

# LEPRA Society Safeguarding Policy

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## Purpose

The purpose of this policy is to protect people, particularly children, at risk adults and any project participants, from any harm that may be caused due to their interactions with LEPRA. This includes harm arising from:

- The conduct of staff or personnel associated with LEPRA.
- The design and implementation of LEPRAs programmes and activities

The policy lays out the commitments made by LEPRA Society and informs staff and associated personnel of their responsibilities in relation to safeguarding.

This policy does not cover:

- Sexual harassment in the workplace – this is dealt with under Prevention of sexual Harassment Policy
- Safeguarding concerns in the wider community not perpetrated by LEPRA or associated personnel.
- Sexual Exploitation & Abuse – this is dealt with under LEPRA’s PSEA Policy, which is being drafted and will be finalised and published.

## What is safeguarding?

Safeguarding means protecting peoples' health, wellbeing, and human rights, and enabling them to live free from harm, abuse, and neglect.

In the International Development sector and in our organisation, we understand it to mean protecting people, particularly children and at-risk adults, from harm that arises from coming into contact with our staff or programmes.

Further definitions relating to safeguarding are provided in the glossary below.

## Scope

This policy covers:

- All staff contracted by LEPRA Society.
- Associated personnel whilst engaged with work or visits related to LEPRA, including but not limited to the following: Board members; partner and funding agencies’ staff; those on secondment; consultants; volunteers; contractors; LEPRA Ambassadors, invited programme visitors.

## Policy Statement

LEPRA believes that everyone we come into contact with, regardless of age, gender identity, disability, sexual orientation, ethnic origin, religion or social class / caste has the right to be protected from all forms of harm, abuse, neglect and exploitation. LEPRA will not tolerate abuse and exploitation by staff or associated personnel.

This policy addresses both child safeguarding and adult safeguarding. These key areas of safeguarding may have different policies and procedures associated with them (see Associated Policies below p.6).

LEPRA commits to addressing safeguarding throughout its work, through the three pillars of **prevention, reporting and response**.

## Policy Principles

### Non-negotiables

There are certain behaviours that we will not tolerate from all those connected with us in the different roles mentioned above. They are known as the non-negotiables of conduct and are as follows:

- Do not subject a child or adult to sexual, emotional, or physical harm, exploitation, or abuse.
- Do not exchange goods, money, favours, or services for sex.
- Do not have sexual contact with a person receiving assistance.
- Do consistently promote effective safeguarding in your work.
- Do report any concerns you may have. If in doubt – report

## Prevention

### LEPRA responsibilities

LEPRA will:

- Ensure all staff have access to, are familiar with, and know their responsibilities stated in this policy.
- Design and undertake all its programmes and activities in a way that protects people from any risk of harm that may arise from their coming into contact with LEPRA. This includes the way in which information about individuals in our programmes is gathered and communicated.
- Implement stringent safeguarding procedures when recruiting, managing, and deploying staff and associated personnel.
- Ensure staff receive training on safeguarding at all level commensurate with their role in the organisation.
- Follow up on reports of safeguarding concerns promptly and according to the processes provided within this policy.

## Staff responsibilities

### Child safeguarding

LEPRA staff and associated personnel must not:

- Engage in sexual activity with anyone under the age of 18yrs.
- Sexually abuse or exploit children.
- Subject a child to physical, emotional, or psychological abuse, or neglect.
- Engage in any commercially exploitative activities with children including child labour or trafficking.

### Adult safeguarding

LEPRA staff and associated personnel must not:

- Sexually abuse or exploit at-risk adults.
- Subject an at-risk adult to physical, emotional, or psychological abuse, or neglect.

### General responsibilities

LEPRA staff and associated personnel are obliged to:

- Contribute to creating and maintaining an environment that prevents safeguarding violations and promotes the implementation of the Safeguarding Policy
- Report any concerns or suspicions regarding safeguarding violations by a LEPRA staff member or associated personnel to the appropriate staff member.

## Reporting

### Enabling reports

#### Reporting concerns by Staff

LEPRA strives to create an environmental culture that empowers our staff to raise concerns. LEPRA will ensure that safe, appropriate, accessible means of reporting safeguarding concerns are available to staff and the communities we work with (see how to report a safeguarding concern below).

#### Whistleblowing

Any staff reporting concerns or complaints either through informal complaints or through formal whistleblowing channels will be protected by LEPRA's Whistleblowing Policy.

#### Reporting concerns by persons outside the organisation

LEPRA strives to create a conducive environment to receive concerns or complaints from external sources such as members of the public, partners, and official bodies.

### How staff should report a safeguarding concern

Staff members who have a complaint or concern relating to safeguarding should report it immediately to their Safeguarding Focal Point [as appropriate] or line manager, or can alternatively communicate concerns directly to the Safeguarding Committee by emailing their concerns to the confidential e-mail address at [safeguarding@leprahealthinaction.in](mailto:safeguarding@leprahealthinaction.in), unless it is being reported using the Whistleblowing policy. If the staff member does not feel comfortable reporting to their Safeguarding Focal Point or line manager (for example, if they feel that the report will not be taken seriously, or if that person is implicated or complicit in the concern) they should report to any other appropriate staff member or directly to the afore-mentioned email. Completion of a Safeguarding Incident Report Form forms part of the reporting process.

Safeguarding concerns about the CEO and the board members should be raised directly to the chair of the board or to the Safeguarding Committee, and they will decide how best to proceed.

### How should external members of the public report a safeguarding concern?

Any external member of the public should feel free to contact any member of staff to raise a concern, or alternatively use the confidential phone line, the online complaints procedure or via post. Members of the public, including beneficiaries, should be made aware through sensitisation campaigns of the existence and function of LEPRA Safeguarding Policies, and their right to report anonymously.

### Response

LEPRA encourages an open culture of reporting without reprisals and believes that it is imperative for staff and representatives to report their concerns, even if there is uncertainty. All persons raising concerns under this policy will be protected. LEPRA will follow up safeguarding reports and concerns according to policy and procedure, and legal and statutory obligations (see Procedures for reporting and response to safeguarding concerns in Associated Policies).

LEPRA will apply appropriate disciplinary measures to all LEPRA staff and associated personnel found in breach of this policy. The consequences of which may amount to one or more of the following (but not limited to):

- 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 LEPRA for members, partners and suppliers
- Matters reported to law enforcement and other agencies (where it is appropriate to do so)

LEPRA will offer appropriate support to survivors of harm caused by staff or associated personnel, regardless of whether a formal internal response is conducted (such as an

internal investigation). Investigations will not be conducted, if after assessment the report is deemed not to be a safeguarding issue as defined within this policy.

Decisions regarding support will be led by the survivor, with all decisions taken being in the best interests of the survivor. The support provided for the survivor to cope may include psychological counselling or any other form of support that is deemed appropriate or necessary.

### **Confidentiality**

It is essential that confidentiality is maintained at all stages of the process when dealing with safeguarding concerns. Information relating to the concern and subsequent case management should be shared on a need-to-know basis only and should be kept secure at all times.

### **Associated policies and Procedures**

- LEPRA Global Code of Conduct
- LEPRA Anti Bullying policy
- LEPRA Whistleblowing Policy
- LEPRA Disciplinary Procedure
- Grievance Procedure
- Equal Opportunities Policy
- Procedures for reporting and response to safeguarding concerns (see safeguarding concern form)
- Staff Recruitment
- LEPRA Prevention of Sexual Harassment Policy

## Glossary of Terms

### **Abuse**

Abuse consists of anything that individuals, institutions or processes do (or fail to do) that directly or indirectly harm children or adults or damages their prospect of a safe and healthy development. This includes any form of physical, emotional, sexual and neglectful abuse.

### **Beneficiary of Assistance**

Someone who directly receives goods or services from LEPRA's programme. Note that misuse of power can also apply to the wider community that the NGO serves and can include exploitation by giving the perception of being in a position of power.

### **Child**

According to the UN Convention on the Rights of the Child, a child is anyone under the age of 18.

### **Confidentiality**

Confidentiality is the process of privately managing information that is identified as being of a personal and sensitive nature.

### **Grooming**

Grooming is when someone builds a relationship, using trust and an emotional connection with a child or person, so that they can manipulate, exploit, and abuse them.

### **Harm**

Psychological, physical and any other infringement of an individual's rights.

### **LGBTIQ+**

LGBTIQ+ stands for 'lesbian, gay, bisexual, transgender, intersex, queer (or sometimes questioning)', with the '+' indicating that there are many forms of gender and sexual diversity that are not covered by these terms.

### **Non-binary**

A non-binary person identifies in a gender other than binary options of 'woman' or 'man.' In some countries there are culturally recognised 'third gender' groups.

### **Psychological harm**

Emotional or psychological abuse, including (but not limited to) humiliating and degrading treatment such as bad name calling, constant criticism, belittling, persistent shaming, solitary confinement, and isolation.

### **Protection from Sexual Exploitation and Abuse (PSEA)**

The term used by the humanitarian and development community to refer to the prevention of sexual exploitation and abuse of affected populations by staff or associated personnel.

## **Safeguarding**

Safeguarding means protecting peoples' health, wellbeing, and human rights, and enabling them to live free from harm, abuse and neglect'.

In the International Development sector, we understand it to mean protecting people, particularly children and at-risk adults, from harm that arises from coming into contact with our staff or programmes. One definition is as follows:

Safeguarding means taking all reasonable steps to prevent harm, particularly sexual exploitation, abuse, and harassment from occurring; to protect people, especially vulnerable adults, and children, from that harm; and to respond appropriately when harm does occur.

This definition draws from our values and principles and shapes our culture. It pays specific attention to preventing and responding to harm from any potential, actual or attempted abuse of power, trust, or vulnerability, especially for sexual purposes.

Safeguarding applies consistently and without exception across our programmes, partners, and staff. It requires proactively identifying, preventing, and guarding against all risks of harm, exploitation and abuse and having mature, accountable, and transparent systems for response, reporting, and learning when risks materialise. Those systems must both be survivor-centred and protect those accused until proven guilty.

Safeguarding puts beneficiaries and affected persons at the centre of all we do.

### **Sexual abuse**

The term 'sexual abuse' means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

### **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. This definition includes human trafficking and modern slavery.

### **Survivor**

The person who has been abused or exploited. The term 'survivor' is often used in preference to 'victim' as it implies strength, resilience, and the capacity to survive, however it is the individual's choice how they wish to identify themselves.

### **At-risk adult**

Sometimes also referred to as vulnerable adult. A person who is or may need care 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.