# TLMEW Safeguarding Policy

## Safeguarding of Children & Vulnerable Adults (SCVA) Protection Policy

### TLM Commitment Statement

1. The Leprosy Mission (TLM) is a Global Fellowship of Members and Affiliates that are autonomous legal entities in their own countries. The Global Fellowship Board has overall responsibility for TLM entities around the world. For the purposes of this Policy, TLM includes 31 Members and Affiliates who are signatories to The Leprosy Mission Global Fellowship Charter and use the name and brand of The Leprosy Mission. It also includes the International Office based in London, and TLM Trading based in Peterborough, United Kingdom
2. This Policy binds the following persons within the TLM Global Fellowship:
	* **Staff** includes all TLM employees, working part-time or full-time
	* **Representatives** includes TLM volunteers, interns, Board members, advisors, consultants, community health workers, visitors, media and journalists, and all who represent or associate with TLM in any way

The relevant parts of this Policy also bind within the TLM Global Fellowship:

* **Partners**\* - local, national or international organisations with whom TLM enters into a contractual agreement to undertake activities, projects and programmes.
* **Suppliers**\* - those who supply TLM Members, Affiliates, and Partners with materials or supplies delivery of operations, fundraising, and programmes.

**\*** Partners and suppliers may vary in size and operational capacity from country to country and each Member will define which stakeholders fall into these categories for the purpose of this policy.

1. This Policy aims to protect and safeguard children and vulnerable adults from the **different forms of abuse, exploitation and neglect.** More specifically, these terms mean the following:
* A **child** is defined as any person under the age of 18 and in accordance with Article 1 of the United Nations (UN0 Convention on the Rights of the Child, 1989. TLM recognises that some children may be more vulnerable to abuse due to personal and/or external circumstances, e.g., sexual orientation, physical and/or mental disabilities, orphaned and/or single carer household
* A **vulnerable adult** is someone aged 18 or over who has care and/or support needs by reason of being affected by personal circumstances such as leprosy, physical, learning or mental disability, old age, gender, sexual orientation, illness, or external circumstances

 such as poverty, conflicts or disaster. They are, or may be, unable to protect themselves against harm, abuse or exploitation

* **Survivor/Victim** - The person who has suffered harm or injury from abuse, exploitation, harassment and neglect. The term ‘survivor’ is often used in preference to ‘victim’ as it implies strength, resilience and the capacity to survive. It is the individual’s choice whether they wish to identify themselves as survivor or victim
* **Abuse, Exploitation and Neglect** - All forms of action or inaction by TLM staff or representatives in a position of power, trust and authority that may result in different forms of harm (or risk of harm), injury, or even death of a child or vulnerable adult
1. TLM expects the **highest standards of professional practice and behaviour** by its staff and representatives in its work and when in direct or indirect contact with all people, particularly children and vulnerable adults. It is committed to safeguarding such persons from abuse, exploitation and harassment and has **zero tolerance** towards behaviour that may harm anyone
2. **Safeguarding** refers to the responsibility and duty of care exercised by all TLM staff and representatives who are in positions of power, authority, trust and responsibility to safeguard all people, especially children and vulnerable adults, from the risk of harm, abuse, exploitation and harassment that may be caused by them through their behaviour, activities, projects and programmes, both directly and indirectly. **Managers have a specific role to play in raising awareness of safeguarding procedures and ensuring a safe environment for all**
3. This is a **cross-cutting policy** and seeks to ensure that the safeguarding of all people, especially children and vulnerable adults, is paramount in **every area of work** at TLM. This includes Finance, Operations, Fundraising, Programmes, Procurement, Research, Monitoring and Evaluation, Media and Communications (internal and external), Human Resources, and IT

### Key Principles

1. This policy, and all related policies, are underpinned or reinforced by TLM’s values(**Compassion, Justice, Integrity, Inclusion and Humility**)and international safeguarding standards including:
2. Keeping Children Safe Standards
3. Core Humanitarian Standard and 9 Commitments
4. Inter-agency Standing Committee (IASC) 6 Principles on Protection from Sexual Abuse and Exploitation and
5. The Department for International Development (DFID) Enhanced Due Diligence Safeguarding Principles

It is also based on the following International Human Rights Instruments:

* The United Nations (UN) Convention on the Elimination of Discrimination against Women (CEDAW), 1979;
* UN Convention on the Rights of the Child (UNCRC), 1989; and
* UN Convention on the Rights of Persons with Disabilities (UNCRPD), 2006
1. Based on these standards, TLMEW will carry out its duty of care and responsibility in implementing this policy and procedures and all related processes based on the following **key principles**:
* **Non-discrimination** - Without exception, all people have the right to protection from abuse, neglect and harm regardless of gender, age, race, disability, sexuality, sexual identity, or beliefs. No individual or group should be treated any less or more favourably than others in being able to access services which meet their needs
* **Best interest** - All actions must be taken in the best interest of the victim(s) or survivor(s), employing a survivor-centred approach
	+ **Confidentiality** – All care must be taken to ensure information regarding safeguarding concerns should only be shared with those who need-to-know. All reports will be handled with strictest confidentiality to protect the identity of the individuals concerned and ensure there is an environment of no reprisals against those who report. Information about concerns will only be shared with agencies and or individuals who need to know on a risk-assessed basis
* **Co-operation** - Working in co-operation with children, vulnerable adults, carers, communities and relevant agencies is essential to promoting the welfare of everyone
* **Accountability and transparency** – The creation of a culture and environment in which staff, representatives, and beneficiaries, such as children and vulnerable adults, are valued, listened to, and feel safe to raise their concerns. Also, where safeguarding concerns are reported and dealt with quickly and appropriately
* **Commitment** - Sharing this policy and the Code of Conduct with all TLMEW staff and representatives for their signature as a sign of acceptance
* **Prevention** – Ensuring that safety is built into all activities and service provision, including the reduction and management of risk
* **Clear reporting** – Clear reporting and management lines where concerns can be raised and managed in a timely and appropriately manner are made known to TLMEW staff, representatives, partners and beneficiaries.
* **Appropriate response** – Immediate steps taken to prevent further harm and investigate and deal with concerns appropriately, including, when possible, working together with other organisations that have a responsibility to safeguard children and vulnerable adults
* **Learning** – Ensure recommendations from lessons learnt are incorporated back into improving this policy, procedures, and safeguarding practice by TLM and ensuring systems are in place to monitor and review the progress
* **Resourcing** - Maintain and allocate the necessary resources in terms of time and budget to support the implementation of this policy and other related policies and procedures
* **Clear** **goal setting** - to prevent, report and respond to safeguarding concerns
1. TLM is also committed to **safeguarding its staff and representatives** from any harm or injury caused by bullying, harassment, and sexual harassment. Those matters are dealt with in the **Bullying and Harassment Policy** and related HR policies and procedures

### Responsibilities under this policy

1. **Safeguarding is everyone’s responsibility.** TLMEW staff and representatives have a responsibility to safeguard children and vulnerable adults in all aspects of its work. This includes understanding this policy and related processes and being committed to creating an environment where children and vulnerable adults feel safe and supported. More detailed responsibilities are defined in the Safeguarding Procedures document
2. **TLMEW staff and representatives must report safeguarding concerns** to the **Designated Focal Person** (when applicable in-country), the **TLMEW** **Designated Safeguarding Lead** (DSL) at confidential@TLMEW.org.ukor the **Global Designated Safeguarding Officer** (DSO) DSO@leprosymission.org at the earliest and, as far as possible, within 24 hours
3. **TLMEW staff and representatives can also opt to report safeguarding concerns to the TLMEW Board at** safeguarding@TLMEW.org.uk **or to the Global Fellowship Board at** safeguarding@leprosymission.org **if the other safeguarding reporting channels available (point 2) do not seem adequate to address the concern**
4. **In certain circumstances,** staff, representatives, or those with whom we come in contact, may feel more comfortable using an **external independent reporting channel** and to this effect reports can be submitted to <https://www.safecall.co.uk/file-a-report/>or to the relevant contact number in each country
5. **Reporting safeguarding concerns is a mandatory and professional obligation and failure to do so could lead to appropriate disciplinary action.** This applies even to those staff or representatives who have no direct contact with children and vulnerable adults during their work

### Adoption and Implementation of this Policy

This policy, the accompanying procedures, and the Code of Conduct set **the minimum standards expected by TLM Fellowship Members, their staff and representatives.**

The [Safeguarding Children & Vulnerable Adults Procedures](https://tlmi.glasscubes.com/cube/document/8198825)(SCVA) **supports the implementation of this policy**:

* **Signing of the Code of Conduct** by all TLMEW staff and representatives. The [Code of Conduct](#_TLMEW_Code_of) sets minimum standards of behaviour in and outside of work, which are mandatory. This Code forms part of the terms and conditions of any individual’s contract or engagement with TLM
* **Safe People – recruitment and selection and other HR procedures** applicable to all TLMEW staff and representatives
* **Mandatory induction and training** and regular communications regarding this policy
* **Clear and confidential ways to provide feedback, report and respond to safeguarding concerns** for staff, representatives, and beneficiaries.
* **Implementing Safeguarding Risk Assessments**
* **Gathering, storing and using images and personal data of children and vulnerable adults** for marketing, communications, fundraising, research and evaluations, including the use of Informed Consent Forms
* **Fundraising** recognises that some supporters will be vulnerable, and they must be protected, and adjustments made to meet their needs
* **Working with Partners and Suppliers** - TLMEW shares, and expects compliance of this Policy and Procedures, by its partners and suppliers for their context. Partners should also undergo a safeguarding due diligence process where gaps in their policies, procedures and/or capacity are identified and TLMEW supports them to develop and improve
* **Responsibility of the implementation of this policy** lies with all staff and representatives, particularly Managers, Country Leaders, and their Board. They will be supported by the Global DSO situated at TLM International Office and the in-country DSLs and Safeguarding Focal Persons

### Survivor-centred approach

1. TLMEW will prioritise the rights, needs, and wishes of the survivor by taking a human rights approach. This approach aims to create a supportive environment in which the survivor’s rights are respected and in which the survivor is heard and treated with dignity and respect. TLMEW will promote the survivor’s recovery and their ability to identify and express needs and wishes, as well as to reinforce their capacity to make decisions about possible interventions
2. All actions will be risk-assessed, and decisions taken with the best interest of the survivor(s) using the following criteria where the survivor has a right to:
* be treated with dignity and respect instead of being exposed to victim-blaming attitudes
* choose the course of action in dealing with the abuse instead of feeling powerless
* privacy and confidentiality instead of exposure
* non-discrimination based on age, disability, ethnicity, sexuality or sexual orientation, status, language and
* receive appropriate and comprehensive information to help them make their own decisions instead of being told what to do
1. Where TLMEW becomes aware that its staff member or representative may pose a risk to children or vulnerable adults, TLMEW will comply with the applicable in-country legislation in respect of disclosing this information to the appropriate authorities, if it does not pose a serious risk to the survivor(s)
2. Every practical effort will be made to assist the survivor in coping with any post-traumatic stress they may be experiencing. This may include psychological counselling, or another form of assistance deemed necessary or appropriate. TLMEW has a responsibility to map services for possible referrals

### Monitoring this Policy

1. **Global Level:**
* Safeguarding will be included in the organisational Risk Register with clear risk owner and mitigating measures in place. The Leprosy Mission International (TLMI) Board will review this register at least annually
* Safeguarding will be included as a standing item on the agenda of the TLMI Board and the Designated Safeguarding Trustee and Global DSO will provide a report on the implementation of the policy, any concerns that have arisen, and the outcome of any investigations
1. **Country Level:**
* Safeguarding will be included in the TLMEW Risk Register with clear risk owner and mitigating measures in place. The TLMEW Board will review this register at least annually
* Safeguarding will be included as a standing item on the agenda of the TLMEW Board and the DSL will provide a report on the implementation of the policy, any concerns that have arisen and the outcome of any investigations
* For countries without a local TLM Board, safeguarding risks, mitigations, policy implementation, any concerns and the outcome of any investigations will be included in the formal meetings between the International Director and the Country Leader three times a year

### Breach of this Policy and Procedures

**1**. Anyone found to have breached this policy, including failing to report safeguarding concerns or failing to co-operate with safeguarding investigations, or breaching the Code of Conduct or committing acts against children or vulnerable adults which are criminal in nature or grossly infringe upon the rights of a child or vulnerable adult, will face appropriate action from TLM according to the limit of its authority. The consequences may amount to one or more of the following. This is not an exhaustive list:

* Disciplinary action, which could amount to dismissal of staff
* Termination of engagement for Board members, volunteers, and other representatives
* Termination of contract for consultants/contractors
* Suspension/withdrawal of funding/support and ending the relationship with TLM for members, partners and suppliers
* Matters reported to law enforcement and other agencies (where is it appropriate to do so)
1. TLMEW views the safety of children and vulnerable adults as paramount. It encourages an open culture of reporting without reprisals. It believes that it is always better for staff and representatives to report their concerns, even if they are uncertain

### Revision

The TLMEW Safeguarding Policy will be reviewed every two years to ensure compliance with international standards and updated legislation, as well as incorporating lessons learned.

The Procedures may be updated more frequently if internal or external circumstances significantly change and to ensure high standards of practice.

### Related Policies

The following policies should be aligned with this policy and procedures. In the event there is a discrepancy, the higher standard will apply:

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| * Recruitment and Selection Policy
 | * Data Protection and Access to Information Policy
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| * Whistleblowing Policy
 | * Health, Safety and Security Policy
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| * Bullying, Harassment and Sexual Harassment Policy
 | * Equality & Diversity Policy
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| * Grievance Policy & Procedures
 | * Disciplinary Policy & Procedures
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