



EngenderHealth
for a better life

Adult Safeguarding Policy

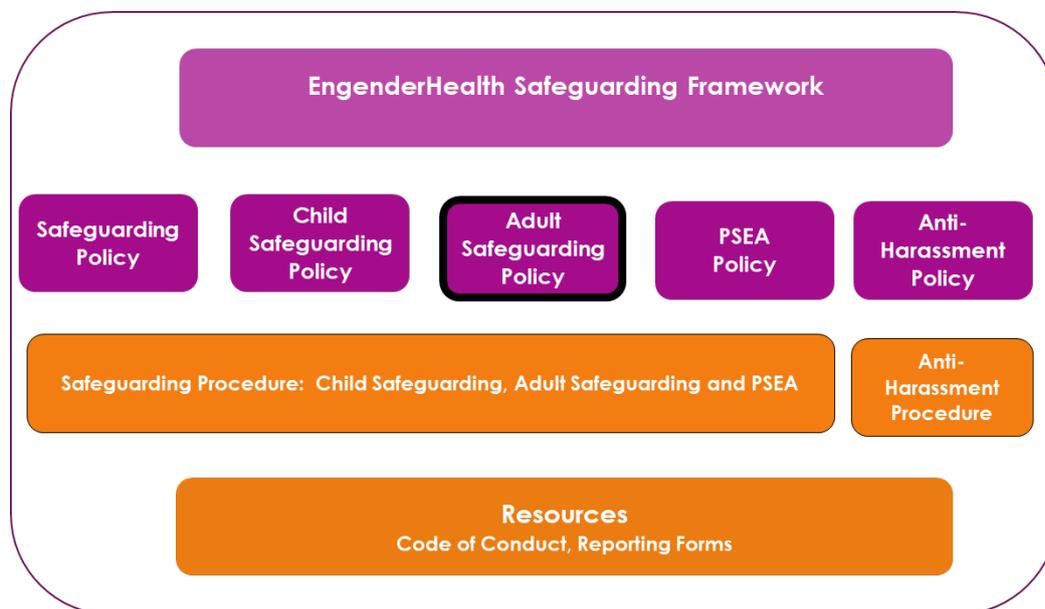
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Safeguarding Framework

This document is part of EngenderHealth's Safeguarding Framework that consists of this policy, procedures and resources.



Policy Introduction

EngenderHealth is committed to protecting adults regardless of age, gender, disability, or ethnic origin from any form of harm, abuse, neglect or exploitation. EngenderHealth has a zero tolerance for abuse of adults at risk in any form.

The purpose of the Adult Safeguarding Policy is to ensure that all EngenderHealth staff, associates, and partners are aware of their role and responsibilities in keeping vulnerable adults safe from harm. The policy clarifies definitions and responsibilities regarding prohibited behaviour and the associated procedures outline the reporting and investigation processes.

Accountability Statement

EngenderHealth takes this policy very seriously, and the mandate prohibiting any form of harm to adults comes from EngenderHealth's Executive Team (ET) and Board of Directors.

The Adult Safeguarding Policy applies to all EngenderHealth staff members, associates, and partners who must comply with its requirements and understand the sanctions that may be applied for breaches of the policy. Where required by law or local practices, EngenderHealth or Country Offices may enhance the standards as set out in this policy. This commitment will be evidenced through signing the policy and the Code of Conduct. Training in this policy is mandatory for all EngenderHealth staff members, associates, and partners.

The Board of EngenderHealth is ultimately accountable for this policy. The CEO, ET and directors of EngenderHealth are responsible for its implementation. It is the responsibility of all representatives of EngenderHealth to raise any concerns regarding

sexual exploitation and abuse. EngenderHealth takes all concerns and complaints seriously and will initiate a comprehensive investigation of complaints that are in violation of this policy and take disciplinary and possibly legal action as warranted.

Policy Approach

This policy details how EngenderHealth achieves its obligations and applies to all staff, associates and partners regardless of their location.

Framework Principles

This policy and the entire Safeguarding Framework are guided by the following principles:



Safeguarding

EngenderHealth is committed to all community members as outlined in the definitions as having the right to safeguarding and protection from sexual exploitation and abuse irrespective of ability, ethnicity, faith, gender, sexuality, and culture. A key principle within this is that all processes are survivor led. EngenderHealth commits to survivors leading the complaint process where it is possible and appropriate to do so.



Shared Responsibility

For the adult safeguarding policies and practices to be effective in reducing the risks to beneficiaries and communities, all at EngenderHealth must share the responsibility for implementation and improvement. As such, a failure at one level of the organization constitutes a failure at all levels of the organization.



Effective Communication

EngenderHealth effectively communicates with all staff, associates, and partners in simple and accessible language to create a positive and accessible culture where responsibilities for adult safeguarding are clear.



Continuous Improvement

EngenderHealth provides assessment, reflection and feedback mechanisms to inform the organisation of any improvements that can be made to policies and practices. These mechanisms include quarterly incident reviews, regular safeguarding audits, as well as regular policy review and refresher training.



Dignity and Respect

EngenderHealth creates a work environment where the principles of dignity and respect for all staff, associates, and partners, in all locations are at the heart of what

the organisation does. Included in this are the principles of being non-judgemental when hearing the concerns and complaints of survivors of sexual exploitation and abuse.



Zero Tolerance

EngenderHealth has zero tolerance for any forms of harm to vulnerable adults.



Confidential

EngenderHealth is committed to confidentiality and information will not be shared outside of the Safeguarding Committee unless it is absolutely necessary, and the safety of the person involved is a concern.

Policy Implementation

Policy Map

This policy will guide EngenderHealth staff, associates, and partners through the definitions as they relate to vulnerable and at-risk adults. The associated procedures and resources will provide information on how to report any complaints, the format of the reporting, and how these complaints will be managed.

Governance

The Chief Executive Officer (CEO), together with the Board of Directors, has ultimate responsibility for this policy and its proper management, using a systematic approach. As such, the CEO and the Board of Directors will receive a summary of any reported sexual exploitation and abuse incidents and follow-up measures taken at each Executive Team meeting and Board meeting, respectively.

Responsibilities

EngenderHealth is committed to following through on the following measures in order to ensure that the organisation is observing its adult safeguarding commitments:



These commitments are fully outlined in the Safeguarding Policy.

EngenderHealth's Obligations

EngenderHealth believes that all vulnerable and at-risk adults have a right to live their lives free from harm including abuse, neglect and exploitation and will not tolerate its staff, associates or partners engaging in any sort of behaviour that puts beneficiaries or communities at risk. To that end, EngenderHealth commits to:

1. Creating a safe culture for both those it serves and those who work for and represent the organisation.
2. Following through on any complaints and concerns in a timely manner through its Safeguarding Committee and taking each complaint seriously.
3. Safeguarding adults at risk by valuing, listening to and respecting them.
4. Sensitising staff, associates, and partners around how to make a complaint.
5. Ensuring zero tolerance towards harm, abuse, neglect, or exploitation of vulnerable adults.
6. Building a culture of dignity, honor and respect where all those who work with and are served by EngenderHealth feel empowered to report complaints.
7. Educating staff, associates, and partners that any form of harm, abuse, neglect, or exploitation of vulnerable adults constitutes gross misconduct and are grounds for termination of employment and possibly legal action.

8. Providing information on how to report complaints and the investigation procedure.
9. Ensuring that all staff, associates, and partners have access to the adult safeguarding policy and procedures as well as all other related safeguarding policies.
10. Providing training to all staff, associates, and partners on adult safeguarding.

Staff Responsibility

All staff, associates, and partners are required to adhere to this policy at all times and are obliged to report any suspicions of violation of adult safeguarding. All staff, associates, and partners are required to sign the associated Code of Conduct and an acknowledgement of having read and understood the policy.

Manager Responsibility

All Managers and Directors hold overall accountability for this Policy and its Implementation. Managers also have a responsibility to support and develop systems that maintain an environment where all parties involved with EngenderHealth understand how to behave, how to raise complaints and concerns, and what action will be taken.

Safeguarding Committee

A Safeguarding Committee has been established at the HQ level as well as in each field location to manage any adult safeguarding reports. Please see the Safeguarding Policy for further details.

Confidentiality of Complaints

EngenderHealth will protect the confidentiality of adult safeguarding allegations to the greatest extent possible in order to protect the integrity of the investigation and prevent embarrassment, further discrimination or harassment, or retaliation.

Confidential or sensitive information obtained by any staff member during the course of an investigation shall not be disclosed to others unless required by law. Concerns of individuals regarding confidentiality of information provided by them will be handled as sensitively as possible, and information shall not unnecessarily be disclosed to others.

EngenderHealth cannot guarantee, however, complete confidentiality, because the organisation cannot conduct an effective investigation without revealing certain information to the alleged perpetrator and potential witnesses. EngenderHealth will share information about allegations of adult safeguarding only with those who need to know about it. Records relating to adult safeguarding complaints will also be kept confidential on the same basis.

Whistle-Blowing

As referred to in EngenderHealth's whistle-blowing policy, all disclosures will be treated in confidence. EngenderHealth maintains a third-party secure reporting system through EthicsPoint to ensure that all staff, associates, and partners have recourse in the event of possible misconduct. Reports may be submitted anonymously for

investigation via www.ethicspoint.com or by calling the US hotline at 1-866-739-4117 or the country number found at the same webpage.

Prohibited Retaliation

EngenderHealth maintains a zero-tolerance policy for retaliation against anyone for reporting adult safeguarding, assisting in making a complaint, or participating in an investigation.

Any staff, associate, or partner who makes a good-faith complaint of adult safeguarding, assists, testifies, or participates in any investigation or proceeding or who reasonably opposes such conduct in the workplace will not be adversely affected in the terms and conditions of his or her employment and will not be discriminated against or discharged for engaging in such activity.

Adult Safeguarding Commitments

All EngenderHealth staff, associates, and partners are expected to conduct themselves in accordance with the adult safeguarding policy. Following are the core commitments relating to adult safeguarding that all staff, associates, and partners are expected to follow. The following behaviours are prohibited:

Sexual Activity with Vulnerable Adults

Sexual activity with vulnerable adults, as outlined in the definitions, is prohibited.

Vulnerable Adult Abuse

As outlined in the definitions, any form of vulnerable adult abuse including, but not limited to, physical, sexual, psychological, financial/ material, discriminatory, domestic abuse, and self-neglect are prohibited under this policy.

Sexual Exploitation or Abuse

As outlined in the Preventing Sexual Exploitation and Abuse Policy, any sexual exploitation or abuse of a vulnerable adult is prohibited.

Coercion

Any form of coercion as outlined in the definitions with vulnerable adults is prohibited.

This list may be expanded at any time and details will be communicated with staff, associates and partners through the Safeguarding Committee.

Consequences

Any staff, associate, or partner who is in violation of the adult safeguarding policy will face disciplinary procedures, which may result in disciplinary action, termination of employment or contract and/or referral to the appropriate law enforcement agency or legal authority.

Communication and Training

It is EngenderHealth's responsibility to ensure that all staff, associates, and partners are aware and fully compliant with the adult safeguarding policy. In order to take the steps to prevent any forms of harm or abuse, EngenderHealth will ensure that:

1. Training is provided for all staff who have a specific responsibility for implementing this policy and associated procedure or who may be involved in dealing with complaints which arise.
2. Awareness raising training is provided to all staff, associates, and partners on adult safeguarding. The training will equip staff, associates, and partners to develop awareness as well as an understanding of when and how to report any concerns.
3. Proactive steps are taken to communicate the zero-tolerance message.
4. All staff is informed of and trained in the policy and procedure.
5. All staff is aware of the definitions under this policy.
6. All staff is aware of reporting procedures.
7. All staff has signed and acknowledgement that they have read and understood the policy.

Adult Safeguarding Reporting Procedures

The associated procedures document outlines how to report any incidents of adult safeguarding.

Failure to Report

It is the duty and the responsibility of all staff, associates, and partners to report any adult safeguarding concerns. Failure to report may lead to disciplinary action.

Definitions

Safeguarding adults at risk

Safeguarding adults at risk is the process of protecting adults from abuse or neglect, enabling the adults to maintain control over their lives and make informed choices without coercion. It involves empowering adults at risk, consulting them before taking action unless someone lacks the capacity to make a decision, or their mental health poses a risk to their own or someone else's safety, in which case, always acting in his or her best interests.¹

Vulnerable adults

Vulnerable adults are defined as:

- Those aged over 18 years and who identify themselves as unable to take care of themselves/ protect themselves from harm or exploitation; or
- Who, due to their gender, mental or physical health, disability, ethnicity, religious identity, sexual orientation, economic or social status, or as a result of disasters and conflicts, are deemed to be at risk.

Vulnerable Adult Abuse²

A vulnerable adult is defined as someone “who is or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation”. Vulnerable adult abuse can take many forms

¹ Oxfam GB Safeguarding Adults Policy May 2018

² Indirect Government Services Recognising Adult Abuse, Exploitation and Neglect

including: physical, sexual, psychological, financial/ material, discriminatory, domestic abuse and self-neglect.³

Physical – Physical abuse occurs when a person purposefully injures or threatens to injure a vulnerable adult. It includes, but is not limited to, hitting, slapping, pushing, kicking, misuse of medication, unlawful or inappropriate restraint and inappropriate physical sanctions.

Sexual – is unwanted sexual activity or behaviour that happens without consent or understanding

Psychological – is emotional abuse which causes distress and can be verbal and non-verbal

Financial and material – includes theft, fraud, exploitation and pressure in connection to wills, property, inheritance and financial transactions, or inciting an adult at risk to do any of these things on another individual's behalf; it may also involve the misuse or misappropriation of property, possessions and benefits of an adult at risk

Discriminatory- includes abuse based on an individual's race, gender, disability, faith, sexual orientation, or age; and other forms of harassment, slurs or similar treatment or hate crime/incident

Neglect or self-neglect - includes a wide range of behaviours such as neglecting to care for one's own personal hygiene or health. Neglect also includes the failure to provide a vulnerable adult with the conditions that are culturally accepted as being essential for their physical and emotional development and well-being.

Domestic Abuse – is “any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality”⁴

Coercion

Coercion covers a whole spectrum of degrees of force. Apart from physical force, it may involve psychological intimidation, blackmail or other threats. For instance, threats of being dismissed from a job or of not obtaining a job that is sought. It may also occur when a person is unable to give consent. For example, while drunk, drugged, asleep or mentally incapable of understanding the situation.⁵

Sexual Exploitation

The term “sexual exploitation” means 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.⁶

³ Department of Health and Social Care No Secrets: guidance on protecting vulnerable adults in care

⁴ Home Office Guidance: Domestic Violence and Abuse

⁵ World Health Organization World Report on Violence and Health (2002)

⁶ Ibid.

EngenderHealth staff refers to individuals who receive a regular salary for work in any part of EngenderHealth Inc., including all Country Offices, Field Offices, Headquarters and any other location where EngenderHealth operates.

EngenderHealth associates refers to a range of paid and non-paid individuals who have committed to work with or support EngenderHealth. It includes volunteers, interns, and consultants and contractors.

EngenderHealth managers refers to EngenderHealth staff who have responsibility for line managing or supervising the work of EngenderHealth staff or EngenderHealth associates.

EngenderHealth partners refers to staff and/or representatives of partner organizations and local governments when operating in partnership agreement with EngenderHealth.

Policy Review

To meet with sector best practice, EngenderHealth agrees to review this policy and the entire PSEA Framework every two years, as a minimum. It is the responsibility of the Chief of Governance and Operations to complete this review, in collaboration with any key internal stakeholders or external third-party providers.