



EFICOR'S **Vulnerable Adult** **Safeguarding and** **Protection Policy**

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Preamble:

EFICOR is working to establish a just, responsible and compassionate society,

- It is committed to promote an environment that is of mutual respect and understanding.
- It believes in the principles of stewardship, transparency, accountability and inclusivity.
- To further the objectives and the principles it embodies, the board of EFICOR has resolved to create policies and guidelines to achieve its stated objectives.

The Source of its Values, Principles and Practices

1. Our understanding, principles, and practices are guided by the law of the land.
2. Our involvement will be based on the voices of different groups in a community and primary and secondary data.

Application of the Policy

This Policy applies to

- Any Staff Member who are defined in EFICOR Employment Policy.
- Any Representatives, which includes: All Board and Society Members, Guests, Visitors, Supporters, Consultants, Journalists, Photographers, Media Persons, Interns etc.

EFICOR Vulnerable Adult safeguarding and protection policy states as under.

- Definition: A vulnerable adult is defined as a person over the age of 18: who is temporarily or permanently unable to manage his/her personal affairs or his/her property because of an impairment or insufficiency of his/her personal faculties, and/or has severe physical or mental disabilities and is vulnerable and/or forced to live in unsafe place and/or depends on others and/or is potentially vulnerable to exploitation or abuse as a result of his/her status or his/her lack of power and control. Also the vulnerable adult is a one who may be in a relationship (work or social) or in contact with another adult, who seeks to misuse his/her position of authority or trust to control, coerce, manipulate or dominate them.
- Safeguarding and Protection: Vulnerable adult safeguarding is the responsibility of the organization and it has to make sure that their staff, operations, and programmes do no harm to vulnerable adults, that is that they do not expose vulnerable adults to the risk of harm and abuse, and that any concerns the organization has about vulnerable adults' safety within the communities in which they work, are reported to the appropriate authorities.

The Board directs the Management to draft and implement appropriate rules, guidelines and actions to be taken to fulfil the vulnerable adult safeguarding and protection policy. The Board of Management at its meeting dated July 26, 2019, adopted "EFICOR Vulnerable Adult safeguarding and Protection Policy". The Board of Management approved the rules, regulations and processes as recommended by the Management for the implementation of the policy.



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EFICOR Vulnerable Adult Safeguarding and Protection's rules, regulations and processes

A. DEFINITIONS

1. 'Do no harm' refers to EFICOR's responsibility to 'do no harm' or minimize the harm they may be doing inadvertently as a result of inappropriate programming.
2. Harm is any detrimental effect of a significant nature on the vulnerable adult's physical, psychological, or emotional wellbeing. For harm to be significant, the detrimental effect of a vulnerable adult's wellbeing must be substantial and serious. The harm should not be transitory in nature and harm should be demonstrable in the vulnerable adult's presentation, functioning, or behavior.
3. Vulnerable adult abuse is either because of gross negligence or abuse either of sexual nature or physical or emotional which harms the vulnerable adult.
4. Neglect and negligent treatment: allowing for context, resources and circumstances, neglect and negligent treatment refers to a persistent failure to meet a vulnerable adult's basic physical and /or psychological needs, which is likely to result in serious impairment of a vulnerable adult's healthy physical, spiritual, moral and mental development. It includes the failure to properly supervise and protect vulnerable adults from harm and provide for nutrition, shelter, and safe living/ working conditions.
5. Sexual abuse is forcing or enticing a vulnerable adult in a sexual activity, which the vulnerable adult cannot comprehend or has no choice in consenting to it. This may include but is not limited to fondling, rape, oral sex, penetration, or non- penetrative acts such as masturbation, kissing, rubbing, and touching. These acts may occur whether the vulnerable adult is clothed or unclothed. Non-touching vulnerable adult sexual abuse would include exhibitionism and voyeurism and the involvement of a vulnerable adult in prostitution or pornography.
6. Physical harm is actual or likely physical injury inflicted upon the vulnerable adult with cruel and/or malicious intent, forced labour and marriage. It may be the result of a deliberate act, but could also be caused through the omission or failure to act to protect the vulnerable adult.
7. Emotional abuse: persistent emotional maltreatment that impacts on a vulnerable adult's emotional development that includes degrading, bullying (including cyber bullying), actual or likely discrimination (based on gender, race, age, ability, disability, religion, creed, caste, class, culture, sexuality, lifestyle, health and other such unlawful or unjustifiable reasons) rejection (refusing to acknowledge the vulnerable adult's worth and emotional needs), isolation (denying the vulnerable adult's social experiences: locking vulnerable adult in the closet, restriction of movement), terrorizing (verbal assault with or without weapons), ignoring (refusing to show affection), corrupting (reinforcing destructive, antisocial, or sexually exploitative behaviors), verbal assault (extreme sarcasm, name calling, public humiliation), and over-pressuring (criticism of age-appropriate behaviors/skills as inadequate).
8. Vulnerable adult sexual exploitation: a form of sexual abuse that involves vulnerable adults being engaged in any sexual activity in exchange for money, gifts, food, accommodation, affection, status, or anything else that they or their family

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need. It usually involves a vulnerable adult being manipulated or coerced, which may involve befriending vulnerable adults, gaining their trust, and subjecting them to drugs and alcohol. The abusive relationship between victim and perpetrator involves an imbalance of power where the victim's options are limited. It is a form of abuse that can be misunderstood by vulnerable adults as consensual. Vulnerable adult sexual exploitation manifests in different ways. It can involve an older perpetrator exercising financial, emotional or physical control over a young person. It can involve peers manipulating or forcing victims into sexual activity, sometimes within gangs and in gang-affected neighbourhoods. It may also involve opportunistic or organised networks of perpetrators who profit financially from trafficking young victims between different locations to engage in sexual activity with multiple men.

9. Commercial exploitation: exploiting a vulnerable adult in work or other activities for the benefit of others and to the detriment of the vulnerable adult's physical or mental health, education, moral or social-emotional development. It includes, but is not limited to, vulnerable adult labour. 10. Delinquent Employee: Delinquent Employee is as defined in the Employment Policy.

B. ORGANISATIONAL COMMITMENTS

EFICOR commitments in Vulnerable Adult Safeguarding and Protection are the following:

EFICOR systems and procedures to safeguard vulnerable adults

1. Will form a Vulnerable Adult Safeguarding & Protection Steering and Working Committee and define its roles and functions in safeguarding vulnerable adults and to take appropriate actions as appropriate.
2. Will identify and nominate Vulnerable Adult Protection Officers in each Unit.
3. Will provide a clear guidelines and formats to report vulnerable adult abuse. This is given in Annexure 1.
4. Will provide guidelines on actions to be initiated if a vulnerable adult abuse case is reported.

EFICOR staff and volunteer recruitment process

1. In recruitment of new staff or in inducting volunteers, EFICOR will properly screened during their recruitment period. In their application form, they will agree to EFICOR Vulnerable Adult Safeguarding & Protection Policy and declare that there have been no previous convictions for abuse against vulnerable adults, violent behavior or other convictions that would raise concern about behavior towards vulnerable adults. Their application form will be screened with a minimum of 2 reference checks in specific to any previous vulnerable adult abuse incident/s during their recruitment process. The details will be recorded in the staff files, before the new staff member is invited to take the position.
2. Information on the Vulnerable Adult Safeguarding and Protection Policy will be introduced before and on acceptance of employment.

EFICOR staff and representatives' behaviour protocol while working with vulnerable adults



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EFICOR staff and representatives must

1. Sign a statement accepting that they have read the policy, will respect it and understand that action will be taken in case of inappropriate behavior while visiting or working with vulnerable adults.
2. Visitors will sign a declaration that they will follow the protocol while interacting with the children during their visit related to EFICOR work.
3. Avoid meeting with individual vulnerable adults when possible or meet within the sight of others.
4. Not make unnecessary physical contact with the vulnerable adult in a way that is against the rights of the vulnerable adult or expose them to inappropriate materials such as pornographic videos and literature.
5. Not take images of vulnerable adults (photos, video etc.), which are detrimental or explicit and undermine the vulnerable adult's dignity.
6. Not initiate or engage in sexually provocative conversations or activity with vulnerable adults, even in fun.
7. Not allow the use of inappropriate conversation between vulnerable adults or about vulnerable adults to go unchallenged.
8. Not threaten to or use any form of physical punishment.
9. Not allow any allegation of abuse by a vulnerable adult to go unreported or either trivialize or exaggerate vulnerable adult abuse issues.
10. Agree to inform Convenor, Vulnerable Adult/Child Safeguarding Committee immediately if new information arises that casts doubt on a team member's trustworthiness with vulnerable adults and will not start an investigation personally in a case of suspected vulnerable adult abuse. Such information would be treated as confidential, and appropriate action will be initiated.
11. Take actions if protocols are broken, and the person involved will be disciplined and may lose his/her job and may be subject to criminal proceedings.

In working with community

As per the context and situation in the community

1. EFICOR staff will not allow a vulnerable adult to come to the office premises alone without accompanying with another person. In case of emergency, if the vulnerable adult comes alone, the staff should ensure that there is more than one staff in the office. A poster in this regard in local and English language shall be put in all EFICOR office appropriately.
2. EFICOR staff will not visit staff house or community family's house when the vulnerable adult is alone.
3. Monitor existing programmes and policies, and take measures to make it vulnerable adult safe.
4. Address and educate to provide safety and protection for vulnerable adults in communities.
5. Ensure that structures do not deny vulnerable adults their due status and rights – either social, economical, spiritual or political.
6. Address the rights of the vulnerable adults.

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7. Encourage greater participation of vulnerable adults in planning and decision making in programmes implemented.
8. A poster in local language and in English inviting staff and communities to report on Vulnerable Adult abuse with contact details shall be pasted in EFICOR office and in community centres appropriately.
9. A poster in local language and in English giving details of the process by which the community and staff to inform concerned authorities on vulnerable adults abuse shall be pasted in EFICOR office and in community centres appropriately.
10. Staff and representatives character expected in the community should be shared with the community and the same should be minuted in the community committee meeting minutes.
11. If EFICOR staff come to know about a vulnerable adult abuse case in the community they should inform the Line Manager and fill Incident Reporting Format and send it to the Convenor of the Vulnerable Adult/Child Safeguarding Committee.

Implication of Vulnerable Adult Safeguarding & Protection Policy in relation to Partner organization

1. EFICOR would expect the partner organization to have a Vulnerable Adult Safeguarding & Protection Policy/staff and representative behavior protocol are in place while partnering with them. If they do not have a Policy or protocol, then EFICOR will help them to develop one. . Till the new Policy is developed for the partner organization, EFICOR's Vulnerable Adult Safeguarding and Protection Policy will be applied to them. The Organization should sign in agreement to this with EFICOR.
2. Where an EFICOR partner organisation staff or representative is suspected of being involved in vulnerable adult abuse, EFICOR will strongly advise the organisation to deal with the issue and will offer advice and expertise (where possible) on how to handle the matter.
3. If an EFICOR partner organisation staff or representative is suspected of abuse and the partner organization is unwilling to address the matter, EFICOR may take further measures, e.g. end the partnership; report the matter to the appropriate authorities etc. EFICOR must first inform the partner organisation of the actions they plan to take in order to give them every opportunity to address the matter.

EFICOR in its communication

1. EFICOR in its communication about vulnerable adults will reflect images that preserve their dignity and decency and not seek to exploit their circumstances.
2. EFICOR will take special care to protect identities and specific geographic location of vulnerable adults in public documents.
3. Those speaking on behalf of EFICOR will make all possible efforts to ensure that the message communicated in all circumstances will reflect that vulnerable adult abuse is wrong.
4. Disclosure of information about past or present abuse of vulnerable adults and any of the persons involved should be limited to only the people who need to know.

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EFICOR in sensitizing Staff on Vulnerable adult Protection Policy



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1. EFICOR will sensitize the staff on the Vulnerable Adult Safeguarding & Protection Policy at least once in a year.
2. EFICOR will orient the new staff recruited, on Vulnerable Adult Safeguarding & Protection Policy before being appointed and ensure that the staff give it in writing that they have read and understood the Policy and they will abide by the same.
3. EFICOR will produce a poster and flow chart and paste it in all office locations in the news board to sensitize them on vulnerable adult protection and the process involved in Complaint and Redressal on vulnerable adult abuse.
4. EFICOR will ensure that staff Members of EFICOR, undergo training on vulnerable adult protection and consciously work towards protecting the vulnerable adult.

a. Vulnerable adult abuse reporting procedure and process:

1. EFICOR will use a separate complaint handling mechanism for Vulnerable Adult Abuse and Exploitation to receive the complaint on abuse and exploitation.
2. The complainant raise a genuine concern relating to suspected or actual vulnerable adult abuse and should be made in good faith, meaning that, the disclosure is sincere and honest.
3. EFICOR will also use the already existing policies on reporting, like People with Disability Policy, Whistle Blower Policy and Prevention of Sexual Exploitation, Abuse and Harassment Policy.
4. On receiving complaint EFICOR will act on it, irrespective of whether it comes through dedicated Vulnerable Adult Abuse and Exploitation Reporting or not.
5. All the abuse would be registered in Vulnerable Adult Abuse and Exploitation Report Register and confidentiality will be maintained optimally in relation to subject of compliant and strictly in relation to victim.
6. Staff/Person should inform in writing to the Convenor, Vulnerable Adult/Child Safeguarding Committee either through postal mail or email and copied to the line Manager and concerned Director.
7. In case the perpetrator is the Convenor, Vulnerable Adult/Child Safeguarding Committee then the mail should be addressed to Executive Director/ Convenor, Governance Standing Committee / Chairperson of EFICOR Board either through postal mail or email.
8. If sent by postal mail, write on the cover "Confidential and to be opened only by the person to whom the letter is addressed".
9. If sent by email they can send it to the following email id: ed@eficor.org or convenorgsc@eficor.org; or chair@eficor.org.
10. In case of vulnerable adult giving a direct complaint, it should be recorded and registered by staff/person and certify that it was recorded in their presence (This in absence of another adult known to the vulnerable adult).
11. The EFICOR Staff or representative are not allowed to conduct any kind of enquiry on their own. Only the Management with the approval from the Executive Director will do the enquiry.
12. If any violation is noticed regarding the above said clauses by any EFICOR Staff member or representatives appropriate actions will be initiated against the concerned person following the procedures stated in the Employment Policy.

b. Action taken after receiving the Complaint:

The suspected staff or Representative should be kept away (leave / suspension / transfer / reporting to HQ etc.) from the existing work place immediately after receiving suspicious call / letter / email in order to prevent manipulation of evidence and to have fair investigation.

c. Actions following the investigation Report:

EFICOR Vulnerable Adult Protection Steering Committee shall investigate the complaint and make its recommendations to the administration, to take necessary steps as



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recommended. The Vulnerable adult Protection Steering Committee upon investigation may recommend the punishment to the administration against the delinquent employee as per the procedure stated in the Employment Policy.

d. EFICOR shall

1. Provide on-going support to survivor(s) within the purview of EFICOR's capacity.
2. Appropriate feedback to complainant, victim, subject of complaint, witnesses, community, staff team, as necessary.
3. Mitigate damage to subject of complaint's reputation, if cleared.
4. Provide training, monitoring to address identified poor practice of subject of complaint, if appropriate.
5. Mitigate damage to relationship with the community
6. Manage morale of the staff team.
7. Review risk matrix and strengthen measures for protection of vulnerable adult in future, as necessary.

Vulnerable Adult Abuse Reporting Format:

The information in this form is confidential. It must be sent to the Convenor Vulnerable adult/Child Safeguarding Committee and copied to the appropriate line Manager or Director. This form should be held in a safe and secure place.

Try and complete the whole form, only leaving blanks if you have no knowledge. Clearly state if the information reported has been personally observed (first hand information) or has been told to you by a third party (hearsay information).

PART 1: About you

Name:

Your role in EFICOR:

(Tick the correct box, if you are unsure and fill the last point)

- A EFICOR staff member
- A volunteer/Intern
- A journalist/consultant/ photographers / external Media
- A Board member / Supporter
- A Beneficiary
- A staff member of a Partner Organization
- Someone from the community
- Any others. Specify _____

Contact details:

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Details of any other organisation involved:

Your relationship to the concerned vulnerable adult:

(Your identity as an informer will be kept confidential. despite that if you may, for personal reasons, not want to disclose your identity, you are requested to cooperate fully in sharing the rest of the following information.)

PART 2: About the Vulnerable Adult

(If more than one alleged survivor, provide information for each person)

About the vulnerable adult

Name, _____

Gender, _____

Ethnicity, _____

Nationality:

Approximate Age:

Address:

.....

Who does the vulnerable adult or young person live with?

Is the alleged Survivor in a safe place and receiving appropriate care? _____

Are there any immediate medical or safety issues for the vulnerable adult? For other staff? _____

Does the alleged Survivor have any disability or special needs? _____

Are there any cultural issues to consider?



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PART 3: (State your concern / allegation)

Please give as much detail as you can, regarding your concern of abuse or danger to a vulnerable adult. E.g. of details could be related to:

(Tick the correct box, if you're unsure, leave this blank)

- Category – 1: A EFICOR staff member or representative
- Category – 2: A staff member of a Partner organization or Alliance.
- Category – 3: Someone from the community

a. Who raised the concern?

.....

b. Was abuse observed or suspected?

.....

c. Nature of concerns / allegation/s (What are the circumstances, What is alleged to have happened):

.....

d. Date, time, & place of any incidents:

.....

e. Observation made by you (Vulnerable adult's emotional status, physical evidence)

.....

f. Write down/share exactly what the vulnerable adult said and what you said:

.....

g. Any other relevant information:

.....

h. Was any other vulnerable adult involved, aware?

.....

i. Have you reported this to any relatives of the vulnerable adult or caregiver or any other

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vulnerable adult protection personnel or agencies?

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j. Time and date of reporting:

k. Person to whom report was made:

l. Advice given:

m. Action taken:

PART 4 - Additional Information

Alleged Perpetrators details: (Complete as much as possible if Known)

Name :

Nationality :

Address/Current Location:

Language/s spoken

Age :

Sex : Male/Female

Relationship to victim:

Occupation :

Employer :

Any other details (including physical description):

Current Safety of the vulnerable adult? (Include any immediate safety concerns such as access of perpetrator to the safety within the family, any emergency needs)



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Has any emergency medical or other support been required? If so what was provided, when and by whom?

Does the report or presentation of the vulnerable adult (if present) suggest emergency medical attention is needed?

Is this project where the incident happened directly funded by EFICOR local funds - Yes or No

Name the Funding Agency, which are funding this project: _____

Signed: _____ Dated: _____

Lessons Learnt:

EFICOR is committed to ensuring that the lessons learnt from incidents of Vulnerable Adult abuse and exploitation are acted on within the relevant programme or head office. This is achieved by the following means:

1. Through project learning reviews
2. Sessions on current issues on vulnerable adult abuse
3. Risk Management being included in Governance Standing Committee meetings.
4. Staff and partner training programmes.
5. Training materials being periodically updated to capture learning from recent vulnerable adult abuse cases.