



Jesuit Worldwide Learning

Higher Education at the Margins

Safeguarding Policy for the Protection of Children and Vulnerable Adults at Risk

The Policy

Jesuit Worldwide Learning (JWL) aims to ensure the protection of all children and vulnerable adults who are involved with JWL around the world, and to give staff a clear structure within which they can work safely.

This document outlines minimum standards for JWL staff worldwide and applies to all JWL Community Learning Centres & Local Partners' Learning Centres.

Since JWL is committed to acting at all times in the best interests of children, women and all vulnerable people in need, and it shares the view that the Catholic Church, and any Catholic agency, should be an example of best practice in the issue of child protection and vulnerable adults at risk, JWL regional and country offices and local partners must adopt and implement policies and procedures to ensure this happens. This policy is a step towards addressing the issue. By introducing and implementing this policy, JWL commits itself to making the issue of protection a priority in every situation where it is present.

JWL acknowledges that the issue of child protection and the protection of vulnerable adults at risk is a global challenge. JWL clearly states that sexual exploitation and abuse represent a betrayal of trust as well as a devastating failure of protection.

1. Principles

JWL's Safeguarding Policy and Procedures are underpinned by the principles derived from the UN Convention on the Rights of the Child.

- All children have equal rights to protection from abuse and exploitation and should be encouraged to fulfil their potential and inequalities should be challenged;
- Everybody has a responsibility to support the care and protection of children;
- International non-government organisations (NGOs) have a duty of care to children with whom they work & with whom their representatives work;
- If agencies and organisations work through partners, they have a responsibility to meet minimum standards of protection for the children in their partners' programmes;

JWL believes that all children and vulnerable adults regardless of age, gender, disability or ethnic origin have a right to be protected from all forms of harm, abuse, neglect and exploitation. JWL is committed to the protection of all children under 18, in line with the Committee of the Rights of the Child, the monitoring body for the UN Convention on the Rights of the Child, which has encouraged States to review the age of majority if it is set below 18.

2. Glossary of Terms

2.1 Definition of JWL staff

JWL staff refers to and is defined as, but not limited to, employees, temporary staff including students and part-time employees, volunteers (non-paid), tutors and teachers (either paid or nonpaid), all third-party contractors and freelancers, independent contractors (includes Subject Matter Experts), which are either contracted by JWL or by another organisation that is contracted or has an agreement in place with JWL.

2.2 Definition of a Child

Child Protection Procedures apply to children and youth who have not yet reached their 18th birthday. The definition of a child for the purposes of safeguarding and child protection should not be confused with the legal definition of a child or age limits set out in other relevant laws. The fact that a person under the age of 18 may have reached the local age of majority, age of sexual consent, voting age, etc., does not alter their inherent vulnerability as a child.

2.3 Child in need of protection: is one who has suffered significant harm, is suffering significant harm or is at unacceptable risk of suffering significant harm; or does not have a parent, guardian, or care giver able and willing to protect the child from harm.

2.4 Definition of a Vulnerable Adult at risk Adults, aged 18 and over, who:

- are unable to safeguard their own well-being, property, rights or other interests; • are at risk of harm and abuse;
- because they are affected by disability, mental disorder, illness or physical or mental infirmity, are more vulnerable to being harmed than adults who are not so affected.

2.5 Definition of Abuse

There are different legal and operational definitions of child abuse across all countries. All definitions refer to the physical or psychological damage caused to another person by the abusive behaviour of others, or the failure of others to protect from such damage. Most commonly, the categories of abuse cover sexual, physical and emotional abuse, neglect, and exploitation.

Child abuse as defined by UN Convention on Right of the Child refers to circumstances where a child's basic needs are not being met in a manner that is appropriate to his/her individual needs and stage of development and the child is, or will be, at risk through avoidable acts of commission or omission (neglect, emotional abuse, physical abuse and sexual abuse).

Abuse of vulnerable adults can constitute the physical, psychological, emotional, financial, or sexual maltreatment (including pornography) 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 (neglect, emotional abuse, physical abuse and sexual abuse). The lack of appropriate action can be a form of abuse.

Physical abuse is the use of physical force that may result in bodily injury, pain, or impairment.

Psychological abuse is a pattern of non-physical behaviour which can seriously interfere with a child's cognitive, emotional, psychological, or social development sometimes causing more lasting harm to a young child's development than overt physical abuse.

Abuse of power is defined as the wrongful application of power by someone in dominant position. Whether abuse occurs in institutions or in the home, it involves the elements of a power imbalance, exploitation and the absence of full consent. It also involves acts of omission and commission.

2.6 Definition of Sexual Abuse & Sexual Exploitation

Sexual Abuse is actual or threatened physical intrusion of a sexual nature, including inappropriate touching, by force or under unequal or coercive conditions. For a child under 18, consent is not a defence. Sexual abuse includes sexual behaviour involving two or more people in the following circumstances:

- 1 or more persons bribe, coerce, exploit, threaten or is violent toward the affected person;
- the affected person has less power than the other person(s);
- there is a significant disparity between the affected person and the other person(s) in intellectual capacity or maturity.

Sexual Exploitation is sexual coercion and manipulation (all types of sexual acts including pornography) by a person in a position of power providing any type of assistance in exchange for sexual acts. In these situations, the survivor believes that she or he has no other choice than to comply; this is not consent and it is exploitation. Exploitation happens when a person misuses his

or her power to profit sexually or otherwise from someone who needs something from the exploiter. Children in sexually exploitative situations and relationships may receive something such as gifts, money or affection as a result of performing sexual activities or others performing sexual activities upon them. The same applies to vulnerable adults.

2.7 Definition of Exploitation

Exploitation is the intentional ill-treatment, manipulation or abuse of power and control over a child or adult; to take selfish or unfair advantage of a child or adult, for personal gain. It may manifest itself in many forms such as child or adult labour, slavery, servitude, engagement in criminal activity, begging, benefit/financial fraud or child trafficking. It extends to the recruitment, transportation, transfer, harbouring or receipt of children for the purpose of exploitation.

3. The Specified Safeguarding Policy Objectives:

- to ensure that all JWL staff (as defined in 2.1) take responsibility in order to protect children, young people and vulnerable adults;
- to make all JWL staff are aware that they have a role in protecting children and vulnerable adults from harm and must give paramount concern to their welfare;
- to ensure all JWL staff are informed of the relevant responsibilities in identifying and reporting possible abuse so that children and vulnerable adults are safe;
- to ensure that JWL provides an environment in which everyone, particularly children, young people and vulnerable adults feel safe, secure and valued;
- that concerns or allegations of child abuse are always taken seriously, investigated and acted on if appropriate;
- that we will support the participation of children by valuing, listening to and respecting them;
- that all JWL staff and students have access to, and are familiar with this policy, and know their responsibilities within it;
- that all JWL staff, JWL's local Partners and beneficiaries/students including children themselves have access to information about how to report concerns or allegations of abuse;
- that JWL's recruitment practices are robust enough to ensure that we will not recruit personnel, volunteers or others if they pose a known risk to children, students and staff safety & wellbeing;
- that all JWL staff and JWL's local partners' staff are responsible for implementation of this policy.

4. Justification

This policy and the related procedures have been drawn up in accordance with current legislation and principles derived from the following:

- United Nations Convention on the Rights of the Child
- The Human Rights Act 1998
- Centre for Child Protection 2012 – Pontifical Gregorian University in Rome, Archdiocese of Munich & Freising and Department of Child & Adolescent Psychiatry & Psychotherapy of the State University Clinic of Ulm

5. Policy Link to JWL's Core Values & Code of Conduct Policy

5.1 Core Values

- Value a working environment built around the key values in Jesuit Higher Education: Cura Personalis, Magis, Men and Women for and with Others, Unity of Mind and Heart, Contemplatives in Action and Finding God in All Things.
- Providing all learners with the highest quality learning experience.
- Valuing colleagues and treating others with respect and integrity.
- Embracing diversity as a cornerstone of our learning community.
- Accepting accountability and responsibility for our actions.

5.2 Code of Conduct Policy - Summary

- Treat everyone with respect, recognising their right to personal privacy.

- Be aware of situations which may present risks and manage these.
- Plan and organize any events involving children so that risks are minimised. • Recognise that caution is required in all one-to-one situations.
- Provide access for children & adults to talk to others about any concerns they have.
- Encourage children & adults to feel comfortable to state attitudes or behaviour they do not like.
- Avoid inappropriate physical or verbal contact with others.
- Avoid showing favouritism to any individual.
- Never make suggestive remarks or gestures, even in fun.
- Do not trivialize or exaggerate child abuse or other forms of abuse issues.

5.3 Code of Conduct in relation to contact with children or vulnerable adults

- The safety and welfare of children or vulnerable adults is paramount and must be first consideration in any contact with them.
- Respect the rights, dignity and worth of every child, young person or vulnerable adult treating each equally regardless of age, gender, ability, ethnic or cultural origin, or religion.
- Physical or verbal interactions with children, young people or vulnerable adults should never be punitive, aggressive, embarrassing or humiliating.
- Be aware of and sensitive to culture difference and engage with children, young people or vulnerable adults in a culturally sensitive way.
- Ensure that learning centres is structured so that children, young people and vulnerable adults can learn and study in a suitable fitting environment according to age.
- Do not spend time alone with children or young people in services one visits.
- Do not spend time or meet with children or vulnerable adults outside of services.
- Do not take children or young people in a car or to other locations or premises .
- There should be no unnecessary physical contact between an adult and a child or young person. Physical contact should only be in response to the needs or initiative of the child and should be appropriate to their age and the level of development.
- If you think you may have caused offence, however unintentionally, acknowledge and offer an apology or explanation as soon as possible.
- Any observations or witnesses to any action, behaviour or symptoms that indicate a concern in relation to a child's safety or welfare, must be reported immediately.

6. Recruitment and Training of Staff and Volunteers

6.1 Recruitment Procedures

Safe recruitment is an integral part of good Safeguarding policy and practice. In addition to standard good HR practices, JWL staff (as defined in 2.1) recruitment will include:

- Clear **job descriptions** that notes all staff will be vetted and must adhere to JWL's Safeguarding Policy as well as all other JWL policies.
- **Application forms**, which include a Safeguarding declaration and reference to the JWL Safeguarding Policy, must be completed by the candidate.
- That **references** (a minimum of 2 required) will be requested and checked as fully as possible.
- Where legally possible, **background checks** will be carried out on those in positions that have direct contact with children.
- **Interviews** will be conducted with candidates, in which specific questions on Safeguarding topics and risks are asked to establish a candidate's suitability to work with children and vulnerable adults.
- Candidates will be required to confirm their identity -**identification check**- with proof of relevant qualifications and documentations where available.
- All JWL staff must complete the **confidential self-disclosure form** in Appendix 1.
- All staff, without exception, must sign the **Acceptance Form** in Appendix 2 for the policy and agreed to abide by it. All current staff already associated, will be requested to sign the Acceptance Form. If any refuse, and their duties involve direct contact with children or they

pose a risk to any children under the care of the programme, they may be removed from the post, whether paid or voluntary.

- Where **recruitment agencies** are engaged, the selection procedures of such will be scrutinised.

6.2 Training

Induction: An initial induction on the Safeguarding Policy and Procedures will be carried out by the learning centre coordinators following appointment of new JWL staff within 14 days of commencing the post. All JWL staff (as defined in 2.1), whether directly or indirectly dealing with children or vulnerable adults, shall receive a briefing regarding their obligations under the policy, not to harm individuals and how to report allegations of abuse to a Safeguarding Officer.

ALL JWL staff (both current and new) must complete the following online **Safeguarding Essentials** training course as part of their induction: <https://kayaconnect.org/course/info.php?id=1424>.

JWL staff (both current and new) who interact with **children (persons under 18 years)**, must complete the following **Introduction to Child Protection** online training as a part of their induction: <https://kayaconnect.org/course/view.php?id=312>

A certificate proving successful completion of the course must be sent to JWL. **Non-completion could result in termination and/or withholding of payment.**

Regular Trainings: Regular trainings (at least twice a year) will be facilitated by a Safeguarding Officer and/or JWL Programme Director to all learning centre Coordinators on Safeguarding to ensure they are aware of their responsibilities, the process for reporting a concern, disciplinary actions and their role in strengthening monitoring systems. Learning centre coordinators will also be responsible for holding regular Safeguarding training with local Staff (at least twice a year) using material provided to them by the Designated Safeguarding Officer. Records of trainings provided to staff must be kept and forwarded to a Safeguarding Officer.

Additional Training: Any staff who require specific training or upskilling in relation to their work, if it improves the quality of Safeguarding and protection services, should receive support in doing so. This may apply to external online training courses through thru Kaya - Humanitarian Leadership Academy (<https://kayaconnect.org/>) on protection and rights of children and vulnerable adults.

7. Reporting and Responding to Concerns, Allegations or Suspicions of Abuse

7.1 Designated Persons for reporting

Any concerns, allegations or suspicions of abuse by any JWL staff member (as defined in 2.1), should be reported immediately to one of the following JWL leaders, who will take such steps as considered necessary to ensure the safety of the child or vulnerable adult in question and any other person who may be at risk. This could include contacting the local appropriate authorities.

Designated Safeguarding Officer

Name: Armando Borja
Mobile/Landline: +1 571 239 6097
Email: Armando.Borja@jwl.global
Location: Washington, USA

Deputy Designated Safeguarding Officer

Name: Susanna Ablewhite
Mobile/Landline: +33695690768
Email: Susanna.Ablewhite@jwl.global
Location: Geneva, Switzerland

Child Protection Compliance Contact (under 18 years)

Name: Henk Goebel
Mobile/Landline: +49176 847 23038
Email: mail@henkgoebel.com

We expect all JWL staff to respect the age of the child as any person below 18 years and will do everything we reasonably can to protect children and prevent harm. It is the responsibility of all JWL staff to raise any concerns of abuse to the Child Protection Compliance Contact. In case of emergency, where a child or youth appears to be at immediate and serious risk the civil local authorities should be contacted immediately.

In situations where a person prefers to place an anonymous report in confidence, they are encouraged to use JWL's third party hotline provider, Navex WhistleB. Persons are encouraged to submit reports relating to violations stated in this policy or JWL Greater Good Principles policies or any other JWL policy. The information provided will be sent to JWL by EthicsPoint on a totally confidential and anonymous basis if this should be chosen: [WhistleB, Whistleblowing Centre](#)

7.2 Raising a Concern or Disclosure

Anyone can raise a concern or make a complaint about something they have experienced or witnessed or disclose information in relation to Safeguarding or any other JWL Policy that they've been informed about.

Those who have disclosed a concern or allegation should receive a compassionate response from JWL staff (as defined in 2.1) and be offered access to appropriate care, advice and support. Complainants need to be listened to and heard to ensure that any allegation or disclosure of abuse is handled effectively, professionally and compassionately. Disclosing abuse takes enormous courage and calls for a high level of trust. Abuse by its very nature can damage trust; it is therefore imperative that when a complainant is ready to tell their story, the listener responds with great sensitivity and compassion.

The following can assist in guiding any staff member receiving a concern or disclosure:

- **Keep calm** and act normally; do not say or show that you are shocked.
- **Do not investigate** or question the child or adult. If a child or adult reports abuse directly to you, only ask questions to get enough information to understand the complaint (e.g. 'who, what, where, when' questions, but not 'why' questions). Do not ask the child or adult for specific or graphic details which may retraumatise them. Accept what the child or adult says. **It is not your responsibility to judge or investigate an allegation.**
- **Reassure the child or adult** that they have done the right thing by telling you and let them know you need to tell someone else. Never agree to keep a secret. Our staff must not keep confidences when it involves Safeguarding concerns. Any information offered should be received on the basis that it will have to be shared with the appropriate Safeguarding Officer (note in 7.1). This applies also to all representatives as defined in 2.1. In circumstances where a person has shared a Safeguarding concern or disclosure in a conversation that was initially understood as being in confidence, the staff involved are required **to report the concern to the appropriate Safeguarding Officer.**

All JWL staff and JWL's local partners are obliged to raise any Safeguarding concerns **immediately** to the appropriate Safeguarding Officer. Failure to report suspicion of abuse relating to any individual is a breach of our Safeguarding policy and could lead to disciplinary action being taken.

- **Let the child or adult know what you are going to do next** and that you will let them know what happens. If you are unsure if the concern raised is a violation of national law, refer the concern to the appropriate Safeguarding Officer.
- **Avoid delay.** Do not dwell on allegations or suspicions of abuse or disclosures. While counselling will form part of the response, this must not be the immediate reaction. The first priority is the

immediate safety and welfare of the individual and raising the concern to the appropriate Safeguarding Officer. If you are unsure if there's criminality involved, you must still raise the concern to the appropriate Safeguarding Officer.

- **Do not directly challenge** parents/guardians or alleged perpetrator about the disclosure.
- **Record all the details** as soon as possible while the information is still clear and **raise the concern or disclosure verbally or in writing immediately to the appropriate Safeguarding Officer**, even if it relates to something that has happened a long time ago.

For the avoidance of doubt, there is no obligation placed on any individual child or vulnerable adult to share any incident that has happened to them if they are not ready to do so. Likewise, there is no obligation placed on any staff to report any incident that has happened to them as a child or adult.

7.3 All Suspicions, Allegations and incidents will be recorded and acted upon

- JWL recognises that disclosures (i.e. when a specific allegation of abuse is made against a named individual) and suspicions (i.e. when concern is expressed about abuse that may have taken place or be in prospect) will always be investigated and acted upon swiftly, making the welfare of a child or vulnerable adult the paramount consideration.
- Any information offered in confidence will be received on the basis that it will be shared with relevant people in authority: this might include a JWL senior staff and, if appropriate, child protection personnel in statutory agencies. Parents or care-takers will also be informed, if appropriate but apart from this, confidentiality will be carefully observed.
- If a member of JWL's staff (as defined in 2.1) is the subject of an allegation of child abuse and/or any other abuse, that staff member will be asked to take leave from their duties until an investigation has been completed. It should be made clear that such suspension does not imply guilt but rather protects all parties whilst an investigation is undertaken.
- No action will be taken against staff who report in good faith information indicating perceived misconduct.
- Where it is established that abuse has taken place, the guilty party will be terminated, dismissed or contractually terminated from their position immediately and the matter handed over to the local police and Social Services.
- Where it is established that abuse has not occurred, steps will be taken to sensitively reinstate the staff member without delay.

7.3 Responding to a Concern – Core Procedures for the Safeguarding Officers

Once a concern has been raised with a Safeguarding Officer, the below procedures will be followed. More detailed procedures to guide Safeguarding Officer are available within the JWL Child and Vulnerable Adult Safeguarding Procedures Manual.

Disclosures and suspicion should always be acted upon swiftly. Owing to the sensitivity of allegations relating to a child or adult abuse and exploitation, all reported cases shall be treated seriously, with utmost professionalism and confidentiality in order to protect the rights of all parties involved.

If possible, try to clarify if the complainant (the person who is the subject of the concern or disclosure) is **below 18** – if so, the Child Protection Compliance Contact (noted in 7.3) will be assigned the case and will follow the procedures below. If the person is 18 years and older, please refer to JWL's Safeguarding Procedures Manual. If it is unclear if the person is over or under 18, the Child Protection Compliance Contact will be assigned to review the case.

The procedure for responding to a concern relating to a person **below 18** years shall be as follows:

- If there is an urgent child protection situation, for example if a child is in imminent danger of abuse, then **immediate protective action** must be taken by the Child Protection Compliance Contact and relevant locally assigned Child Protection representative and/or organization.

- The Child Protection Compliance Contact must fill in the Child Safeguarding **Concern Form** after receiving a concern or disclosure and forward it to the Local Child Protection Representative. This form is in the Child Safeguarding Procedures Manual.
- Where it is established that the allegation or disclosure constitutes a violation of the national laws, the Child Protection Compliance Contact must ensure that the Local Child Protection Representative refers the case to concerned **statutory authorities** such as the Police and local authorities, for investigations to be carried out so that legal action may be taken. The Local Child Protection Representative's major role is to forward cases to the concerned authorities **if it's a potential violation of the relevant laws** protecting the child, but not to preside over cases. Exceptions can be made in countries where a case will not be investigated or when referring a case to the statutory authorities will most likely result in the child being put at further harm.
- If the person subject of the allegation is a JWL staff member (as defined in 2.1), that person may be asked to **take leave or suspended** from their duties until an investigation has been completed to protect all parties whilst an investigation is undertaken.
- Where staff are involved in cases of abuse outside the reach of JWL or during their free time, involving children outside of the learning programmes, JWL will follow its Safeguarding Procedures Manual. The law should always take its course.
- Where necessary and possible, JWL shall provide guidance and counselling services to help support a child who has been abused physically, emotionally or psychologically. The child may also be helped to receive care and emotional support from hospital as a response action. Survivors and victims can choose if and when they would like to take up the support options available to them.
- In the event that JWL staff, after investigations have been carried out, are found to be in breach of this Safeguarding Policy, they be subjected to disciplinary action in accordance with procedure policies and national laws of the country of operation. Where it is established that abuse has taken place, immediate disciplinary action will be taken which might include summary dismissal and termination of contract.
- Should the allegations be found to be false, or it is established that abuse has not occurred, JWL will work with the parties involved to restore their reputation and steps will be taken to sensitively reinstate the staff without delay.

Children have a right to be heard, listened to and taken seriously. Taking account of their age and understanding, they should be consulted and involved in all matters and decisions that may affect their lives. Parents/guardians also have a right to respect and should be consulted and involved in matters that concern their family. A proper balance must be struck between protecting children and respecting the rights and needs of parents/guardians and families. Where there is conflict, the child's welfare must come first.

8. Ensuring Awareness and Prevention

8.1 Communicating the Safeguarding Message

- **Access to the policy:** JWL will ensure that a hard copy of the Safeguarding policy will be available in all its offices and learning centres around the world. JWL Learning centre Coordinators will be responsible for ensuring that a hard copy is available in the local learning centre. The policy will be translated into local language where possible.
- **Sensitisation:** All children and vulnerable adults will be made aware of their rights, what constitutes abuse, exploitation and neglect against them and the message should be communicated to them regarding whom they should report to, or seek advice from, if they feel they have been violated or offended in any way.
- **Who to contact:** JWL Staff (as defined in 2.1) should know the identity and contact details of the relevant person responsible as well as that of those relevant persons within JWL and have contact details for statutory authorities including Social Services and the Police, as appropriate.

- **General Awareness:** Learning centre Coordinators will ensure that visual friendly notices are displayed about the existence of this policy in appropriate language in all centre facility and classrooms where possible. The policy will also be circulated to other stakeholders and opportunities will be taken to promote the policy and keep Safeguarding front of mind for everyone by including short sessions on the policy or related Safeguarding matters during staff meetings, other trainings and via regular communications.
- **Online information:** All organisational policies related to JWL's Greater Good Principles are available online to the public on JWL's website and social media platforms.

8.2 Two Adult Rule

The Two Adult Rule serves to keep children and youth safe, as well as the adults serving them. Wherever practical no fewer than two adults should be present at all times during any programme, event or ministry involving children and youth. It is best that these two adults not be related.

Adherence to this rule:

- drastically reduces the risk of an incident of abuse, as any potential abuser will lose interest if constantly in sight of another adult;
- protects the adults against false allegations;
- sends a clear statement that children are important and valued.

For JWL Staff (as defined in 2.1) who may need at times to deal one-to-one with a child, the interaction should be conducted in as open and observable a way as possible. This can be contributed to by leaving doors to offices and classrooms open. A second adult is also not required where a class with 5 or more students is being taught.

8.3 Visitors

Any persons visiting a JWL learning centre for any related reasons, including consultants and donors must be given a copy of the Safeguarding Policy either prior to their arrival or upon their arrival and submit their signed Acceptance Form to a Safeguarding Officer before engaging in any assignment-related duties or site visits.

All learning centre Coordinators must prepare these documents in advance of a visitor's arrival to avoid any delays. Where visitors are likely to have significant contact with children especially over an extended period, it is necessary to conduct background checks as described above.

8.4 Media, Audio & Visual Recordings

Every child has the right to privacy, and to protection from all forms of exploitation (Articles 16 & 36 of the UN Convention on the Rights of the Child).

If any audio or visual recordings involve interviewing a child always ensure that the child is at no risk of being endangered, or adversely affected. This includes ensuring their privacy and not disclosing identifying information about a child, i.e. their full names, addresses or identifying their home, host community, or general location and being vigilant of street signs, advertising boards or any other background information that will indicate to a viewer where the child may live. Do not publish a story or an image which might put a child, or that child's siblings or peers, at risk. This is the case even when identities are changed, obscured, or not used. Only use a child's first name and provide a general location that is wide such as a city or province to avoid them being identified.

Still photographs and videos must never be demeaning, or disrespectful of the dignity of the persons portrayed. The rights, safety, and wellbeing of the persons being portrayed are always to be protected. The gratuitous portrayal of extreme suffering is always to be avoided. Editing should maintain the integrity of the photographic and video images' content and context. No changes should be made that distort the context of the image, or that make a situation look worse than it actually is.

People should always be adequately clothed. They should never be portrayed in poses that could be regarded as sexually suggestive, erotic, or obscene. Images which are not intended to be sexual can be 'sexualised' when viewed and/or shared by certain individuals, particularly online.

8.5 Expectations of JWL Partners

We expect that partner organisations of JWL operate effective child and vulnerable adult safeguarding policies and procedures, including having an appropriate qualified Child Protection Representative and/or Organization to handle any concerns and issues according to standard practices set outlined above in Section 4. If JWL receives a safeguarding concern about a partner organisation, JWL will inform them and expect the partner to respond quickly and appropriately. JWL will assist the partner to ascertain its obligations under local law to refer the matter to the police or other statutory authorities for criminal investigation. Where appropriate, JWL will work with the partner to address the issue through an appropriate independent investigation which should not interfere with any criminal investigation being conducted by statutory authorities. If the outcome is that abuse has occurred, ongoing work with the partner cannot involve the perpetrator(s) concerned. If there is reason to believe that an allegation of abuse has been dealt with inappropriately by a partner, then the partner organisation risks withdrawal of funding or ending its partnership with JWL. JWL expects partners to inform a JWL Safeguarding Officer of any safeguarding incidents they are dealing with where these have not come to JWL's attention.

8.6 Monitoring Compliance

On-going monitoring and evaluation will indicate the extent to which safeguarding is being effectively implemented and any need in training for JWL staff (as defined in 2.1). Resources will be made available for the full implementation of the JWL Safeguarding Action Plan and this will form the basis of monitoring progress. Records will be kept tracking:

- the numbers of Self-Disclosure and Acceptance Forms completed, comparable with the number of JWL staff appointed.
- Inductions and trainings provided in Safeguarding, numbers attended and dates.
- All child safeguarding concerns and disclosures reported to a Safeguarding Officer, which will be stored online in a JWL secure SharePoint file and kept in a safe and confidential manner.
- Job descriptions and adverts to confirm if they all contain the commitment to JWL's Safeguarding Policy.

The Safeguarding Policy will be reviewed by JWL on a three-yearly basis and that new processes, changes in legislation and guidelines and practices will be incorporated in accordance with lessons learned.

**There are no exemptions to this policy.
This policy will be reviewed and updated in February 2025.**

9. Authorisation

This policy has been reviewed and approved by the below authorising persons. All updated versions or amendments of the policy will be circulated to all JWL Staff.

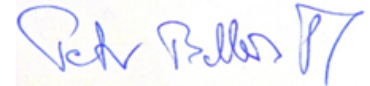
Policy Created: 1 April 2022

Policy to be reviewed: February 2025

Authorisation by JWL's Global Leadership Team & Global Advisory Board: Peter

Balleis SJ
JWL Executive President Geneva,
Switzerland

Date: 15 April 2024



Signature: _____

Sign off by Designated Safeguarding Officer

Armando Borja
CEO Jesuit Worldwide Learning USA
JWL Chief Operations Officer

Washington DC, USA

Date: 15 April 2024



Signature: _____

Sign off by Deputy Designated Safeguarding Officer

Susanna Ablewhite
JWL Global English Language Director
Geneva, Switzerland

Date: 15 April 2024

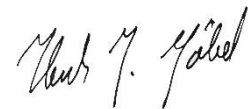


Signature: _____

Sign off by Child Protection Compliance Contact

Henk Goebel
Child Protection Consultant in Prevention & Counselling for
the ECE Jesuit Central European Province
Welzheim, Germany

Date: 15 April 2024



Signature: _____

Jesuit Worldwide Learning
Safeguarding Policy for the Protection of Children and Vulnerable Adults at Risk
Appendix 1 - Confidential Self-Disclosure Form

JWL is committed to the protection of all children under 18 and vulnerable adults, in line with the Committee of the Rights of the Child, the monitoring body for the UN Convention on the Rights of the Child. The Convention states that a child has a right to be protected from physical and mental violence, injury, abuse or exploitation including sexual abuse. In accordance with this Convention, persons (Staff as defined in 2.1 of the Safeguarding Policy document) working or volunteering with JWL abide by good practice and agree to keep children and vulnerable adults safe from harm when working with them. In addition, we ask that all persons declare the following:

Have you ever been convicted of a sexual or child Safeguarding offence or are subject to an on-going sexual or child Safeguarding investigation?

Yes No

If yes, please state below the nature and date(s) of the offence(s), case(s) or allegation(s):

Have you ever been the subject of disciplinary procedures or been asked to leave employment or voluntary activity due to inappropriate behaviour towards a child or vulnerable adult?

Yes No

Full Name (Print): _____

Any name previously known by: _____

Address: _____

Date of Birth: _____ **Place of Birth:** _____

Declaration: I understand that, if it is found that I have withheld information or included any false or misleading information above, I may be removed from my post/assignment whether paid or voluntary, without notice. I understand that the information will be kept securely by the works/project. I understand that if an allegation is made against me, I must inform my manager immediately.

I hereby declare the information I have provided is accurate.

Country Location: _____ **City:** _____

Signed: _____ **Date:** _____

Jesuit Worldwide Learning
Safeguarding Policy for the Protection of Children and Vulnerable Adults at Risk
Appendix 2 – Policy Code of Conduct & Acceptance Form

I, _____ (staff name as defined in 2.1) working/volunteering with or visiting _____ (Location) confirm that I have taken the time to read and understand JWL's **Safeguarding policy for the protection of children and vulnerable adults at risk** and will abide by the policy and statements stipulated below. I have also taken the online training courses, **Safeguarding Essentials** and the **Introduction to Child Protection**. I have had the opportunity to ask questions and seek clarification on any points that were not clear to me.

I will:

- Treat ALL, including children, with respect, recognising their rights and observing their personal dignity regardless of their age, gender, language, tribe, religion, disability, opinion or other status.
- Be aware of situations which may present risks and manage these.
- Plan and organise any events involving children so that risks are minimised.
- Recognise that caution is required in all one-to-one situations.
- Provide access for children to talk to others about any concerns they have.
- Encourage children and adults to feel comfortable to point out attitudes and behaviour they do not like.
- Avoid inappropriate physical or verbal contact with others.
- Avoid showing favouritism to any individual.
- Never make suggestive remarks or gestures, even in fun.
- Never trivialize or exaggerate child abuse or other forms of abuse issues.
- Immediately report concerns or allegations of child abuse in accordance with JWL's child safeguarding procedure described in the policy.
- Apply the following self-assessment questions regarding my professional boundaries:
 - Am I dealing in a different way with a particular child than with others under the same circumstances?
 - Is my address/availability/language different from normal with a particular child?
 - Would I do or say this to a child if a colleague were present?
 - Would I condone my conduct if I observed it in another adult?

I will never:

- Put a child or adult at risk of harm through inaction (including failure to report a concern).
- Condone or participate in any child related activity which is illegal, exploitative, unsafe or abusive; this includes behaviour by other children.
- Use computers, mobile phones, video and digital images to exploit or harass children and adults or to access child pornography through any medium.
- Use language or behaviour towards children or adults that is harassing, abusive, sexually provocative or that is intended to shame, humiliate or emotionally abuse or place a child or adult at risk of abuse.
- Hit or otherwise physically assault a child or adult irrespective of cultural norms, including as discipline.
- Abuse my position to withhold professional assistance or give preferential treatment, gifts or payment of any kind to a child or adult, or another person in relation to a child or adult, in order to solicit any form of advantage or sexual favour from a child or adult.
- Seek to make contact or spend time with any child or adult with whom I come into contact as part of my work or assignment except as part of the designated activities set out in my role.
- Do things of a personal nature for a child or adult with whom I come into contact as part of my work that the child or adult can do for themselves (e.g. toileting, bathing, dressing).
- Visit a child's home alone during a field visit; invite unaccompanied children into my accommodation when on a field visit; spend excessive time alone with children away from others during a field visit; share a bedroom with or sleep close to an unsupervised child/children during a field visit.
- Have sexual intercourse or participate in any form of sexual activity, including paying for sex, with any person under 18 years old or under the local age of sexual consent (where higher). This applies to all Staff regardless of the age of consent under European Union Law or the age of consent in the country being located or for any social, cultural or religious reasons.

- Seduce nor be seduced into any form/act of sexual activity with children. **I understand and will abide by the following:**
- The safety and welfare of children and vulnerable adults is paramount and must be the first consideration in any contact with them.
- Respect the rights, dignity and worth of every child and vulnerable adult, and treat each one equally regardless of age, gender, ability, ethnic origin, cultural background or religion.
- Physical or verbal interactions with children or vulnerable adults should never be punitive, aggressive, embarrassing or humiliating.
- Be aware of and sensitive to cultural difference and engage with children or vulnerable adults in a culturally sensitive way.
- Do not spend time alone with a child in one-to-one situations.
- Do not spend time or meet with children or vulnerable adults outside of service.
- There should be no unnecessary physical contact between an adult and a child. Physical contact should only be in response to the needs or initiative of the child and should be appropriate to their age and the level of development.
- If you think you may have caused offence, however unintentionally, acknowledge and offer an apology or explanation as soon as possible.
- Any observations or witnesses to any action, behaviour or symptoms that indicate a concern in relation to a child's or adult's safety or welfare, must be reported immediately.

Signature: _____ **title:** _____

Country: _____ **City:** _____

Date: _____