

YOU, **matter**

**MANUAL FOR THE
PROTECTION OF INTEGRITY
AND PERSONAL FREEDOM**



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MANUAL FOR THE PROTECTION OF INTEGRITY AND PERSONAL FREEDOM

Zaragoza, 5 november 2022

INTRODUCTION

*"What you do unto one
of the least of these brethren,
you do to me".
(Mt 25, 40)*

Today we are challenged as People of God to assume the pain of our brethren who are violated in their flesh and in their spirit. If in the past omission could become as a form of response, today we want *solidarity, understood in its deepest and most challenging sense, to become our way of making history present and future, in an environment where conflicts, tensions and especially the victims of all kinds of abuse may find an outstretched hand that may protect and rescue them from their pain* (cf. EG 228).

With the words of Pope Francis we want to base the reason to be of this Manual on "Protection of Personal Integrity and Freedom".

Before the situations of pain and suffering in today's world, which are contrary to God's will for the whole Creation, we want to be attentive to what is happening around us, to be sensitive to the needs of the people who suffer, to be aware of the multiple

forms of mistreatment, negligence in the treatment and abuse, which exist around us: physical, emotional, psychological, spiritual, of power, sexual, and to commit ourselves in the prevention and denunciation of these behaviours.

We, *Sisters of Charity of Saint Anne*, are women, consecrated and rooted in Christ who share “with heroism... pain and misery” of humanity (Const. 3); and we “are called, like Christ, to witness to the Father’s love for all with a Universal Charity, chiefly to the poorest and the neediest, through the practice of Hospitality to the point of heroism” (Const. 6).

From the origins of the Congregation we are at the service of the person:

The sisters... enter the Hospital to serve the sick women without exception of sicknesses... especially in the immediate care of their persons... (cf. Const. 1824, p. 6), ... they will see in the sick the person of Jesus Christ... (cf. Const. 1805, p. 89), valuing and loving the persons, serving Christ in them... (Const. 1981, no. 68).

We can say that our service is characterized by listening, welcome, respect, valuing the person, goodness in treatment, humility and meekness... To value and to love the person, seeing Christ in the person, is a dynamism that accompanies us and is part of our spirituality.

Pope Francis in the Global Educative Compact, and in our Project of Evangelization in Chapter IV, remind us that “the center of our evangelizing action is the whole person”. The analysis of the reality that we carry out, has a purpose to propose our evangelizing interventions as a response to the specific needs of the person, so that the person can become himself/herself. To be faithful to God requests us to be faithful to the person in the same attitude of love.¹

Concern for the person requires us, in turn, to denounce anything that endangers the integrity and/or freedom of any one them, as

¹ Evangelization Project no. 36, General Directorate for Catechesis 145.

Pope Francis encourages us to do. For all this, we see the need to have a document with guidelines and procedures to be followed, in case any of our Sisters, or the persons who share life and mission with us or who work in our Communities and/or Centers in a paid or voluntary manner, may be accused of mistreatment or abuse, suffer it or be witness of them, either in our Centers or in our Formation, Government Houses or in our Communities.

This document is intended to raise our awareness and to help us live a healthy and authentic life by being concerned about the most defenceless and vulnerable people, living the values that are born from the Gospel and which were transmitted to us by John Bonal, Maria Rafols and the First Sisters. At the same time, it is a sign that our Congregation recognizes the seriousness of abuse in any of its forms and is committed to the care and protection of every person, especially of those most vulnerable.

Each Province or Delegation will adapt it to its reality, to the laws of the country, Autonomous Community, Region, Department, State, and will commit itself to implement this way of understanding and living the “Culture of Hospitality” promoted by the Sisters of Charity of Saint Anne.

1. LEGAL ASSETS TO BE PROTECTED.



We seek to protect the persons who are with us and are part of our Charismatic Family (Sisters and Laity), the persons who collaborate with us, the persons whom we serve, as well as the Congregation and its structures.

1.1 Integrity and Freedom of Persons.

Are protected the rights to personal integrity and freedom of the persons who are part of the Charismatic Family, the collaborators and the people whom we serve, in all spheres of life, facing any kind of abuse.

1.1.1 Right to Personal Integrity.

It is the fundamental right that has its origin in the respect for the life of any person and in the total development of the person in the physical, psychological, of conscience and sexual dimension. No one can undermine the exercise of this right inherent to the own person.

In the physical dimension it refers to the preservation of the anatomy of the person's body, its bodily or physiological functions.

In the psychic dimension it refers to the total preservation and without undermining of the person's psyche, that is, the development of his/her mental functions.

In the conscience dimension it refers to the capacity and autonomy of the person so as to maintain his/her own personal values.

In the sexual dimension, it refers to the preservation, without undermining by a third party, of the ability to make decisions about one's own sexual life within the context of personal and social ethics.

1.1.2 Right to Personal Freedom.

It is the fundamental right that guarantees that no person may be, arbitrarily or unjustifiably, deprived of his/her physical freedom, nor of his/her freedom to achieve integral development as a person, in any area of his/her life (affective, psychological, sexual,



educative, social, economic, political, cultural, religious, spiritual, of conscience, etc.).

In our Congregation, starting from the premise that all of us enjoy our individual physical freedom, we will focus our efforts on guaranteeing that any member of the Charismatic Family, collaborators, volunteers, people whom we serve, may develop themselves in an integral way as persons, without forgetting that the exercise of personal freedom is not an absolute right and that it can be subject to limitations based on legislation, both civil and canonical, as long as these may be reasonable, proportional and do not attempt against the essence of this universal right.

We must always remember the principle that “our freedom ends when the freedom of others begins”. From the concept of each one of these rights inherent to the person, we will protect any member of the Charismatic Family, collaborators, volunteers and people whom we serve against abuses, which, for example, may undermine their:

- Integrity and affective freedom: right to live one's own feelings, needs and emotions in an integral way and the right to establish relationships from choice, not from obligation, subordination or deception, carried out by third parties. This entails taking responsibility for our reactions facing the emotions of others.
- Integrity and freedom of conscience: right to decide for oneself, without being subjected to the interests and desires of another person, fully maintaining our capacity for action and reaction.
- Integrity and economic freedom: right to decide how to live in a community or individual way, without any type of economic coercion or act of corruption developed by third parties, which may affect our will.
- Educational integrity and freedom: right to educational equality regardless of our origin, ethnicity or race, enjoying

the same educational opportunities in any part of the world where we are present, and ensuring that this may be received according to the values of our Congregation.

- Labour Integrity and freedom: right to follow one's vocation or to dedicate oneself to a professional activity without being obliged to carry it out forcibly or being treated unfairly; to receive a fair remuneration and protection from our superiors that may guarantee our full vocational or professional development. No one may be deprived from a job for arbitrary reasons.
- Integrity and sexual freedom: right that allows the free choice, expression and living of our sexuality, guaranteeing the autonomy to do or not to do what is our will, without a third party being able to influence in it, without this having a negative impact on other aspects of our life and being coherent with the commitments acquired in our religious profession or work contract.

1.2 Integrity and Freedom of the Congregation.

It is necessary that the Congregation may protect the Spiritual Patrimony it has received and its juridical and material structures. It is the responsibility of the Sisters, at all levels, to preserve the immaterial and material patrimony of the Congregation. It is to be understood that each and every one of us, we are called to live that to which we have committed ourselves to in our Religious Profession.

1.2.1 Intangible Patrimony.

Each and every one of the Sisters, we are called to maintain the Intangible Patrimony of the Congregation: the charism, the mission, the apostolic-evangelizing style that has been transmitted from generation to generation and that it is necessary to transmit to the persons who collaborate with us in our centers and tasks.

We are all committed to carry out the task and to live it as it is set forth in our documents and this is how we try to make it come



alive. Any kind of abuse on the part of the Sisters, workers, and collaborators or volunteers of our Centers will be penalized.

1.2.1.1 Congregational Identity.

We refer to the Decree of Approval of the Congregation of Pope Leo XIII, given in Rome, by the Secretariat of the Sacred Congregation of Bishops and Regulars, on January 14, 1898:

It belongs to these Sisters to add to the three usual simple vows of poverty, obedience and chastity that they make, first temporal, and then perpetual, another fourth vow also simple, to serve all kinds of sick people, without exception to those who may suffer from plague or contagious disease.

But as their principal denomination comes to them from Charity, they have also proposed to exercise as an Institute not less offices of the most pure Charity, mainly with the foundling children, with the insane people, with the orphans or abandoned children, and also with the poor girls, instructing them free of charge, as it is natural in their Schools, and duly educating them in the sanctity of the catholic religion...

After the Second Vatican Council, in the return to the sources, promoted in the *Perfectae Caritatis*, there was a return to the fourth initial vow, vow of Hospitality:

"Hospitality, the core of our Charism, is a reflection of God's Hospitality who loved us first and manifested his love to us in the sending of his only Son into the world" (Const. 5).

Each of the Sisters "we concretize the Charism and spirit in mission through our special vow of Hospitality with which we express our congregational identity in the Church and the world. All the Sisters are responsible for maintaining the Charism always true to itself, renewing it according to the signs of the times, in service to humanity..." (Const. 7).

"Faithful to this heritage, through the vow of Hospitality, we commit ourselves to surrender ourselves 'day by day', to the service of the needy chiefly of the poorest, even risking our own life in the mission to which the Congregation may send us" (Const. 18).

1.2.1.2 Mission.



“The Congregation has received from Christ in the Church the mission of collaborating in the spreading of the Kingdom through the proclamation of salvation by Charity through the practice of Hospitality” (Const. 38).

The Congregation, born with the purpose of assisting the poor sick, continues the work of Jesus. Our Founders and First Sisters bequeathed to us an own style of living Charity made service, “with the greatest care”, with full detail, “with all love”, seeing Christ in the sick, welcoming Christ in the children of the Foundling Home, recognizing Christ in the poor and destitute everywhere and in every place (cfr. Const. 39).

“The mission of our Congregation in the Church, is to be a visible sign of the Kingdom in the world, through the exercise of Charity and the explicit proclamation of the Gospel. We carry out the joyful surrender to God in the service to the brethren in any part of the world, preferentially looking after the poorest and the neediest” (Const. 41).

The mission of our Congregation commits us to a style of living and evangelizing:

To manifest like Christ the love of the Father to the world; commits us: to live in an attitude of continuous conversion, to live the Gospel with a liberating and transcendent sense, to be open to the evangelical values we discover in those around us, in other cultures and in other religions, to esteem and love the person, seeing Christ in him or her, to humanize society, to be ferment of fraternity, justice and peace, to look after the neediest considering them as “our masters”, to work for the assistance and promotion of persons and in the defence of their rights so that they may build a more worthy community from their culture (Cf. Const. 44).

Our evangelizing style is: “of generous, unlimited self-giving, even to the point of heroism, with total availability, from humble, simple and diligent service, in a life of poverty and detachment, with a treatment of goodness, persevering patience and fortitude

of spirit, in an attitude of welcome and closeness, with ability to adapt oneself to new situations and to face difficulties even risking one's own life" (Const. 45).

Since our origins, we have been concerned with the protection of persons. In the Manuscript of Barcelona, foundation of our first Constitutions, when speaking of "the way the Brothers should behave with the sick", it is said that they will correct *with sweetness and love those who "make mistake" and will be as lions against women who enter with a twisted purpose to visit the sick and the Sisters* will defend the sick women from *the men who go to visit them, making use if necessary of the Administration*.

As a consequence of all this, we are called to promote the Protection of minors and people in situation of vulnerability, which entails:

- To raise awareness of their importance.
- To promote the formation of the Sisters and the people who collaborate with us, on this subject.
- To denounce in case of need.

Our Congregation carry out its mission in different Fields and in the Pastoral Ministries in which our task is concretized:

The Mission in our Congregation is founded on the Christian conception of the person, in the respect for his/her life, freedom, dignity and right to his/her integral wellbeing. Through this Ministry, we render our service in the preventive, curative, educative and social areas. We promote health, we try that each person may reach the maximum realization of his/her life, even in weakness and we work in order to humanize the attention to the person by being presence and sign of God's love. (Cf. Const. 53).

We commit ourselves to give preferential and solicitous care to the most vulnerable patients, those who suffer most, and/or are most lonely and abandoned; and to make sure an integral attention to the person in all his/her dimensions: physical, psychological, social and spiritual (cf. Const. 54).

We defend life as the first right of the person in the whole process of his/her development and we denounce every situation that may attack or manipulate him/her (cf. OL 54):

- 👤 Caring for, protecting and empowering vulnerable people.
- 👤 Demanding kind, respectful and professional treatment from the personnel of our centers, as well as the signing and observance of the Code of Conduct established by the Institution.
- 👤 Making of our Communities of Elderly Sisters and Centers, "safe spaces".
- 👤 Promoting the existence in our Centers of Customer Care Services and/or mailboxes for complaints and suggestions.
- 👤 Having protocols for prevention and intervention in the event of any type of abuse.
- 👤 Offering formation in protection, prevention and intervention against maltreatment and abuse.

Through this Pastoral Ministry, we seek to make the merciful love of God visible, working to build a more just and egalitarian society and seeking the common good as well as the social conditions that allow people to develop their capabilities and live with dignity (cf. Const. 56).

This commits us to be in contact with people, especially the most disadvantaged; to create a family atmosphere where people may feel welcomed and respected in their dignity; to foster the capacity to listen; to live open and flexible in order to respond to the real demands of those who are marginalized and at social risk; and to maintain an itinerant and available attitude when the need of society and the cry of the poor demand from it (cf. Const. 57).

We therefore commit ourselves:

🍎 In dignifying and liberating vulnerable people, highlighting the values of solidarity as *"moral virtue and social attitude"* (Fratelli Tutti 114) which are expressed in generous service and look at the human face of Jesus in the poor brother.

🍎 In the promotion, orientation, sensibilization and responsibility in the fight against the culture of abuse.

🍎 In acting from the humble service of Jesus, and the congregational spirit and Charism, focusing ourselves on the following points:

- To be people of virtue, integrity and transparency.
- To protect vulnerable people.
- To offer a safe environment for minors and vulnerable adults through norms based on the principles of justice and charity.
- To accompany, protect and attend the victims of any form of abuse or mistreatment, offering them all the necessary support for their complete healing.

Through the Pastoral Ministry of Education, “we live the mission, collaborating in the formation of the person so that he/she may be an agent of his/her own development, reach human maturity, freely opt for faith and commit himself/herself to the building up of a more just and fraternal society, based on truth, peace and love.” (Const. 59).

We commit ourselves to a generous self-giving to the students with persevering patience, faith and hope in their capacity for improvement, to take special care of the most needy pupils, to blend firmness with goodness in a simple and delicate treatment, and to make sure that the Educational Centre projects its action in the social milieu where it is inserted (cf. Const. 60).

We watch over the protection of minors and vulnerable persons:

- Promoting formation, advice and the elaboration of protocols for prevention and action in each Educational Centre.
- Appointing the responsible teams.
- Creating safe spaces.

In response to the Pope’s call to rebuild the Global Educative Compact, we want to assume the seven commitments proposed since we see in them a great relation with the Congregational Charism.

- 1. To place the person at the center of every educational process, formal and informal,** her/his value and dignity in order to highlight her/his own specificity, beauty, uniqueness and, at the same time, her/his capacity to relate to others and to the reality that surrounds her/him; to reject these lifestyles that favour the spread of the throwaway culture.
- 2. To listen to the voice of children, adolescents and young people** to whom we transmit values and knowledges, to build together a future of justice and peace, a worthy life for each person.

3. **To foster the full participation of girls and young women in education.**
4. To have **the family** as the first and indispensable educator.
5. To educate and to educate ourselves to **welcome, opening ourselves to the most vulnerable and marginalized people.**
6. **To commit ourselves to study** in order to find other ways of understanding economy, politics, growth and progress, so that they may be truly at the service of the person and the whole human family, in the perspective of an integral ecology.
7. **To safeguard and cultivate our common house**, protecting it from the exploitation of its resources, adopting more sober lifestyles and seeking the integral use of renewable and respectful energies with the human and natural environment, following the principles of subsidiarity, solidarity and the circular economy.

1.2.2 Material Patrimony.

We are called to respect the material goods that constitute the Patrimony of the Congregation:

- “The temporal goods of the Congregation, Provinces, Delegations and Houses belong to the Congregation. The Provinces, Delegations and Houses only have subordinate ownership, use and usufruct” (Const. 158).
- “The legal registration of immovable property in public registries is made in the name of the Congregation of the Sisters of Charity of Saint Anne, as far as possible, and in accordance with the legislation of every country, and this is how properties must be entered in the documents or deeds, whether public or private” (Const 159).
- Our duty is to administer them with charity and justice, seeking the “fulfillment of the Social Doctrine of the Church and of the civil laws, especially those concerning social, fiscal and economic matters” (Const. 161).

- The Administrator Sisters will carry out their work in an efficient manner, with love, justice, transparency and generosity (cf. Const. 156) and abiding themselves by ethical principles and not by the simple search for economic profit. Managing according to economic criteria should not suffocate the Charism, but should help us to live it to the full.
- Through the Communication of Goods “we share with solidarity goods among Communities and Provinces, of these among themselves and with the General Administration” (Const. 168), which allows us to carry out our mission no matter where it may take place or the means at disposal, always seeking the social good.
 - Without forgetting the call to the living of our Charism, which will be our top priority, we must comply with the requirements of the Holy See and establish the criteria that set the Stable Patrimony of the Congregation. A just planning for the future contributes to the sustainability of the works. In this way our continuity in the future will be ensured so that our Charism, granted to the Congregation through the Church, may continue being a living and enduring flame.



2. DEFINITION OF TERMS.



We consider that before advancing in this topic it is necessary to clarify certain terms in order to create a common language:

Sin. Thought, word, action or omission that, in a specific religion, is considered that goes against the will of God or the precepts of that religion (cf. Real Spanish Academy, RAE).

“Sin is a fault against reason, truth, right conscience; it is failing to the true love for God and for one’s neighbour, because of an attachment... to certain goods. It hurts person’s nature and attacks on human solidarity. It has been defined as “a word, an act or a desire contrary to the eternal law”.

... Sin is an offense against God... sin revolts against the love that God has for us and turns our hearts away from Him. Like the first sin, it is a disobedience, a rebellion against God by the desire to become “like gods”, pretending to know and determine good and evil (*Gen 3:5*). **Sin is thus “love for oneself to the point of contempt for God”... Because of this proud exaltation of oneself, sin is diametrically opposed to the obedience of Jesus that brings about salvation (CCC 1849, 1850).**

Crime. Brokenness of the law. Penal infraction that goes against the juridical order of society and that has to be punished with the corresponding penalty. The Penal Codes of some countries, as the Spanish one in its Article no. 10 define the crimes as actions and omissions, willful or reckless punished by the law.

Victim. A person who has suffered a form of mistreatment, neglect, abuse or traumatic situation that has had an impact and compromised his/her physical, psychological, social and/or spiritual integrity, as well as his/her well-being.

Sex offender. The person who attack the sexual freedom of another person, using violence or intimidation (Penal Code, Article no. 178).

Paedophile. That person who feels attracted to children or adolescents. This attraction need not lead to a concrete action or consummation of desires.

Child molester. It refers to the man who desires with passion to children and/or adolescents and this desire leads to concrete actions of abuse.

With respect to sexual abuse of minors, it should be emphasized that not all paedophiles are child molesters, but all the child molesters are paedophiles. Some target children not out of attraction, but because of their vulnerability. Many people with paedophilic disorders (DSM-5, 302.2) are not sexual offenders, for example, if they have not directly abused a child or used child pornography, both of which are crimes. However, recurrent use of paedophilic fantasies is considered a deviance, but not an abuse since only the acts are considered crimes, not the thoughts. That said, these subjects should receive clinical attention as soon as possible.

Mistreatment or maltreatment. This is an umbrella term that encompasses all forms of neglect and abuse, physical, psychological, emotional and spiritual. Omissions and harmful treatment on someone in need of care (e.g., parents towards their children, or children towards their elderly and/or sick parents). It covers all vulnerable people in need of special care (an elderly person, a child or a patient in the hospital may be victims of mistreatment, etc.).

3. KINDS OF ABUSES.



We are going to list and explain the different types of abuses that are currently known and against which we want to fight:

3.1 Abuse of power.

“Desire for domination, lack of dialogue and transparency, forms of double life, spiritual emptiness, as well as psychological frailties, are the ground in which corruption thrives”.

(Post-Synodal Apostolic Exhortation *Christus Vivit* 98, 2019).

Canon 1378, of the new Code of Canonical Law tells us:

1. Whoever abuses ecclesiastical power or office, is to be punished according to the gravity of the act or omission, not excluding deprivation of office, unless there is already a penalty established by law or precept against such abuse.

2. Anyone who, through culpable negligence, illegitimately performs or omits, and with other people's damage, an act of ecclesiastical power, of the ministry or other function, is to be punished with a just penalty.

We can define the abuse of power as a “misuse, a distorted use of the position of superiority of one subject over another, with consequences, sometimes serious, -psychological, physical, spiritual, moral or even economic- on the victim.

Abuse of power occurs when in an asymmetrical relationship established by the authority (with a position or office), the person takes advantage of the trust placed in him/her due to the responsibility he/she occupies and, taking advantage of this, manipulates and imposes himself/herself to gratify a need for egocentric domination.

Abuse of power can be manifested in various forms, such as, for example:

- the imposition of one's own thinking that does not admit differences of opinion;

- blaming those who do not follow the “single thinking”, different types of rewards for those who follow that authority’s thinking (positions, gifts, etc.) and punishments, sometimes subtle, for those who do not support that thinking;
- lack of transparency in relationships, emotional blackmails, creation of a group of faithful followers and who admire the leader, devaluation of the one who does not think as the leader and the presumption that one speaks in the name of God”².

The people who easily can carry out these abuses are the Sisters and Laity who hold positions of responsibility in any administrative or management area or level, in hospitals, schools, hostels, orphanages, etc., when they do not give orders for the common good but for personal gain.

According to **Vos Estis Lux Mundi**³, **vulnerable person** is “any person in a state of illness, physical or psychological deficiency, or deprivation of personal freedom that, in fact, limits even occasionally their ability to understand or to want or, in any case, to resist the offense”⁴.

There are people who find themselves, permanently or occasionally, in a situation of spiritual, affective-emotional or other types of fragility, and who need existential confirmation. Precisely the peak of the abuse of power is manifested in the attitude of submission of those who are subject to it to the point of defending and supporting the abuser, without any awareness of the offense to their dignity and sometimes in a kind of delirium of identification with the abuser person.

² Maria Rosaura Gonzalez Casas, *stj. Conference to the Sisters of Charity of Saint Anne. June 25, 2022.*

³ Apostolic Letter *as motu proprio* published by Pope Francis on May 7, 2019.

⁴ VELM art. 1. 2b.

Examples:

- A person who has lost someone close to her family and is psychologically fragile and a community sister approaches at that moment to console her and takes advantage of her situation of fragility, vulnerability, to ask her to do or say what she wants in her own interest.
- Disabled people, abandoned people... whose situation can be used to demand more hours of work.

3.2 Spiritual abuse.

"Spiritual abuse occurs when there is emotional and affective manipulation that deals with religious and spiritual issues and affects the person's relationship with God.

The person who directs, accompanies, etc., places him/herself as the voice of God, perhaps even believing that he/she is the voice of God who must be blindly obeyed. On the other hand, the victim confuses the one who accompanies him/her with the voice of God. The role of a person who accompanies, spiritual director is only to help the person so that he/she can make himself/herself available to listen to the voice of God. Spiritual abuse is an abuse of power"⁵.

Examples:

- The formator who tells the Sister in formation what she has to do regarding her vows: "I see that you are suitable and you have to make your vows".
- The Sister Superior who says to a Sister in her Community: "I am the superior and I don't think you have to continue your studies".

⁵ Maria Rosaura Gonzalez Casas, stj. Conference to the Sisters of Charity of Saint Anne. June 25, 2022.

3.3 Abuse of conscience.

"Abuse of conscience is a way of controlling and dominating the victim's conscience in such a way that the person morally believes that he/she is acting correctly, however, he/she does so according to the interests and orientations of the manipulator"⁶. They include a type of relationships that occur in the intimacy of two or more people in which the most sacred space of the other, which is where freedom and conscience are given, is violated.

The relational style of the abuser is usually authoritarian. This does not mean that it is given in an imposing or abrupt way, it can be a very soft and seductive style, without the other person initially realizing what is happening, but progressively the one who directs, puts himself/herself in the place of the conscience of the other and in the center of the relationship.

The abuse of conscience implies a loss of freedom, confusion and alienation of oneself that makes hand over the power to another person in order to decide for the person: "whatever you say".

It begins with seduction. The abuser gives access to privileges, places, conversations... He/she says, for example, "You know how much I love you, that's why I only tell this to you...", "You are a very special person... that's why only you can come here". He/she may also get physically close to embrace the victim, losing limits.

The abuser uses language with affective-emotional tones and of intimacy, manipulations of the type: *"As you know, I love you very much, like a real daughter, I trust you very much... and that is why it is very important what I ask you to do, if you don't do it, you will disappoint me", "I think a lot about you, you are the extension of my life... what a gift God has given me!"*

The abuser makes use of the confidence he/she has received. This is to say, if he/she wants to get something from the person he/she accompanies, he/she appeals to the relationship that has been

⁶ *ibid.*

established and to what the person who is accompanied has told him/her. *"You are my spiritual daughter... and I have given you all of me and I also know many personal things about you, because of this love of ours you must behave like this in order to always be one of us"*. He/she uses affection to control, manipulate, appropriate the life and decisions of the other person.

He/she can also threaten to use the information to control and manipulate the conscience: *"if you do not act in this way, I will not consider you close to me..."*.

Consequences of the abuse of conscience:

- *Mental and psychological dependence.* The victim feels less and less, with low esteem, and more and more dependent on the abuser who directs him/her. Only the abuser directs the relationship and is the one who authorizes the victim. If the victim does not follow exactly what he/she is told, he/she can live in scruples and guilt because, for him/her, the abuser is the one who takes the place of God.
- *Loss of will and critical judgment.* The victim does what the abuser tells him/her and his/her ideas and satisfactions are those of the abuser.

When the victim tries to recover for himself/herself his/her own conscience and freedom of action, the abuser attacks psychologically, stigmatizes and harasses. The desires, discernment and the own choices of the victim are degraded by the abuser by pointing to mistake, fault, error, evil spirit, temptation.

Examples:

- The worker subjected to authority who is not able to think and say for himself/herself.
- The person in formation who lives subjected to the judgement of the Formator Sister.

3.4 Physical abuse.

Physical abuse consists of using physical force to hurt or endanger someone. It can vary in magnitude and intensity. The most common forms are: scratching, hitting, biting, strangling or kicking, throwing some object against people, pulling hair, pushing, shaking, pulling, grabbing clothes, grabbing to prevent the victim from leaving....

Examples:

- Hitting a child, hitting him with an object, kicking him; burning him with a cigarette, with hot water; putting him under water; tying him up; shaking a baby hard; inflicting excessive punishments such as locking in a room, depriving of food, forcing him to sleep outside the Center....

3.5 Sexual Abuse.

Sexual abuse is an act constituting a crime, which takes place when, without the consent of any of the parties, acts that violate the freedom or sexual indemnity of another person are carried out.

Sexual abuse of a minor consists of sexual contact between an adult and a minor.

Sexual abuse can also be performed on an adult in a situation of vulnerability due to different causes.

In legal terms, sexual abuse has been defined as sexual violence. This is important because it makes it evident that incest abuse cannot be dealt with only within the family, since acts of violence are subject to the law. People who act violently are acting against the law and committing a crime. Sexual abuse is a crime.

Example:

- The person who sexually abuses pupils in recreation time or in other spaces or who abuses the frail elderly or psychiatric patients or who takes advantage of a person in a vulnerable situation.

3.6 Psychological, affective-emotional abuse.

In this type of abuse there is no physical contact, but the aftermath can be more lasting. The behaviours used can be: insults, yelling, emotional blackmail, manipulation, control of social networks, telephone, schedule, friendships; constant criticism, embarrassing in public; preventing the victim from talking to family members, telling him/her what to do and what to use, damaging objects owned by the mistreated person, threatening to harm the victim, his/her child, his/her family....

Examples:

- The person (can be Sister, worker) who uses blackmail, who criticizes, insults another to control, subjugate him/her and make him/her do what she/he wants.
- The formator Sister who threatens the candidate with prohibiting to make the vows if she does not do what the formator wants.

3.7 Economic abuse.

Economic abuse consists of the control, improper appropriation or misuse of the economic resources of the victims: Community, Congregation, other persons (Sisters, collaborators or people whom we serve). Misuse includes wasting assets or not giving what corresponds to a person or an entity.

Examples:

- In the home for the elderly, holding on to the financial resources or the possessions of the elderly.
- Superior Sister who wastes the money of the community or who does not give what is necessary to the Sister who needs it.
- In a donation, when the will of the donor is not fulfilled.

- Using money from Projects or Sponsorships for other purposes.

3.8 Labor Abuse.

This type of abuse consists of physical and psychological mistreatment that occurs in the work area. It can cause serious problems for the victim, who will be forced to leave the job or suffer all kinds of pressure and belittling, which can undermine her/his self-esteem. It may be a way of forcing resignation from the job, since dismissal may cause problems with the law. In other cases, it may be related to problems of envy.

There may be harassment among different hierarchical levels or among people who occupy strategic places at work.

This abuse can be caused if workers are not paid according to the law, if they are exploited or their rights are not respected.

Examples:

- The authority who does not pay workers according to the law and the contract that corresponds to them, who does not respect their schedule, vacation days, paid leave days, etc.
- The authority uses the workers' money for his/her own benefit.
- Mistreatment of workers, not having adequate occupational risk measures, protection elements, etc.
- The worker who abuses the trust of the Sisters and does not perform his/her work properly or does not comply with the schedule.

4. PASSIVE AND ACTIVE SUBJECTS OF AN OFFENSE.



Regardless of the applicable jurisdiction, and of the Proper Law, Canon Law or the Criminal Law of each country, in the commission of any criminal conduct of those addressed in this Manual, there are always two subjects involved, the passive subject and the active subject.

4.1 Passive subject.

This is the person who owns or possesses the legal property that has been damaged or endangered. It may be one or more natural persons (i.e. any human being), as well as a legal person (i.e. any entity, group of persons or organization having its own legal entity under the respective law).

In principle, any natural or legal person could be a passive subject, however, depending on each crime, its own concept or definition indicates us or determines who can be a passive person and under what circumstances.

Examples of potential passive subjects:

Natural persons:

- Minor person.
- Vulnerable person according to canon law.
- Any person belonging to the Congregation, whether Postulant, Novice, Junior or perpetually professed.
- Any person of legal age collaborating with the Congregation or Laity of Saint Anne Family (SAF).

Legal persons:

- Local Community.
- Educational, health or social institution.
- A Province.

- Any Apostolic Work of the Congregation.

These legal persons will be represented by one or more natural persons, as the case may be.

4.2 Active subject.

It is the agent who performs the conduct that is normatively considered as prohibited, either by action or omission (not doing anything, not avoiding, not preventing, etc.). This conduct may be performed by a natural person (one or more persons) or by a legal person.

For a natural person to be an active subject of a crime, he/she must be considered imputable, this is to say, he/she must have the necessary psychological capacity and be able to understand that, through his/her conduct, for being unlawful, he/she is violating the law, therefore he/she knows that his/her actions will have legal consequences.

Examples of potential active subjects:

Natural persons:

- Any person over 16 or 18 years of age depending on the age of criminal majority established in the corresponding jurisdiction.
- Any person of legal age belonging to the Congregation, whether Postulant, Novice, Junior or perpetually professed.
- Any person of legal age collaborator of the Congregation or Laity of SAF.

Juridical persons:

- Any governing body of the Congregation with its own juridical personality.
- Any Apostolic Work of the Congregation.

5. APPLICABLE LEGISLATION.



The following normative sources have been used for the preparation of this Manual:

5.1 Proper Law.

It is the law emanated by our Congregation, whether it be the initial Constitutions, and their corresponding updates, together with norms legislated in the General Chapters or any other norm developed by any of the governing bodies of our Institution authorized for this purpose.

Examples:

- It is mandatory for Superior General and Provincial Superiors to count on the consent or opinion of their Council in certain cases and failure to do so may invalidate their decision.
- It can be a financial abuse to give an amount of money less than that established in the Community Project as a Personal Budget to a Sister or not to render an account of the Community Personal, Provincial or General Budget.

5.2 Canon Law.

The Sisters of Charity of Saint Anne, we are an institution of Pontifical Law, and therefore subjected to the particular legislation of the Church promulgated by the Holy Father which includes among others:

- Updated Code of Canon Law.
- Apostolic Letter in the form of Motu Proprio of the Supreme Pontiff Francis “Vos estis lux mundi” (May 7, 2019).
- Apostolic Letter in the form of Motu Proprio of the Supreme Pontiff Francis “Like a loving mother” (June 4, 2016).
- Norms on offenses reserved to the Congregation for the

- Apostolic Letter in the form of Motu Proprio of the Supreme Pontiff Francis “Competentias quasdam decernere” (February 11, 2022).
- Apostolic Letter in the form of Motu Proprio of the Supreme Pontiff Francis “*Recognitum Librum VI*” (April 26, 2022).

Example:

CCL 696: “A member can also be expelled for other causes, provided they are grave, external, imputable and juridically proven, such as: habitual neglect of the obligations of the consecrated life; repeated violations of sacred bonds; obstinate disobedience to the legitimate commands of Superiors in grave matters; grave scandal caused by his culpable conduct; obstinate defence or dissemination of doctrines condemned by the magisterium of the Church; public adherence to ideologies contaminated by materialism or atheism; the illegitimate absence referred to in can. 665 § 2, for more than one semester; and other causes of similar gravity, which can be determined by the proper law of the institute”.

5.3 International Law.

The universal principles of protection of minors, vulnerable persons (women, refugees, etc.) contained in different international legislations, whether of the United Nations World Organization (UN), the European Union (EU) or other organizations, have been used as an initial basis for conceptualizing some of the different protected legal goods:

- United Nations (UN) Charter of Human Rights.
- United Nations (UN) Refugee Statute.
- Council of Europe Convention on the protection of children against sexual exploitation and sexual abuse (Lanzarote Convention 2007).

Examples:

- A minor who arrives in a country as a refugee and suffers from labour or sexual exploitation.

5.4 National Law.

Natural and legal persons collaborating or belonging to the Charismatic Family are always bound by the national law of the State where they reside temporarily or permanently.

When we are talking about penal norms, depending on whether or not they are members of the Congregation of Sisters of Charity of Saint Anne, the persons, whether natural or legal, will be under the corresponding national legislation or will be under the duality of the proper and canonical jurisdiction together with the national jurisdiction of the country where they may have been the object of a crime or have committed it.

Examples:

- Lay woman teacher in Colombia, Ghana, Spain or the Philippines: Canonical legislation, national legislation of the country and the International Legislation recognized by her country.
- Sister of Charity of Saint Anne: proper and canonical legislation together with the national legislation of the country where she resides in addition to the International Legislation applicable to her.

When we are talking about moral norms, any person belonging to the Charismatic Family is subject to the principles and values established in the regulations of SAF, independently of the corresponding national legislation.

6. CODES OF CONDUCT.



6.1 Sister of Charity of Saint Anne of Perpetual Profession.

The public and private conduct of the Sisters of Charity of Saint Anne may inspire and motivate people, especially the young, but it can also scandalize and undermine their faith. For this reason, as Sisters of Charity of St. Anne, always, we must be mindful of the responsibility that accompanies our task. We also recognize that God's goodness and grace support us in our life and mission.

The responsibility for compliance with the Code of Conduct rests with each individual. A Sister of Charity of St. Anne who fails to comply with this **Code of Conduct** will be subject to corrective action in accordance with the Congregation's "Manual for the Protection of Personal Integrity and Freedom" to protect the rights of all.

Corrective action may take various forms, from verbal reproach to dismissal or suspension from the function performed, depending on the nature and specific circumstances of the offense and the extent of the harm.

Each one of the Sisters of Charity of Saint Anne must respect the rights and protect and promote the dignity, freedom and care of every person, especially their Sisters and those entrusted to them in their service-task.

Therefore, I, Sister:

- 1 I take up the challenge to live and promote respect for basic human rights, primarily the one on personal dignity and integrity, and, therefore, I commit myself to treat each person with respect and consideration.
- 2 I will use positive reinforcement rather than criticism, competition or comparison wherever I live and develop my task.
- 3 I will not humiliate, ridicule, threaten, degrade, hit, shake or slap any person.

- 4 I will not engage myself in any form of physical, psychological, economic or spiritual harassment, written or verbal, and will not tolerate such harassment by other Sisters or any other person.
- 5 I will not use my position to exercise improper power and authority over any person.
- 6 I will not engage myself in sexual intimacies, in any form, including consensual or non-consensual contact, forced physical contact and inappropriate sexual comments with any person, nor will I use, share or distribute pornographic material of any kind.
- 7 I will report any suspicion of abuse or moral misconduct to the Local and/or Provincial/Delegation and/or General Protection Officer⁷. I understand that failure to report suspected abuse may constitute a misdemeanour under the law.
- 8 I will cooperate fully in any investigation of abuse of children, youth or adults who are vulnerable.
- 9 I will be responsible for my own physical, mental, emotional and spiritual health. I will seek help whenever I notice behavioural or emotional warning signs that indicate possible difficulties in any of these areas.
- 10 I will collaborate in caring for the physical, mental, emotional and spiritual health of my Sisters and I will encourage them to seek help whenever I discover warning signs.

As a Sister of Charity of Saint Anne, I promise to strictly follow the rules and guidelines of this Code of Conduct as a condition of serving those to whom I have been sent.

⁷ In general, the communication will be made to the three levels, unless it is related to the person responsible for the protection of a level, in which case the information will be given only to the person responsible for the higher level(s).

I understand that I am subject to a thorough background check, including criminal background checks.

I assume that any action inconsistent with this Code of Conduct or failure to act as mandated by this Code of Conduct may result in my removal or suspension from the role with which I have been entrusted, and that such conduct will be subject to corrective action in accordance with the “Manual for the Protection of Personal Integrity and Freedom” which is in force in the Congregation.

I KNOW, I ACCEPT AND I COMMIT MYSELF TO FULFILL THE PRINCIPLES ENUMERATED IN THIS PRESENT DECLARATION.

Sister of Charity of Saint Anne

Signature

At, on 20....

6.2 Sister of Charity of Saint Anne Formator Sister and/or Sister who accompanies.

The public and private conduct of the Sisters of Charity of Saint Anne may inspire and motivate people, especially those who are in the different stages of formation, but it can also scandalize and undermine their faith. For this reason, as Sisters of Charity of St. Anne, always, we must be mindful of the responsibility that accompanies our task. We also recognize that God’s goodness and grace support us in our life and mission.

The responsibility for compliance with the Code of Conduct rests with each individual. A Sister of Charity of St. Anne in charge of Formation or who accompanies candidates, postulants, novices and Sisters with temporal profession, who fails to comply with this Code of Conduct, will be subject to corrective action in accordance with the Congregation’s “Manual for the Protection of Personal Integrity and Freedom”, to protect the rights of all.

Corrective action may take various forms, from verbal reproach to dismissal or suspension from the function performed, depending on the nature, the specific circumstances of the offense and the extent of the harm.

A Formator Sister and/or Sister who accompanies candidates, postulants, novices and Sisters with temporal profession, must respect the rights and promote the wellbeing of every person, especially of those entrusted to her in their service.

Therefore, as FORMATOR SISTER and/or SISTER WHO ACCOMPANIES, I Sister

- 1 I will treat everyone with consideration and respect for their integrity and dignity.
- 2 I will use positive reinforcement instead of criticism, competition or comparison, wherever I live and carry out my task as formator and/or person who accompanies.
- 3 I will not humiliate, ridicule, threaten, demean, hit, shake, or slap any person entrusted to me.
- 4 I will not participate in any form of physical, psychological, economic or spiritual harassment, written or verbal, towards people entrusted to me and I will not tolerate such harassment done by other Sisters or any other person.
- 5 I will not use my position to exercise inappropriate power and authority over any person.
- 6 I will not engage in sexual intimacies, in any form, including consensual or non-consensual contact, forced physical contact and inappropriate sexual comments with any person, nor will I use, share or distribute pornographic material of any kind.
- 7 I will conduct sessions of accompaniment at appropriate places and times.

- 8 I will maintain the confidentiality of the information obtained during the sessions of accompaniment, except when, for compelling reasons, the reference leadership requires it.
- 9 I will report any suspicion of abuse or moral misconduct to the Local and/or Provincial/Delegation and/or General Protection officer. I understand that failure to report suspected abuse may constitute a misdemeanour under the law.
- 10 I will cooperate fully in any investigation of abuse of children, youth or adults who are vulnerable.
- 11 I will be responsible for my own physical, mental, emotional and spiritual health. I will seek help whenever I notice behavioural or emotional warning signs that indicate possible difficulties in any of these areas.
- 12 I will collaborate in caring for the physical, mental, emotional and spiritual health of my Sisters and of the persons entrusted in my task, and I will encourage them to seek help whenever I discover warning signs.

As a Sister of Charity of Saint Anne, in charge of Formation, I promise to strictly follow the rules and guidelines of this Code of Conduct as a condition to accompany the candidates, postulants, novices or Sisters of temporal profession.

I understand that, as Formator Sister or Sister who accompanies, I am subject to a thorough background check, including criminal background checks. I assume that any action inconsistent with this Code of Conduct or failure to act as mandated by this Code of Conduct may result in my removal as formator or person who accompanies, and that such conduct will be subject to corrective action in accordance with the "Manual for the Protection of Personal

8 In general, the communication will be made to the three levels, unless it is related to the person responsible for the protection of a level, in which case the information will be given only to the person responsible for the higher level(s).

Integrity and Freedom” which is in force in the Congregation.

I KNOW, I ACCEPT AND I COMMIT MYSELF TO FULFILL THE PRINCIPLES ENUMERATED IN THIS PRESENT DECLARATION.

Formator Sister or Sister who accompanies

Signature

At, on 20....

6.3 Aspirant, Postulant, Novice and Junior Sister of the Sisters of Charity of Saint Anne.

The public and private conduct of the aspirants, postulants, novices and junior Sisters of the Sisters of Charity of Saint Anne may inspire and motivate people, especially the young, but it can also scandalize and undermine their faith. For this reason, these must be always mindful of their responsibility and recognize that God’s goodness and grace support and accompany them.

The responsibility for compliance with the Code of Conduct rests with each individual. Therefore, the Aspirant, Postulant, Novice or Junior Sister who fails to comply with this Code of Conduct will be subject to corrective action in accordance with the “Manual for the Protection of Personal Integrity and Freedom” in force in the Congregation.

Corrective action may take various forms, from verbal reproach to the end of formation, depending on the nature, specific circumstances of the offense and the extent of the harm.

An Aspirant, Postulant, Novice or Junior Sister of the Sisters of Charity of Saint Anne must respect the rights and protect and promote the dignity, freedom and care of every person, especially of their Sisters or companions and of those entrusted to them in their service-task.

Therefore, I,
(name and surname)

- 1 I assume to live and promote respect for basic human rights, and to treat each person with respect and consideration.
- 2 I will use positive reinforcement rather than criticism, competition or comparison wherever I live and develop my task.
- 3 I will not humiliate, ridicule, threaten, degrade, hit, shake or slap any person.
- 4 I will not engage myself in any form of physical, psychological, economic or spiritual harassment, written or verbal, and will not tolerate such harassment done by other Sisters or any other person.
- 5 I will not use my position of superiority to exercise improper power and authority over any of my companions in the stage of formation in which I am.
- 6 I will not engage myself in sexual intimacies, in any form, including consensual or non-consensual contact, forced physical contact and inappropriate sexual comments with any person, nor will I use, share or distribute pornographic material of any kind.
- 7 I will report any suspicion of abuse or moral misconduct to the Local and/or Provincial/Delegation and/or General Protection Officer⁹. I understand that failure to report suspected abuse may constitute a misdemeanor under the law.
- 8 I will cooperate fully in any investigation of abuse of

9 In general, the communication will be made to the three levels, unless it is related to the person responsible for the protection of a level, in which case the information will be given only to the person responsible for the higher level(s).

children, youth or adults who are vulnerable or in situation of vulnerability.

- 9 I will be responsible for my own physical, mental, emotional and spiritual health. I will seek help whenever I notice behavioural or emotional warning signs that indicate possible difficulties in any of these areas.
- 10 I will collaborate in caring for the physical, mental, emotional and spiritual health of my companions and I will encourage them to seek help, to talk with the appropriate Sister, whenever I discover warning signs.

As Aspirant, Postulant, Novice or Junior Sister of the Sisters of Charity of Saint Anne, I promise to strictly follow the rules and guidelines of this Code of Conduct as a condition of continuing in my stage of formation and to carry out the services entrusted to me.

I understand that I am subject to a thorough background check, including criminal background checks.

I assume that any action inconsistent with this Code of Conduct or failure to act as mandated by this Code of Conduct may result as a consequence, the interruption of my formation and the suspension of the task entrusted to me, and I will be subject to corrective action in accordance with the "Manual for the Protection of Personal Integrity and Freedom" which is in force in the Congregation.

I KNOW, I ACCEPT AND I COMMIT MYSELF TO FULFILL THE PRINCIPLES ENUMERATED IN THIS PRESENT DECLARATION.

Aspirant, Postulant, Novice, Junior Sister (Delete what is not applicable)

Signature

At, on 20....

6.4 Centres of the Pastoral Ministry of Health.

In the Health Institutions governed by the Sisters of Charity of Saint Anne (SCSA) a Code of Conduct is followed that is based on the values and principles contained in the document “Basic and Assistance Principles of the SCSA in the Pastoral Ministry of Health”.

This Code orient decision-making and regulates the conduct of all the people who render their services in these Centres: managers/executives, workers, collaborators and volunteers, and is mandatory for all of them.

Each one of these persons signs and assumes the following:

Code of Conduct for Staff, Collaborators and Volunteers of the Centres of the Pastoral Ministry of Health of the Sisters of Charity of Saint Anne.

I,
as manager/executive, worker, collaborator, volunteer (delete what is not applicable) of the Centre commit myself:

- 1 To know and respect the legislation of the country, the Internal Regulation of the Centre and the document “Basic and Assistance Principles of the SCSA in the Pastoral Ministry of Health”.
- 2 To recognize and respect the dignity and rights of every person and of all the people present in the Centre (users, family members, people who accompany, visitors, workers, collaborators, volunteers and managers/executives) regardless of their situation and capacity.
- 3 To act with integrity and honesty in all respects, both in my interpersonal relationships and in respect and care for the assets of the Institution, its employees and collaborators, without misappropriating any of them.
- 4 To maintain an attitude of listening and observation of the

- needs, expectations, desires, values and beliefs of each person whom I may attend and to offer a personalized, respectful, humane, warm and empathetic professional treatment to the users, their families and people who accompany them.
- 5 To promote a pleasant, healthy and safe work environment, where positive human relationships of encounter, dialogue and collaboration among all may be given.
 - 6 To avoid any kind of discriminatory conduct, contempt, harassment or negligence that may violate the fundamental rights of other people.
 - 7 To value and timely respect the spiritual dimension of every person, healthy or sick, and to enable their pastoral care.
 - 8 To guarantee the right to privacy, intimacy and image of each person, with more zeal if they cannot defend themselves due to cognitive impairment or other circumstances.
 - 9 To respect the principles of confidentiality and professional secrecy, as well as the Centre's Data Protection policy.
 - 10 To maintain and optimize the use of the Centre's assets, including work time, avoiding wasting it on personal issues that could interfere with or impede compliance with work responsibilities.
 - 11 To avoid any manifestation of violence, physical, sexual, psychological, moral or other harassment, abuse of authority at work, and any other conduct that may involve intimidating or offensive treatment.
 - 12 Not acquire, obtain, produce, keep, distribute, trade, use, or consume any kind of pornography.

- 13 Not acquire, distribute or consume psychoactive substances that may affect the performance of my professional activity.
- 14 To report any suspicion of abuse or moral misconduct to the Centre's Prevention and Protection Delegate.
- 15 To cooperate fully in any investigation of abuse of minors or vulnerable adults or in situation of vulnerability, when required.

I assume that the accredited or flagrant breach of any of the principles and recommendations contained in this declaration, may entail, by decision of the Company, the immediate termination of my work functions, professional or volunteering services with the Institution.

I KNOW, I ACCEPT AND I COMMIT MYSELF TO FULFILL THE PRINCIPLES ENUMERATED IN THIS PRESENT DECLARATION.

Signature

At, on 20....

6.5 Centres of the Pastoral Ministry of Social Action.

In the Institutions of Social Action governed by the Sisters of Charity of Saint Anne (SCSA) a Code of Conduct is followed that is based on the values and principles contained in the document “Our Evangelizing Style in Social Action”.

This Code orient decision-making and regulates the conduct of all the people who render their services in these Centres: managers/ executives, workers, collaborators and volunteers, and is mandatory for all of them.

Each one of these persons signs and assumes the following:

Code of Conduct for Staff, Collaborators and Volunteers of the Centres of Social Action of the Sisters of Charity of Saint Anne.

I,
as manager/executive, worker, collaborator, volunteer (delete what is not applicable) of the Centre commit myself:

- 1 To recognize and respect the dignity and fundamental, individual, social and civil rights of the persons of the Centre of Social Action, whatever their situation and capacity may be, in order to create the essential conditions of freedom, justice and peace.
- 2 Not to play (no favouritism) favouritism or discriminate against anyone based on ethnicity, language, religion, sex, sexual orientation, gender identity, nationality or lack thereof, age, abilities, culture, skills, political orientation, socioeconomic situation or family structure.
- 3 To propitiate a pleasant, healthy and safe environment for coexistence and work at the Centre, with relationships of respect, listening, dialogue and collaboration.
- 4 To act with integrity and honesty in all respects, both in my interpersonal relationships and in respect and care for the assets of the Institution, its employees and

- collaborators, without misappropriating any of them.
- 5 To cultivate the social skills that may allow us to live in harmony with those around us: active listening and empathy.
 - 6 To act with integrity and honesty in every way; to be coherent with what is said and done, in order to generate trust and credibility.
 - 7 To be prudent and keep the confidentiality of people; to respect the Centre's Data Protection policy.
 - 8 To treat vulnerable people with humanity, understanding, compassion and tolerance, accepting their limitations and the situation of each one.
 - 9 To assume with the people of the Social Centre the human and ethical values of respect, justice, honesty, truth, equality, integrity, sincerity and responsibility.
 - 10 To respect the limits between my personal and professional life. Not abuse my position of authority, nor the trust placed in me, nor in my interpersonal relationships, nor to obtain a personal benefit or enrichment.
 - 11 To inform the Center Management of any small gift that I could give or receive in relation to my work.
 - 12 To show myself and to be transparent about the reasons for the decisions taken.
 - 13 To foster debates and participate in them in order to facilitate ethically informed decision-making.
 - 14 To consider people as a whole and not limit them to their problem or deficiency.
 - 15 To avoid any manifestation of violence or physical, psychological, moral or sexual harassment.

- 16 Not use the media or social networks in order to intimidate, offend or harass other people.
- 17 Not acquire, obtain, produce, keep, distribute or consume any kind of pornography.
- 18 Not acquire, distribute or consume psychoactive substances that may affect the performance of my professional activity.
- 19 To report any suspicion of abuse or moral misconduct to the Centre's Prevention and Protection Delegate.
- 20 To cooperate fully in any investigation of abuse of minors or vulnerable adults or in vulnerable situations, when required.

I assume that the accredited or flagrant breach of any of the principles and recommendations contained in this declaration, may entail, by decision of the Company, the immediate termination of my work functions, professional or volunteering services with the Institution.

I KNOW, I ACCEPT AND I COMMIT MYSELF TO FULFILL THE PRINCIPLES ENUMERATED IN THIS PRESENT DECLARATION.

Signature

At, on 20....

6.6 Centres of the Pastoral Ministry of Education.

6.6.1 General criteria to be taken into account by the members of the Educational Community.

In the Educative Institutions governed by the Sisters of Charity of Saint Anne (SCSA) a Code of Conduct is followed that is based on the values and principles contained in the document "Specific Character" of the Educative Centres of the SCSA.

This Code orient decision-making and regulates the conduct of all the people who render their services in these Centres: managers/executives, workers, collaborators and volunteers, and is mandatory for all of them.

Each one of these persons signs and assumes the following:

Code of Conduct for Staff, Collaborators and Volunteers of the Educative Centres of the Sisters of Charity of Saint Anne.

I,
as manager/executive, worker, collaborator, volunteer (delete what is not applicable) of the Centrecommit myself:

- 1 To treat all minors and co-workers respectfully, without discrimination of any kind and without invading their sphere of physical and psychological privacy.
- 2 To be aware that I carry out a professional or institutional role and, in light of this, those with whom I deal trust my good intentions and professionalism, which entails great responsibility and the need to act in accordance with said trust.
- 3 To develop a culture where minors may express themselves freely without any risk to their physical and emotional health and where the educator, non-teaching staff and volunteers may be reference models for the minor.
- 4 To seek transparency in one's own behaviour, avoiding

- carrying out conducts in unclear conditions that may give rise to incorrect interpretations, particularly with respect to minors and disabled people.
- 5 To act with integrity and honesty in all respects, both in my interpersonal relationships and in respect and care for the assets of the Institution, its employees and collaborators, without misappropriating any of them.
 - 6 To respect the limits of each minor, helping them develop the sense and the awareness of their rights, as well as the way to proceed if they feel that there is some kind of problem that could put them in danger.
 - 7 To be prudent in my signs of affection, so that, even understanding that they are relevant and necessary for the proper development of the formative, healing and accompaniment processes, it is necessary to restrict them to welcome, approval, understanding, empathetic listening and appreciation, avoiding any physical or verbal contact that could lead to ambiguities, misinterpretations or invade the privacy of the other person.
 - 8 To avoid physical punishment and any form of verbal, psychological or emotional aggression. Not use, in any case, forms of correction that include rude, threatening, intimidating, derogatory or humiliating attitudes or language and to follow, in disciplinary problems, the procedures established in the coexistence regulations, without justifying, in any case, any way of physical, mental or emotional abuse.
 - 9 To adequately inform parents or legal guardians about the kind of activities that are carried out with their children and to obtain their express authorization, when required by the current regulation, for the participation of their children in them. To count, whenever minors have to be transported in vehicles to carry out activities, with the written consent of their parents or legal guardians. Likewise, in case of a scheduled sleepover, to provide the

parents with information on the manner and conditions in which this will take place.

- 10 To take care, in the subjects that I deal with minors and in the means that I use for it (vocabulary, recordings, movies, games or any other form of personal interaction or entertainment) that my words and way of relating to the minors may be as and in such a way that they could be said or performed in the presence of the parents, assuming that any kind of sexually explicit or pornographic material is expressly prohibited.
- 11 To keep clear and professional limits with minors or refer them to another adult educator if I perceive that inappropriate physical or personal attraction is being developed between a minor and an adult.
- 12 To take appropriate measures to immediately intervene and provide a safe environment for the minor if I observe someone (adult or minor) allegedly abusing him/her. To communicate it immediately to the Person Responsible for the Prevention and Protection and to the Principal of the Centre. They will proceed in accordance with the established protocols.
- 13 Not use social networks for issues related to the school activity, except from official accounts, for promotional purposes and with the authorization of the parents of the students and the permission of the Principal.
- 14 If the WhatsApp tool is used, or any other messaging program as a means of information or communication with families and students, always do so together with another responsible adult collaborating with the Centre, and respecting current data protection legislation. If this is not possible, use the Official Platform of the Centre.
- 15 To dress appropriately for the role performed at the Centre (teacher's gown, uniform, work overalls, etc.). In this sense, out of respect for the rest of the members of

the Educational Community and dignity of the job, the use in the Centre of any kind of sports clothing is not appropriate (except in the case of Physical Education teachers, coaches, sports monitors and similar) or any other kind of clothing that, at the discretion of the Centre Management, may be considered disrespectful to the rest of the educational community or inappropriate for the development of teaching activity. Said criterion will be governed by the right of the Company to maintain an image consistent with and respectful of the educational activity that is carried out.

- 16 To keep the duty of secrecy and confidentiality. Not transfer to the students, their parents or guardians, or to third parties details or comments related to any sensitive matter of their own or others' private life, or of students, their families or the personnel who provide services in the Centre, nor with respect to actions related to the educational field of which there is some kind of knowledge.
- 17 To respect the rules of functioning and coexistence of the Centre, the authority of the directive / executive bodies, and to collaborate in the good functioning of the seminars, guidance services, tutorship and any other services of the Institution.
- 18 Not provide private teaching or guidance services to those students to whom I teach or could reasonably give it. Likewise, members of the guidance services may not refer students to their own consultation or psychological office.
- 19 To ensure the good state of maintenance and cleanliness of materials and facilities, making good use of it and using it rationally.

Signature

At, on 20....

6.6.2 Inappropriate actions or behaviours that must be avoided in activities with minors.

By way of example and without claiming to be exhaustive, some inappropriate behaviours are listed:

- a Any type of physical aggression that may be considered as abuse of power, abuse of force or physical mistreatment. No form of physical correction is acceptable.
- b Any form of verbal, psychological or emotional aggression that could hurt the minor or make him/her look ridiculous in front of the peer group (insulting, humiliating, underestimating or degrading a minor). Therefore, language, both verbal and non-verbal, must be taken care of, without being correct the use of vulgar language or profanity, particularly in the presence of minors. Likewise, comments and gestures with sexual connotations will be avoided.

In any case, it is expressly prohibited to possess, distribute, display or otherwise facilitate access to material that may be considered pornographic, nor to be in possession of inappropriate printed or audio-visual material or of a sexual nature (magazines, photos, videos, movies, etc.).

- c Any way of relating to minors that could be considered abusive or exploitative or that could place the minor at risk of abuse
- d To keep any form of unnecessary or inappropriate physical contact with minors. Activities and games that may have sexual connotations should be avoided with minors, and among minors themselves. Affective/sentimental and/or sexual relationships between the staff who work and collaborate in the Centres and their students are totally and expressly prohibited, regardless of age. Failure to comply with this rule will mean the loss of confidence in the worker and the consequent decision to terminate the employment

relationship with him/her, for breach of the duty of good faith

- e In any case, the affected teacher must refrain from grading or evaluating related students in cases where there may be a marital, affective or identical nature relationship between the teacher and the father, mother or legal guardian of the student, always that the pedagogical structure of the Centre may allow it.
- f To keep any kind of physical contact when alone with a minor. If a minor initiates physical contact, to respond in a proportionate way.
- g To discuss sexual activities with minors, unless it is a specific requirement of educational work and the person is prepared to address such topics.
- h That minors spend the night in places not previously planned and without the knowledge and permission of their parents or legal guardians.
- i That minors and adults use the same changing rooms and showers in sports and leisure activities.
- j That minors and adults use the same tent or the same bed to sleep.
- k To host a minor or minors, whom I am working with, in my home overnight without the supervision or presence of other adults.
- l To possess, use or be under the influence of illegal drugs.
- m To promote, provide or allow minors to consume alcohol or drugs, narcotic substances.
- n To be naked or unworthily dressed in the presence of minors.
- o To take photographs of minors while they are undressed or getting dressed or, in any case, without the authorization of

their legal representatives, whether for purposes related to teaching or not.

- p To show disproportionate forms of expression of affection that may be interpreted as inappropriate or that include physical contact that could be cause for displeasure or rejection by the minor.
- q To discriminate, to show different treatment or particularly favour some minors to the exclusion of other minors.

ACCREDITED OR FLAGRANT BREACH OF ANY OF THE PRINCIPLES AND RECOMMENDATIONS CONTAINED IN THIS PRESENT DECLARATION, MAY ENTAIL, BY DECISION OF THE COMPANY, THE IMMEDIATE TERMINATION OF THEIR WORK OR VOLUNTEER FUNCTIONS AT THE CENTRE.

I KNOW, I ACCEPT AND I COMMIT MYSELF TO FULFILL THE PRINCIPLES ENUMERATED IN THIS PRESENT DECLARATION.

Signature

At, on 20....

6.7 Government Houses.

In the Government Houses (General, Provincial, Delegation) of the Sisters of Charity of Saint Anne (SCSA) a Code of Conduct is followed that is based on the values and principles contained in their Constitutions, mainly in the numbers referring to Hospitality, the evangelical-charismatic commitment and the evangelizing style.

This Code orient decision-making and regulates the conduct of all the people who render their services in these Centres: Administration and General Services Staff (Reception, Cleaning, Maintenance, Gardening, Surveillance, Security, Kitchen, Drivers), Human Resources or Occupational Risk Prevention Staff, Hired

Advisors, Collaborators and Volunteers; and it is mandatory for all of them.

Each one of these persons signs and assumes the following:

Code of Conduct for Staff, Collaborators and Volunteers of the Government Houses of the Sisters of Charity of Saint Anne.

I,
as manager/executive, worker, collaborator, volunteer (delete what is not applicable) of the House commit myself:

- 1 To know and respect the legislation of the country, the Manual for the Protection of Personal Integrity and Freedom of the Congregation of SCSA, the Protocols for Prevention and action facing situations of mistreatment or abuse and the Internal Regulations or Normative of the Congregation/ Province/Delegation (delete what is not applicable) and of the House.
- 2 To recognize and respect the dignity and rights of every person and of all the people present in the House (Sisters, SAF Laity, relatives, visitors, workers, collaborators, volunteers and advisers) whatever their situation and capacity may be.
- 3 To act with integrity and honesty in all respects, both in my interpersonal relationships and in respect and care for the assets of the Institution, its employees and collaborators, without misappropriating any of them.
- 4 To keep an attitude of listening and a personalized, respectful, humane and empathetic professional treatment with the Sisters and all the people who come to the House.
- 5 To propitiate a pleasant, healthy and safe work environment, where positive human relationships of encounter, dialogue and collaboration among all may be given.

- 6 To avoid any kind of discriminatory, contempt, harassment or negligence conduct that may violate the fundamental rights of other people.
- 7 To timely value and respect the spiritual dimension of every person.
- 8 To guarantee the right to privacy, intimacy and image of each person, with more zeal if they cannot defend themselves due to cognitive impairment or other circumstances.
- 9 To respect the principles of confidentiality and professional secrecy, as well as the data protection policy of the Congregation/Province/Delegation (delete what is not applicable).
- 10 To maintain and optimize the use of the House's assets and resources, including working time, avoiding using it for personal issues that could interfere with or prevent compliance with work responsibilities or voluntarily assumed commitments.
- 11 To avoid any manifestation of violence, physical, sexual, psychological, moral or other harassment, abuse of authority at work, and any other conduct that may involve intimidating or offensive treatment.
- 12 Not acquire, obtain, produce, keep, distribute, trade, use or consume any kind of pornography.
- 13 Not acquire, distribute or consume psychoactive substances that may affect the performance of my professional, collaborative or volunteer activity.
- 14 To report any suspicion of abuse or moral misconduct to the person Responsible for Prevention and Protection of the Congregation / Province / Delegation / House (delete what is not applicable).
- 15 To cooperate fully in any investigation of abuse of vulnerable people or in situation of vulnerability, when required.

I assume that the accredited or flagrant breach of any of the principles and recommendations contained in this declaration, may entail, by decision of the Company, the immediate termination of my work functions, professional or volunteering services with the Institution.

I KNOW, I ACCEPT AND I COMMIT MYSELF TO FULFILL THE PRINCIPLES ENUMERATED IN THIS PRESENT DECLARATION.

Signature

At, on 20....

6.8 Laity of Saint Anne Family (SAF), Volunteers of the Missionary Volunteering (SAMV) and Other Volunteers and Collaborators of the Congregation of Sisters of Charity of Saint Anne.

The public and private conduct of the SAF Laity, members of Saint Anne Missionary Volunteering (SAMV) and volunteers collaborators of the Congregation of Sisters of Charity of Saint Anne can inspire and motivate people, especially the young, but it can also scandalize. For this reason, the laity linked to the Congregation, in every moment, must be mindful of the responsibility that accompanies our commitment and our service.

The responsibility for compliance with the Code of Conduct rests with each individual. The one who fails to comply with this Code of Conduct will be subject to corrective action in accordance with the Manual for the Protection of Personal Integrity and Freedom in force in the Congregation.

Corrective action can take various forms from verbal reproach to dismissal from SAF or SAMV or the suspension from the function performed, depending on the nature and specific circumstances of the offense and the extent of the harm.

Each one of the persons linked to the Congregation of Sisters of

Charity of Saint Anne must respect the rights and protect and promote the dignity, freedom and care of every person, especially of their laity companions and the persons entrusted to them in their service-task.

Therefore I,
member of SAF / SAMV or Volunteers of the Congregation (delete what is not applicable) commit myself:

- 1 To respect the dignity, freedom and social and moral values of people, observing the principle that people are the center of our action.
- 2 To act with integrity in every way, with respect and good faith, building positive relationships, and to avoid any kind of discriminatory, contempt, harassment or negligence conduct that may violate the fundamental rights of the other person.
- 3 To avoid physical, psychological, intimidation harassment or others that could be considered abuse of authority or of any other kind (conscience, sexual, economic...) and not tolerate its performance by other people; to reject any racist, sexist or offensive attitude or expression, whether exposed publicly or privately.
- 4 To observe the current legislation of the own country and, in each case, that of the one or those where the person carries out his/her activity, attending to and respecting its rules and regulations.
- 5 To maintain cordiality and respect at all times with the people who I meet in any of the groups or centers worldwide.
- 6 Always maintain and project absolute respect for the local customs and traditions of each place, attending, to the extent possible, the own values of each culture, relationship protocols or clothing guidelines, among others.
- 7 To maintain and optimize the use of the goods of the

- Congregation and of SAF (delete what is not appropriate), in their communities and centers.
- 8 Not accept favours, alms, gifts, meals or attentions that could compromise the ability to make free and objective decisions.
 - 9 Not acquire, carry or use or allow the use of any kind of weapon to carry out any of the activities of the Congregation or of SAF (delete what is not appropriate).
 - 10 Not acquire, distribute or consume psychoactive substances.
 - 11 To respect the freedom, integrity and dignity of each person and to have appropriate sexual conduct in all parts and spheres of the Congregation or SAF (delete what is not appropriate) in coherence with the values of the Institution that is represented.
 - 12 Not acquire, obtain, produce, keep, distribute, trade, use or consume any kind of pornography.
 - 13 To report any suspicion of abuse or moral misconduct to the Prevention and Protection Delegate of the Congregation.
 - 14 To cooperate fully in any investigation of abuse of children, young people or vulnerable adults or in situation of vulnerability, in which I may be required, regardless of the country where the alleged abuse may have occurred.

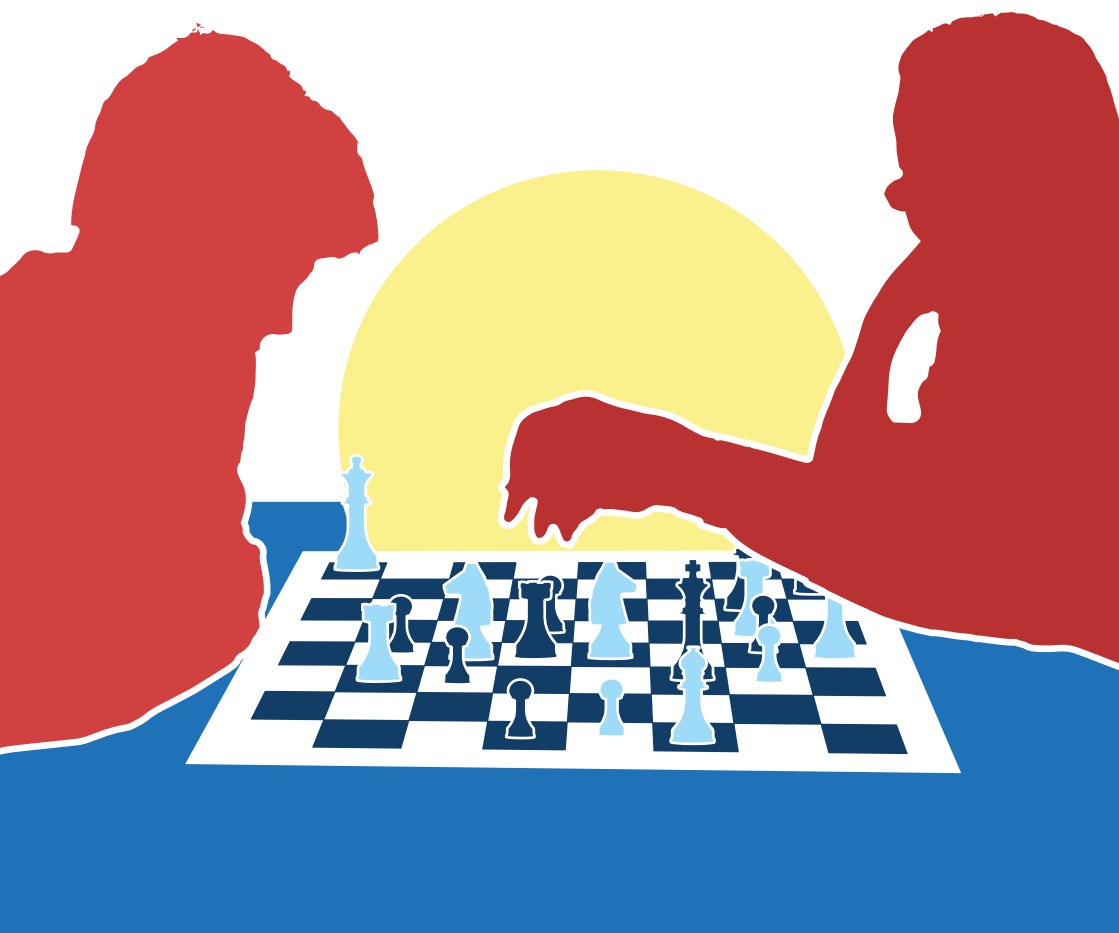
I assume that the accredited or flagrant breach of any of the commitments and recommendations contained in this present declaration will lead to the immediate termination of my functions or services as Lay person linked to the Congregation or SAF (delete what is not applicable).

I KNOW, I ACCEPT AND I COMMIT MYSELF TO FULFILL THE COMMITMENTS ENUMERATED IN THIS PRESENT DECLARATION.

Signature

At, on 20....

7. PREVENTION PLAN.



To favour in our communities and centers care and protection of people, especially those who are in a situation of vulnerability, we take into account aspects related to the possible victims, with the potential aggressors and with the environment where we carry out our mission.

7.1 Concerning the victim.

We try to know the risk factors, in order to minimize them, and the protective factors, in order to potentiate them.

Risk factors.

Being aware of them is essential to be able to prevent and identify abuses of any kind. These factors can be:

- Personal: being a minor, going through moments of difficulty (own illnesses or those of close people...), having a lack of self-esteem, psychiatric problems, living of bereavements, problems of sexual identity, situation of cognitive impairment or dependency...
- Family: crisis in the family, psychiatric problems, abusive family...
- Social: xenophobia (racism, machism, nationalism, clericalism, homophobia).
- Substance use, such as drugs, medications or alcohol abuse that causes a decrease in the will in the victim or annul her/his consciousness.
- Cultural: in some cultures, the position of authority is used to impose inappropriate behaviours.

Protective factors.

The best way to protect people is to empower them in order to be able to protect themselves.

- To treat all people, especially children, youth and vulnerable adults with respect, to act in the same way, knocking on doors before entering private rooms, asking for permission to join them and to respect their privacy and possessions...
- To respect difference, what people like and dislike.
- To respect people's dignity and feelings, to ask about their personal preferences, the way to address them and the help they may need.
- To use appropriate and inclusive language and do not exclude anyone from conversations having in their presence.
- To actively promote the empowerment and well-being of vulnerable adults through appropriate opportunities.
- To appoint a person as coordinator for the protection of children, youth and vulnerable adults in each Center. This person should have formation and know about his/her functions.

7.2 Concerning the possible aggressor.

To pay attention to the selection and formation of women candidates to Religious Life and of the different persons who are going to collaborate and work with us in the different fields and places where we are. When it may be needed, to require always the legal documentation necessary in order to collaborate or work with minors in each territory.

To care for the vocational discernment and the formation at all stages.

The Congregation, as part of the commitment to the vocation of each Sister and to her evangelizing mission in the world, promotes the Initial, On-Going and integral Formation of its members, paying special attention to the appropriate use of the authority and of the personal power, together with the respect for the limits in the

relationships that the Congregation establishes.

The Congregation must take care and give special importance to the discernment of vocations and to the criteria for admission to the Congregation and for giving the step to the different stages of formation of the Sister. Throughout the whole formative process, personal accompaniment and discernment will be encouraged and the search for help of professionals, when necessary, will be animated.

7.3 Regarding the Centers owned by the Congregation.

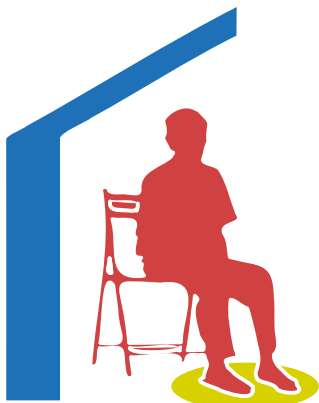
In addition to taking care of the adequate selection of personnel in the Centers owned and/or managed by the Sisters of Charity of Saint Anne, the Congregation promotes the elaboration of Risk Maps and Prevention Plans in these Centers, in order for them to be "safe spaces". The Congregation is also concerned that all persons who perform any task in them may receive mandatory formation in terms of protection, and sign their commitment to comply with the codes of conduct established by each Center.

When the Congregation has the first news of a situation of acts against integrity and personal freedom (abuse of authority, sexual, economic, psychological...), that one of its members or a worker or volunteer has been denounced by an alleged victim of any type of abuse, of whatever kind it may be, it is necessary to act urgently. The information will be communicated as quickly as possible, following the internal communication protocol (communication channel from the apostolic work to the General Government).

At the General level there is a team made up of the following persons:

- The Sister Responsible for the Field of Formation and Spirituality.
- The Sisters Responsible for the Pastoral Ministries.

One of them will be the Prevention and Protection Delegate at General Level.



At Provincial level it is necessary that there may be a Delegate of Prevention and Protection, which belongs to the Provincial Council; she will be accompanied by two or three people.

At Local Level there will be:

- A Protection and Prevention Delegate in the Community (who will or will not be the Superior of

the Community).

- A person responsible for Prevention and Protection in each Center.

Both will be in communication with the Provincial Team of Prevention and Protection.

In this first phase we have to distinguish what kind of news come to us about acts against integrity and personal freedom, as they can be:

- a "notitia delicto": that is, some information that may have arrived to us orally or in writing, both from the persons allegedly involved and from third parties.
- a denunciation: that is, a written document in which the alleged victim transmits to us the facts that she/he has suffered by the victimizer.

8. INTERVENTION PROTOCOL .



Before approaching any kind of external expert (lawyers, psychologists, etc.), if it is not an extreme case involving arrests of people, an internal communication will be carried out so that the corresponding teams may evaluate the need whether to utilize it or not.

8.1 Centralized and rapid information.

Agents who intervene:

- Delegate for Prevention and Protection at Community level.
- Delegate for Prevention and Protection of the Centers or Activities (Sister or Lay person, according to the reality).
- Delegate for Prevention and Protection at Provincial/ Delegation level.
- Delegate for Prevention and Protection at General level.

Communication Protocol.

A) Center or Activity.

It is necessary that in each Center or activity there may be a person responsible for Prevention and Protection, a team and a communication protocol.

Example:

- In the case of an abuse to a person, either minor, vulnerable adult or not, in a particular school in a country, the Responsible for Prevention and Protection of the Center communicates it to the Delegate for Prevention and Protection of the Province and to the Delegate for Prevention and Protection at General level simultaneously. In parallel, that Responsible will communicate it to the concerned official bodies.

B) Sisters.

If the abuse is between or with the Sisters, the Sisters have direct access to the Provincial and General Delegates for Prevention and Protection.

If the abuse takes place in the Community, the Sister can go directly to the Provincial level.

If it is a third person (Sister or Lay person) the one who denounces, the information has to reach signed at the Provincial and General level.

8.2 Actions to be carried out on receiving a “Notitia” of a denunciation.

Upon receiving the news of facts that could constitute a crime, or when receiving a complain of an accusation, we should always:

Upon receiving the news of facts that could be constitutive of crime or upon receipt of a denunciation, we must always:

- activate immediately the protocol of communication of the Congregation, so that the persons who are responsible and expert in the matter may facilitate us the help needed.
- listen, welcome and protect the person or persons who are transmitting to us the news or the denunciation, both the alleged victim or his/her legal representatives, family members or persons who are close to them.

In order to take a correct decision, apart from sending the written documentation we have, it is very important to transmit all the information that may help to understand the extent of the problem.

- Condition of the alleged victim (minor or de facto incapacitated person, or capable adult), and the age.
- Condition of the alleged abuser (religious sister, priest, religious man, lay person linked to the Congregation or the Center), and the age.
- Concrete or the approximate date in which the acts took place.
- Jurisdiction to which recourse is sought by the alleged victim or his representatives (criminal or canonical).
- Jurisdiction to which it is intended to appeal by the alleged victim or her/his representatives (criminal or canonical).



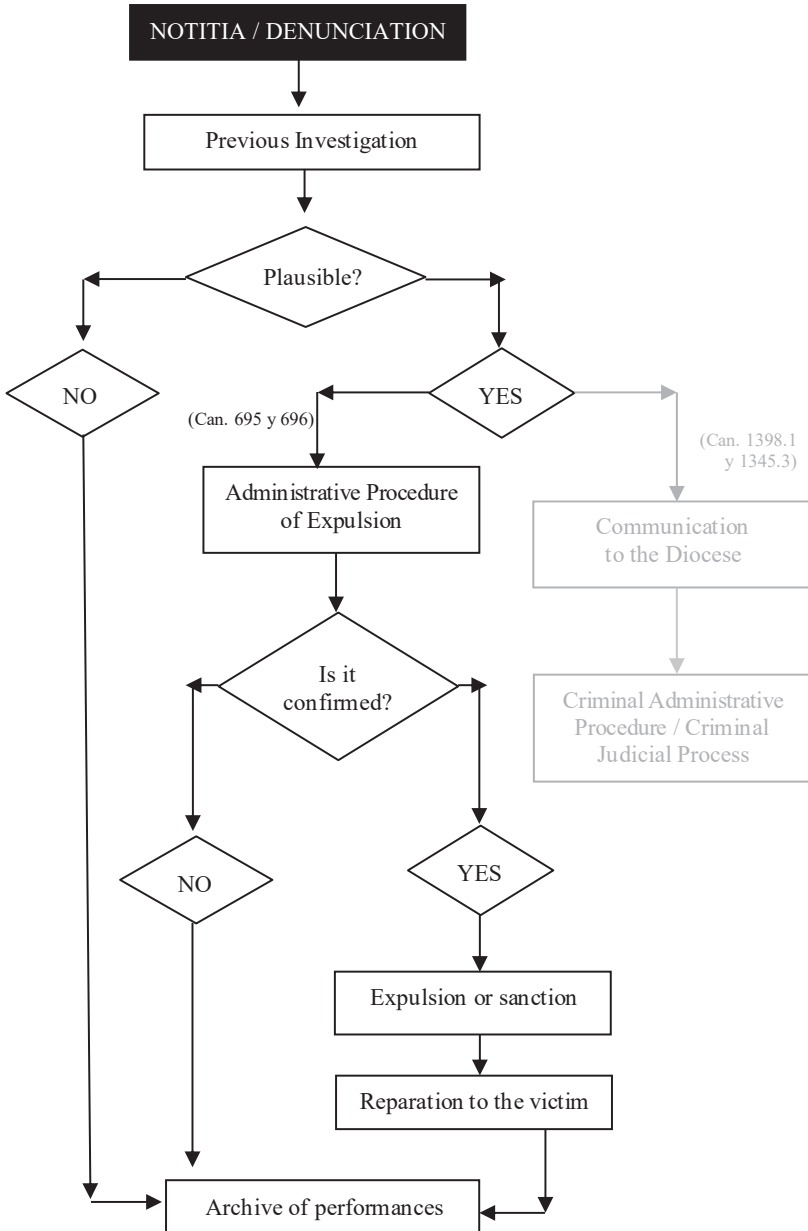
With the treatment of this information, the persons responsible for prevention and protection, will be able to provide us with the necessary help to find out if the facts discussed or denounced are prescribed or not, or whether or not we have a legal obligation to communicate it to the corresponding state instance (prosecutor's office, police or other).



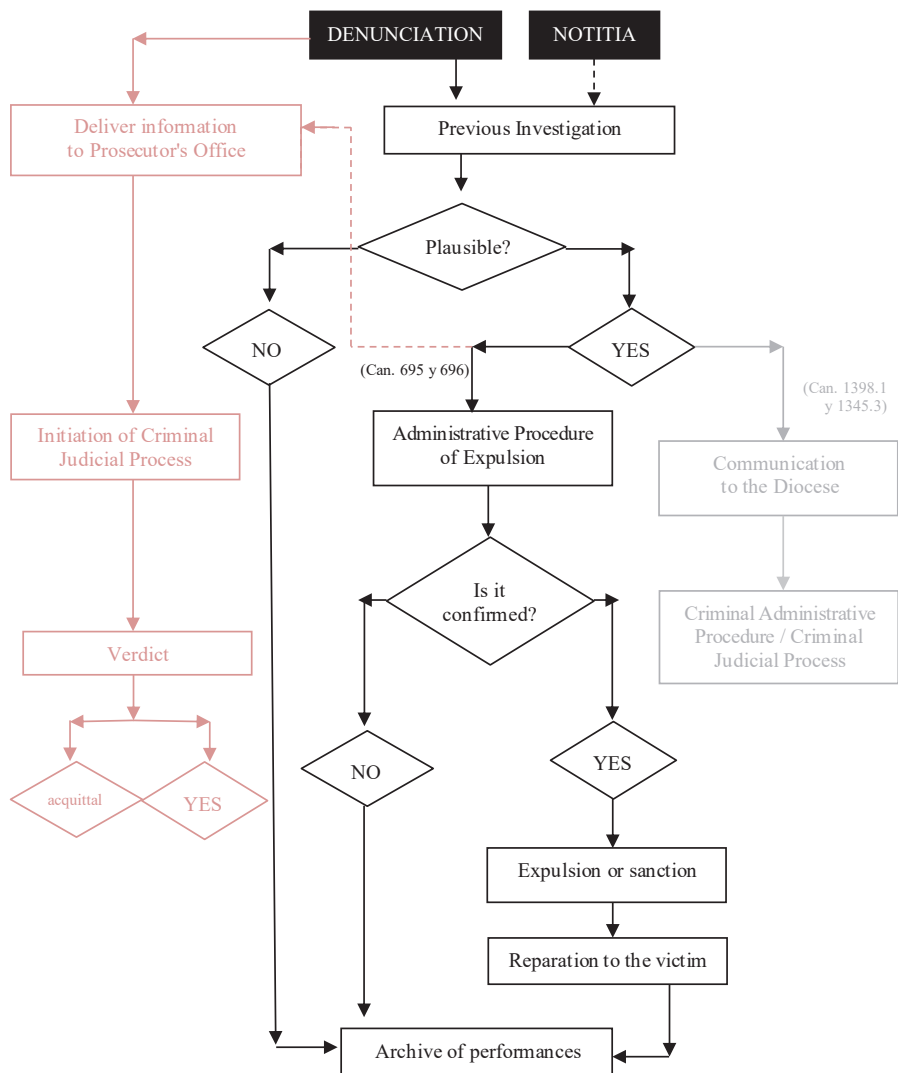
8.3 Procedure to follow if a Sister is the one denounced

Independently of the legal actions that can be carried out by the alleged victim or his/her legal representatives, after knowing the prescriptibility or not in the state jurisdiction of the alleged facts transmitted or denounced, the Congregation will compulsorily follow the canonical jurisdiction according to the following schemes, with the pertinent simultaneous communication to the civil authorities (Prosecutor's Office, police, ...), if necessary:

“NOTITIA” OR DENUNCIATION PRESCRIBED IN STATE JURISDICTION



“NOTITIA” OR DENUNCIATION NOT PRESCRIBED IN STATE JURISDICTION



8.3.1 Initial Communication

From the moment the denunciation or the news of alleged criminal acts is received, it is compulsory to avoid contact between the alleged victim and the alleged aggressor, always safeguarding the right to the presumption of innocence and the principle of credibility of the victim. Confidentiality of the acts will be kept until the confirmation of the authenticity of the same.

Upon confirmation of the possible authenticity of the news of alleged criminal acts, the necessary administrative disciplinary measures will be established so that, as a precautionary way until the end of the procedure provided for by current legislation, the alleged offender may be suspended from any activity that may involve contact with the protected legal assets, whether minors, vulnerable persons or any other type of persons or assets (money, immovables...).

Throughout the whole process and until the end of the procedure, support and closeness of the Congregation and its commitment to the principle of zero tolerance towards any type of abuse will reach to the victims. They will be informed of the precautionary separation of the accused person from any contact with minors or vulnerable persons and that reparation measures will be offered in case the accused person finally pleads guilty. However, reparation measures will not be activated at this time in order to ensure neutrality, avoiding any kind of interference.

All contacts will be handled through the lawyers, following their advice and instructions. If a judicial process is followed, the lawyer of the Congregation and the lawyer of the accused religious woman should be different, though the Congregation will help the Sister to get the legal help necessary for her defence. The presence of the lawyer of the accused woman is obligatory during the entire judicial process.

In the case of a criminal administrative proceeding, the presence of a lawyer will be conditioned to the canonical legislation in force at

the time, and always safeguarding the legitimate right to defence.

8.3.2 Communications during the process, if the accusation is a criminal one.

With the accused woman if she is a Sister.

Personal and legal level.

Whenever possible, the Major Superior will meet with the Sister and will make sure that in addition to a lawyer, she is offered an interlocutor in order to accompany her and to evaluate her physical, psychological and spiritual state, especially if there is a situation of risk of suicide, depression, psychosomatic effects, etc. If she recognizes the crime, she will be clearly told of the categorical reprobation of the acts committed and the submission to the law.

Institutional level.

In the case that provisional freedom is decreed, the place where the religious woman will be sheltered will be determined, inside or outside the Institute. If she will reside in a Community, the Superior General or a Sister delegated by the Superior General will prepare the host community.

With the community and the center of activity where the accused Sister carries out her work.

The Local Superior, the Major Superior or a Sister delegated by her, will meet with the community of the religious woman and with the workers or volunteers of the Center, in any case, and they will be informed of the initiation of the procedure and of the facts of which she is accused. Insistence will be made on the adhesion of the Congregation to the principle of zero tolerance towards conducts involving abuses of any kind or violence in general, the absolute respect for judicial decisions, the accompaniment to the accused woman and the commitment to reparation with the victims, if it is finally concluded that a crime has existed.

With the destinataires of the Center.



The Delegate for Prevention and Protection of the Center, in coordination with the Provincial Delegate for Protection, safeguarding always confidentiality of the accused person, will assess the opportunity to communicate the situation to the alleged victim's colleagues, especially if they have been involved in any way. In that case, the Delegate for Presentation and Protection will take special and close care of such communication and, if necessary, will count for that on the presence and mediation of persons of the Congregation close to the daily attention to minors and/or vulnerable persons and whom the Delegate trusted on. The communication will be adapted to the age and other circumstances of the addressees, it will be explained to them that the Sister has been removed from her functions, they will be reminded of the principles of good treatment and the commitment of the Congregation towards them.

With the Provincial Council.

The Major Superior will inform of the situation to her Council which will make decisions on how to deal with the situation both *ad intra* and *ad extra* of the Institute.

With the Province in which it has occurred: the Provincial Council or, where appropriate, the General Council, will assess the opportunity of a declaration to the whole Province, objective and transparent in which the facts submitted to the judgment may be collected and the adhesion of the Institute to the principles and commitments indicated in the previous numbers.

With the media: As far as possible, a single interlocutor of the Congregation with the media will be designated. It may be considered to issue a press communication in which, objectively pointing out the facts, the adhesion of the Congregation to the principles of this document of zero tolerance towards conducts that may imply abuses of any kind or mistreatment in general, the absolute respect for judicial decisions, the commitment to reparation with

the victims, and the suspension of the pastoral or labour functions of the accused woman and of her habitual contact with minors or vulnerable persons will be highlighted. It will be precautionary during the judicial process, and definitive in the terms foreseen by law, if this ends in a conviction.

8.3.3 Communications after the judicial Process or administrative procedure.

With the victims and their families.

The Congregation, through the Major Superior or the Delegate of Prevention and Protection, will contact the victim, in the case of a condemnatory conviction, to offer to her the measures of reparation that are foreseen, the request for institutional forgiveness for the harm caused, if applicable, the analysis of what has happened and the possible failures of the “system”, together with the commitment of the Congregation to strengthen all the measures of prevention so that such cases do not be repeated again.

The victim and her/his family will also be informed in case the administrative procedure is closed for lack of evidences.

With the convicted Sister.

The Superior General together with the General Council, should assess whether she should continue or not her religious life in the Congregation in light of the seriousness of the facts and their impact within the Institute and in the ecclesial and civil environment, keeping in mind the age and personal situation of the religious woman. This assessment and discernment will be made after a dialogue of the Superior General with the convicted Sister and keeping in mind the civil and canonical norms regarding dismissal or, in her case, removal from any activity in habitual contact with minors or vulnerable persons.

If it is decided to continue in Religious Life, the Major Superior, if possible, with the opinion of her Council, will decide the destination of the convicted Sister. The priority criterion will always be, in view

of the risks of relapse, and by legal obligation, that the destination may be absolutely far from habitual contact with minors or vulnerable persons. The host community will be advised of the situation and will have an important role to play in helping and supporting the Sister in her new situation and in dealing with her past. A psychological and spiritual follow-up of the person is indispensable, if she agrees with it. It is also necessary, from the institutional point of view, some periodic meetings of the Sister with the Major Superior, her Delegate or the Local Superior.

If the Sister leaves religious life, the Major Superior will see to it that she has the conditions for her social and professional reintegration and her non-recidivism.

With the acquitted Sister.

If the verdict is acquitted, the Major Superior will welcome the Sister who was accused and will offer to her the necessary help and support to integrate and overcome the situation she has lived.

Communication at public level.

At the end of the process and in the case of a condemnatory sentence, communication will be carried out to the various interlocutors already mentioned, giving notice of the judicial resolution and the request for forgiveness from the Congregation for not having been able to guarantee the protection of the victim, together with the analysis of the possible errors committed in this sense, in order to try to avoid the repetition of similar situations, will go public.

If the sentence is acquittal the Major Superior will take appropriate measures to restore the reputation of the person falsely accused, and to repair the harm caused.

8.4 Communication of past or historical facts about a Sister.

News or denunciations of past events may come to the knowledge of the Congregation, either through e-mail or other channels provided

for this purpose or through the media. In these cases, the protocol indicated above will be followed. Penal and canonical proceedings will be conditioned if the alleged victim has died or if the crime is statute-barred. If any of the ways is viable, the complainant will be informed of the actions that can be taken to debug responsibilities.

If the complainant is unwilling or unable to take legal actions, the Congregation, through the Delegate for Prevention and Protection, will carry out an internal investigation to verify the information that exists in the Congregation's records about the case; a process of determining responsibility will be established and, if it is concluded that abuse occurred, appropriate reparation measures will be put in place.

8.5 If the person reported is a Lay person working in one of our Centers.

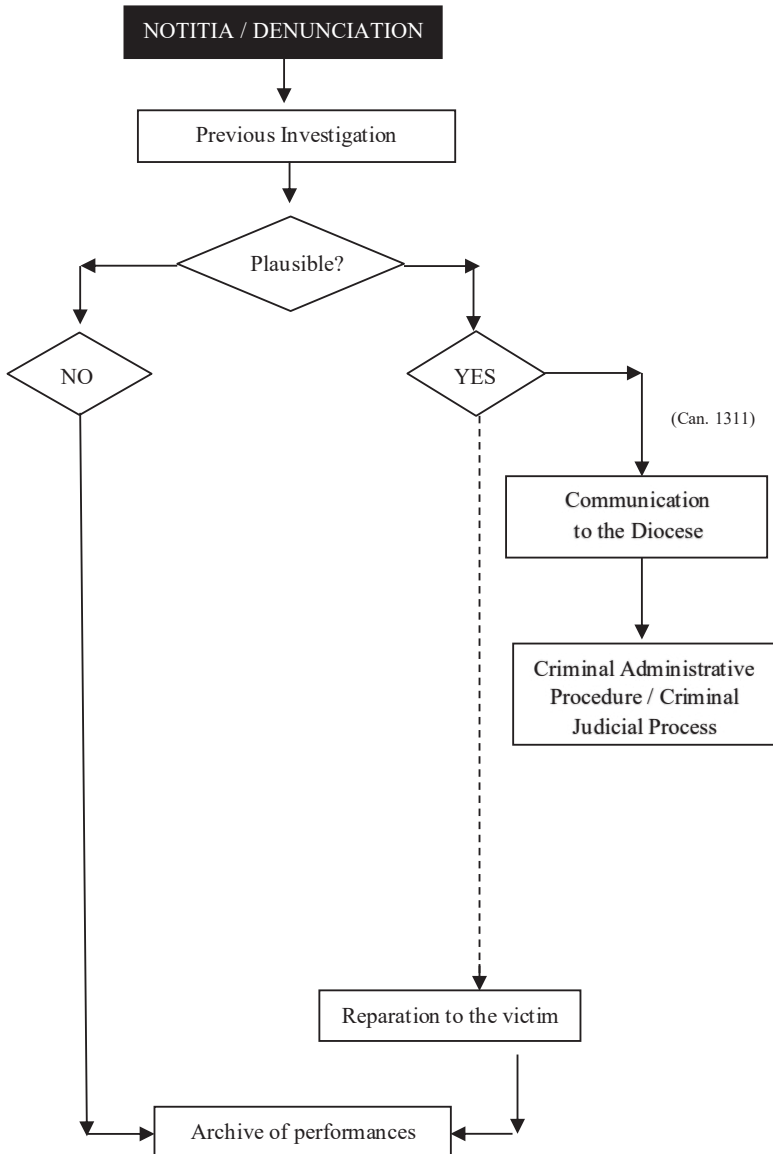
When the reported facts have been made on a minor or incapable person, or on an adult person in a situation of vulnerability, and are not statute-barred, the appropriate state instance (prosecutor, police...) will be informed to assess the need to initiate a judicial process. And, until a firm resolution is reached, the necessary preventive measures will be taken to protect the alleged victims and to avoid the repetition of similar conducts by the perpetrator person.

When the reported facts have been carried out on an adult person (who eventually may or may not be in a situation of vulnerability), if it is a non-prescribed crime, the alleged victim will be informed that if she/he does not take the decision to denounce the facts, according to the state legislation of the corresponding territory, the Congregation may be forced to communicate or report the facts to the corresponding civil instances.

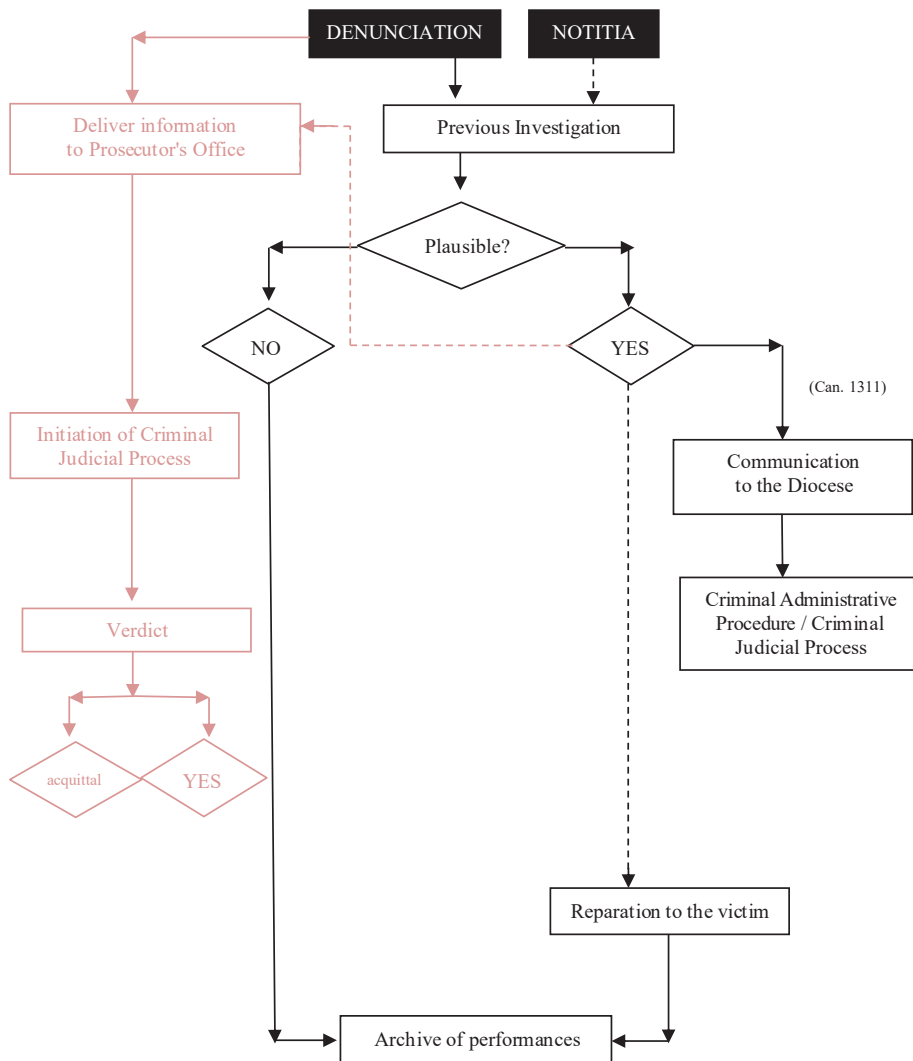
For all these reasons, regardless of whether the facts reported or denounced are prescribed or not in the state jurisdiction, we will always conduct an investigation in order to determine the plausibility of the alleged facts and to avoid what, in any case, the alleged victims are left in a situation of helplessness or neglect

due to our part. We must not forget that certain actions are not considered crimes in state jurisdiction, and instead they are so considered in canonical jurisdiction.

“NOTITIA” OR DENUNCIATION PRESCRIBED IN STATE JURISDICTION



“NOTITIA” OR DENUNCIATION NOT PRESCRIBED IN STATE JURISDICTION



8.6 If the person denounced is a priest or religious who collaborates with us.



In addition to following what is stated in the point 8.5. of this manual, if the alleged victimizer is a diocesan priest and the alleged facts are prescribed, from the Congregation we can carry out a Previous Investigation to verify the plausibility of the information. Once this is finished, the result will be given to the Bishop of the corresponding Diocese, and, if it is a matter of a religious, to his/her Major Superior.

If the facts are not prescribed, and have allegedly been carried out on a minor or vulnerable person, simultaneously, the communication will be made to the civil instance that proceeds, the Bishop of the Diocese will be informed, and, if it is a question of a religious, to his/her Major Superior.

While the facts are clarified, the person denounced is separated from any contact with minors or vulnerable persons in the area of the Center.

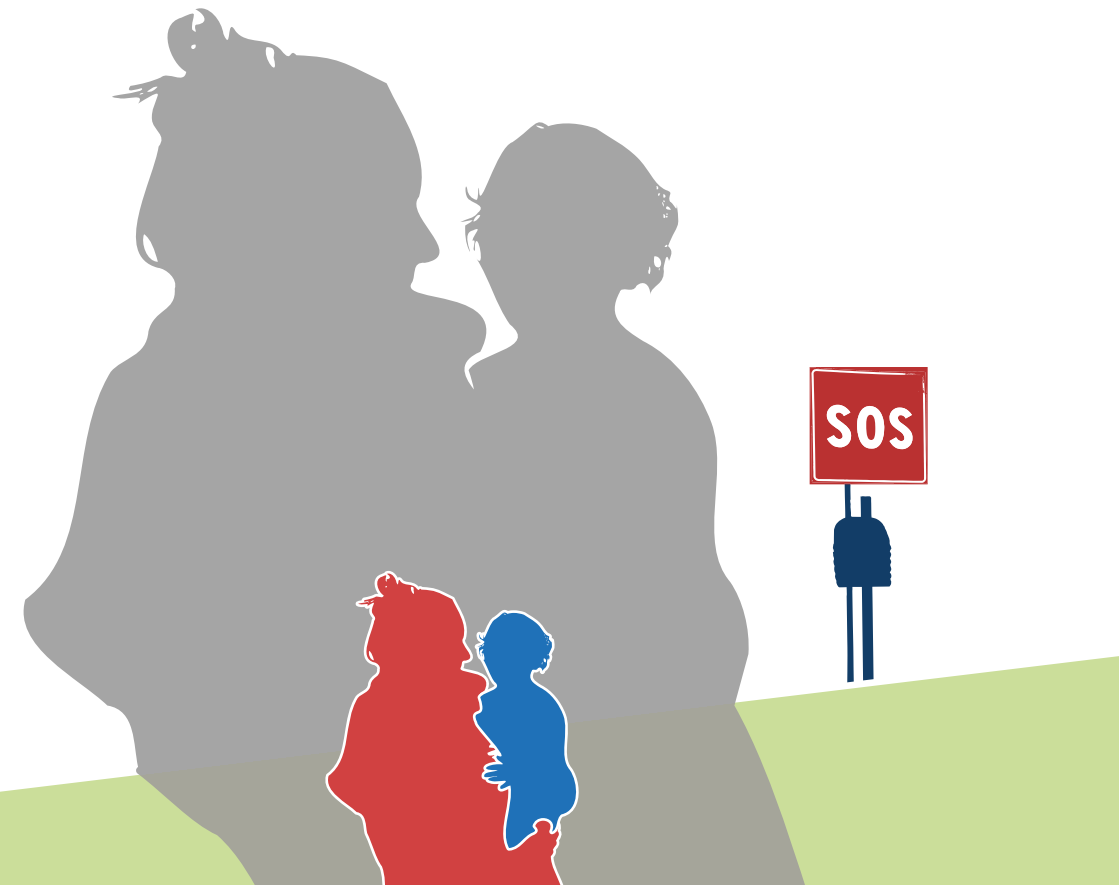
9. RETRIEVAL OF THE VICTIM.



Reparation may take the form of financial compensation, either directly or in the form of psychological care and recovery services. Reparation will involve a request for forgiveness on the part of the Congregation, and the commitment to adopt the necessary measures of prevention so that the events do not happen again.

Victims need:

- To be listened to in an environment of respect and trust about the facts and the wounds of all kinds produced over them.
- To be recognized for the harm suffered and to be believed both by the Institution to which the victimizer belongs or belonged, and, if possible, by the person who perpetrated the acts.



10. FUNCTIONS OF THE DELEGATE PERSONS OF PREVENTION AND PROTECTION.



- To inform, in accordance with the protocol established at the congregation level, of every news, incident or denunciation of alleged criminal acts, to the immediate person responsible for Prevention and Protection, either from the Provincial Council or the General Council of the Congregation.
- Constant supervision of the recommendations and policies established in this document.
- Elaboration of a document adapted to the reality in which she is, in coordination with its immediate responsible superior in the matter, either at the provincial or general level, of the development of the specific regulation of the communities or apostolic works that are under her supervision.
- Planning of the annual formation calendar on the subject of prevention and protection, following the indications of her immediate superior responsible for the matter. She should ensure that all members of our Saint Anne Family in her area of operation are formed in prevention and protection policies.
- Initiation of the files according to the regulations established in this document or the national regulation in its case.
- Maintenance of a record of each case and the different steps that have been carried out.
- To coordinate, in accordance with the protocols approved by the public administrations of each territory, the cases that may require intervention by the competent social services, having to inform the corresponding authorities, if deemed necessary, and without prejudice to the duty of communication in the legally provided cases.

Protecting Caring



HCSA