



THE LAYTON RAHMATULLA BENEVOLENT TRUST

13.

Children & Vulnerable Adults Safeguarding Policy



Purpose

The purpose of this policy and procedure is to regulate how LRBT's programs and operations are designed and how its representatives perform their duties so that children and adults who come into contact with LRBT for any reason, are not abused, neglected, harassed or otherwise get harmed in any way.

Definition of Child and Vulnerable Adult

A child is any human being under the age of 18 years.

Vulnerable adults are those persons aged 18 years or older who may be at risk of abuse or exploitation due to their dependence or reliance on others for provision of services, basic needs or protection.

An adult may also be at risk/vulnerable when in a relationship (social or work) with another person, the latter seeks to misuse his/her position of authority or trust to control, coerce, manipulate or dominate the former.

An adult may also be at risk if his/her decision-making capacity is impaired and/or they do not have adequate support to help them make a sound decision.

Scope

This Policy provides guidance to all LRBT Representatives to better understand the importance of Children & Vulnerable Adults safeguarding issues as well as to discharge their legal and ethical responsibilities.

Policy

LRBT believes in creating a protective environment for ALL Children & Vulnerable Adults visiting LRBT's facilities that ensure that they are safeguarded against all forms of violence, coercion, manipulation, harassment, abuse, exploitation, neglect and discrimination.

1. LRBT also ensures that its staff, programs and operations do not harm any Child or Vulnerable Adult in the manners as mentioned below:
 - a) Any form of discrimination.
 - b) Acting against their best interests.
 - c) Any form of violence, sexual abuse, neglect and any type of exploitation.
 - d) Forced labor, drugs trafficking, kidnapping, child trafficking.
 - e) Every Child and Vulnerable adult has the right to express his/her opinion freely and to have that opinion taken into account in any matter or procedure affecting the Child/Vulnerable adult.
2. All LRBT Representatives should be aware of the circumstances in which the risks of harm or disgrace to Children & Vulnerable Adults are increased and must mitigate these risks by:
 - Undertaking a Risk Analysis prior to any activity involving Children & Vulnerable Adults.
 - Abiding by the LRBT's Code of Behavior pertaining to this policy.
 - Abiding by the instructions for communication and fundraising as described in this policy.

Undertaking a Risk Analysis

A Risk Analysis will be undertaken prior to any activity involving Children & Vulnerable Adults or out of the ordinary visits where Children & Vulnerable Adults are present, or research with Children & Vulnerable Adults and measures shall be undertaken to mitigate any risk. Risk Identification form is enclosed at Annex-1.

Safer Recruitment & Selection

Following procedures will be taken into consideration to ensure safer recruitment and selection:

- a) All job advertisements will mention that “LRBT is committed to safeguarding Children & Vulnerable Adults”.
- b) Candidates for hospital and community jobs will be asked specific Children & Vulnerable Adults safeguarding related questions during their interviews.
- c) All LRBT Hospitals and community staff will undergo mandatory orientation training including safeguarding Children & Vulnerable Adults after joining service.
- d) All LRBT staff will be provided Employee Handbook for their information and record which will include Children & Vulnerable Adults safeguarding policy too.
- e) Any part information of a candidate that contravenes LRBT’s Children & Vulnerable Adults safeguarding policy will disqualify the candidate from service immediately.

Code of Behavior

All LRBT Representatives are required to understand their responsibility to keep Children & Vulnerable Adults safe and follow this Code of Behavior.

Adherence to this Code of Behavior is mandatory for all LRBT representatives. Any violation of the same will result in disciplinary proceedings which may include termination from service or legal action where the severity of violation warrants it.

Acceptable Behavior:

LRBT representatives should:

1. Be committed to creating a culture of openness and mutual accountability at workplaces. This culture will enable all Children & Vulnerable Adults protection concerns to be raised and discussed and abusive behavior can be challenged.
2. Contribute to an environment where Children & Vulnerable Adults are listened to and respected as individuals and which is safe, positive and encouraging to them.
3. Ensure the use of the ‘Two Adult Rule’. This means, when interacting with Children & Vulnerable Adults, ensure that another adult is present or available in near vicinity.
4. Ensure physical contact is at all times appropriate and not an invasion of the child or vulnerable adult’s privacy.
5. Use positive, polite and non-violent methods while interacting with Children & Vulnerable Adults.
6. Report all concerns to the focal person, respond to all allegations if leveled against them, and share all disclosures with focal person according to the reporting method mentioned in this policy.
7. Cooperate with the investigation board (including interviews) and make available any information related to any incident, if they are asked to provide it before investigation board.

Unacceptable Behavior:

Within their work environment, LRBT representatives must not:

1. Hold, fondle, kiss, cuddle or touch Children & Vulnerable Adults in an inappropriate and / or culturally insensitive way.
2. Engage in activities involving close body contact with Children & Vulnerable Adults beyond the professional requirements.
3. Act in ways that may be abusive or may place a Child or Adult at risk of abuse.
4. Make sexually suggestive comments or actions to a Child or Adult, even as a joke.
5. Engage in sexual activity or have a sexual relationship with a child, regardless of consent.
6. Marry a person below the age of 18, regardless of consent and local custom.
7. Assist a child or vulnerable adult in tasks that he or she can do unaided (such as taking them to the toilet, bathing or changing clothes), unless help is requested, in which case the 'Two Adult Rule' applies.
8. Hit or otherwise physically assault or physically abuse Children & Vulnerable Adults under any circumstance.
9. Act in ways intended to shame, humiliate, belittle or degrade Children & Vulnerable Adults, or otherwise perpetrate any form of emotional abuse.
10. Discriminate against or unduly favor particular Children & Vulnerable Adults to the exclusion of others.
11. Develop relationships with Children & Vulnerable Adults that could in any way be deemed exploitative or abusive.
12. Spend time alone with a child or vulnerable adult, away from others, behind closed doors or in a secluded area (see 'Two Adult Rule' above).
13. Take a child or vulnerable adult to their home or visit a child or vulnerable adult at their home where they may be alone with that child or vulnerable adult, or sleep in the same room, without another adult present.
14. Sleep in the same bed as a child or vulnerable adult or allow a child or vulnerable adult to stay overnight at their home unsupervised, when not related to that child or vulnerable adult.
15. Condone, or participate in behavior with Children & Vulnerable Adults, in action or behavior which is illegal, unsafe or abusive, including being part of harmful traditional practices, spiritual or ritualistic abuse or substance abuse.
16. Exploit Children & Vulnerable Adults for their labor (e.g. domestic servants) or for sexual purposes (e.g. prostitution) or trafficking of Children & Vulnerable Adults; The definition of child domestic work (house help) does not include occasional babysitting, gardening, help during school holidays or out of school time. However the 'Two Adult Rule' should be applied.
17. Take a child or vulnerable adult alone in a vehicle unless it is absolutely necessary and with parental/guardian and managerial consent.

Communications

It is imperative that instructions on communications are in place to ensure that people with ulterior motives cannot misuse photographs and related information beyond the agreed purpose and consent. The best interests of each child & adult are to be protected over any other consideration.

- a) LRBT is committed to ensure all interviews and images of children are undertaken with sensitivity in order to safeguard the child & adult's right to dignity, identity, confidentiality and privacy. Where possible, they should be prepared for interviews prior to being interviewed. A parent or guardian must always be present during interviews of Children & Vulnerable Adults.

- b) Pictures of Children & Vulnerable Adults should always be decent and respectful and it should be avoided that a family and / or a community is stigmatized and stereotyped. All Children & Vulnerable Adults, both females and males should be clothed top and bottom. Consent to use information obtained in interviews and/or images of Children & Vulnerable Adults who have been interviewed should be obtained from Children & Vulnerable Adults themselves (if they are of an age, understanding and possess the maturity to do so) and from their parents and/or guardians.
- c) LRBT will carefully guard any information about all Children & Vulnerable Adults who feature in LRBT's publications, ensuring that their personal data is used appropriately. This also applies when material is made available to third parties.
- d) Pictures, materials and personal information regarding Children & Vulnerable Adults will be held in a secure database with only authorized personnel to have its access.

Reporting and Incident Management

LRBT has reporting and incident management procedures for handling reports related to Children & Vulnerable Adults Abuse. The goal of these procedures is to enable appropriate and swift investigation of any case and to identify cases of abuse and maltreatment early on. All LRBT staff should be informed of LRBT's Children & Vulnerable Adults Safeguarding Reporting and Incident Management Procedures. The welfare and safety of the Children & Vulnerable Adults serve as the foundation for all the decisions made during the management of an incident or suspected case.

Confidentiality

All reports and information related to this policy will be treated and managed with strict confidentiality by all concerned persons to protect identities of

- a) Children & Vulnerable Adults concerned
- b) Informer and
- c) Accused

Duties of the designated Safeguarding Focal Person

Hospital Administrators, Administrative Superintendent or Admin Officer as the case may be, acts as the Safeguarding Focal Person at all LRBT's Facilities. In the event of a safeguarding concern being raised, Focal Person of the respective LRBT Facility will hold a meeting with the Chief Medical Officer/General Manager on receipt of such a report. He will closely liaise with the GM Operations, LRBT Central Office and provide the incident report to them for further action.

Based on the information provided, decisions will be made by the CEO which may include:

- a) Reporting to relevant local law enforcement agencies or any other external body if the matter is criminal in nature.
- b) Help child(s)/adult(s) in concern and their families to refer or connect support services, if required.
- c) Appoint and delegate investigation to an Investigation Officer/Team if the matter is in breach of this Policy and therefore requires further enquiry.

Implementation of Safeguarding Policy

- a) LRBT will take the following measures to ensure effective implementation of this policy:
- b) All LRBT employees will be required to sign an acknowledgement and consent to the terms of this policy during their orientation training.
- c) LRBT's website homepage and every workplace will display information that "LRBT is committed to safeguarding Children & Vulnerable Adults" with contact details for reporting incidents of possible child/adult abuse to the relevant authority.



- d) LRBT will integrate Children & Vulnerable Adults safeguarding measures into relevant core internal processes such as: planning and program design, partner agreements, risk management, monitoring and accountability mechanisms and recruitment processes.
- e) HR will submit a summary of Child & Vulnerable Adult safeguarding concerns received annually to the Chairman to ensure transparency and accountability.

Risk Identification Chart

Areas of Risk	Risk Factors	Risk Significance High, Medium, Low	Mitigating Strategy	Actions to Implement

		Impact		
		Low	Medium	High
Likelihood	High	Medium	High	High
	Medium	Low	Medium	High
	Low	Low	Low	Medium



CONFIDENTIAL
CHILDREN & VULNERABLE ADULT SAFEGUARDING INCIDENT REPORTING FORM

To : Hospital Administrator / Administrative Superintendent / Admin Officer

Location _____

This form is for reporting concerns about potential violations of LRBT’s Children & Vulnerable Adults Safeguarding Policy.

It should only be submitted to the abovementioned officers (your local Safeguarding Focal Person). Please try to provide as much information as possible in the form. Areas where you have nothing to report can be left blank.

Details of reporting person (unless he/she wants to remain anonymous)

Name:	Designation / Relation with LRBT:
Location:	Mobile No.:
Address:	
Relationship to the person abused:	

Administrative Information related to the Incident

Location of incident:	
Date of incident:	Time of incident:
Witness 1 (if any): Name: Phone No. Address:	Witness 2 (if any): Name: Phone No. Address:

Type of safeguarding concern or abuse [Please check appropriate box(es)]

Did you witness Child or Adult abuse?	
Has someone reported Child or Adult abuse to you?	
Do you believe that a Child or Adult may have been neglected?	
Do you believe that a Child or Adult may have been neglected?	
Do you believe that a Child or Adult may have been mentally / emotionally / spiritually abused?	
Do you believe that a Child or Adult may have been sexually / physically abused?	

Victim’s details

Name:	Father Name:
Date of Birth / Age:	Gender:
Address:	
Relationship to the suspected abuser:	
Current location of the Victim:	



Further details of concern or incident (including victim's direct words if possible):

What action (if any) has already been taken and by who?

If emergency medical care is required, has it been accessed?

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

Report written by:

Name:	Date & Location:
Phone No.:	Signature:

Submitted to: _____

Date submitted: _____



SAFEGUARDING INCIDENT CLASSIFICATION AND MANAGEMENT AT LRBT

MINOR INCIDENTS

Resolution by Local Hospital Administration + inform Central Office Operations

Minor incidents are incidents or allegations that are not criminal but breach LRBT's Safeguarding Policy e.g. violation of the "two adult rule", deliberately missing safeguarding training.

All such incidents are handled at the most local level and should be recorded by the Safeguarding Focal Person who then notifies the Central Office Operations.

If committed by a LRBT partner's representative, the partner is expected to manage this and is not obligated to inform LRBT unless there are specific contractual requirements.

SERIOUS INCIDENTS

Resolution by Local Hospital Administration in collaboration with Central Office Operations

Serious incidents or allegations are usually (but not always) criminal and pose high levels of risk and impact to vulnerable groups. Serious incidents not only pose harm to individuals but are usually coupled with high reputational, media, security and existential threats for an organization.

Serious incidents include any form of sexual abuse like rape, molestation, child pornography, child marriage, sexual harassment. Serious incidents also include negligence, professional malpractice in LRBT's program service delivery; corporal punishment to the extent of hospitalization or bleeding; causing severe bodily harm; harmful traditional practices; human trafficking; labor exploitation; financial exploitation like extortion; exposing children to illegal substances among other offences. Note that minor incidents can become classified as serious if systemically perpetrated or recurring.

Incident management of serious incidents is usually locally-led by Hospital Administration but is overseen by the Central Office Operations who can call upon assistance of any other LRBT's department, if needed. LRBT may transfer incident management away from the local Hospital Administration, in order to protect from reprisal or conflict of interests. When required and in the best interests of vulnerable groups, LRBT will report to/liaise with local authorities.

If a serious incident occurs at any partner's organization, LRBT expects to be informed by the partner at the earliest possible time. LRBT also expects the partner to appropriately manage the incident and may make recommendations if requested or where necessary. If appropriate and timely action is not taken by a partner, as a last resort, LRBT may suspend its association.

CONSENT FORM FOR USING PICTURES, IMAGES OR STORIES OF CHILDREN AND ADULTS

Guidelines on obtaining consent

Age of Person	Consent of Parents/Guardians
Child age 0 – 16 years	Consent of Parents/Guardians needed. Observe for children’s willingness to participate.
Child above age 16 but below age 18	Both child and parents/guardians can consent.
Adult (any person 18 years and above)	Adults can consent on their own. However, in some cases, assisted decision making may be needed.

Details of Person

Name:	Date of Birth/Age:
Location:	Date:
Signature / Thumb Impression:	

Consent of Person or Parent/Guardian

1. I agree to a LRBT Representative:
 - Speaking to me and recording my words
 - Taking my photographs
 - Making my video

2. I agree for LRBT to:
 - Mention my name
 - Mention what country I come from
 - Use photographs and/or videos of me
 - Use information about myself, family and community to form stories
 - Use information about my potential disease/medical treatment, my impairment or disability

3. I understand that the information, photos and/or videos as mentioned above will be used on a voluntary basis (no payment will be received) for the purposes of fundraising, awareness raising, advocacy and other communications with our sponsors, media or the public.

They will be used in printed products, electronically as well as online (LRBT websites, social media, e-mail etc.) or for broadcast.



I understand that I can revoke my consent at any time with future effect. After revocation, the information will be deleted from the data base, but might continue to be accessible if the data has been used by other parties.

Name of person giving consent:	Age:
Relationship to Child if consenting on behalf of a child:	Location & Date:
Signature / Thumb Impression:	

Declaration of translator or person helping with assisted decision making:

The interpreter will translate the contents of this form in the appropriate language of the child/parent/guardian and confirm the following:

- I have translated and or explained the contents of this form into a language understood to the persons concerned.
- I didn't notice any signs that the contents of the forms may not have been fully understood by the person I am assisting.
- I collected the consent with respect to the LRBT Safeguarding Policy.

Name:	Designation:
Organization (if applicable):	Date:
Signature / Thumb Impression:	

Declaration of the person collecting consent:

I collected the consent with respect to the LRBT Safeguarding Policy requirements.

Name:	Designation:
Organization:	Date:
Signature / Thumb Impression:	

CHILDREN & VULNERABLE ADULT SAFEGUARDING CODE OF BEHAVIOR

I acknowledge that I have read and understood LRBT's Children & Vulnerable Adults Safeguarding Policy. By signing this document, I agree:

- To comply the Children & Vulnerable Adults Safeguarding Policy of LRBT.
- To be responsible for observing and spreading awareness for the Code of Behavior in my work environment.
- To respond immediately to any concerns, allegations and incidents, and to notify the LRBT Safeguarding Focal Person without delay.

In this respect I will:

- Be committed to creating a culture of openness and mutual accountability at workplaces. This culture will enable all Children & Vulnerable Adults' protection concerns to be raised and discussed and abusive behavior can be challenged.
- Contribute to create and/or uphold an environment where Children & Vulnerable Adults are listened to and respected as individuals and which is safe, positive and encouraging to them.
- Ensure the use of the 'Two Adult Rule'. This means, when interacting with Children & Vulnerable Adults, ensure that another adult is present or within reach.
- Ensure physical contact is at all times appropriate and not an invasion of the Child or Adult's privacy.
- Use positive, non-violent methods to manage Children & Vulnerable Adults' behavior.
- Respect Children & Vulnerable Adults' dignity and their need to be protected at all times when taking photographs, filming or writing reports for public relations work.
- Protect and handle personal data of Children & Vulnerable Adults with care and ensure that this is also respected by third parties who receive information about Children & Vulnerable Adults from LRBT.
- Respond to all concerns, allegations or disclosures according to the reporting protocol.
- Comply with any investigation (including interviews) and make available any information necessary, if required by investigation board.

I will never:

- Hold, fondle, kiss, cuddle or touch Children or Vulnerable Adults in an inappropriate and/ or culturally insensitive way.
- Engage in activities involving close body contact with Children or Vulnerable Adults beyond the professional requirements.
- Act in ways that may be abusive or may place a Child or Adult at risk of abuse.
- Make sexually suggestive comments or actions to a Child or Adult, even as a joke.
- Engage in sexual activity or have a sexual relationship with a child, regardless of consent or local custom. Mistaken belief in the age of a child is not a defense.
- Engage in sexual activity or have a sexual relationship with an adult beneficiary of LRBT because of the inherently unequal power dynamics.
- Marry a person below the age of 18, regardless of consent and local custom.

- Assist a Child or Adult in tasks that he or she can do unaided (such as taking them to the toilet, bathing or changing clothes).
- Hit or otherwise physically assault or physically abuse Children or Vulnerable Adults. All disciplinary measures are non-violent and do not humiliate.
- Act in ways intended to shame, humiliate, belittle or degrade Children or Vulnerable Adults, or otherwise perpetrate any form of emotional abuse.
- Discriminate against or favor particular Children or Vulnerable Adults to the exclusion of others.
- Develop relationships with Children or Vulnerable Adults that could in any way be deemed exploitative or abusive.
- Spend time alone with a Child or Adult, away from others, behind closed doors or in a secluded area (see 'Two Adult Rule').
- Take a Child or Adult to their home or visit a Child or Adult at their home where they may be alone with that Child or Adult, or sleep in the same room.
- Sleep in the same bed as a child or allow a Child or Adult to stay overnight at their home unsupervised.
- Condone, or participate in behavior with Children or Vulnerable Adults, which is illegal, unsafe or abusive, including being part of harmful traditional practices, spiritual or ritualistic abuse.
- Exploit Children or Vulnerable Adults for their labor (e.g. domestic servants) or for sexual purposes (e.g. prostitution) or trafficking of Children or Vulnerable Adults; The definition of child domestic work (house help) does not include occasional babysitting, gardening, help during school holidays or out of school time.
- Take a Child or Adult alone in a vehicle unless it's absolutely necessary and with parental/guardian and managerial consent.
- Use any computers, mobile phones, video cameras, cameras or social media to exploit or harass Children or Adults, or access child exploitation material through any medium.
- Give or allow children to use illegal drugs, alcohol or restricted substances or encourage their use.

Signed: _____

Name: _____

Designation: _____

Date of Joining: _____