported cases of bad behaviour outside SSHJM premises by children from the premises should be dealt with in consultation with the parents.
- Encourage good social behaviour in all activities especially during free play time
- Reward good behaviour and admonish for bad behaviour. Be consistent with both rewarding and admonishing.

SECTION 14

14.0 MONITORING PLAN

The Sisters of the Sacred Hearts of Jesus and Mary in Uganda have in place a monitoring plan for CVASP for projects in Mukono and Pabo. See Appendix iv

14.1 Reporting

What to do if you witness or suspect a wrong-doing

It is the obligation of all SHJM staff and related personnel to raise any concerns or suspicions they have, actual or perceived, of any breach of the SHJM Child Protection Policy by any colleague or supplier/implementing partner/vendor. SHJM employees and related personnel may avail of SHJM's Whistleblowing Procedure for doing so or they may discuss the incident with their Line Manager if they feel comfortable doing so.

All SSHJM programmes have a focal person trained in handling sensitive issues arising from an actual or perceived breach of the SSHJM Child Protection Policy.

When made aware of an alleged breach of the SSHJM Child Protection Policy, SSHJM will:

- Investigate allegations of child exploitation and abuse involving SHJM staff and related personnel
- in a timely and professional manner, and to the best of its capacity encourage all designated stakeholders to do the same.
- Use appropriate interviewing practices with complainants and witnesses, particularly with children.
- Engage professional investigators or secure investigative expertise as appropriate.

- Take swift and appropriate action, the police/ civil authorities will take the legal action when required, against employees and related personnel who commit sexual exploitation and/or abuse.
- Take swift and appropriate action against those who were aware of such abuse/exploitation but did not report it.
- Support survivors of child exploitation and abuse through the complaints process, including but not limited to medical assistance, if required.
- Take appropriate action to the best of its capacity to protect persons from retaliation when allegation of child exploitation and abuse are made in good faith

14.2 APPENDIXES

Appendix i **INCIDENT REPORT FORM ALLEGATIONS OF ABUSE**

Date of incident _____ Time of incident _____ Place of incident.

_____ Witnessed by _____

Child/ Vulnerable Adult Name: _____ D.O.B. _____

Sex _____

Next of

kin _____ Address; _____

Brief details of incident leading to
allegation _____

Action Taken

Information passed to	Date Passed
Designated Project Officer	
Parents / next of kin	
Local Authority	
Congregational Safeguarding Coordinator Chigwell	

Person Reporting:

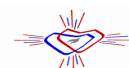
Name _____ Signature _____

Witness (if any) Name and Signature

_____ Date _____

Copy to be sent to the Congregational Safeguarding Co-ordinator (Chigwell)

Appendix ii. Detailed Child/Vulnerable Adult Safeguarding Recording Form



1. About the disclosure

Date of disclosure/concern _____ Time of disclosure/concern _____

How was information received? Please tick appropriate box. (Attach any written information to this form)

a) Through personal disclosure ☐

b) by an observer ☐

2. Details of child or alleged victim

Name_____D.O.B._____

Address_____

Disability_____

Special Needs_____

4. Parent/careers details

Name_____

Address_____

Mobile _____ Other methods for contact_____

Are they aware of the allegation/disclosure/suspicion/complaint _____

5. Details of alleged perpetrator

Name_____

Address_____

Mobile_____ Other methods of contact_____

Relationship to child/alleged
victim_____

Current contact with children if
known_____

Any additional information_____

5 Details of concern/allegation/complaint

(Include dates, times and location the incidents occurred if known. Does the child/complainant know that this referral is being made?)

6 Action taken

Referred to – *the Ugandan Police Child and Family Protection Unit.*

Date _____ Time _____
By whom _____ Designation _____
Tel _____ Mobile _____
Email _____

7. Next Steps

What actions were agreed and by whom when the matter was referred – *the Ugandan Police Child and Family Protection Unit.*?

Are there any immediate child protection concerns? If so please record what they are and state what actions have been taken by whom to address them

8. Designated Coordinator Safeguarding Officer DCSO/ULC details

Date form sent _____

1. Details of person completing the form

Name _____
Address _____
Tel _____ Mobile _____
Position _____
Date form completed _____ Time _____
Signed _____

(The original must be retained by the DSO and filed in a secure location and a copy sent to the DCSO and to *the Ugandan Police Child and Family Protection Unit.*)

Appendix iii

MONITORING OF CHILD AND VULNERABLE ADULT SAFEGUARDING POLICY

The monitoring of the Child and Adult Safeguarding Policy (CVASP) will be coordinated by the Unit Link Coordinator (ULC), guided by the monitoring framework below and progress will be reviewed in the 6 monthly meetings of the SHJM. Learning from monitoring of SHJM practice will be shared internally following these meetings. In the spirit of openness and transparency, key lessons from the implementation and monitoring of CVASP and procedures will be shared with others working on implementing SHJM good practice.

Monitoring and Evaluation functions shall be undertaken at all levels to enhance accountability and effectiveness. This will require developing and establishing monitoring and evaluation mechanism, which include the following:

- Developing monitoring indicators into activities in every sector beginning with the planning stage;
- Establishing internal evaluation structures to look at the effectiveness and impact of this policy;
- Preparing and disseminating the reports;
- Reviewing the policy every six months.

Monitoring and Evaluation template

Elements of Child and Vulnerable Adult Protection Policy / overall impact	Objectives	Indicator	Who should take the responsibility for measuring this	How should we monitor/collect the relevant information?
Overall	Written CVAS policy publicised, promoted and widely distributed	Policy is visible in SSHJM offices and institutions in Pabo and Mukono	ULC	Observation
	Annual Review of Policy takes place	Review process written up	ULC	Meeting with staff, feedback in staff appraisals
Recruitment	Reference checks have been conducted satisfactorily before post has been offered and are maintained up to date.	Reference check filed in personnel file,	ULC and PSO's	Review of personnel files
	Relevant Job Descriptions contain specific reference to the responsibilities of the post holder for implementing and safeguarding the CVAS policy and procedures	Job Description	ULC and PSO	Review Job Descriptions
	Every Staff member has signed a commitment to the CVAS in their contract	Contract	ULC and PSO	Review Contracts
Education and Training	Staff, intern & volunteer and trustee inductions have included child	Staff are able to explain how they would respond if a child disclosed an experience of	ULC and PSO	Feedback from staff,

	protection training covering core CVAS issues and staff are inducted within 3 months of joining SHJM.	abuse to them and understand what is expected of them in their work. Staff understand their responsibilities in terms of behaviour towards children and communication about them		evaluation of training
	Staff are acting in accordance with behaviour and communication guidelines	Staff have been trained on these and there is positive feedback from children & partner staff. Observation of staff	DSO's	Reporting back to PSO's Working Group
	Staff responsible for recruitment have been trained to ask CVAS questions and are aware of safe recruitment practice	A trained staff member is included in recruitment panels.	DSO's	Notes from Interviews/ Questions lists
Management Structure	Designated Project Officers are coordinating Policy implementation	Team meets quarterly and reports back on action plan & incorporates new actions/ decisions	DSO's	Notes from Team meetings, action plan
Management Structure	CVAS is incorporated into project and organisational evaluation and review and staff appraisals	Evaluation reports, staff appraisal records	ULC and PSO	Evaluation TOR, Staff appraisal document
	Staff and children understand the consequences of breaching the code	Staff are able to explain about the organisation's disciplinary procedures.	ULC	Feedback from staff
Communication	Children's 'informed consent' is obtained when being asked for information about them or their photos are taken	Informed consent forms. Children are able to say "No"	All staff who are photo-graphing children, over-seen by DPO	Forms collected
Reporting and Reaction	Reporting and reaction processes are standardised, clearly outlined and made available to all representatives and include reporting and storing information	These processes are clearly documented and understood by all staff, trustees, interns, volunteers, consultants etc.	DSO's	Regular questions to different groups of staff
Ramifications of misconduct	The organisation has clear disciplinary guidelines	Disciplinary guidelines	DSO	Review Disciplinary guidelines
	Investigations are prompt and follow standardised procedures	Investigation notes are recorded	DSO's	Review investigation notes
Monitoring and Review	The organisation is regularly reviewing and monitoring its CVAS policy and practice.	CVAS monitoring processes and tools and info. Collated	CVAS Team – Pabo and Mukono	Review documented

Appendix iv

STATEMENT OF COMMITMENT

(Staff, contractors, trustees, officers, interns, volunteers & visitors)

“I have read and understood the standards and guidelines outlined in this Child and Vulnerable Safeguarding Policy. I agree with the principles contained therein and accept the importance of implementing child safeguarding policies and practice while working with Sisters of the Sacred Hearts of Jesus and Mary. I do undertake that I do not have any on –going or previous court convictions or investigations regarding any form of abuse relating to children and vulnerable adults.”

Appendix v- Designated Persons and contact information as of March 2023.

Name	Designation	Place	Mobile No.	e-mail address
Sr Teddy Nankumbi	Ugandan Unit Link Coord.	Mukono	+256 757639773	chinmukono@hotmail.com
Iris Nakanobe	CHIN PSO	Mukono	+256751264118	chinmukono@hotmail.com
Sr Beatrice Akwero	WACFO PSO	Pabo	+256760038606	wtwacfopabo@gmail.com

* ULC = Unit Link Coordinator. PSO = Project Safeguarding Officer.

At each Project in Mukono and Pabo Safeguarding Officers at departmental level (DSO's) are in place and their contact details are available

Appendix vi:

Reporting and responding to Suspicion or Disclosure of Sensitive Case

Introduction

Sensitive cases where individuals or groups are harmed, discriminated against, exploited or neglected by individuals. The sensitive cases will cover:

Non-compliance with the Child and vulnerable adults safeguarding policy, the Protection from Sexual exploitation and abuse policy, the anti-trafficking policy Any harm caused by an individual of organisation contracted by SHJM (employee, volunteer, trainee, consultant, partner, sub-grant,). Harms done can be physical, sexual, emotional, discriminatory and can lead to situations of exploitation, abuse of power, Considering that most sensitive cases are characterised by the relation of powers between the stakeholders (the abuser and the victim), we are referring to them as “abuse”.

A clear reporting structure and response process is critical to ensure that any report is handled consistently. This is important in order to protect the best interests of the victim, the organisation and the staff.

This is a step-by-step guide which must be followed when a disclosure or suspicion of sensitive case/abuse is reported.

Specificities of human-related sensitive issues, what to do if a disclosure of suspicion is reported

Barriers to report a concern/ suspicion of human misbehaviours are very important.

They are at two main levels:

Our interventions are embedded in **relations of powers**. The abuser is generally using their powers (hierarchy, seniority, critical role in providing support) to exploit, abuse and get advantages. When a suspicion of misbehaviour is raised, it highlights the opportunities the system provides for abuse, questioning the systems (HR management, procedures)

From the **victim's perspective**: their age, gender, vulnerability, dependence, can prevent them from disclosing the abuse they are victim of. Furthermore, local values and culture may increase barriers to report concern: macho culture, police response, attitude towards women... are factors that will influence the "protection" and impunity of the abuser. Victims often feel hostage of their abuser, and helpless. They do not know, trust or dare to report concern. The way the abuse is felt by the victim, with shame, feelings of worthlessness, responsibility will also increase barriers to report.

From the **listener perspective**: Abusers may be part of the circle of colleagues and partners.

Especially in groups under stress or sharing strong values/ belief systems, the individuals will react first in solidarity and protection to their groups. This brings important bias/ defensive mode against any concern raised and disbelief.

The following gives guidance on dealing with a disclosure of abuse:

Some basic principles for dealing with a disclosure of abuse are:

- Accept what the person says.
- Keep calm and do not appear shocked, don't panic, use a low, soothing voice.
- Don't seek help while the victim is talking to you, stay with them until they have finished speaking and/or crying. Remember, it may have taken the person a lot of courage and time to build up to disclosing the information.
- Fully take the local environment and culture into consideration.
- Do not promise not to tell anyone; explain that you may need to tell a parent/doctor/counsellor, to seek help and support for the person.
- Be honest.
- Never ask leading questions, instead repeat the last words the person has said in a questioning manner.
- Try not to repeat the same questions – for this reason, it is important to stay calm and focused.
- Never push for information.
- Don't fill in words, finish their sentences or make assumptions.
- Be aware that the person may have been threatened, and so may be fearful about sharing this information.
- VERY IMPORTANT – Reassure the person that they are not to blame.
- VERY IMPORTANT – Reassure the person that they were right to tell you.
- Let the person know what you are going to do next and that you will let them know what happens.
- Take proper steps to ensure the physical safety and psychological wellbeing of the person. This may include referring them for medical treatment, to a psychologist or to a place of safety.
- Make certain you distinguish between what the person has actually said and the inferences you may have made. Accuracy is very important in this stage of the procedure.
- Do not permit personal doubt to prevent you from reporting the allegation.
- As soon as possible, when you have finished being with the person, document what the person told you using the Protection Report Form4 (Annex 4) or other paper, if this is not available. Include: how the person seemed, words the person used to describe the abuse or neglect, dates/times the person detailed the abuse as having occurred, and names of people the person mentioned. Date and sign this documentation, (even if it is untidily completed on loose paper).

Things to say:

- / Repeat the last few words in a questioning manner.
- / 'I believe you'
- / 'I am going to try to help you'
- / 'I will help you'
- / 'I am glad you have told me'
- / 'You are not to blame'

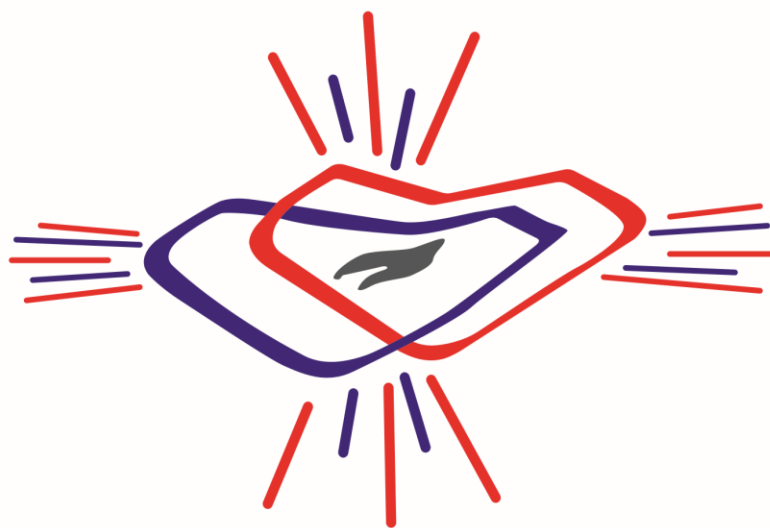
Things not to say:

- × 'You should have told someone before'
- × 'I can't believe it. I am shocked'
- × 'Oh, that explains a lot'
- × 'No not.....he is a friend of mine'
- × 'I won't tell anyone else'
- × 'Why? How? When? Where? Who?'
- × 'I can't believe that would happen'

Protecting the alleged victim pending investigation

The alleged victim must be protected pending an investigation. If the accused person is a staff member, the organization must immediately suspend the staff pending a full investigation. The suspension takes immediate effect, with full salary, until the investigation comes to a conclusion: whether all suspicion have been lifted or not. In cases of abuse and misbehaviour, proving beyond doubt can be extremely difficult. Levels of suspicion are enough to take disciplinary actions.

If it is a beneficiary who is accused of abuse of another beneficiary, the suspected person must be removed from the place where the exploitation has happened during the course of the investigation.



**SSHJM CHIN AND WACFO (SISTERS OF THE SACRED HEARTS OF
JESUS AND MARY CHILDREN IN NEED AND WOMEN AND
CHILDREN FIRST ORGANISATION)**



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