

# SAFEGUARDING POLICIES



**SSpS**

Missionary Sisters  
Servants of the Holy Spirit

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## **Mission statement**

The Mission Congregation of the Servants of the Holy Spirit (SSpS) was founded for missionary service. The prologue of our Constitutions reminds us to focus all our efforts on our missionary goal as expressed in the motto of our Founder, St. Arnold Janssen: That the Holy Triune God live in our hearts and in the hearts of all people.

With the conviction that the Holy Triune God lives in every human heart, we, the members of the Mission Congregation of the Servants of the Holy Spirit (SSpS), are called to witness to the love and life-giving presence of the Triune God in all we do. Flowing from this mission, we commit to creating and maintaining environments where every person is respected, protected, and nurtured. We commit ourselves to making our institutions, ministry sites, and our formation houses and communities safe places. And we are committed to promoting a culture of safeguarding within our Congregation and in all our relationships and missionary activities.

## **Message from the Congregational Leader**

With deep gratitude, I wish to acknowledge the commitment, professionalism, and generous collaboration that have gone into the preparation and revision of this Safeguarding Policy. I am sincerely thankful to all those who studied, reflected, consulted<sup>1</sup>, and worked diligently to bring this important document to completion. Your dedication expresses a profound care for life and for the dignity of every person entrusted to us.

This Safeguarding Policy is not simply a set of procedures or requirements. It is an essential expression of our SSpS identity and culture. Rooted in our faith in the Triune God who lives in every human heart, it reflects our Gospel commitment to protect life, promote well-being, and create environments where respect, safety, and trust can flourish.

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1. The SSpS General Administration wishes to express its sincere gratitude to Tina Campbell, consultant in safeguarding, whose expertise and generous support were invaluable in bringing forth this third edition of the Safeguarding Policy.

Safeguarding belongs at the heart of our missionary vocation and is inseparable from our call to witness to God's life-giving presence in the world.

I warmly encourage every Sister to study this document carefully, to make it her own, and to integrate its principles into daily life, community relationships, leadership, formation, and all areas of ministry. While contexts and realities differ across Provinces and Regions, the responsibility to safeguard remains the same everywhere. Each of us is called to implement this Policy faithfully and creatively according to our local situation, always with vigilance, compassion, and accountability.

May this Safeguarding Policy help us to grow in awareness, responsibility, and mutual care, so that our communities, institutions, and ministries truly become safe spaces where life is respected, healing is possible, and the mission entrusted to us bears lasting fruit.

With gratitude and trust in the Spirit who guides us,

Sr. Miriam Altenhofen, SSpS  
Congregational Leader

## Introduction

The 13th General Chapter, 2008, emphasizes our commitment to protect life and human dignity. All our efforts are directed towards valuing, responsibly protecting, and promoting life in all its forms through networking and building communities/ societies of Gospel justice, reconciliation, and healing where personal and social violence in any form has no place. Our Sisters are engaged in different ministries, which include interaction with children and vulnerable adults <sup>2</sup>. It is of foremost importance that each SSpS creates a safe and compassionate environment for themselves and for everyone they relate to and work with. This document supports and ensures this environment.

## Policy Statement and Aims

We SSpS are committed to a zero-tolerance approach to any form of abuse by any member of the Congregation or anyone connected with our mission. We will respond appropriately to all concerns and allegations that are raised by following civil and ecclesiastical requirements. It is mandatory that all members of the Congregation, as well as everyone who collaborates with us, follow this Safeguarding Policy.

It has been issued by the SSpS Congregational Leadership Team for use by its Provinces and Regions. It is a revised version of the 2020 SSpS Safeguarding Policy. It comprises Standards, Principles, Practices, and Guidelines that help ensure Safeguarding is understood and firmly embedded across all SSpS Provinces and Regions. At the same time, it is recognized that Safeguarding Policies and practices will vary according to the statutory obligations of the countries in which the SSpS live. This is particularly the case when dealing with investigations into allegations of abuse. Both the civil laws of the country and the policies and procedures adopted by the Bishops' Conferences will vary from country to country. Therefore, it is not possible to produce standardized Congregational

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2. The Apostolic letter of Pope Francis in March 2023, *Vox estis lux mundi* (Art. 1), defines a “vulnerable person” as follows: any person in a state of infirmity, physical or mental deficiency, or deprivation of personal liberty which, in fact, even occasionally, limits their ability to understand or to want or otherwise resist the offence.

guidelines for dealing with investigations of all allegations of abuse. Each Province/Region is therefore asked to adopt Safeguarding Policies and Procedures that align with those of its respective Bishops' Conference.

Wherever the Bishops' Conference has good policies and practices in place, the Conference of Major Superiors is often a signatory. In instances where such Safeguarding Policies and Procedures don't include references to the concerns of Religious, the Conference of Major Superiors should have its own Safeguarding Policy with indications as to how it applies to. And, in places where such Safeguarding Policies and Procedures have not yet been issued, Provinces/Regions are asked to seek advice from the Conference of Major Superiors and the local diocese to put these international guidelines into local policies.

Where the Missionary Sisters Servants of the Holy Spirit is the direct employer or has volunteers working in its institutions, the principles contained in this Safeguarding document apply with adaptations suitable to the respective context and situation of the institution. Where members work in institutions and organizations outside the civil and canonical jurisdiction of the Missionary Sisters Servants of the Holy Spirit, the Safeguarding Policies of the employer organization are to be followed by the SSsP employee. Each Province/Region is to name a Safeguarding Officer.

## **Why a Standards Approach to a Safeguarding Policy?**

The Safeguarding Standards Approach was used as a framework for this Safeguarding Policy. It provides a clear system of accountability for the members of the Congregation. The structure and content of this document support consistent and professional implementation at all levels in our congregation.

The Safeguarding Standards also provide evidence for good practice. Moreover, this "Standards Approach" has been implemented in many countries throughout the world and has proven effective.

## **Safeguarding Policy Standards**

The Congregational Leadership Team has opted for this document with 6 Standards. However, each Province/Region is free to choose the Standards and tailor the Policy applicable to their context while retaining all aspects of the content.

## **STANDARD 1 ~ 6**

|                   |                                                                |
|-------------------|----------------------------------------------------------------|
| <b>STANDARD 1</b> | <b>DEFINITION, PRINCIPLES, ROLES AND RESPONSIBILITIES</b>      |
| <b>STANDARD 2</b> | <b>CREATING A CULTURE OF SAFETY, PROTECTION AND PREVENTION</b> |
| <b>STANDARD 3</b> | <b>RESPONDING TO CONCERNS AND ALLEGATIONS</b>                  |
| <b>STANDARD 4</b> | <b>RESPONDING TO AND CARE FOR VICTIM SURVIVORS</b>             |
| <b>STANDARD 5</b> | <b>MANAGEMENT AND SUPPORT FOR THE ACCUSED</b>                  |
| <b>STANDARD 6</b> | <b>SAFEGUARDING TRAINING AND AUDITS</b>                        |

# STANDARD 1

## DEFINITION, PRINCIPLES, ROLES AND RESPONSIBILITIES

### What is Safeguarding?

Each person is made in the image and likeness of God and has an innate dignity. Recognizing the dignity and worth of the human person is not a new phenomenon but is often found wanting in today's societies. Human dignity is central to both the Gospel message and the Universal Declaration of Human Rights:

'In everything, do to others as you would have them do to you.' (Mt.7:12)  
'Everyone has the right to life, liberty and security of person' (Universal Declaration of Human Rights Article 3.)

Today, the rights of children and vulnerable adults, in particular, must be recognized, affirmed, and safeguarded.

The term “safeguarding” replaces “child protection” and also “child safeguarding”. This is to ensure a common and international understanding that both children and vulnerable adults are provided with the highest level of care and protection, and, most importantly, that all abuse is prevented. Safeguarding is the work of both the Church and society to ensure that the same level of care, protection and prevention is provided at all times.

#### 1.1 Who is in Most Need of Safeguarding?

Everyone needs to be safeguarded, not only the young and vulnerable. Everyone in the Congregation should strive to keep themselves safe by practicing safe and appropriate behaviors and interactions with others, not only in ministry but also in community life. It is therefore important that the Provincial/Regional Policy identifies ways to implement safeguarding not only within institutions and ministries but also in the daily life of its communities.

## 1.2 Important Definitions:

- A. **A Child**, according to Canon Law, is anyone under the age of 18. This is true even if, in some contexts, it is lawful for a person under 18 to marry.
- B. **A Vulnerable Adult**, or “an adult at risk”, is “any person in a state of infirmity, physical or mental deficiency, or deprivation of personal liberty which, in fact, even occasionally, limits their ability to understand or to want or otherwise resist the offence.” (VELM 2023) <sup>3</sup>.

## 1.3 The Commitment to Safeguarding



3. Apostolic Letter issued *Moi Proprio*: *Vos Estis Lux Mundi* March 2023

The members of the Mission Congregation Servants of the Holy Spirit categorically state that any abuse of any person is wrong. We are committed to safeguarding human life and dignity by: preventing all forms of abuse; protecting children and vulnerable persons; empowering individuals to speak up; working in partnership with others; responding proportionately to concerns; and upholding the highest standards of care, accountability, and integrity. The goal of this Policy is to ensure the welfare and safety of all, especially children and vulnerable adults under our care.

## 1.4 Safeguarding Structures and Roles of Leaders in our Congregation

### 1.4.1 The Congregational Leader

**The Congregational Leader** holds ultimate responsibility for safeguarding throughout the Congregation. She is responsible for:

Demonstrating best practices and strong leadership in the care and protection of children and vulnerable adults and the prevention of all forms of abuse in the Congregation.

Appointing Safeguarding experts who could be contacted to deal with issues at the congregational level.

Responding immediately and professionally to any allegations within the Congregation.

Supporting Provincials/Regionals (and their respective Safeguarding Delegates) when needed in the Case Management of the accused.

Ensuring Congregation-wide dissemination of the policy with clear directions for implementation in all communities, ministries, and entities of the Congregation.

Although the Congregational Leader is ultimately responsible within the Congregation, each Provincial/Regional Leader is expected to address cases in their respective areas in accordance with the local context and the regulations of their country/countries. They are expected to update their Safeguarding Policy regularly and to educate members, employees,

and collaborators on the Congregation's commitment to promoting a culture of safeguarding.

At the Congregational level, the Congregational Leader is supported by a team of consultants with diverse areas of expertise. They provide advice and guidance to ensure that safe and appropriate procedures are followed.

### **1.4.2 Provincial/Regional Leader**

The Provincial/Regional Leader holds ultimate responsibility for Safeguarding throughout her Province/Region. She has to be aware of the statutory obligations and the guidelines issued by the Vatican and the Bishops' Conference Safeguarding Policy and Procedures in her own country.

### **1.4.3 Tasks of the Provincial/ Regional Leader**

She is responsible for:

1. Demonstrating best practices and strong leadership in the prevention of all forms of abuse and in the care and protection not only of the young and vulnerable, but of all Province members.
2. Being aware of the statutory obligations and of the Guidelines issued by the Vatican, the Bishops' Conference concerning Safeguarding Policies and Procedures in her own country.
3. Ensuring that the Province/ Region has a clear and comprehensive Safeguarding Policy and Procedures and that they are regularly reviewed and revised when necessary.
4. Being fully aware and supportive of the work of both the Safeguarding Commission/Team and the Risk Assessment Management Team.
5. Responding immediately and professionally to any allegation against a member of the Province/Region, its employees, and those participating in its ministries.
6. Ensuring the Mandatory Reporting of allegations.
7. Ensuring that victim survivors are welcomed and heard with

compassion.

8. Supporting the Safeguarding Delegate (or other respective person) in the Case Management of the accused.
9. Ensuring there is a Contact Person whose name and contact details are in the public domain (such as the Province/Region website).
10. Ensuring that the Spokesperson for the Province/Region handles all media matters concerning the case.
11. Ensuring that she is kept informed at all stages of a case investigation, but she is not be involved in the investigative aspects of a case.
12. Informing the Congregational Leader of any allegations or other serious safeguarding matters.
13. Annually reporting, in writing, to the Congregational Leader, on safeguarding in the Province/Region.

#### **1.4.4 The Province Safeguarding Team/ Commission**

##### **A. The Safeguarding Team**

The Provincial/Regional Leadership Team appoints a Safeguarding Commission in accordance with the nature and needs of the Province/Region. The team consists of qualified persons such as Safeguarding Delegate, Lawyer, Canonist, Police Officer, Social Worker, Psychologist, persons with a medical and educational background, along with two members of the congregation with relevant skills or experience) who can assist the safeguarding delegate. The Safeguarding Team should meet at least once a year to review the Province/Region Safeguarding Policy and Procedures to ensure it is up to date and working effectively, and to share any matters of common concern.

##### **B. Important Tasks of the Provincial/Regional Safeguarding Team**

1. Assist the Safeguarding Delegate by offering wise professional

advice

2. Ensure that the Safeguarding Delegate never works alone
3. Ensure accurate record keeping
4. Support the Safeguarding Delegate in establishing professional relationships with other agencies
5. Commit to regular meetings and always ask: “What more can we do?”

### **C. Provincial /Regional Safeguarding Delegate**

The Safeguarding Delegate, appointed by the Provincial or Regional Leader, leads the Safeguarding Team. She is an SSpS Sister with a background in law, social sciences, social welfare, or safeguarding. She is trained for this role and is expected to continue updating her knowledge by regularly attending conferences and/or workshops on safeguarding. She must be familiar with statutory obligations and the guidelines of the Bishops’ Conference in matters relating to safeguarding.

Her name and contact details should be known and easily accessible in SSpS houses, Institutes, and any other context where ministry takes place. She maintains good contact with other officials who work professionally in the field of Safeguarding so that she has immediate access to them in case of need.

### **D. Tasks of the Provincial /Regional Safeguarding Delegate**

1. Acts as the internal resource for all matters relating to safeguarding.
2. Advises the Provincial/Regional Leader, Council members, formators, and others on safeguarding matters.
3. Works collaboratively with the Safeguarding Team in responding to both victim-survivors and the accused.
4. Assists in developing local policies and organizing training for Sisters, employees, youth, and children.

## **E. Risk Assessment Management Team**

It is recommended that each Province/Region have a Risk Assessment Management Team comprising the Safeguarding Delegate and two members of the Safeguarding Commission.

The Purpose of the Risk Assessment Management Team in a Province/Region is:

- Review all concerns raised and to ensure appropriate action is taken
- Review all allegations made
- Ensure mandatory reporting of all criminal allegations
- Ensure the Province/Region is providing compassionate care for victim survivors
- Support the Safeguarding Delegate in Care Plans for victim survivors
- Assist the Safeguarding Delegate regarding Risk Assessments
- Ensure good record keeping
- Assist the Safeguarding Delegate and Provincial in Safety Plans
- Ensure media/press statements are prepared

Furthermore, the Team is expected to maintain confidentiality, except in circumstances when specific persons or authorities need to be informed.

## STANDARD 2

### CREATING A CULTURE OF 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”. (Pope Frances, Letter to the people of God, 20th August 2018).

#### 2.1 Safe People

Every member of the Congregation, including those in initial formation, and all our employees, volunteers, and participants in all our services, has a role to play in ensuring that children and vulnerable adults can develop and be safe. Having a robust, safe recruitment system in place reduces the risk of allowing those who seek to harm others to have access to the young and vulnerable.

The process for safe recruitment in the institutions of the Congregation and in our convents should include the following:

- Application Forms
- References
- Health Checks (as required)
- Psychological Assessment (as required)
- Police or Background check-
- Safeguarding Induction Training
- Self-Declaration
- Signing the Safeguarding Policy
- Signing the Code of Conduct

## 2.2 Safe Places

All the sites where members of the Congregation live and work should be safe places for all. To ensure that physical or digital environment where activities take place does not pose a risk of harm, the following points can assist in achieving that goal:

- Risk Assessments of the premises: identifying actual or potential hazards/dangers.
- Immediate action taken to rectify the hazard/danger.
- Ensuring responsible use of digital platforms and content involving children remains appropriate, respectful, and fully lawful.
- Ensuring that annual Risk Assessments are completed.
- If accidents occur, which relate to any premises being unsafe even temporarily, these should be recorded in an Accident Book and the problem rectified as soon as possible.
- Risk Assessments of places also apply to any location where a member of the Congregation might take children and or vulnerable adults for even a relatively short period of time.

Provinces/Regions may include additional ways, depending on their situation (refer to Glossary)

## 2.3 Safe Activities

All activities involving members of the Congregation and employees, volunteers, and participants in our services must ensure the safety and well-being of everyone involved. The following points support the achievement of this objective.

- Permission/Consent forms for activities with children and/or vulnerable adults.
- Photo Consent forms.
- Information shared regarding the planned activity.

- Appropriate sharing of information about medical conditions or special needs.
- Risk Assessment of the activity.
- Provide good leader-to-child and/or vulnerable adult ratios.
- Emergency contact numbers.

## 2.4 Safe Relationships

Safe relationships are central to our spirituality and mission. We foster positive interactions, respectful and non-violent communication with all. Every person is treated with dignity, regardless of age, gender, or background. We uphold clear and healthy boundaries at all levels to ensure responsible use of power, address power imbalances, and prevent any form of abuse.

### A. Respect

- Interact with children and vulnerable adults affirming their dignity, using calm, respectful, and age-appropriate language and behaviour.
- Avoid using power, status, or authority to silence, pressure, or manipulate others. Set and respect clear boundaries—physical, emotional, and digital in all interactions.
- Respect the privacy of children and or vulnerable adults in places such as changing rooms, showers and toilets.
- Forbid, in all circumstances, physical punishment of children or vulnerable adults. Striking or hurting a child or adult in any way or by any means is not to be tolerated.

### B. Ministry With One Child

- Avoid being alone with one child or vulnerable adult
- One-to-one meetings with a child or vulnerable adult should take place in a room with the door left open or in a room where there is easy visibility from the outside.
- Be sensitive to the possibility of becoming overinvolved or spending

a great deal of time with any one child or vulnerable adult.

### **C. Touching**

- Use ‘touch’ only when necessary and appropriate.
- Never do for a child or vulnerable adult what they can do for themselves.
- Respect the physical integrity of the child or vulnerable adult, with sensitivity for what might be unacceptable in different cultural backgrounds.
- Do not engage in inappropriate physical contact of any kind.

### **D. Additional Safe Practices**

- Sisters, employees and volunteers must not engage in, nor tolerate, any behavior whether digital, online, or in person that is abusive to children or vulnerable adults - physically, sexually, verbally or psychologically.
- Sisters, employees and volunteers should be sensitive to the fact that comments of a sexual nature are inappropriate, even as jokes.
- Erotic or pornographic material is never acceptable.
- It is recommended that sisters, employees and volunteers do not give transportation in their cars to individual children or vulnerable adults. If there is one adult, at least two children should be present for the entire journey. In exceptional circumstances, when it becomes necessary to make a journey or part of a journey alone with a child or vulnerable adult, the parent/guardian/caregiver should be informed as soon as possible.
- Under no circumstances should alcohol, tobacco or illegal substances be given to children or vulnerable adults.
- A clear policy should be drawn up regarding the taking of photographs and the making of video recordings of children or vulnerable adults involved in activities.
- Avoid creating, sharing, or possessing computer-generated,

manipulated, or AI-produced images that depict children and adults in harmful or sexualized ways. This should also cover the generation of computer images.

## 2.5 Ethical Guidelines for Pastoral Ministry

### Preamble

Many of our Sisters work in Pastoral Ministry. Where possible, Sisters who work in Pastoral Ministry should be affiliated with professional associations. The code of ethics of the association to which they are affiliated should be the guiding principle in their ministry work. Those Sisters whose pastoral work is not affiliated with an association should follow the Ethical Guidelines given in this section.

### Definition of Pastoral Ministry

Is a Christian vocation: “A free response to the call of God that we experience in and through our own gifts and the affirmation of the community to live a life of service that participates in the mission of the Church to bring everyone into fuller communion with one another and with God” .... Is a professional service that implies “ the commitment to acquire expert knowledge and skills to serve human needs with good moral character. Ministry is not just a spiritual “calling” but a professional role that demands high standards of ethics and public accountability’ (Gula, Richard M. ‘, Ethics in Pastoral Ministry’, New York, Paulist Press, 1996).

### Examples of Pastoral Ministry

There are various services that can be categorized under pastoral ministry. The following are some examples of ministries undertaken within the congregation

- Parish-Related Pastoral Ministry: Youth ministry, Faith formation programs, Holy Childhood ministry
- Other Pastoral Ministry: Tutoring, Mentoring, Supervision
- Spiritual Care Services: Spiritual accompaniment, Counselling,

Retreat facilitation, Hospital chaplaincy

- Internal Services within the Congregation: Provincial and regional leadership roles, Local leadership (e.g., Sister-in-Charge) Formation ministry (formators)

## **Guidelines**

“Relationships are the basic stuff of ministry. When asked what characterizes healthy relationships in ministry, religious will often mention mutual respect, trust, care, empathy and intimacy. These qualities mediate the presence of God. They also imply one has a healthy understanding of the value of boundaries, essential to appropriate ministerial conduct. Respecting boundaries is an act of love.” (Markham, Donna, and Repka, Fran: “Personal Development and Boundaries Shape Ministry.” In ‘Human Development’ 33, Spring 1997.)

## **Boundaries**

The concept of boundaries, both physical and psychological, is crucial for fostering healthy relationships. It is not possible to work effectively in ministry unless boundaries are established, maintained, and known to all members. Boundaries are limits that allow for a safe relationship based on the client’s needs. They protect the space that must exist between the professional and the client by controlling the power differential in the relationship.

Boundary violations are acts that breach the core intent of the professional/client relationship. They occur when a professional exploits the client relationship to meet his/her personal needs rather than the client’s.

## **Clarity about Roles**

There is one relationship in Pastoral Ministry, and that is the professional one. A dual relationship is one in which a person in ministry attempts to fulfil two roles with the same person, that is, to have a ministerial and a personal relationship with that person. Sexual behavior within a ministerial relationship or any attempt to sexualize a relationship automatically creates a dual relationship, regardless of who initiated it.

Some examples of dual relationships are:

- A spiritual director who regularly goes on holiday with a directee

- A formator who becomes sexually involved with a formandee
- A religious counsellor who treats a friend
- A pastoral minister who holds an additional, distinct position of authority in relation to the client.

The above examples are unlikely to be offences in civil law, but they can be unethical and often lead to allegations of abuse, intentional infliction of emotional harm, alienation of affection, poor counselling or therapy, and sometimes sexual harassment. Sisters need to be very aware of the power differential that exists between the professional minister and her client. In ministry, the roles can render one person powerful and the other vulnerable.

Dual relationships must be avoided, as roles become confused and boundaries are violated. Such relationships could:

- Impair judgment
- Harbor conflicts of interest
- Exploit and forfeit trust
- Encourage an unhealthy dependency
- Create exclusive relationships that harm the community

### **2.5.1 Safe Practice Guidelines in Pastoral Ministries**

These guidelines are designed to protect both the client and the professional from unethical practices in ministry. It is essential that the client is fully informed about the process and that their voluntary, informed consent is obtained before any pastoral engagement begins.

#### **A. The Professional is expected to:**

- Have police clearance or a background check before starting the ministry
- Be aware of the legal requirements concerning work.
- Be professionally competent in knowledge and skills and provide a good standard of practice.

- Have a written contract that clarifies the cost, time, venue and process of sessions as well as limits of the service offered, including limits to confidentiality and a process for evaluating and terminating the relationship.
- Be committed to ongoing professional development
- Have regular supervision.
- Maintain personal boundaries as a professional
- Recognize the imbalance of power, avoiding its misuse.
- Avoid dual relationships.
- Arrange a referral or terminate a pastoral relationship when it ceases to benefit the client, and/or in the event of a boundary violation.
- Respect the client's values, culture and spirituality.
- Avoid any speech or behavior that might be interpreted as sexual harassment.
- Be discerning and careful in showing expressions of regard and in giving and receiving gifts.

If a sister has serious reservations about the ethical behavior of a colleague, she should act to rectify the matter. This might include a one-on-one conversation in the presence of a supervisor, and/or reference to the appropriate professional association.

## **B. The Client is expected to:**

- Agree to a written contract.
- Know the limits of confidentiality. Confidentiality will be maintained except in cases where there is an indication of danger to the client or to others.
- Give prior written consent if s/he is to be observed, recorded, or if his/her story is to be used for training purposes.
- Be informed that s/he is entitled to competently delivered services which are reviewed at regular intervals.
- Be informed that there will be a prompt and appropriate response

to any complaint.

## **2.5.2 Ethical Guidelines for SSpS Formators and Leaders**

Formation is a vital ministry that promotes healthy human, emotional, and spiritual development. Those entrusted with this responsibility within our Congregation are called to accompany those entrusted to them with responsibility, integrity, and care, fostering a safe environment that supports growth and freedom. All who participate in this ministry are expected to adhere to these guidelines.

1. Treat every person with respect, integrity, dignity, and consideration.
2. Use positive reinforcement rather than criticism, competition, or comparison
3. Do not humiliate, ridicule, threaten, or degrade any person
4. Do not engage in any form of physical, psychological or verbal harassment.
5. Maintain clear emotional boundaries; avoid favoritism, exclusivity, or dependency.
6. Do not misuse or abuse power or authority over any person.
7. Do not engage in any form of sexual misconduct, including inappropriate contact, comments, or use of pornographic material.
8. Conduct accompaniment in appropriate settings and times.
9. Maintain confidentiality of information from accompaniment sessions, unless there are serious reasons to disclose it.
10. Report any suspected abuse, moral, ethical or ministerial misconduct to the appropriate authority
11. Participate in regular supervision and accountability practices (e.g., peer review or team debriefing).
12. Teach in a healthy way, avoiding guilt, fear, approval, affection withdrawal, or emotional pressure to influence or control.

13. Respect each person's conscience and spiritual freedom; do not impose personal beliefs or preferences.
14. Respect the formandee's freedom in choosing confessors and spiritual guides.
15. Support and safeguard each person's unique relationship with God and authentic spiritual development.

These guidelines are to be revised and approved every six years by the Congregational Leadership Team.

### **2.5.3 The Code of Conduct**

Each member of the Congregation commits to fostering a safe environment in our SSps communities, institutions, and ministries. As a sign of this commitment, each one consents to faithfully follow the Code of Conduct agreed upon in their respective Province/Region.

1. As a member of the Mission Congregation Servants of the Holy Spirit, I will actively collaborate with the Congregation's efforts to promote a 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.
2. In fulfilling the tasks entrusted to me, I will use my position, power, and authority prudently and responsibly.
3. In my service in the community or in external ministry, I will use my authority to benefit those under my care, not taking advantage of them, nor exploiting them.
4. I will keep all my relationships free from inappropriate and unwanted physical contact and maintain my boundaries.
5. I will report to the proper authorities any known or suspected cases of physical, sexual, or emotional abuse or neglect of minors or vulnerable adults.
6. I will support those who disclose to me any abuse in a way that empowers them to seek help.
7. I will appropriately maintain and uphold confidentiality.

8. I will ensure that funds for which I am responsible are used for their intended purposes and do so with transparency and accountability.
9. I consent to live by this Safeguarding Policy of the Congregation, which expresses my commitment to live and work according to Gospel ideals and the charism and values articulated in our Constitutions and Church teachings.

Code of Conduct examples are also provided in Glossary, which can be used or adapted to the situation of Provinces/Regions.

# STANDARD 3

## RESPONDING TO CONCERNS AND ALLEGATIONS

### Concerns

A concern refers to something that someone witnesses or hears about that is or could be an actual or potential risk to the young and vulnerable. Concerns must be addressed appropriately and not dismissed with excuses. If concerns are ignored, their impact can become cumulative and increase the potential for abuse. Anyone who is informed about a concern, even if they did not directly witness it, has a duty to seek advice.

### Allegations

An Allegation is a claim or assertion that a person in a position of trust (staff, volunteer, or contractor) has behaved in a way that has harmed, or may have harmed, a child or adult at risk. Any allegation or concern must be taken seriously and dealt sensitively and promptly, regardless of where the alleged incident took place. Criminal allegations must be reported to the statutory authorities because of Mandatory Reporting requirements. Some, but not all, allegations are criminal; for example, the sexual abuse of a child or vulnerable adult is a criminal act.

Spiritual abuse is not usually classified as a crime in civil law, but it can become criminal when it involves illegal actions, such as coercion, harassment, threats, fraud, or sexual abuse. In Church law and safeguarding practice, spiritual abuse is treated as a serious form of misconduct and harm, even when it does not meet the threshold of a civil crime.

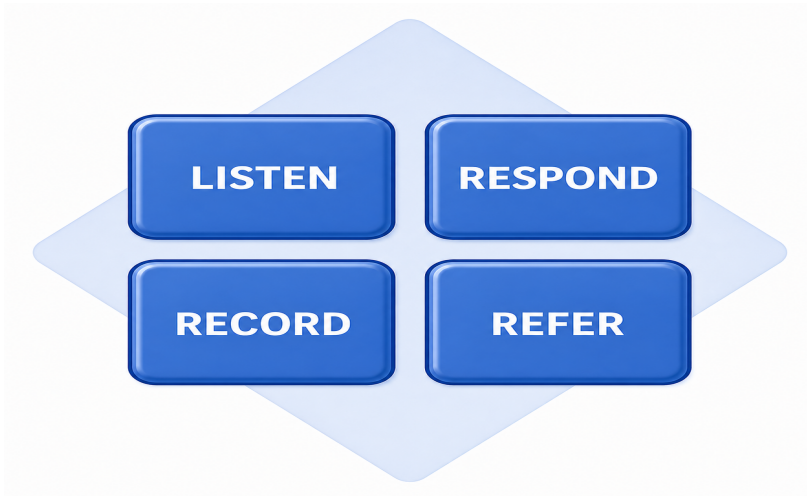
### Mandatory Reporting

This is the requirement to report allegations of a criminal nature to the police or other statutory authorities, depending on the context and the

structures and referral systems in place. Given the diverse contexts, the Province/Region Safeguarding Policy should specify how Mandatory Reporting is met in full compliance. In some countries, there is an additional legal requirement to report a concern within a specific period of time. Failure to do so carries strict penalties.

### 3.1 Responding to Allegations

The Congregation takes allegations seriously and will not tolerate these behaviors by its members, employees, or volunteers. There are four important components of responding to allegations. They are:



#### 3.1.1 Listen

- Reassure the person(s) that they have done the right thing in talking to you
- Listen to and accept what the person says.
- Attentive and intentional listening means doing so with your ears and heart
- Make sure that the listening happens in a safe place, both for the person reporting and for yourself

- Do not be afraid of silence
- Ensure that you will not be interrupted and switch off your phone
- Neither ask intrusive questions, nor interrupt

### 3.1.2 Respond

- Do not promise confidentiality, but state that this will be handled sensitively on a “need to know” basis.
- Take the alleged abuse seriously. It is not your role to question or make decisions about whether the allegation(s) are true.
- Tell the person this has to be shared with somebody who will help.
- Tell the person you believe what you have been told, and say, “I am sorry that this has happened to you.”
- Ask clarifying questions to be certain of what you heard.
- If you do not know the answer to any questions you are asked, admit this and say you will try to find the answer or information.
- Provide the victim with the Support and Information Leaflet .

### 3.1.3 Record

Good record-keeping is essential at all stages of the process

- Make brief notes during or after the meeting
- Use the exact words you heard and clarify what was unclear
- Do not use your mobile phone or other device to record the meeting
- Record carefully what you heard while it is still fresh in your mind.
- Include the date and the time of your conversation and any incident disclosed.

### 3.1.4 Refer

The referral system should be agreed upon at the Province/Region level,

taking into account their situations. However, the following points are helpful:

- Always refer to the appropriate designated Safeguarding personnel and Provincial /Regional Leader
- Ensure that your notes are given to the Safeguarding Delegate
- Your notes might be requested as evidence by the Police and or other investigating authorities.
- Make sure you know the Mandatory Reporting requirements in civil law in your context
- Avoid any delay.

## **3.2 Allegations Against Congregational Members, Employees or Volunteers**

When it comes to dealing with allegations against Congregational Members, employees or volunteers, statutory obligations, and therefore the Guidelines issued by the Bishops' Conference and the requirements of civil law, will differ from one country to another. Hence, it is not possible to develop procedures for investigating allegations that can be applied throughout all Provinces/Regions. Such procedures must follow local practice. Nonetheless, according to *Vox Estis Lux Mundi*, any abuse by clerics/religious or witnessed by them need to be reported.

- Every allegation, however slight or historic, must be investigated by the appropriate authority.
- Every allegation concerning an SSpS or a direct employee or volunteer must be brought to the attention of the Provincial/Regional Leader and the Province/Region Safeguarding Officer.
- Where statutory obligations require the allegation to be submitted to the civil authorities, this should be done without delay.
- Once an allegation has been made, existing supports and resources such as the Bishops' Conference, the National Conference of Major Superiors, Social Services or Health Boards, and Diocesan Officers should be used as appropriate.

- A Preliminary Investigation must be opened and paused while the civil investigation continues.
- It is important that the investigating authority is external to the SSps so that complete impartiality in its proceedings can be maintained and demonstrated.
- When the allegation is against a sister, or a lay employee or volunteer, the Provincial/Regional Leader should, having taken professional advice, suspend them from ministry or work pending the outcome of the investigation.
- Depending on the outcome of the investigation, the Provincial/Regional Leader, usually in consultation with her Council, puts into effect any restrictions or changes to ministry/employment that are required.
- When the abused is a formandee or a sister, she should contact the Provincial/Regional Contact Person and/or the Provincial Leader/Regional Leader or any higher authority and discuss the best next steps.

### 3.3 Confidentiality and information sharing

The Congregation is committed to ensuring that confidentiality is strictly maintained in the management of complaints and allegations of exploitation and abuse. Care must always be taken to preserve the rights, good name, and confidentiality of both the victim-survivor and the accused.

## Vos Estis Lux Mundi: Importance of Reporting

### Art. 3 – Reporting

§1. Except for when a cleric learns of information during the exercise of ministry in the internal forum, whenever a cleric or a member of an Institute of Consecrated Life or of a Society of Apostolic Life learns, or has well-founded motives to believe, that one of the acts referred to in art. 1 has been committed, that person is obliged to report it promptly to the local Ordinary where the events are said to have occurred or to another Ordinary among those referred to in canons 134 CIC and 984

CCEO, except for what is established by §3 of the present article.

§2. Any person, in particular the lay faithful who serve in offices or exercise ministries in the Church, can submit a report concerning one of the acts referred to in art. 1, using the methods referred to in the preceding article, or by any other appropriate means.”(VELM 2023)<sup>4</sup>.

Any person who is a victim of any form of abuse by a member of the Congregation, and whose concerns have not been appropriately addressed at the local level, may report the matter directly to the Congregational Leader through the designated safeguarding email address:

**[safeguarding@worldssps.org](mailto:safeguarding@worldssps.org)**

All reports will be handled promptly, sensitively, and in accordance with the Congregation’s safeguarding policies and procedures, with due regard for confidentiality, fairness, and the welfare of all those involved.

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4. Vos Estis Lux Mundi 2023

# STANDARD 4

## RESPONDING TO AND CARE FOR VICTIM SURVIVORS

The Congregation is committed to assisting any victim-survivor of abuse through their healing process in whichever way they choose. Anyone bringing forward a concern or allegation related to the safety or well-being of a child will be listened to and treated with respect. All matters relating to safeguarding will be sensitively responded to and handled with the utmost level of confidentiality. The Congregation will fully participate in any relevant external investigative process, whether that be a criminal or civil investigation.

### 4.1 The Use of the Words “Victim” and “Survivor”

It is important to be very sensitive to the use of either of these words. Some people who were abused want to be regarded as a victim, others as a survivor, and still others do not want to be identified by either term. It might be helpful to gently discuss with an individual their thoughts, feelings, and preferences regarding the use of these words.

### 4.2 Caring for and Responding to Victims

The Congregation recognizes that caring for and responding to the victim is very important. Victims must be skillfully accompanied with great sensitivity and special care to prevent re-traumatization. The Congregational/Provincial/Regional Leaders must identify persons who can offer support and other resources that are external to the Church and the Congregation.

- The Congregational/Provincial/Regional Leader will provide access to services such as counselling and spiritual accompaniment.
- The victim and his/her family should receive pastoral, medical, and/or therapeutic care as needed.
- No statements should be made that might prejudice the outcome of possible criminal or civil proceedings.

- The SSps must demonstrate fairness and transparency in all their proceedings.
- Provisions will be made to identify safe places to stay, for emergency contacts, and secure communications.
- Practical support, such as providing contact shelters, police, legal aid, or counselling
- Provide emotional support through listening without pressure or judgment.

The above should be worked out in detail by the Provinces/Regions depending on their local norms and circumstances.

# STANDARD 5

## MANAGEMENT AND SUPPORT FOR THE ACCUSED

The Congregation seeks to provide a compassionate, caring, and respectful response to individuals who have been affected by allegations of abuse. Support will be given in a manner that respects the individual's dignity, privacy, and safety. Recognizing that leaders must make important decisions about the case, all parties must respect the agreed boundaries of communication. The Congregational/Provincial/Regional Leader has an important duty to care for the accused member. During the initial days, it is imperative that the accused sister is given the opportunity to meet with the Congregational/ Provincial/ Regional Leader. The civil procedures for the investigation of an allegation will be the same as in the case of others.

However, the following procedures will be followed in our Congregation to monitor the well-being of an accused SSpS:

1. Provide the accused with an agreed-upon Safety Plan
2. Provide the accused with an agreed-upon Support Person
3. Provide an appropriate safe place for the accused to stay (statutory authorities must be notified)
4. Make arrangements to meet her spiritual needs
5. Provide access to healthcare as needed
6. Make restrictions by contacting people in the ministries Sister was involved in.
7. Prohibit contact with those who made the allegations.
8. Make provisions for the Sister's practical and financial needs
9. Designate the accused Sister's place of residence, as decided by the Provincial/Regional Leader in consultation with the Sister.

In the event of a false allegation, every effort will be made to redress any wrong, hurt, or injustice caused to the accused.

(Each Province/Regions adapts this according to their situations based on the safety plan given in Glossary)

## 5.1 The Support Person

The Support Person is appointed to support the accused for either a short or long term. The appointment is made after discussion with the accused. The goal is to appoint someone she can trust; however, the Provincial /Regional Leader is responsible for confirming the suitability of the candidate and indeed for making the final decision.

The Provincial/Regional Leader appoints a Support Person when the accused Religious Sister is:

- Subject to a criminal investigation
- Subject to serious allegations, which are reported to the police for investigation-
- Arrested and charged with sexual abuse or any other offences
- On restricted ministry because of her history of abuse or a behavioral pattern that is incompatible with her vocation

## 5.2 Canonical and Civil Process

### Regarding a Member of the Congregation

It is important to recognize that allegations can reach the Congregational / Provincial/ Regional Leader from several different people, including:

- The victim(s)
- Relative or friend of the victim(s)
- A third party
- The Police
- Another religious

### **Allegation(s) can be reported:**

- In person

- By Telephone
- In an email
- In an anonymous letter

The Process may follow the following sequence:

- An allegation is made and is reported to the Provincial/Regional Leader.
- The Provincial/Regional Leader reports the allegation to the designated statutory authority, and an investigation begins.
- The Provincial/Regional Leader reports the allegation to the Congregational Leader, who in turn supports the Provincial/Regional Leader and Safeguarding Delegate.
- The Provincial/Regional Leader removes the accused from ministry and transfers her to another community in the same country, where she will not have any contact with children and/or vulnerable adults.
- The Provincial /Regional Leader informs the local Bishop if the accused has a Diocesan role.
- The Provincial/Regional Leader sensitively and professionally communicates with others in the Province/Region as required.
- The Provincial/Regional Leader opens the Preliminary Investigation and issues a canonical decree to appoint the Investigator.
- The Canonical Investigation starts and is paused until the civil investigation concludes.

# STANDARD 6

## SAFEGUARDING TRAINING AND AUDITS

### 6.1 Safeguarding Training

Training is essential for ensuring that everyone involved in ministry, whether congregational members, employees, volunteers, or ministry leaders, has the knowledge, skills, and confidence to protect children, young people, and vulnerable adults from harm. Regular Safeguarding Training helps individuals create a safe environment. It also helps them to recognize the signs of abuse or neglect, respond appropriately, and follow correct reporting procedures in line with civil and church requirements. It also reinforces our shared responsibility to create a culture of safety, transparency, and accountability within the congregation. By keeping our training up to date, we promote consistent good practice, empower those in our care to speak out if they feel unsafe, and strengthen our commitment to providing a secure and nurturing environment for all.

Good practices for the protection of children and vulnerable adults also involve implementing a thorough recruitment and selection process and good management of staff and volunteers.

#### 6.1.1 Safeguarding Training Content

The following topics could provide a solid knowledge base for safeguarding. The training could be delivered in separate modules, allowing sufficient time for discussion and clarification.

- Introduction to Safeguarding
- Ground rules and creating safety plans
- Exploring what [Safeguarding is](#)
- Definitions of children and vulnerable adults
- Main types of abuse (Refer to Glossary)

- Mandatory reporting
- Creating a culture of protection and prevention
- Understanding and managing risk
- Responding to allegations and concerns
- Responding to victim survivors
- Care and support for victims
- Management and support of the accused
- Coercive Control
- Case scenarios and discussion
- Secondary Trauma

### **6.1.2 Who Should Attend Safeguarding Training?**

The Congregation expects every member to be well-informed about their responsibility for creating a safeguarding culture. Those in leadership roles, formators at all levels, and those responsible for various ministries are expected to attend Safeguarding Training regularly. Furthermore, this training is to be provided for the employees in our institutions and projects, and for volunteers in our ministries because it ensures that everyone who works with or around children and vulnerable adults understands how to create a culture of safety, respect, and accountability and how to respond to allegations of abuse.

### **6.1.3 Safeguarding Training for Formators**

Formators in our Congregation should attend Safeguarding Training specific to their role(s). Our formators are often in close and ongoing contact with formandees and are given both authority and responsibility. They play a vital role in the spiritual, personal, and religious formation of those in their care.

Safeguarding Training prepares formators to:

- Understand their responsibilities in preventing and responding to any form of abuse, neglect, or misconduct.

- Recognize signs of abuse or vulnerability among those they accompany and know how to respond appropriately.
- Create and maintain safe environments that promote respect, dignity, and healthy boundaries in all formation settings.
- Protect both formator and formandee in the context of accompaniment

The formation plan in each Province/Region must include topics on safeguarding for all stages of formation. The Provincial/ Regional Leaders are to ensure that formators are given opportunities to develop knowledge and skills for creating safe environments for those in formation. The Formation Team of each Province/Region can decide which topics to be included at each stage of the formation process. However, the following topics should be included in the formation program of the Province/ Region:

- Creating a safe culture in our communities and places of ministries
- Abuses: its different forms, and how to protect oneself from
- Personal responsibility towards creating a safe culture in the communities
- Congregational Safeguarding Policy
- Civil Laws and Regulations of the Country
- Procedures for reporting Safeguarding Concerns

#### **6.1.4 Safeguarding Training for those in Leadership Roles**

Safeguarding Training is vital for all those in leadership positions within our congregation. We recognize that leaders in our Provinces/Regions bear primary responsibility for ensuring that safeguarding policies are effectively implemented and that the highest standards of care and protection are upheld.

### **6.2 Safeguarding Audits**

Regular Safeguarding Audits are an essential part of maintaining a safe and transparent environment within the Congregation. The purpose of

a regular Audit is to provide every Province/Region with an opportunity to demonstrate progress and identify an action plan. Audits should be conducted frequently and especially when significant changes occur in personnel, activities, or legislation. The findings of the audit are to be documented, shared with the Provincial/Regional Leadership Team, and used to update the Safeguarding Policy and Procedures as needed.

As a Congregation, we will ensure that a Safeguarding Audit of the Congregation is conducted regularly.

Safeguarding Audits are an effective way to capture an accurate picture of Safeguarding implementation throughout the Congregation. Gaps in both provision and practice can be identified. Action Plans that emerge from the Audit can motivate members to continue improving their knowledge, practice, and understanding.

# GLOSSARY AND TEMPLATES

## 1. Abuses

### **Types of abuse and exploitation** <sup>5</sup>.

Abuse is a form of maltreatment and can either be inflicted by others or self-inflicted. Abuse can take place at home, in educational settings, or within any physical environment. It can also happen in an online or virtual environment, such as social media or gaming apps. An abuser can be anyone, and they are often known by the young person or vulnerable adult (Adult at Risk). An abuser may make every effort to build a trusting relationship with the young person or vulnerable adult and will often befriend or seek to maintain the respect of friends and colleagues. This is grooming behavior. Abuse can occur in any relationship at any time. It can occur within any community, culture, or religion. It may result in significant harm to or exploitation of the person subjected to it.

**Emotional/Psychological Abuse:** Persistent emotional maltreatment of a person that results in the impairment of their well-being or development. Some form of emotional abuse is present in all types of abuse, but it can also occur on its own.

**Physical Abuse:** Any intentional act whereby one person causes physical injury, harm, or pain to another (e.g., hitting, pushing, or assaulting). It can take other forms, including poisoning and inflicting illness upon another

**Sexual Abuse:** Involvement in a sexual act where the person does not give consent, does not have the understanding to make an informed choice, or is coerced (e.g., rape, sexual assault, inappropriate touching, or exposure). It may also include sexual exploitation, where gifts or bribes are offered. Sexual abuse can also occur across electronic devices or social media.

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5. Cf CATHOLIC CHURCH SAFEGUARDING ENGLAND & WALES, defined by Legislation or relevant Guidance.

**Spiritual Abuse:** A form of emotional and psychological abuse that is characterized by a systematic pattern of coercive and controlling behavior in a religious context. It “means abuse of a person that invokes a person’s religious beliefs and faith to perpetrate harm. Spiritual abuse can occur as a secondary experience of abuse when abuse is perpetrated by someone in a position of spiritual authority and trust within the Church and can negatively impact a person’s spirituality”.<sup>6</sup>

**Abuse of Power:** The misuse of authority to harm, manipulate, or exploit others for personal gain. It occurs when those in positions of authority fail to respect the dignity, autonomy, freedom, and responsibility of others, especially vulnerable persons, by imposing their own way of thinking, understanding, and will. It may also involve a lack of transparency in relationships and emotional blackmail.

**Abuse of Conscience:** A form of spiritual and psychological manipulation where a person in authority coercively imposes their will, damaging a follower’s ability to make free, moral judgments.

**Elder Abuse:** Single or repeated act or lack of appropriate action, occurring within any relationship where there is an expectation of trust which causes harm or distress to an older person.

**Emotional Abuse (adults):** Abuse that occurs when a person is subjected to behaviours or actions aimed at preventing or controlling their behaviour, with the intent to cause them emotional harm or fear, through manipulation, isolation, or intimidation.

**Emotional Abuse (children):** Inappropriate verbal or symbolic acts by a parent or caregiver towards a child and/or a pattern of failure over time to provide a child with adequate non-physical nurturing and emotional availability. Such acts of commission or omission are likely to damage a child’s self-esteem or social competence.

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6. PONTIFICAL COMMISSION FOR THE PROTECTION OF MINORS, Glossary from the new Universal Guidelines Framework (UGF), Rome March 2024

**Neglect/Act of Omission:** The failure to prevent harm that may damage or impair the growth or development of a child or young person by not meeting their basic physical, mental, and emotional needs.

**Child on Child (Peer on peer) Abuse:** Harm inflicted upon a child by another child. It usually occurs through bullying, sexual abuse, or physical abuse, but also includes issues online, such as youth-produced sexual images, etc.

**Bullying:** A pattern of behavior that can include threats, aggression, intimidation, insults, cruelty, vindictiveness, humiliation, or degradation of another person. It can happen between young people, adults, in groups or individuals. It can happen in the ‘real world’ or “online”.

**Online Bullying or Cyberbullying:** Bullying that happens across social media networks, gaming platforms, or mobile phones. Examples include posting offensive material, rumors, or embarrassing images.

**Sexting:** The sending of sexually explicit, naked, or semi-naked images, **including youth-produced images.** The images may be of themselves or others. The possession or distribution of such images of a person under the age of 18 is illegal in many countries. Adults posting sexual images of other adults, or even youth-produced sexual images, may be criminally prosecuted.

**Drug or Alcohol Misuse:** A pattern of behavior involving the use of substances, including illegal drugs, prescription medication, or alcohol, that alter the mood or mental state of an individual in inappropriate or harmful ways. Even if such substances are legal, their use may cause long-term issues.

**Self-harm or Self-neglect:** Deliberately harming oneself by either direct injury or by putting oneself in harm’s way. Self-harm is mainly a coping strategy that young people adopt to release emotional stress. Self-neglect is the failure to care for oneself (e.g., personal hygiene, health, or environment).

**Addiction:** The inability to stop a particular behavior (alcohol/ drug abuse, gambling, etc.) that negatively impacts relationships, health, finances, and career. Addiction often co-occurs with other issues and can make people vulnerable to coercion and/or mental health issues.

## **Exploitation:**

- **Sexual Exploitation:** The coercion of individuals into any form of sexual activity using power, money, or status.
- **Modern Slavery / Human Trafficking:** Forced labor, domestic servitude, coercion, deceiving or forcing an individual into a life of abuse/servitude (e.g., prostitution, drug running).
- **Gang:** A group of people (any age) with a defined leadership and internal organization that identifies with or claims control over territory in a community and engages, either individually or collectively, in illegal and possibly violent behavior.
- **County Lines:** A term used when drug gangs from cities expand their operations to smaller towns, often using violence to drive out local dealers and exploiting children and vulnerable adults to sell drugs.

## **Harmful Traditional Practices:**

- **Forced Marriage:** Practice of marrying persons without the consent of one or both parties, often involving violence or threats as coercion. This practice is illegal in many countries.
- **Female Genital Mutilation:** A procedure that intentionally alters or causes injury to the female genital organs for non-medical reasons and which is done without informed consent. It occurs in many countries and is usually illegal.
- **Honor-based Violence:** Incidents or crimes committed to protect or defend the family's or the community's honor.
- **Domestic (Relationship) Abuse:** Violence or abuse in a relationship. It is a pattern of behavior used to assert power over another.

Since 2018, stalking has also been included in this definition. It also includes coercive behavior. Such abuse can happen to young people and adults.

**Financial Abuse:** The “illegal or improper use or mismanagement of a person’s money, property or resources. Stealing, fraud, forgery, embezzlement, forced changes to a will, inappropriate removal of a resident’s decision-making powers and misuse of power of attorney are all forms of financial abuse or exploitation”.<sup>7</sup>

**Discrimination:** The unfair treatment of a person based on a difference such as race, sex, gender, age, disability, religion or belief, sexual preference, appearance, cultural background, pregnancy and maternity, marriage or civil partnership.

**Organizational/Institutional Abuse:** An organization’s failure to prevent repeated maltreatment, abuse, or neglect of children or adults at risk.

**Mental Well-being:** A state of emotional, psychological, and social functioning, enabling a person to cope with normal life stress, work productively, and contribute to the community. Anyone can experience good or poor mental well-being at any point in their lives.

**Mental health:** A state of emotional, psychological, and social functioning, enabling a person to cope with normal life stress, work productively, and contribute to the community. Anyone can experience good or poor mental well-being at any point in their lives. Mental health problems may vary in strength or frequency of recurrence, from an occasional crisis to a chronic state. Some may develop harmful coping strategies, such as anxiety attacks, self-harm, suicidal ideation, or even aggressive behaviour.

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7. PONTIFICAL COMMISSION FOR THE PROTECTION OF MINORS  
Glossary from the new Universal Guidelines Framework (UGF), Rome March 2024

## 2. Code of Conduct Examples

- 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 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 carrying out my responsibilities, I will use my authority for the benefit of those under my care and not take advantage of them nor 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 known or suspected cases of physical, sexual, or emotional abuse or neglect of minors or vulnerable adults to the proper authorities.
- I will support those who disclose to me any kind of abuse in a way that empowers them to seek help.
- I will maintain and uphold confidentiality appropriately, holding in confidence whatever information is not mine to share.
- I will ensure that funds for which I am responsible, or are under my control, are used for their intended purposes, and do so 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.

## 2.1 A Code of Conduct for adults who work with or minister to and/or vulnerable adults

### You are Required to:

- 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 the good conduct you want others to follow. An environment that 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 that are unacceptable within a relationship of trust. This applies to all such behaviors, especially any illegal act.
- Meet with a child or vulnerable adult in an open and observable environment.

## 2.2 A 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 congregational 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.

### 3. Risk Assessment

#### **Risk Assessment Guidance and Template<sup>8</sup>.**

A risk assessment should be carried out as part of good Safeguarding practice before activities with children, young people or vulnerable adults.

The risk assessment should be completed by the most appropriate person. A written record is recommended. This should be signed, dated, a date added for a review to take place and securely stored. The following steps can be used to assess risks for an activity or outing. Please note that the table of identified risks and what safeguards need to be in place is not all-encompassing; therefore, add any that apply to your activity or outing.

#### **Steps for safeguarding and assessing risks in an activity or outing**

- Identify the risks.
- Identify what safeguards need to be in place to address these risks.
- Record who is responsible for ensuring that safeguarding is in place.
- Completion date,
- Sign, date, review date, and securely store the document.

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8. Cf CHURCH IN SCOTLAND, Guidance, 2019.

| <b>Risk Assessment Checklist:</b> | <b>What Safeguarding Needs To Be In Place?</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <b>Who is Responsible?</b> | <b>Date</b> |
|-----------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------|-------------|
| Safe Recruitment                  | <ul style="list-style-type: none"> <li>• Have the relevant employees/volunteers been fully vetted through safe recruitment?</li> <li>• If required for the role, do they have the relevant police clearance?</li> <li>• Have the employees/volunteers attended Safeguarding training?</li> </ul>                                                                                                                                                                                                                                                                                                                          |                            |             |
| Transport:                        | <ul style="list-style-type: none"> <li>• Who is providing transportation?</li> <li>• Is it a private arrangement, Church-sponsored, or institutional?</li> <li>• Is insurance in place?</li> <li>• Has the driver been fully vetted through safe recruitment?</li> </ul>                                                                                                                                                                                                                                                                                                                                                  |                            |             |
| Ratios:                           | <ul style="list-style-type: none"> <li>• Employees/Volunteers: children.</li> <li>• Take into consideration the needs of the children or vulnerable adults and the activity before deciding on ratios.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                         |                            |             |
| Consent:                          | <ul style="list-style-type: none"> <li>• Have the relevant consent forms for the outing been signed?</li> <li>• Has the Media Consent form been completed by a parent, guardian, or appropriate person?</li> <li>• Have any objections to the outing from a parent, guardian, or appropriate person been noted?</li> <li>• Are emergency telephone numbers available to the group leaders?</li> <li>• Are dietary requirements or restrictions noted?</li> <li>• Are any allergies noted?</li> <li>• Are any special requirements due to disability been noted?</li> <li>• Are any medical requirements noted?</li> </ul> |                            |             |
|                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                            |             |
|                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                            |             |
| Health and Safety:                | <ul style="list-style-type: none"> <li>• Have physical hazards been identified?</li> <li>• Has any action been taken to resolve these hazards?</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                            |             |

| <b>Risk Assessment Checklist:</b>                                                                                              | <b>What Safeguarding Needs To Be In Place?</b>                                                                                                                                                                                                                                                                                                         | <b>Who is Responsible?</b> | <b>Date</b> |
|--------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------|-------------|
| Social Media e.g. photography, video, mobile phones, social network sites, text and email                                      | <ul style="list-style-type: none"> <li>• Have Photo Consent forms been signed?</li> <li>• What rules are in place regarding other photographs and the use of mobile phones?</li> </ul>                                                                                                                                                                 |                            |             |
| Insurance:                                                                                                                     | <ul style="list-style-type: none"> <li>• Has the insurance been put in place where applicable? Private, Business, Travel, Transport, Premises, or Injury?</li> </ul>                                                                                                                                                                                   |                            |             |
| Risk of Harm by Employees/ Volunteers or by one Child to another Child or by one Vulnerable Adult to another Vulnerable Adult: | <ul style="list-style-type: none"> <li>• Have ratios been adhered to?</li> <li>• Have special safety requirements for child/ vulnerable adult been adhered to?</li> <li>• Have employees/volunteers been carefully recruited, with police (or equivalent) checks made?</li> <li>• Have employees/volunteers attended Safeguarding Training?</li> </ul> |                            |             |
| Other Identified Risks                                                                                                         |                                                                                                                                                                                                                                                                                                                                                        |                            |             |

- Name: .....
- Signed: .....
- Position: .....
- Date: .....
- Review Date: .....

## 4. Safety Plan Template

This Safety Plan Template can be adapted for broader use; however, it is currently intended for any member of the Congregation who has been:

- Accused of abuse or other harmful/criminal activity.
- Placed on restricted ministry while under investigation by either civil or Canon Law.
- Released from a custodial sentence following a judicial trial.

## **The Agreement**

Safety Plan Agreement between ....., and .....  
..... (Provincial/Regional Leader) on behalf of .....  
(Congregation).

This agreement is for the benefit of both the sister and members of the Community where she will live, to protect both children and vulnerable people from risk. It is also intended to protect the wider community and prevent any further harm or abuse.

## **Information and Confidentiality**

The following people have been made aware of the contents of this agreement (amend as appropriate):

- \* Bishop (if appropriate)
- \* Provincial /Regional Leader
- \* Safeguarding Delegate
- \* Congregational Lawyer (if appropriate)
- \* Police/Civil authorities
- \* Others?

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

## **The Subject of the Agreement:**

Full Name:

Date of Birth:

Location:

She/He will be resident at: Starting on the following date..... /until .....  
/for the foreseeable future.

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

## **Access to the Sacraments:**

### **The Eucharist:**

She will be allowed to attend Mass at.....

### **Sacrament of Reconciliation:**

She will be allowed to receive the Sacrament of Reconciliation at ..... Church/or on regular visits to her Confessor.

## **Life within the Community:**

The Sister in question will:

- Be given specific duties within the Community
- Maintain good and frequent contact with the Provincial/Regional Leader and the appointed Support Person
- Not engage in any pastoral duties that include contact with children and/or vulnerable persons.
- Not have any contact with the victims she has harmed.
- Not have contact with anyone else involved in the abuse/harm or other criminal activity.
- Participate in Community life, including spiritual practices, when appropriate.

## **Holidays/Retreats/Time Away**

The Sister must have the full permission of the Provincial/Regional Leader for any holiday, retreat or time away. All details of location and duration must be shared with the Provincial/Regional Leader, and her Local Leader.

She will be forbidden to return to the location(s) where the abuse/ harm/ crime took place. In some instances, the civil authorities/police might be required to receive this information.

## **Dress:**

She will not be allowed to wear a religious habit to avoid being compromised in any situation where she might be expected to engage in pastoral ministry.

## **5. The Support Person:**

She will have a Support Person appointed who ensures that she receives the support needed to live according to Gospel values and the charism and spirituality of our Congregation. The Support Person will be made

fully aware of why she is not in ministry.

This person may be a priest, but depending on the circumstances, it could also be a Religious or a layperson. The appointment is made in discussion with the (accused) Sister so she can suggest someone she trusts. However, the Provincial/Regional Leader is responsible for determining the suggested person's suitability, and she makes the final decision. If the person selected is a priest, his Bishop must give his approval. If it is a Religious, his/her Superior must give their consent.

**Other requirements**

The psychological and physical health and well-being of the sister are important. Therefore:

- Her medical needs should be met with the knowledge of the Local Leader
- Any recommended therapy and/or external supervision must be provided.
- Any addiction concerns must be monitored, and she should agree to attend the respective addiction services, sessions/meetings.
- Any expression or indication of suicidal ideation must be taken seriously and acted upon promptly with a referral to appropriate medical services.

**Review of the Agreement**

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

Signed: .....

Signed: .....Date (add signatories as appropriate)

The appointment of a Support Person is included in the Safety Plan, agreement/contract, or by decree of imposition. It is often amended and adapted according to the particular needs of each situation.

**5.1 The Qualities and Tasks of the Support Person**

Clerical and Religious Candidates:

A priest or a religious appointed as a Support Person should have at least 15 years of ordained ministry and be in good standing with his Bishop.

A member of a religious institute should demonstrate equivalent experience, stability, and good standing within their Congregation.

Lay Candidates:

A lay Support Person should be a mature individual who can demonstrate stability in their professional, personal, and spiritual life.

### **The Support Person is expected to:**

- Be recognized as trustworthy, discreet, honest, and wise.
- Demonstrate a thorough and up-to-date understanding of safeguarding policies and procedures.
- Possess strong pastoral skills and embody Gospel values in their conduct and relationships.
- Be a person of prayer and compassion, able to respond with empathy while maintaining clear and appropriate professional boundaries.
- Have a sound understanding of how to identify risk-taking behaviors, including indicators of self-harm and suicidal ideation.
- Have no history of safeguarding concerns or allegations.
- Declare any real or potential conflicts of interest promptly and transparently in the course of their role.

### **The Tasks of the Support Person Include:**

- Formally accepting the role by signing an agreement with the Provincial or Regional Leader.
- Adhering to confidentiality at all times, except where the individual discloses information that raises safeguarding concerns or a risk of

harm.

- Maintaining accurate, factual, and professional records of all meetings and contacts, recognizing that these records are the property of the Religious Congregation.
- Reviewing the role and its commitments at least every six months, or more frequently if required.
- Meeting regularly with the individual, as agreed.
- Ensuring that all meetings take place in a safe, appropriate, and mutually agreed setting.
- Reporting any safeguarding concerns without delay to the Safeguarding Delegate of the Religious Congregation.
- Informing promptly the Safeguarding Delegate of the Province/Region of any admission of guilt or disclosure of criminal activity by the individual and providing a formal statement of it to the relevant civil authorities.
- Participating in regular external professional supervision.
- Undertaking annual Continuing Professional Development training.
- Carrying out all duties in accordance with professional boundaries at all times.

### **The Support Person:**

- Should not act as a 'Canon lawyer' for the accused. If necessary, a canon lawyer can be resourced in consultation with the accused.
- Should not act in the role of Spiritual Director for the accused.
- If a priest, should not act in the role of a Confessor for the accused.
- Has no advocacy role and should not respond to any communication addressed specifically to the accused or on behalf of such.
- If a professional or has therapeutic or psychiatric back-ground, must not enter into a formal or informal therapeutic arrangement with the accused.

## 5.2 Termination of the Role of Support Person

If at any time, the Support Person finds this role too burdensome or emotionally or psychologically costly, she/he may terminate the agreement and discontinue supporting the accused. This should be done with due notice so that alternative arrangements can be made.

Moreover, when the Support Person is unable to fulfil their duties or maintain professional boundaries, the Provincial/Regional Leader can/must terminate the Agreement/Contract.

The outgoing Support Person should be offered a debriefing and feedback session, and a final supervision appointment.

## 6. Considerations when Sisters, Formandeess, or those in Formation, come from other Congregations

When Sisters/ Formandee from other Congregations apply to join our Congregation, the following Safeguarding points require careful consideration:

A) Formandee previously in another Congregation require:

- Appropriate references
- Evidence that they understand that Safeguarding is a responsibility shared by everyone in the Congregation
- Confirmation that no legal proceedings are in place

B) Professed Sisters transferring from another Congregation

- All of the above points
- A psychological report

## 7. Photograph Consent Form

We, the Missionary Sisters Servants of the Holy Spirit, ask you to complete the following form, permitting us to take photographs/videos of

you/ your child, which we would use in our printed and online publicity, both during and after XXXX.

I grant my permission for the Holy Spirit Missionary Sisters to take photos/videos of my child \_\_\_\_\_ and the full right to use them and any reproductions or adaptations of them for publicity during and after the XXXX.

This might include the right to use them in their printed and online publicity, social media, and press releases.

Name: .....  
Signature .....  
Date: .....

**8. Declaration of Commitment to the Safeguarding Policy**

The Congregation is committed to the creation and maintenance of a Culture of Safeguarding, and we embody the moral teaching of the Church by upholding a culture of care and protection for all those who are vulnerable.

I, Sister [Name], hereby declare that I have read and fully understand the contents of this Congregational Policy Document on Safeguarding, and I commit myself to uphold and implement the care and protection of minors and vulnerable adults in the exercise of my apostolate.

Name: .....  
Signature .....  
Date: .....

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