



## Child & Vulnerable Adult Safeguarding Policy

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Note: This policy will be reviewed whenever there is a significant change within Overture International or the governing regulations in the US or Haiti and at least once every two years.

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## INTRODUCTION

Overture Outreach International (Overture International) and its partners have a shared belief that we have a special responsibility for the safety and well-being of our beneficiaries, volunteers, partners and staff, to protect them from any behavior that violates their rights. As such, we are committed to being advocates for the most vulnerable in our communities.

This policy is grounded in **five basic guiding principles** of safeguarding and describes the steps that will be taken to ensure that children and vulnerable adults are protected from all types of abuse in the delivery of programs funded by Overture International.

1. We have **zero tolerance** for any form of abuse, neglect and/or mistreatment.
2. All children and vulnerable adults have **equal rights to protection** from abuse and exploitation.
3. **Children and vulnerable adults are empowered and educated about their rights**, personal safety, and steps they can take if there is a problem.
4. **The protection of children and vulnerable adults is integrated into all aspects** of our programs, strategies, and work practices.
5. All suspicions and accusations of abuse **are taken seriously**.

## OUR COMMITMENT

Overture International is committed to the fight for the respect of children and vulnerable adults' rights. Thus, the safeguarding of children and vulnerable adults is our priority in the execution of our mission. Therefore, our goals for this policy are to:

**Raise awareness:** We seek to ensure that all Overture International's staff and partners as well as stakeholders and beneficiaries are aware of the problem of child/vulnerable adults abuse and the risk to children/vulnerable adults. Overture promotes the well-being of children/vulnerable adults, encourages family communication and mediation, and the strengthening of family ties.

**Prevent abuse:** We seek to ensure, through awareness and good practice, that our staff and partners work to prevent cases of abuse and violence involving children/vulnerable adults and seek advocacy with competent authorities for support and respect of children/vulnerable adults' rights, especially in serving those in difficult circumstances who are separated from their families and/or who may be victims of abuse and violence.

**Report abuse:** Overture is committed to protecting children/vulnerable adults whom we and our partners serve and to taking the necessary steps to identify those who pose a risk to children. We seek to ensure that Overture International's staff and partners are clear on what steps to take where concerns arise regarding the safety of children/vulnerable adults.

**Respond:** We seek to ensure that action is taken to support and protect children/vulnerable adults where concerns of abuse arise.

**Communication:** We seek to ensure that beneficiaries, staff and stakeholders are informed about this safeguarding policy. The information is accessible in the local language and for literate and low-literate people. Overture requires all staff and volunteers to attend annual training on our child/vulnerable adult safeguarding policy and partner-specific safeguarding protocols.

## SAFEGUARDING GOALS

- Implement the safeguarding policy and see to it that the staff complies with it.
- To not permit a person to work with children/vulnerable adults if it has been identified that they pose an unacceptable risk to children's/vulnerable adults' safety or well-being.
- Take seriously all child/vulnerable adult abuse concerns raised.
- Take positive steps to ensure the protection of children/vulnerable adults who are the subject of any concerns.
- Support children/vulnerable adults, Overture Outreach International staff, or other individuals who raise concerns or who are the subject of concerns.

- Act appropriately and effectively in instigating or cooperating with any subsequent process of investigation.
- Guide through the child/vulnerable adult protection process by the principle of the best interests of the child/vulnerable adult.
- Listen to and take seriously the views and wishes of children/vulnerable adults.
- Work in partnership with parents/guardians and/or other professionals to seek to ensure the protection of children/vulnerable adults.
- Have a victim-centered approach and maintain confidentiality of victims, reporters, and people accused as appropriate under the circumstances of each case.

## SCOPE

This policy applies to all Overture International leaders, staff, employees, volunteers, and religious institute members at all times, whether engage in Overture International’s activities or not. This policy also applies to Overture International’s consultants, vendors, and visitors when participating in Overture International activities, on Overture International property, or using Overture International facilities. Collectively, the individuals covered by this policy are referred to as “Overture International staff.”

## NON-DISCRIMINATION STATEMENT

Overture International and its partners strive to demonstrate Christian love and promote respect, well-being, and dignity for all children/vulnerable adults. It is our goal to protect all children/vulnerable adults regardless of age, disability, gender, race, religion, social background, and culture.

Overture International explicitly recognizes the additional needs of children/vulnerable adults living in poverty, those from minority ethnic groups, and children with disabilities who face traditional barriers, specifically discrimination and communication. The Child and Vulnerable Adults Safeguarding Policy of Overture International **applies equally to all children/vulnerable adults without discrimination.**

## REQUIREMENT OF SPONSORED PARTNERS

All partners sponsored by Overture International are required to have their own child/vulnerable adults safeguarding policy that is aligned with Overture International's **five guiding principles** (*refer to Introduction*). These policies must include local laws on child/vulnerable adult abuse, procedures that are required by the local law, a list of local authorities to whom child/vulnerable adult abuse cases are reported, as well as a list of partner organizations that can provide the appropriate support services for victims.

## WHAT IS ABUSE?

Abuse or maltreatment can take many forms. The World Health Organization (WHO) defines **child abuse or maltreatment** as: “all forms of physical and/or emotional ill-treatment, sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the child’s health, survival, development or dignity in the context of a relationship of responsibility, trust or power (WHO, June 8, 2020).” **Overture International has adopted this as our definition of abuse for children and vulnerable adults.**

## DEFINITIONS

**Safeguarding:** The responsibility that organizations have to make sure their staff, operations, activities, and programs do no harm to children and the vulnerable, that is they do not expose children or vulnerable adults to harm and abuse, and that any concerns the organization has about the safety of children and vulnerable adults within the communities in which they work are reported to the appropriate authorities.

**Child:** For the purposes of this policy, a *child* is defined as anyone under 18 years old, in line with the UN Conventions on the Rights of the Child and the Government of Haiti.

**Vulnerable Adult:** A person 18 years of age or older whose ability to perform the normal activities of daily living or to provide for his or her own care or safeguarding is impaired due to life circumstances (e.g., poverty, education, institutionalization, etc.); a mental, emotional, sensory, long-term physical, or developmental disability or dysfunction; brain damage; or the infirmities of aging.

**Abuse:** *"Any form of physical and/or emotional abuse, sexual abuse, neglect or improper treatment, or commercial exploitation or any other form of exploitation, compromising the health, survival, development or dignity of the child in a context of responsibility, trust or power ».* (Definition of WHO, 1999).

**Neglect:** The persistent failure to meet a child's/vulnerable adult's basic physical and/or psychological needs, likely to result in the serious impairment of the child's/vulnerable adult's health or development. Negligence may imply that a parent or person in charge of the child/vulnerable adult neglects to:

1. Provide adequate food, clothing, or shelter, including exclusion from home and abandonment,
2. Protect the child/vulnerable adult from suffering or from physical and emotional danger,
3. Ensure adequate supervision, including the use of inadequately responsible persons,
4. Ensure access to appropriate medical care or treatment, and
5. Meet, or lack of response to, the child/vulnerable adult's basic emotional needs.

**Physical Abuse:** Abuse that involves striking, shaking, violently pushing, poisoning, burning or scalding, drowning, choking, or any other form of physical nuisance to the child/vulnerable adult. Physical abuse can be caused by a parent or someone in charge of the child/vulnerable adult who is at the source or causes the symptoms of illness in the child/vulnerable adult.

**Sexual Abuse:** Forcing or enticing a child or vulnerable adult to take part in sexual activities, whether or not the child/vulnerable adult is aware of what is



happening. These activities may involve physical contact, including penetration (e.g. rape or oral sex) or non-penetrating acts such as masturbation, kissing the child/vulnerable adult, or rubbing/touching clothing. This may also include non-contact activities, such as when children/vulnerable adults must observe or are part of the production of sexual images, or when children/vulnerable adults are encouraged to behave sexually inappropriately or are flattered in preparation for acts of abuse (including via the Internet). Sexual abuse is not only perpetrated by adult males. Women can also commit sexual abuse as well as other children/vulnerable adults.

**Emotional Abuse:** The emotional ill-treatment of a child/vulnerable adult such as causing severe and adverse effects on the child's/vulnerable adult's emotional and psychological wellbeing. It is important to note that a certain level of emotional abuse is present in all types of child abuse, but it can exist alone.

Examples of emotional abuse:

1. Consistent use of words or behaviors that show a child/vulnerable adult that they are useless or unloved, inadequate, or that they have value only if it satisfies the needs of another person,
2. Consist actions of not giving the child/vulnerable adult the opportunity to express his or her point of view, silencing them, or making fun of what they say, or how they communicate. This may be due to inappropriate expectations for the child/vulnerable adult's age or development.
3. Include interactions that are beyond the child/vulnerable adult's developmental capacity, as well as over-protection and limitations in learning opportunities, or the prohibition of participation in normal social interaction.
4. Including the child/vulnerable adult as a witness or listening about other abuse.
5. Involving the child/vulnerable adult in harassment (or cyber harassment) where the child/vulnerable adult often feels exposed to danger, exploitation or corruption of children/vulnerable adults.

**Exploitation:** Using a child/vulnerable adult for economic purposes or performing work that may be hazardous or that interferes with the child's/vulnerable adult's

development. This includes educational programs that are focused on production rather than the acquisition of skills, asking children under the minimum labor age to perform paid labor, and keeping a child out of an educational facility to perform other tasks.

**Sexual exploitation:** This happens when an individual or group takes advantage of a power imbalance to coerce, manipulate, or deceive a child or vulnerable adult in sexual activity in exchange for something the victim wants or needs, or for an advantage over the victim. The victim can be exploited even if the sexual activity seems consensual. The sexual exploitation of the child does not always involve physical contact; this can happen through the use of technology.

**Historical Abuse:** It is not unusual for people to talk about experiences of physical, sexual and/or emotional abuse, and/or neglect, only when they reach adulthood or when they feel safe. Historical abuse is defined as a situation where the child/vulnerable adult as a person, suffered a certain degree of physical, sexual, and/or emotional suffering (through abuse or neglect), which was so intense that there should have been the intervention of protective agencies in the life of the child/vulnerable adult and their family.

**Online Abuse:** Any form of abuse occurring online – including through internet browsing, social media, online games, mobile phones, and applications. Children/vulnerable adults may be at risk of foreigners, or people they know. Children/vulnerable adults may experience sexual abuse, be coaxed, sexually exploited, harassed online, or emotionally abused. Abuse can be only online or may occur partly in the real world.

**Institutional Abuse:** Abuse due to the conditions of the institution or by individuals within the institution. Neglect and lack of ethics in professional practice must be considered. This can take the form of isolated incidents or can turn into systematic and visible abuse. Abusive actions include non-standardization of care; neglect to meet urgent needs, rigid routines, and inadequate staff such as incompetence or lacking experience.

**Discriminatory Abuse:** Inappropriate behavior based on the social identity of the person and affecting the dignity of the victim. This can be persistent behavior or an isolated incident. The main problem is that actions or comments are perceived as diminishing or unacceptable by the person when motivated by discriminatory attitudes, feelings, or comments. Abusive actions include racism, sexism, and harassment based on disability or sexual preference.

**Child/Vulnerable Adult Trafficking:** According to International Law, "the recruitment, transport, transfer, maintenance, or reception of a child (*or vulnerable adult*) for the sole purpose of exploitation". A child/vulnerable adult is tampered with when he or she has been moved in or out of the country, by force or not, in order to exploit the child/vulnerable adult.

**Child/Vulnerable Adult Labor:** Defined as the work that removes children/vulnerable adults from their age or mental-related activities, their potential, their dignity, and which violates their physical and mental development. This refers to work that: is mentally, physically, socially or morally dangerous and harmful for children/vulnerable adults; and interferes with their education by taking away the opportunity to go to school or forcing them to leave school prematurely or asking them to combine their presence at school with long days of hard work. In these most extreme forms, child/vulnerable adult labor involves slavery, separation from their families, exposure to diseases and dangers and/or having to fend for themselves on the streets.

**Duty of Care:** The term 'duty of care' identifies the moral and legal responsibility of all organizations working with children/vulnerable adults, either directly or indirectly, to protect children/vulnerable adults within their care from both intentional and unintentional harm. This responsibility includes taking steps to prevent abuse from happening by creating child/vulnerable adult-safe environments, which minimize the risk of abuse, and responding appropriately, where abuse does happen.

**Child/Vulnerable Adult Protection:** Child/vulnerable adult protection is a broad term to describe philosophies, policies, standards, guidelines, and procedures to protect

children/vulnerable adults from both intentional and unintentional harm. In this document, it applies particularly to the duty of Overture International and its partner organizations (and individuals associated with these organizations) towards children/vulnerable adults in their care.

**Child/Vulnerable Adult Protection Policy:** A child/vulnerable adult protection policy is a statement of intent that demonstrates a commitment to protecting children/vulnerable adults from harm and makes clear to all what is expected in relation to the protection of children/vulnerable adults. It helps to create a safe and positive environment for children/vulnerable adults and to show that the organization is taking its duty and responsibility of care seriously.

**Partner Organizations/Implementing Agencies:** Overture International works through NGOs, donors, and government stakeholders. These organizations are referred to as Overture International's partner organizations.

**Staff, Volunteers, Religious Institute Members, Consultants, and Vendors:**

1. *Staff:* An employee of the organization.
2. *Volunteer:* A person who works for and supports the organization without compensation.
3. *Religious institute member:* A member of a religious institute or congregation who works within Overture International.
4. *Consultant:* An expert who offers their skills and experience to the organization for a specific amount of time.
5. *Vendors:* Businesses contacted to work for Overture International, for example, a construction company.

**Content:** Any captured information, written, audio or visuals, of program clients. This term is inclusive of images, video, audio, stories, etc.

**Other vulnerabilities:** There are some factors that can put children/vulnerable adults at greater risk of being abused. The presence of one or more of these factors does not necessarily imply that abuse will occur but rather increases the chances:

1. When there is an imbalance of power and control.
2. When there is a dependency on other people.
3. When there is a need for intimate care.
4. When the burden of caring for a child/vulnerable adult becomes too heavy.
5. Living in the same house as a known abuser.
6. When there is a history of abuse in the family.
7. When there are people with a history of abuse of alcohol, drugs, or other substances, or mental health problems.
8. When there is a lack of knowledge of the rights of the child/vulnerable adult or what constitutes abuse.
9. In institutions that lack staff or training for staff, and/or supervision is inadequate,
10. When there are financial problems.
11. When there is a deterioration in the quality of life of adults in the home, for example, through the loss of a job, or through disease.
12. When there are cultural differences and language barriers.
13. When the behavior of a child/vulnerable adult or someone taking care of the child/vulnerable adult, is difficult or unpredictable.

## SAFEGUARDING GUIDELINES FOR PREVENTION

### AWARENESS & TRAINING

This section sets out the efforts that Overture International intends to undertake to support the implementation of the Safeguarding Policy.

- Overture International will appoint a **Safeguarding Focal Person**. The Safeguarding Focal Person is the primary source of advice and support in relation to safeguarding concerns and the implementation of the Safeguarding Policy. The Safeguarding Focal Person is in turn supported by the Overture International Board of Directors.
- Overture International ensures that within their probationary period, if applicable, and no longer than three (3) months after appointment, **all staff must be given**

**training** as to the Safeguarding Policy, and their responsibilities towards safeguarding. Following hire, all workers will be required to sign a document affirming that they have read, understand, and agree with this policy and the code of conduct (Appendix A) - as it may be amended from time to time.

- Overture International ensures that staff must be **provided with regular updates on safeguarding** – either formally, such as through training or supervision, or more informally, for example through discussion at team meetings.
- Overture International ensures that depending upon the nature of the work being undertaken, the role of the staff, and their background and experience, **additional specialist training regarding child/vulnerable adult wellbeing, protection, and safety should be provided.**
- Overture International ensures that **records must be kept in Human Resource Personnel files** of all training/guidance meetings conducted – with the date and list of attendees.
- While all adults have a responsibility for safeguarding, no one should have to do this alone and unsupported. Overture International managers and directors are responsible for **ensuring that staff are supported in their roles in safeguarding**, with the Safeguarding Focal Person being ultimately responsible for the implementation of the Safeguarding Policy.
- Where support or advice is sought regarding safeguarding this must be taken seriously by the Safeguarding Focal Person, managers, and directors. **At no time must seeking advice or support be considered indicative of someone lacking capacity or knowledge.**
- Where those working with/for Overture International are involved in safeguarding incidents – either as the subject of an investigation or as a witness – **appropriate support must be provided by Overture International management.** This may include additional supervision or counseling. (Further guidance on reporting and managing cases of concern and child/vulnerable adult protection incidents is included later in this policy and procedures).
- A copy of the Overture International Safeguarding Policy should be posted within the Overture International office and made easily accessible via network

drives and printed copies for Overture International staff. **The policy should also be made publicly available on the Overture International website.**

## CODE OF CONDUCT

All Overture International staff, volunteers, contractors, and its partner organizations are expected to comply with and sign the Safeguarding Code of Conduct (**Appendix A**).

The staff and volunteers of Overture International acknowledge that our personal and professional conduct is a representation of the organization, and we are committed to holding one another accountable for honesty, respect, and integrity.

Specifically, when we are in contact with children/vulnerable adults, **we will NOT:**

- Use physical punishment or discipline of children/vulnerable adults.
- Engage children/vulnerable adults in any form of sexual activity or acts, including paying for sexual services or acts.
- Use language or behavior towards children/vulnerable adults that are harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
- Behave in a manner that is inappropriate or sexually provocative.
- Invite unaccompanied children/vulnerable adults to home or into personal vehicles.
- Sleep in the same bed as a child/vulnerable adult for whom they are caring for and who is not a member of their immediate family.
- Condone, or participate in the behavior of a child/vulnerable adult which is illegal, unsafe, or abusive.
- Hire a child for domestic or other labor that is inappropriate given their age or developmental stage, especially when it interferes with their time available for education and recreational activities.
- Exploit or harass children/vulnerable adults or access child pornography through the use of computers, mobile phones, video, digital cameras, or any other electronic mediums.

Additionally, all staff and others in contact with children/vulnerable adults **will**:

- Treat children/vulnerable adults with respect regardless of race, sex, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status.
- Be aware of and manage situations that may present risks.
- Ensure that a culture of transparency exists in the workplace so that poor practice or abusive behavior does not go unchallenged.
- Teach children/vulnerable adults about their rights, what is acceptable and unacceptable, and what recourse they have if a problem arises.
- Talk to children about their contact with staff or others and encourage them to raise their concerns with the appropriate adult authorities.
- Ensure that another unrelated adult is present when working in proximity of children/vulnerable adults; if this is not possible the staff will inform the supervisor beforehand.
- Immediately report concerns or allegations of child/vulnerable adult abuse in accordance with the procedures outlined in this policy.

## SAFEGUARDING FOCAL PERSON

Overture International will assign a Safeguarding Focal Person. The Safeguarding Focal Person will be the Overture International Board of Directors as well as an investigation committee (described as “Addressing the Report” below). They do have primary responsibility for Safeguarding within Overture International. They are the main contact to easily make a report and to ensure confidentiality.

Role of the Safeguarding Focal Person (SFP):

The SFP **will**:

- Respond to all concerns of child/vulnerable adult abuse and report immediately to the management.
- Monitor all reports of child/vulnerable adult abuse and subsequent child/vulnerable adult protection cases that occur within Overture International.



Compile and provide a semi-annual Safeguarding Report (**Appendix E**) for internal use. If the organization is publishing an overall annual report, the Safeguarding Report analysis can be included.

- Recognize and acknowledge any problems relating to the effective protection of children/vulnerable adults within Overture International.
- Is responsible for the awareness creation of the staff and clients on the safeguarding policy of Overture International.
- Submit up-to-date and accurate information relating to child/vulnerable adult abuse to Overture International management.
- Overture International monitoring of child/vulnerable adult abuse will be ongoing and will include recording the scale of the problem, recognizing patterns and trends, identifying particular risks to children/vulnerable adults, and most importantly, evaluating the effectiveness of its policy on child/vulnerable adult protection.

The role of the Management of Overture International in child/vulnerable adult protection:

- Investigate the case further, take action to ensure the immediate safety and well-being of the child/vulnerable adult, and decide on an appropriate course of action that works towards the long-term rehabilitation of the child/vulnerable adult.
- Involve other organizations (police support, legal aid, shelter, counseling, etc.) as appropriate in the child's/vulnerable adult's rehabilitation process.
- Ensure that monitoring is ongoing and includes recording the scale of the problem, recognizing patterns and trends, identifying particular risks to children/vulnerable adults, and most importantly, evaluating the effectiveness of Overture International's policy on child/vulnerable adult protection.

## CONTENT AND CONSENT

The gathering of **Content** can cause harm if it is not carried out to a high ethical standard and can cause offense if it is gathered in an intrusive or inappropriate manner. Overture International is sensitive to local traditions or restrictions while

gathering Content and Overture International ensures that Content is an honest representation of the context and the facts. In all forms of communication, people are treated and portrayed with dignity and not as helpless people, victims of poverty, or in sexually suggestive poses.

All beneficiaries and Overture International staff, who are primary subjects of Content by Overture International must provide informed consent. **“Informed consent”** means the subject has an understanding of the purpose of the Content collection and gives written permission thereof. Consent forms are collected for all Content gathering. The standard consent form is included in **Appendix C** below. Consent should be obtained through communication in the local language to ensure understanding.

Overture International is committed to ethical storytelling and takes the following steps to prevent harm through any marketing or communications, (including photographs/videos/audio clips, stories, articles, reports, or any other communication materials):

- a) Ensuring that personal beneficiary information that is captured, stored, or transmitted through electronic, online, or mobile devices is sent via secure means and is password protected.
- b) Taking into consideration the protection of people, material posted in any marketing or communications does not contain personal location/address.
- c) Developing a thorough review process of Content to be published to ensure that Content is not causing harm. Special care for context, change in the situation in the country, and following a standard of not using Content after five years will help to prevent harm.

Overture International is committed to being respectful and protective of our beneficiaries by following these guidelines:

- We respect the dignity and rights of every child/vulnerable adult in every circumstance.
- When reporting on a child/vulnerable adult, special attention is taken to ensure that each of their rights to privacy and confidentiality is respected. For this reason, we do not disclose a child's last name, personal address, or other information that could be used to locate a child.
- Stories or images are not published which might put a child, family, or community at risk even when identities are changed, obscured, or omitted.
- Stories are not staged. For example, we do not ask children to tell a story or take action that is not part of their own life or history.
- Permission is obtained from the child and his or her guardian for all interviews, videotaping, and, when possible, documentary photographs. When possible and appropriate, permission is obtained in writing.
- Images are not taken or used of children who are inappropriately clothed.
- Health information is not published without the family or individual's written consent.

Use of Overture International materials: All Overture International and its partner's materials are protected by copyrights, including text, photographs, other images and videotapes. Permission to reproduce any Overture International material must be requested from the originating Overture International office and will only be granted on condition that these guidelines are adhered to.

## SAFE RECRUITMENT AND HUMAN RESOURCES

### Orientation:

This section sets out the specific obligations and responsibilities of all Overture International staff.

- By agreeing to work with/for Overture International, it is implied that the terms and conditions of the Safeguarding Policy have been accepted as a condition of involvement.

- All Overture International staff (including volunteers/mission/vision trip participants) are required to sign and abide by the Code of Conduct (**Appendix A**) as a condition of their involvement with Overture International. This sets out specific expectations of acceptable and unacceptable behavior.
- While orientation on the policy together with any necessary additional training regarding responsibilities and duty of care (particular to specific roles) is provided, all adults have a personal responsibility to seek further clarification and advice where they are not clear about what is expected of them.
- Breaching the Code of Conduct or contravening the Safeguarding Policy may lead to suspension and termination of any type of engagement. This will be determined on a case-by-case basis, ensuring that applicable employment conditions and legislation are observed and with regard to the privacy and confidentiality of those concerned while any internal investigation is carried out. In addition, after thorough consideration of the facts, it will be decided whether the case needs to be reported to law enforcement authorities in full conformity with the law.
- The Safeguarding Policy focuses on contact with children/vulnerable adults taking place during work under the responsibility of the organization. Nevertheless, conduct outside the work environment of those associated with Overture International may also contravene the principles and values of the Safeguarding Policy. If such issues arise, these will be carefully considered, and any decisions made will place the utmost importance on the child's/vulnerable adults' best interests.

### Screening and Selection:

- Individuals who are intent on abusing children/vulnerable adults often target organizations where they can gain access to children/vulnerable adults. While no recruitment processes can ever be 100% safe, by having stringent recruitment processes in place, the likelihood of engaging someone who is not suitable to work with children/vulnerable adults can be dramatically reduced. See **Appendix D** for the detailed process. The process for safer recruitment should be followed for all Overture International staff.

- For all staff hired, engaged or employed by Overture International, Overture International conducts criminal history background screens for successful candidates. The results of the background screen may disqualify a person from working for or with Overture International or participating in the activities of Overture International.
- Overture International may conduct background screens for current Overture International staff (Overture International staff are informed prior to a background check being conducted), as well as additional follow-up and special background screens, at any time, at the discretion of Overture International.
- If Overture International learns, either through a background screen or through other sources, that an Overture International staff member has engaged in conduct violating this policy at any time, past or present, including prior to joining or working with Overture International, Overture International may terminate that person's relationship with Overture International or take other action in its discretion.

### Violation of Safeguarding Policy:

Overture International staff members who engage in prohibited conduct, breach the Code of Conduct, or other violations of this policy may be subject to disciplinary action, at the discretion of Overture International. Such action may include but is not limited to, any of the following:

- a warning or reprimand;
- corrective action and/or suspension of the employment, volunteer work, affiliation, or activity with Overture International;
- termination of the employment, volunteer work, affiliation, or activity with Overture International;
- a ban on the perpetrator's presence on Overture International property or at Overture International events or project sites.
- Violators may also be subject to criminal or civil penalties under national or local law.

## RESPONSIVE ACTION

### REPORTING AN INCIDENT

An Overture International staff member shall immediately make a report to the Overture International Safeguarding Focal Person according to this policy if he or she observes or has reason to believe that an Overture International staff member (i) has engaged, or is engaging, in prohibited conduct (as defined in this policy); or (ii) has failed to make an internal report under this policy when required. Overture International staff are expected to self-report their own prohibited conduct and failure to report under this policy.

Reporting of abuse or other prohibited conduct must be accomplished immediately and without delay. To make a report under this policy, the Overture International staff member or anyone who would like to file a report shall notify Overture International's Safeguarding Focal Person. The Safeguarding Focal Person can be contacted via email, phone, mail, or in person (see contact details below). The report can be made orally or in writing and, where possible, should follow the Incident Report Form provided in **Appendix B**. The report should be as detailed as possible in the circumstances. The report can be made anonymously by calling the phone number or submitting an incident via mail.

Any Overture International staff member who becomes aware of prohibited conduct or failure to report by another **should not attempt to investigate or verify the alleged violation before making a report to the Safeguarding Focal Person.**

- Overture International Safeguarding Focal Person: Executive Director
- Phone: +1-336-870-5723 or 509 4466 7247
- Email: info@ooihaiti.com
- Mail:
  - Confidential – Safeguarding Focal Person
  - Overture International
  - PO Box 16045, High Point, NC 27261

Reporting an incident should be made accessible for all. The reporting process should be made readily available and in the local language(s) or communicated in

pictographs or orally so that low-literate people will have access to reporting as well. The phone number to call should be posted on event banners, in public spaces utilized by the organization. The Safeguarding Focal Person should assist any reporter in making a report.

## ADDRESSING THE REPORT

Upon receiving an incident report, the Safeguarding Focal Person, in consultation and/or conjunction with the Social and Community Director (or, if the report implicates the Social and Community Director, the Program Manager), should do the following, as they determine relevant to the circumstances:

- 1) The Safeguarding Focal Person receives all complaints and ensures that the Incident Report Form is completely filled out (see form in Appendix B). If the complaint is received by email or mail, the Safeguarding Focal Person will give an automated reply to the complainant within 48 hours. Any report received in person or by phone should be accepted and documented at that point in time.
- 2) The Safeguarding Focal Person will **immediately determine whether the matter should be reported to the authorities under an applicable national and local Haitian or US law**, and, if so, coordinate the report and/or assist the relevant Staff Member to make a report (if not already done); and inform the Social and Community Director.
  - a) **Within the United States and Haiti**, child/vulnerable abuse concerns are reported to your local or state law enforcement agency.
  - b) The two **Child Protection Agencies in Haiti** are the Institute of Social Well-being and Research (IBESR) and the Brigade for the Protection of Minors (BPM).
    - i) **IBESR** is the government of Haiti office responsible for children's welfare and well-being. The main office is in Port-au-Prince, however, there is an office in each of the Regional Departments of Haiti. For more information, call: +509 3170-3799; +509 3170-3795; +509 3170-3816 (Port-au-Prince) of +509 3170 3835 (Les Cayes – Sud Department).

- ii) **BPM** is the Haitian government authority responsible for the protection of children. BPM is located in each of the Regional Departments of Haiti and can be reached through local law enforcement. For more information, call +509 3721-5079 (Port-au-Prince) or +509 3710-3076 (Les Cayes)
  - iii) In the case of **alleged abuse by members of any religious denomination or entity**, the first report should be made to local and state law enforcement. Reports should then be made to the appropriate religious authority or community.
- 3) If there is no legal duty to report the matter to the authorities, the Safeguarding Focal Person in conjunction with the Social and Community Director will consider, within 48 hours of the incident report being submitted, whether the matter should nonetheless be reported to the authorities (e.g., where a criminal violation appears to have occurred, or it is determined that a report should be made in the best interests of the child or vulnerable person for moral reasons);
  - 4) The Social and Community Director should establish an investigation committee. The investigation committee should consist of a minimum of three people but no more than five. The Social and Community Director or Program Manager (if needed) will not be part of the investigation committee. The first meeting should take place within 4 days of the incident report being submitted to the Social and Community Director. The scope of the investigation should be defined together with the Social and Community Director, focusing on what is relevant for the incident only.
  - 5) The Social and Community Director will inform the accused staff member that an incident report has been filed against them and then will decide/inform what measures should be taken during the investigation (such as placement on administrative leave, removal from the field, and/or instructions to cease contact with the victim and the victim's family, Overture International personnel and/or constituents).
  - 6) The Safeguarding Focal Person will coordinate communications with the incident reporter, victim and victim's family, as appropriate, with focus on safeguarding, confidentiality, care/counseling, and support. As needed, the focal person may also arrange for appropriate resources (counseling etc.) for the parties involved.



- 7) The investigation committee should have the following approach:
  - a) Be neutral without any affiliation with the parties involved.
  - b) The Safeguarding Focal Person should not be a member but can be the secretary.
  - c) The parties involved in the investigation should be able to speak in their own language. This may require an interpreter.
  - d) The investigation committee should use a “victim-centered” approach to ensure confidentiality for both the victim and the accuser.
  - e) The investigation committee should take reasonable steps to protect the confidentiality and safety of any witnesses/informants of the investigation.
  - f) The investigation committee will keep the Social and Community Director informed of their progress if needed.
  - g) The investigation committee will provide an investigation report to the Social and Community Director within two to four weeks (depending on the scope of the investigation) of the incident report being submitted to the Social and Community Director.
- 8) Based on the report of the investigation committee, the Social and Community Director decides on the actions to be taken with the parties involved within a reasonable amount of time from receiving the report.
- 9) Communication with the parties involved (incident reporter, victim and perpetrator) after a decision is made will be conducted by the Safeguarding Focal Person and/or the Social and Community Director. All parties should be informed of the outcome. The level of sharing should be determined based on the specifics of the case. They should be informed as soon as a decision is made.
- 10) The outcome will be recorded and provided in the internal Annual Safeguarding Report (Appendix E). No identifying information will be included in that report. Depending on the severity of the incident, important relevant stakeholders may be informed when the case is closed or at an appropriate time during the investigation.
- 11) Confidentiality is essential and should be maintained throughout the whole process.



## APPENDIX A: SAFEGUARDING CODE OF CONDUCT

This Code of Conduct must be signed by all staff and volunteers BEFORE commencing duties. Overture International considers all forms of abuse towards children and vulnerable adults to be unacceptable and recognizes that it has a duty to safeguard children/vulnerable adults – that is to keep them safe, promote their wellbeing and protect them from abuse and harm. Neglect, physical, psychological/emotional and sexual violence are the main forms of abuse.

Our Safeguarding Policy and Procedures set out the measures we will take to safeguard children/vulnerable adults. This includes proactive actions to prevent situations of abuse and harm occurring and reactive actions to respond to situations where a child/vulnerable adult is, or maybe, suffering abuse.

A child is any human under the age of 18 as stipulated by the UN Convention on the Rights of the Child, 1989.

A vulnerable adult A person 18 years of age or older whose ability to perform the normal activities of daily living or to provide for his or her own care or safeguarding is impaired due to life circumstances (e.g., poverty, education); a mental, emotional, sensory, long-term physical, or developmental disability or dysfunction; brain damage; or the infirmities of aging.

As part of our Safeguarding Policy, it is a requirement that all staff (including paid employees, consultants and interns as well as mission/vision trip volunteers), whether full or part time, agree to abide by the Safeguarding Policy and specifically to agree to work in accordance with this Code of Conduct which sets out responsibilities for safeguarding and expected behavior of staff. THIS IS A MANDATORY REQUIREMENT.

Any form of unacceptable behavior which breaches this Code of Conduct must be reported. In the case of situations which are not covered by the Code of Conduct,

Overture International expects its representatives to apply common sense whilst focusing on the “child/vulnerable adult’s best interests”.

Overture International respects the Convention on the Rights of the Child and the following **five principles**:

- 1) **Children/vulnerable adult’s rights**: all Overture International staff must respect and promote children’s /vulnerable adult’s rights. Above all, they must protect the right of each child/vulnerable adult to live in safety, without risk of abuse or exploitation and must act, at all times, in the child’s/vulnerable adult best interests.
- 2) **Zero tolerance**: Overture International will not tolerate any form of abuse and will take all necessary measures to implement the Safeguarding Policy.
- 3) **Risk management**: Overture International ensures that risks are identified and minimized from the planning stage through to the implementation stage of activities.
- 4) **Everyone’s responsibility**: the successful implementation of the Safeguarding Policy is based on the individual and shared responsibility of all Overture International representatives including staff.
- 5) **The duty of notification**: any suspected violation or any actual violation of the current Code of Conduct must be reported immediately to the Safeguarding Focal Person. Confidentiality will be maintained throughout the entire procedure.

**BY SIGNING THE SAFEGUARDING CODE OF CONDUCT, I agree that:**

**I will always:**

- Treat children/vulnerable adults with respect regardless of race, sex, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status.
- Ensure that another unrelated adult is present when working in proximity of children/vulnerable adults; if this is not possible the staff will inform the supervisor beforehand.
- Immediately report concerns or allegations of child/vulnerable adult abuse in accordance with the procedures outlined in this policy.

- Maintain a culture of communication and create trust with the children/vulnerable adults and their families, communities, other staff and volunteers and representatives of partner organizations so that concerns may be shared and discussed.
- Use non-violent and positive behavior methods when supervising children/vulnerable adults.
- Encourage children/vulnerable adults and communities to speak openly about their interactions with adults and with each other.
- Inform children/vulnerable adults and communities of their right to report any worrying situations and how they can raise a concern.
- Empower children/vulnerable adults so that they are in a position to better protect themselves.
- Try to preserve the child's/vulnerable adults' autonomy and make sure that I do not do things that a child/vulnerable adult can do for herself/himself.
- Plan activities and organize the workplace in such a way so as to minimize the risk of harm taking into account the age and development of the child/vulnerable adult.
- Ensure that information concerning children/vulnerable adults, families and communities remains confidential.
- Behave in a way that sets a good example (avoid smoking, showing disrespect towards colleagues, etc.).
- Obtain permission from the child/vulnerable adult and their parents before taking a photograph, recording, or using the child's/vulnerable adults' image, what they have said, or their history. This includes explaining to children/vulnerable adults and their parents how the photos or messages will be used. See Overture International Consent form.
- Ensure that the child /vulnerable adult does not pose in a degrading manner or in a way that may be interpreted by others as having sexual connotations.
- Raise any concerns and queries concerning the Safeguarding Policy with my manager/supervisor/trip leader and the Safeguarding Focal Person.

- Immediately report any suspicions or allegations to the Safeguarding Focal Person of behavior which goes against the principles of the Safeguarding Policy and Code of Conduct including any form of child/vulnerable adult abuse – even if the information or allegation is vague.

**I will never:**

- Engage children/vulnerable adults in any form of sexual activity or acts, including paying for sexual services or acts.
- Exchange money, job, goods or services, or humanitarian aid for sexual favors or subject the child/vulnerable adult to any other kind of humiliating, degrading or abusive behavior.
- Touch children/vulnerable adults or use language or make suggestions in an inappropriate manner, to provoke, harass or degrade the child or show disrespect for cultural practices. This includes acting in a manner that is likely to have a negative impact on the child's/vulnerable adults' confidence and feelings of self-worth.
- Not use language or behavior towards children/vulnerable adults that are harassing, abusive, sexually provocative, demeaning, or culturally inappropriate.
- Use physical punishment or discipline of children/vulnerable adults.
- Exploit a child/vulnerable adult for labor (for example through domestic work).
- Discriminate against, treat children/vulnerable adults unequally or unfairly for example by favoritism and excluding others.
- Not invite unaccompanied children/vulnerable adults to home or into personal vehicles, unless absolutely necessary for the safety of the child/vulnerable adult.
- Be under the influence of drugs or alcohol while working with children/vulnerable adults.
- Take photos or videos of beneficiaries for use that is not strictly professional.
- Use any computers, mobile phones or video and digital cameras inappropriately and never exploit or harass children/vulnerable adults or access child pornography through any medium.

- Show the faces of children/vulnerable adults who are exploited sexually, victims of trafficking, abuse, in conflict with the law, linked to armed groups or who can easily be located even if their identity has been modified.
- Take or publish photos of children/vulnerable adults entirely naked or dressed in a manner that is not adapted to the situation in which they are represented.
- Represent children/vulnerable adults as victims of poverty (weak, powerless, unassisted, desperate, etc.).
- Use photos that have not been checked and approved by Overture Outreach International Person/Team or post official pictures or information about children/vulnerable adults on personal websites or social networks (such as Facebook).
- Maintain contact with children via social networks.
- Close my eyes to ignore or fail to report any concern, suspected violation, or violation of the Safeguarding Policy and the Code of Conduct to the Safeguarding Focal Person.

**I understand that, in the event of suspicions or allegations of my violation of the Safeguarding Code of Conduct:**

Overture International will take any action they deem necessary, which may include, but is not limited to:

- Providing assistance for the victim and taking immediate steps to protect and support the child/vulnerable adults.
- Attempting to establish the facts in the most objective manner possible (the presumption of innocence prevails) while protecting the reputation and confidentiality of the people involved.
- Undertaking disciplinary action, which may result in my suspension or termination of the contract.
- Initiating judicial proceedings and/or reporting to the authorities any violation of the Code of Conduct which may breach national legislation.
- Taking appropriate measures in order to ensure that such incidents do not occur again, for example, informing other organizations which may seek to verify my

professional references, about the termination of my contract due to violation of the principles of the protection of children/vulnerable adults (within the legislative framework applicable to the protection of information).

**Acknowledgment of the Code of Conduct**

I, the undersigned, \_\_\_\_\_ declare I have received, read, and understood Overture International's Safeguarding Policy and I commit to know and agree to work in accordance with it.

I understand that any failure to uphold the Code of Conduct may result in the termination of my engagement with Overture International, or further disciplinary or judicial proceedings as mentioned above.

Furthermore, I declare that I have no criminal records regarding an offense towards a child/vulnerable adult (which I have not previously declared) nor do I know of any reason why anyone would deem me unsuitable to work with children/vulnerable adults.

Overture International shall reserve the right to inform other institutions which may apply to obtain my professional references, about the termination of contract for serious violation of the principles of the protection of children/vulnerable adults within the legislative framework applicable to the protection of information.

Date ..... at .....

Signature .....



## APPENDIX B: INCIDENT REPORT FORM

### Form Questions:

Unless you would like to remain anonymous, please provide the following details (the reporter can be anyone including the affected person, a witness, a concerned person, or caretaker):

- Your Name:
- Your relationship to the child/vulnerable adult at risk: Mobile/Phone:
- Email:
- When did the reporter become aware of the safeguarding concerns?
- Date:
- Time:

### Details of the incident or Incidents of concern involving a child or vulnerable adult

**1) Details of the people involved in the issues of concern:**

**a) Child(ren) or vulnerable adult involved:**

**b) Age (estimated) of the child/vulnerable adult involved: Gender of the child/vulnerable adult involved:**

**2) Type of safeguarding concern or abuse:**

a)  Physical

b)  Sexual

c)  Emotional

- d) \_ Neglect/Negligence
- e) \_ Economic and other exploitation
- f) \_ Breach of Code of Conduct

3) Details of the incident(s) (including victim's own words if possible). What action (if any) has already been taken and by who?

a) Location:

b) Date and time of the incident:

c) Description of the incident:

d) Who was involved in the incident (alleged person(s) and witness(es):

4) Of emergency medical care is required, has it been accessed?

5) Have any referrals or external entities/stakeholders been informed of this incident?

a) If yes, please insert the type of entity/stakeholder

6) Other relevant information (if any):

## APPENDIX C: CONSENT FORM

### CONSENT PROCESS

#### **The following process applies to the following:**

All Overture International Staff, volunteers, consultants, partner organization and all other Overture International visitors who may take pictures or be involved in interviewing beneficiaries.

#### **Step 1:**

Overture International staff will explain the purpose of the visit, the interview and of the pictures to be taken. CCO staff will ensure that the information and picture(s) will be used with dignity and integrity.

#### **Step 2:**

Overture International staff will ask for consent of the interviewee, the caretaker in case of children under 18yrs and vulnerable adults or their caretaker before the interview will be conducted, or picture(s) be taken.

#### **Step 3:**

The consent form attached to this process will be used by Overture International staff to collect consent for the use of picture(s) and information. Overture International staff will ensure that the format is translated into the local language and that illiterate/low-literate persons will be provided with full information to be able to sign off. If they are not able to provide a signature, be prepared to sign off by fingerprint.

#### **Step 4:**

The following scenarios can be handled accordingly:

- **Group Photos:** share the purpose of the picture and ask the persons who don't want to give their consent for the use of the picture to step aside and ensure that they are not part of the picture. The Overture International staff will then fill out one consent form for the group.
- **Photos of minors in a school setting:** If photos are taken regularly at the school by staff or by visitors, consent should be obtained when children are registered for school. In case the school management doesn't have an agreement with parents about handling pictures of students, the school administration should inform the parents/caretakers before the visit and ask for their consent. Overture International staff will ensure that no pictures are taken of minors whose parents didn't give their consent.

**Step 5:**

After the interview, Overture International staff will ask the interviewee to confirm the consent. If the interviewee/caretaker is not in agreement anymore, Overture International staff will not use the information and pictures and will discard the signed consent form.

**Step 6:**

Overture International staff will file the consent form together with the information/pictures taken for future reference.

**Step 7:**

All Overture International staff will ensure that information or pictures will not be used for other purposes than agreed on with the interviewee/caretaker.

## OVERTURE INTERNATIONAL CONSENT FORM

Local Language	<input type="checkbox"/> French <input type="checkbox"/> Creole <input type="checkbox"/> English
<p>“Overture International respects your integrity and dignity and will not use any picture / information without your consent. Overture International will not use any information or photos taken of children under 18 years old that are older than five years.</p>	
<p>Are you giving consent for Overture International to use your photo and interview in written/printed material, on social media (Facebook, Instagram, CCO Blog, others), and on our website?”</p>	
<p>I declare that Overture International is allowed to use my picture and interview / to use the picture and interview of my dependent for the following purposes:</p>	
<p><input type="checkbox"/> Internal Reports &amp; Private Reports to Specific Donors</p> <p><input type="checkbox"/> Printed Materials    <input type="checkbox"/> Audio/Visual Materials    <input type="checkbox"/> Facebook</p> <p><input type="checkbox"/> Instagram    <input type="checkbox"/> Overture International Website</p> <p><input type="checkbox"/> Other:</p>	
Date:	
General Location:	
Name of Interviewee:	
Signature of Interviewee/Guardian (if under 18):	

## APPENDIX D: SAFER RECRUITMENT GUIDE

### SAFER RECRUITMENT CHECKLIST

This checklist is designed to be followed for the safer recruitment of posts for recruitment of posts. It is recognized that recruitment can never be totally 'safe'. The aim of safer recruitment is to put in place a number of actions that, together, aim to reduce the chances of employing the 'wrong' person. In some countries it may be difficult to fully comply with all areas of the checklist – for example, getting references may not be feasible, or police checks may be easily forged. Similarly obtaining copies of qualifications may be impossible, particularly if applicants have moved several times or have had to leave their country (for example, refugees).

Not being able to comply with one aspect of the checklist does not mean that the appointment cannot proceed. An overall assessment of the information available needs to be made. However, in case of doubt, the person concerned must not be hired. Where the checklist cannot be complied with then this must be recorded on HR files. Copies of all checks and references must also be retained. The Safer Recruitment procedures also apply to standing volunteers who will be working on a regular basis with Overture International.

#### Recruitment & Selection

##### **Profile:**

Decide what skills and knowledge are needed to safely work with children/vulnerable adults and include these within the profile.

##### **Advertisement:**

Include a clear statement about an organization's commitment to safeguarding.

##### **Interview Questions:**

Include at least one question that relates to safeguarding.

### **Employment History:**

Always ask for information about previous employment and obtain satisfactory explanations for gaps in employment (e.g. maternity leave, sick leave).

### **Pre-Appointment**

#### **Reference Checks:**

Two references must be provided including one from the current or most recent employer, or most recent academic referee. All references should always be sought and obtained directly from the referee using only a business email address, postal address or landline number and written by a supervisor. Open references (e.g., the candidate providing a written reference) are not sufficient.

#### **Proof of Identification:**

Verifying a candidate's identification as a predatory offender may provide false information - including a false identification - to secure a job.

#### **Qualification & Registration Check:**

Verify that candidates have actually obtained all qualifications or professional registrations claimed in their application by asking to see original certificates, to make sure that there is no attempt to hide any professional qualifications and experience.

#### **Background Check:**

The decision to request a background check needs to be made regarding whether the post requires access to children/vulnerable adults.

Note that some countries have a database of offenders/people who are not suitable to work with children/vulnerable adults. If this exists, then it should be checked. If a police check returns with a conviction, then the Safeguarding Focal Person and HR colleagues need to decide whether to proceed with the appointment. Having a conviction does not necessarily mean that the person cannot be appointed; it depends on the offense

(although any conviction for mistreatment /abuse of a child/vulnerable adult will lead to a decision not to hire the person).

It is recognized that it may be difficult to obtain background checks and references in some operating contexts, or their reliability may be questionable. No one check will ever be a total guarantee of someone's suitability for working with children/vulnerable adults. Managers need to take a pragmatic view and put in place additional steps when background checks cannot be obtained. For example, ensuring that more than one person works with children/vulnerable adults at a time.

Where background checks/references raise concerns about the suitability of someone to work with children/vulnerable adults, this needs to be carefully considered before deciding to proceed with the appointment. Explanations for the decision to proceed with an appointment must be thoroughly recorded in HR files. **In case of doubt, the candidate must not be hired or allowed to volunteer.**

#### **Self-Declaration and Code of Conduct:**

All candidates/volunteers must sign the code of conduct, including the section confirming they are safe to work with children/vulnerable adults.

### **Post-Appointment**

#### **Probationary Period:**

Probation periods should be used to actively assess the employee's suitability for the job or voluntary activities. Terms and conditions including the duration of the probationary period will depend on the employment laws in-country, but ideally should be at least three months.

#### **Induction:**

Briefing/orientation on the Safeguarding Policy (including contact details of the Safeguarding Focal Person).



## APPENDIX E: ANNUAL SAFEGUARDING REPORT

### Annual Report for 20XX Safeguarding Statistics:

Prohibited Behaviors	No. of Incidents	No. of Children Involved	No. of Vulnerable Adults Involved	No. of Incidents Reported to Authorities

*Please Note: Description of the data collected- To be added at the time of compiling the report. Do not provide any confidential information when writing this report.*

*Please Note: Describe what the outcomes of the investigations were and any trends that can be identified as well as any disciplinary measures taken.*

*Please Note: Description of ongoing efforts to strengthen Safeguarding- To be added at the time of compiling the report.*





