
Safeguarding Children and Vulnerable Adults Policy

Contents	Pages
1. Purpose	1
2. Scope	1
3. Safeguarding Principles	2-3
4. Prevention of Sexual, Exploitation and Abuse	3-5
5. Complaint and Reporting	5
6. Complaint Handling procedure	5-6
7. Investigation process	6-7
8. Disciplinary procedure	7
9. Appeals procedure	7
10. Data Protection	7
11. Monitoring and Evaluation	7
 Annex 1. Definitions	 8-9
Annex 2. Behavior Protocols	10-11
Annex 3. Declaration of Commitment	11
Annex 4. Guidance and actions to be taken if an abuse have been received or suspected	12-13
Annex 5. Incident Reporting Form	14-16

1. Purpose of the Policy

This policy is developed to safeguard the wellbeing of every individual and promote dignity of all vulnerable people. ORGANIZATION is committed to protect children, young people and the most marginalized and the vulnerable adults from unintended harm and abuse and that the working practices of the ORGANIZATION minimises the risk of all harms.

ORGANIZATION will work with the main statutory agencies – local authorities, police department, Government Departments, INGOs/NGOs and Local Civil Society organization to promote safer communities, prevent harm and abuse and to deal with suspected or actual cases of abuse. Our procedures aim to make sure that the safety, needs and interests of children and vulnerable adults at risk are always respected and upheld. This includes upholding human rights and human dignity.

2. Scope

Safeguarding children and vulnerable adults is everyone's responsibility. All staff and volunteers, in whatever setting and role, are also the frontline in preventing harm or abuse occurring and empowering the person at risk to take action where concerns arise. All senior staff are accountable for the implementation of the Safeguarding Policy.

This policy applies to:

- All staff, volunteers and interns, lay and religious
- Beneficiaries
- Partners and donors
- Representative working under a contractual arrangement "eg. Consultant, suppliers and other third parties
- Any other official visitors to ORGANIZATION

3. Safeguarding Principles

ORGANIZATION 's Safeguarding Principles are:

- Safeguard the well-being of all individuals
- Respect and promote dignity of the poor and treated equally regardless of ethnicity, creed, gender, sexual orientation, age or disability
- All children and vulnerable adults have the right to protection from all kinds of abuse and exploitation
- ORGANIZATION has a duty of care to children and adults at risk with whom they work, are in contact with, or who are affected by their work and operations
- ORGANIZATION has a responsibility to help partners meet the minimum requirements on protection.
- ORGANIZATION is responsible to ensure protective and safe environments to its beneficiaries
- All activity is done in the best interests and benefits of the child/vulnerable adults
- Ensure all staff, partners, beneficiaries, suppliers understand the meaning of safeguarding and comply to the procedures of the organizations

In line with global policies, including the UN Secretary General's Bulletin on protection against sexual exploitation and abuse, and for the purpose of ORGANIZATION 's work with, the following core principles will be adhered to:

Six Core Principles – Sexual Exploitation and Abuse

Updated October 2019 based on the Inter-Agency Standing Committee (IASC) secretariat revision of 12.09.2019

1. Sexual exploitation or sexual abuse by humanitarian workers constitute acts of gross misconduct and are therefore grounds for termination of employment.
2. Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of a child is not a defence.
3. Exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behavior is prohibited. This includes exchange of assistance that is due to beneficiaries.
4. Any sexual relationship between those providing humanitarian assistance and protection and a person benefitting from such humanitarian assistance and protection that involves improper use of rank or position is prohibited. Such relationships undermine the credibility and integrity of humanitarian aid work.
5. Where a humanitarian worker develops concerns or suspicions regarding sexual abuse or exploitation by a fellow worker, whether in the same agency or not, he or she must report such concerns via established agency reporting mechanisms.
6. Humanitarian workers are obliged to create and maintain an environment which prevents sexual exploitation and abuse and promotes the implementation of their code of conduct. Managers at all levels have particular responsibilities to support and develop systems which maintain this environment.

4. Prevention of Sexual Exploitation and Abuse

In order to ensure Safeguarding of children and vulnerable adults, the following prevention activities are to be carried.

A. Social Media

- ORGANIZATION will not photograph or video, publish stories of children or vulnerable adults without the written consent of them and his/her parents/ guardian.
- In all forms of communication, children or vulnerable adults are treated and portrayed with dignity and not as helpless victims.
- Material posted on social media or digital technology does not contain the name of children or vulnerable adults.
- ORGANIZATION discourages direct, un-facilitated, undocumented communication through social media without ORGANIZATION 's knowledge between a ORGANIZATION person and children or vulnerable adults.
- All contact with children or vulnerable adult (whether by phone, text, email or direct contact) should be supervised, accompanied, or at least in sight of other adult.

B. Screening and Recruitment

ORGANIZATION will not hire staff with a prior conviction for abuse cases, pedophilia or child or adult related offences.

To prevent the risk of hiring someone that may pose and unacceptable risk to children and vulnerable adults, a proper recruitment process will be undertaken. This will also apply for recruitment of steering committee members, members of board of directors, interns, volunteers and contractors.

- Advertisement and job description for identified posts will include a reference to the commitment to ORGANIZATION Safeguarding Children and Vulnerable Adults Policy and request a police background check for application.
- Basic screening of applicants for employment includes a written application, personal interviews and reference checks. During the interview process, applicants will be asked to describe their previous experience of working with children or vulnerable adults and whether any incident with children or vulnerable adult has occurred to the person before.
- Job offers made in relation to identified posts for employee, members of Board of Directors, interns, volunteers and contractors will be subjected to the satisfactory clearance from referees.
- Individuals who are hired as staff and independent contractors are also notified of ORGANIZATION Safeguarding Children and Vulnerable Adults Policy and made aware that they are expected to sign acknowledgement of behavior protocols (Annex 2) and also to sign a **Self-declaration form**.
- A dissemination action plan will be developed to distribute and receive signed acknowledgement of employees, members of Board of Directors, interns and volunteers and a training and awareness planning will also be developed. Every workplace will display contact details for reporting and response of Vulnerable Adults and Child incidents.
- Any volunteer who is recruited or designated for work with children and community will be asked to complete a disclosure form, and to provide a reference letter mentioning the person has no known conviction for child or vulnerable adult sexual exploitation and other violence and has been recommended as suitable to work with the children or vulnerable adult.

C. Sub-Implementing Partner

All ORGANIZATION 's partners will sign and abide by ORGANIZATION Safeguarding Children and Vulnerable Adults Policy or their own organization's Safeguarding Policies for Children and Vulnerable Adults. ORGANIZATION will provide necessary support (risk assessment, training, materials, etc.) to the partners for effective implementation.

D. Training

ORGANIZATION will equip all employees, members of Board of Directors, interns, volunteers, independent contractors, donors, visitors, partners and others affiliated with ORGANIZATION to understand and perform the Safeguarding Children and Vulnerable Adults Policy.

All employees, members of Board of Directors, interns and volunteers will receive training on Safeguarding Children and Vulnerable Adults Policy within 3 months of recruitment. Refresher training will also be provided every year.

ORGANIZATION will also raise awareness of communities on Safeguarding Children and Vulnerable Adults Policy.

E. Safeguarding Focal Person

A Senior Safeguarding Manager is designated by the Director to oversee ORGANIZATION 's obligation described in this policy. The role of the Manager is to ensure that the risks of harm to children and vulnerable adults are prevented and responsible for receiving and responding to complaints of abuses in the ORGANIZATION work areas. The Senior Safeguarding Manager has the ultimate responsibility to oversee effective implementation of the policy and will report to the Director of any incidents and to conduct the investigations.

In all ORGANIZATION offices, a designated Safeguarding Manager/Officer assigned by the respective Directors and will be responsible for implementing of the policy. He/she will also coordinate and work closely with the Safeguarding Manager of the Head Office.

F. Risk assessment and management

In order to safeguard and to reduce the possibility of incidents, risks are assessed and controls are to be in place in all ORGANIZATION works. Each programme must conduct a regular risk assessment to ensure all activities are conducted in a safe environment and a dignified manner. The Safeguarding Officers under the guidance of the Senior Safeguarding Manager will maintain a Risk Register for each office that will be regular assessed and updated.

5. Complaint and Reporting

Reporting Children and Vulnerable Adults incidents

All employees and representatives have a mandatory duty to report any suspected incident of sexual exploitation or abuse of children or vulnerable adults to the Safeguarding Focal Person and to the Director. Failure to report such matters may result in disciplinary action. **(Incident Report Form)**

Employees, interns, volunteers, partners, Board members are encouraged to raise genuine concerns of children or vulnerable adults may be at risk and ORGANIZATION is committed to ensuring that adherence to confidentiality in the management of complaints and allegations of sexual exploitation and abuse, is strictly maintained.

Children and Vulnerable Adults safety is vital and therefore their confidentiality must be protected at all stages. Identified information about Children or Vulnerable Adults protection incident will be shared on a "need to know" basis only.

The subject of the complaint (alleged perpetrator) and all witnesses must cooperate fully and openly with internal and statutory investigations and hearings. ORGANIZATION preserve the right to inform

the children or vulnerable adult's incident to other recruiting agencies for the best interest of the children or vulnerable adult. Complaints can be:

- Anonymous Complaints: accept and handle anonymous complaints if there is sufficient information to clarify the issues.
- Malicious complaints: If the complaint was deliberately made falsely with the aim to cause harm, an appropriate disciplinary action will be taken.

6. Complaint Handling Procedures

Responses for Children or Vulnerable Adults incidents will include the following:

- Complaints and concerns will always be investigated and acted upon swiftly.
- ORGANIZATION will take whatever action is appropriate, necessary and possible, without risk of further harm to any individual and to ensure the safety of those involved. Where children or vulnerable adults are concerned, their welfare will be the utmost consideration.
- Disclosures from Children or Vulnerable Adults will be treated with sensitivity and without pressing for information. The staff will reassure children or the vulnerable adults that they have done the right thing by coming forward and let them know they need to tell someone else.
- Disclosures or concerns reported by children or vulnerable adults should also be received on the basis that information may be shared with relevant authorities. No staff member or volunteer will prejudice their own standing at work by responsibly reporting potential or suspected children or vulnerable adult's abuse. If reporter requested to be anonymous ORGANIZATION will respect his/her choice and only when intentional false accusation is found after investigation, ORGANIZATION will further manage the issues as staff management issue.
- The Safeguarding Manager/Officer receiving the complaint should make a risk assessment for the immediate future and do whatever they can to mitigate these risks. They must carefully record the complaint and pass the record, without delay, to Director.
- If alleged perpetrator is the person who has no affiliation with ORGANIZATION , it will still record the incident and provide necessary psychosocial support to the survivor and the family.
- If alleged perpetrator is the person who has affiliation with ORGANIZATION , the Director will convene the Meeting. This must be held within 24 hours. If urgent action is required to protect the vulnerable adults or others then this should be done immediately.
- The Meeting will include the Director, Human Resource Manager/Officer, Senior Safeguarding Manager unless otherwise there are other reasons not to include these persons. The meeting will be to assess the concern and decide next steps, including who else needs to be kept informed. Parents or guardians of children or vulnerable adults involved will also be informed if appropriate. Apart from this, careful confidentiality will be observed.
- The meeting may instigate an investigation if it is thought that there may have been a breach of organizational policy or standards. The meeting, will designate an investigating officer and an investigation team and will continue to guide and monitor the process.

Retaliation

ORGANIZATION prohibits any staff from retaliating in any way against anyone who has raised any concern about harassment, sexual harassment or discrimination against another individual. No adverse employment action will be taken for any employee making a good faith report of alleged harassment.

7. Investigation Process

The responsibilities of the investigation team

- The investigation team will gather evidence and interview relevant parties in order to establish the probable facts where the non-statutory cases or statutory cases investigation has been non-existent or inadequate.
- The investigation team will also make recommendations on improving the policies and practices that may have enabled the breach of Safeguarding children and vulnerable adults obligations, as well as on how to -rebuild community trust and on what help should be provided to minimize the harm to survivors of the incident.
- If a member of staff is the subject of an allegation, that staff member will be asked to take leave from their duties on full pay until an investigation has been completed. If a volunteer is the subject of an allegation, that volunteer will be asked to withdraw from their work until an investigation has been completed. In both cases, it should be made clear that suspension does not imply guilt but rather protects all parties whilst an investigation is undertaken.
- ORGANIZATION will provide psychological support and other emergency support to both the alleged survivor and the alleged abuser as far as possible whilst an investigation is carried out.

8. Disciplinary Procedure

ORGANIZATION has zero tolerance towards the abuse of any form include bullying, harassment, sexual exploitation and abuse (SEA). If employees, members of Board of Directors or interns are found to have committed Child or Vulnerable Adults incident, ORGANIZATION will take disciplinary action and/or any other action as per the ORGANIZATION Disciplinary Policy. If required ORGANIZATION will refer to matter to law enforcement agencies, and share information about the perpetrator with other organizations if/ when requested.

If volunteers are found to have committed such acts, the volunteering relationship will be ended.

9. Appeal Procedure

ORGANIZATION wishes to resolve any complaint in a satisfactory manner for both the complainant and the Organization. If the complainant does not accept the outcome he/she

can appeal the next level (Senior Management Team-SMT) within the organization or outside of ORGANIZATION .

10. Data Protection

ORGANIZATION is committed to apply the highest levels of protection in the processing of personal data and to treat all information received with utmost confidentiality.

11. Monitoring and Evaluation

ORGANIZATION will monitor the implementation of the policy, review and evaluate every 12 months on the effectiveness of the policy and make any changes as needed. An annual report on compliance including information of Vulnerable Adults incidents is developed and reported to the Board of Directors.

Annex 1

Definitions

Child: Any person under the age of 18 as defined in the UN Convention on the Rights of the Child (UNCRC).

Vulnerable Adult: Vulnerable Adult is someone who is 18 years or over who may be in need of community care due to a mental health problem, learning disability, physical disability, age or illness. As a result, they may find it difficult to protect themselves from abuse.

Beneficiary - person(s) (both adults and children) ORGANIZATION serves, directly or indirectly, as a part of the work of ORGANIZATION .

Disability - is an evolving concept that results from the interactions between persons with impairments, as well as attitudinal and environmental barriers that hinder their full and effective participation in society on an equal basis with others.

Survivor - persons who experience any form of exploitation or abuse and whose claims have been substantiated through an administrative investigation process or by a governmental judicial process.

Perpetrator - a person who carries out a harmful, illegal or immoral act. A person (or group of persons) who commits an act of SEA or offence.

Confidentiality - a principle wherein information, data and photographs are kept secure and private.

“Sexual exploitation” is any actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes, including, but not limited to profiting monetarily, socially or politically from the sexual exploitation of another.

“Sexual abuse” is the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. This include rape, abusive sexual contact like unwanted touching, incest, behavioral sexual harassment and all forms of sexual activities including pornography.

Physical abuse – 'the use of force which results in pain or injury or a change in a person's natural physical state' or 'the non-accidental infliction of physical force that results in bodily injury, pain or impairment'. This includes hitting, beating, kicking, shaking, biting, strangling, scalding, burning, poisoning and suffocating. Much physical violence against children in the home is inflicted with the object of punishing.¹

Neglect - where basic needs such as food, warmth and medical care are not met, or when there is a failure to protect a child from exposure to any kind of danger, resulting in serious impairment of a child, young person or vulnerable adult’s health or development.

Exploitation – The use of the Vulnerable Adults for the benefit of the others. This includes labour, trafficking and exchange of sexual favours for goods, food and money through an abuse of power or trust.

Discrimination – discriminatory abuse exists when values, beliefs or culture result in a misuse of power that denies opportunities to some groups or individuals.

Violence – The use or threat of physical force or power that harms the adults at risk including mob violence, oppression and harassment. It can also include gender- based violence that are primarily or exclusively committed against women and girls. (eg. Trafficking in person and forced prostitution.)

Harassment - Intimidation, hostility, humiliation, bullying, verbal or other offenses which might interfere with work or individual dignity.

Annex 2

Behavior Protocols

All person affiliated with ORGANIZATION (employee, members of Board of Directors staff, interns, volunteers independent contractors, donors, visitors, and partners) abide by and acknowledge in

¹ *Preventing child maltreatment: a guide to taking action and generating evidence, World Health Organization and International Society for Prevention of Child Abuse and Neglect*

writing the receipt and understanding of behavior protocols. Signed agreements should be kept on file by the relevant office.

Staff must:

- Ensure that children or vulnerable adults are treated equally and not discriminated based on religion, race, culture, gender or sex or on any other grounds;
- Treat children or vulnerable adults with respect compassion, humanely and courtesy and without harassment;
- Ensure that in dealing with children or vulnerable adults, their actions are in no way demeaning;
- Be aware of situation that may present risks and manage these; ORGANIZATION sometimes helps children or Vulnerable Adults to travel to events, activities that required travel. In such cases the parents or caregivers, or other legally required entity or individual, give informed consent prior to the travel. The children and vulnerable adults' health, safety and well-being are the most important priorities during travel supported by ORGANIZATION .
- Dress in a culturally appropriate way at work
- Build mutual trust and understanding with children or vulnerable adults
- Recognize and respect the children or vulnerable adults' right to privacy
- Listen to what the children have to say and reveal and take appropriate and immediate actions as required.
- Maintain professional boundaries in dealing with under 18 supporters or beneficiaries.
- Adhere to expected behavior regarding communication, social media and digital technology

Staff must not:

- Physical assault or physically abuse children or adults at risk
- Develop sexual relationships with children or vulnerable adults
- Place themselves in a position where they could be accused of sexually abusing a child or vulnerable adult.
- Use language, make suggestions or offer advice which is inappropriate or abusive, including language that causes shame or humiliation, or belittling or degrading human dignity.
- Sleep or be alone with children or vulnerable adults in the same room with whom they are working unless accompanied by responsible person.
- Behave in an inappropriate physical manner (e.g touching, viewing or holding the private parts of children or vulnerable adult's),
- Offer benefits such as food, clothes, jobs, money in exchange for sexual favours
- Show favouritism to any individual for sexual favours in return.
- Act in ways intended to shame, humiliate, belittle or degrade children or vulnerable adults, or otherwise perpetrate any form of emotional abuse.
- Be intoxicated under the influence of alcohol or drugs whilst children or vulnerable adults are in their care.
- Fondle, hold, kiss, hug or touch children or vulnerable adults in an inappropriate or culturally insensitive way.
- Hit or use other corporal punishment against a child while the child is in ORGANIZATION 's care or ORGANIZATION person is conducting ORGANIZATION work
- Do things of a personal nature (such as bathing or toileting) for a child that they can do for themselves.
- Show favour to particular children.

-
- Hire children for any form of child labor including as domestic helper (Child labour is work that is mentally, physically, socially or morally dangerous and harmful to children, or that interferes with their schooling. See ILO Convention 182 and 138 for further explanation of child labour)

Annex 3

Declaration of commitment

I have signed ORGANIZATION Safeguarding Children and Vulnerable Adults Policy with the acknowledgement that;

- 1) I have read and understood the detail content of Safeguarding Children and Vulnerable Adults Policy (including annexes).
- 2) I will work within the procedure of Safeguarding Children and Vulnerable Adults policy as set up in the organization.
- 3) I have not been accused or convicted of any offences relating to the abuse or exploitation of children or vulnerable adults.
- 4) I admit to accept any discipline by ORGANIZATION for breach of any agreement involved in this policy.

Signature _____

Name _____

Position _____

Area _____

Date _____

Annex 4

Guidance and actions to be taken if an abuse have been received or suspected

What to do if children or vulnerable adult experiencing abuse tells you about it

-
- If children or vulnerable adult experiencing abuse or neglect speaks to you about this, assure them that you are taking them seriously. Listen carefully to what they are saying, stay calm and get a clear and factual picture of the concern.
 - Be honest and avoid making assurances that you may not be able to keep, for example, complete confidentiality. Be clear and say that you need to report the abuse. Do not be judgmental and try to keep an open mind.
 - Do not keep concerns relating to potential abuse of children or vulnerable adults to yourself. Confidentiality may NOT be maintained if the withholding of information will prejudice the welfare of the adult.
 - All staff (professionals and volunteers) of any service involved with children or vulnerable adults at risk should inform the relevant manager if they are concerned that children or vulnerable adult has been abused or may be at risk of harm.
 - If you hear about an incident of abuse from a third party (this is when someone else tells you about what they have heard or seen happen to a vulnerable adult at risk), encourage them to report it themselves or help them to report the facts of what they know.

What to do if you suspect abuse

Everyone with a duty of care to the children or vulnerable adult at risk should:

- act to protect the child or vulnerable adult at risk
- deal with immediate needs and ensure the person is, as far as possible, central to the decision making process
- report the abuse to an appropriate person or service (e.g. line manager)
- if a case has or may have been committed, contact the police to discuss or report it
- record the events.
- A concern may be a direct disclosure by the children or vulnerable adult at risk, or a concern raised by staff or volunteers, others using the service, a carer or member of the public, or an observation of the behaviour of the children or vulnerable adult at risk, or the behaviour of another.

How to make a report of suspected abuse

- All concerns of abuse or neglect of children or vulnerable adult at risk can be reported to: Senior Safeguarding Manager/Officer (person name, phone number, email ID.)
- However, if a serious case has taken place or there is a need for an immediate police response to protect the child/children or vulnerable adult at risk, consider dialing reaching out to police.

What happens when I make a report of suspected abuse?

Referrals to the ORGANIZATION will be taken from anyone who has a concern that child/children or a vulnerable adult is at risk. Details from the referrer about the allegation of abuse will be needed so it is helpful to have the facts of the circumstances ready to hand.

The referral may be passed to the local safeguarding team or allocated to a worker who will seek to:

- clarify the circumstances of the alleged abuse or neglect
- take any immediate steps to protect the children or vulnerable adult at risk, if needed
- decide if the safeguarding adult procedures are the required and appropriate response to the situation
- work in partnership with other agencies, like the police or health services, where necessary.
- The allocated worker will call a multi-agency strategy meeting where details of the investigation and responsibilities will be agreed. Protecting child/children or vulnerable adults at risk is the responsibility of all the agencies working together and they will all follow the 'Safeguarding Children and Vulnerable Adults Policy.

Incident Reporting Form

CONFIDENTIAL

Number of disclosure/concern:

Referral Details:

Date:

Time:

Area/ Place:

How was the information received? (attach any written information to this form):

Please tick:

In person

Letter

email

phone

Details of person making disclosure/raising concern: (if provided)

Name:

Address/Area:

Contact phone:

Occupation:

Relationship to Child/Vulnerable Adult(s):

Details of Child/Vulnerable Adult(s):

Name:

Age:

Date of Birth:

Gender:

Ethnicity:

Religion:

Language: (is interpreter/ signer needed)

Any disability:

School (if applicable)

Education Level:

Occupation:

Others (any):

Alleged perpetrator' s Details:

Age:

Date of Birth/Age:

Gender:

Ethnicity:

Religion:

Relationship to vulnerable adults:

Occupation:

Current situation of Child/Vulnerable Adult(s):

Presenting problems:

Safety:

Physical health:

Psychological:

Social:

Other:

Detail Description of concern, allegation or complaint:

Date:

Time :

Location of Incident(s):

Occurred:

Witnesses (if know)

Does the Child/Vulnerable Adult/s know this concern is being raised?

Is alleged perpetrator ORGANIZATION person? Yes, ----- No, -----

Fill-up by

Name:

Position:

Date

Received by

Name:

Position:

Date:

