



Protection Policy for Vulnerable Adults and Children

Title	Protection Policy – For Vulnerable Adults and Children
Document type	Policy
Applies to	All staff
SOP point of contact	HR and Administration Manager
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1. Policy statement

Everyone has the right to protection from abuse and neglect to live a life characterized by inclusion and participation wherever they are.

Everyone has the right to lead a life where they fulfil their potential to lead dignified, healthy and secure lives.

MANEPO through its work and the behaviour of all who work in it strive to ensure all those with whom we work and have contact with can live a life free from:

- • Sexual, mental, and physical abuse and violence
- • Humiliation
- • Fear
- • Neglect and Exclusion
- • Discrimination

If you have concerns about the protection from abuse of a vulnerable adult or child, you have a duty to act and report.

2. Introduction

MANEPO promotes the rights specifically of older people and is increasingly working with other vulnerable groups to protection from abuse within its strategies and programme work. As the work of MANEPO continues to develop and grow, the organization needs to ensure that it takes direct and practical actions that protect vulnerable adults and children potentially at risk of harm as a direct result or consequence of this work. To achieve this, we must continue to build our existing knowledge and awareness, learning and capacities to enhance our abilities to protect those with whom we work and come into contact with in our daily lives.

This Protection Policy seeks to complement and expand on principles set out in MANEPO's Code of Conduct specifically in relation to vulnerable adults and children, emphasizing the need to promote awareness of the issues of abuse and how to ensure that the protection of vulnerable adults and children becomes a tangible part of daily and working life. The rights of vulnerable adults and children to protection from abuse are captured in many international conventions¹ and national laws and the policy is in line with standards recognized across the sector.

The policy promotes an understanding of protection needs and acceptable behaviours that reduce the risks of harm and exploitation by those included in its scope. The policy also stresses a responsibility to report and respond to concerns of abuse, and for those experiencing abuse to be supported in every way practicable to remove them from risk or harm.

¹ including at least:

- • The UN Principles of Older People (1999)
- • The UN Convention of the Rights of the Child (1989), and its associated regional conventions;
- • The Convention for the Elimination of Discrimination Against Women (CEDAW)
- • The International Covenant on Economic, Social and Cultural Rights;
- • The International Convention on the Elimination of all Forms of Racial Discrimination;
- • The Slavery Convention, as amended, and The Supplementary Convention on the abolition of Slavery; and,
- • The Convention on the Status of Refugees and its additional protocol.
- • The convention against Torture and other Cruel, Inhuman or Degrading Treatment or Punishment
- • The four Geneva Conventions of 1949, containing humanitarian rules for armed conflicts.

This policy seeks to illustrate basic standards and actions which everyone under the scope of this policy should adhere, and which must become practice in our work, to promote good practice and minimise risks to stakeholders.

MANEPO has a zero tolerance to abuse of vulnerable adults and children and this policy provides a framework for managing and reducing risks of abuse in the delivery of our programme activities

3. Scope of policy

This policy applies to all:

- MANEPO staff
- Trustees
- Volunteers
- Interns
- Consultants
- Partners

The policy establishes MANEPO's position and sets out a good example of protection of vulnerable adults and children in their work and everyday lives, and sets out guidance and procedures to enable this.

4. Definitions

Vulnerable adults are those aged 18 years or more who either:

- identify themselves as unable to take care of themselves or protect themselves from harm or exploitation. or
- due to their gender, old age or frailty, mental health problems, learning or physical disabilities as well as disasters and conflicts, and are unable or unwilling as a result to identify themselves as vulnerable or subject to abuse, but are deemed at risk.
- Children – children are defined by the UN Convention of the Rights of a Child as being someone under the age of 18 years of age.

Using the mistaken belief in not realising someone is a minor is not an excuse or defence for sexual relations with someone under 18.

Abuse can come in many forms and includes:

- Physical abuse – hitting, slapping, pushing, kicking, injuring, misuse of medication, restraint or inappropriate sanctions
- Sexual abuse - rape, sexual assault or sexual acts to which a vulnerable adult has not consented to or has been coerced into giving consent through psychological abuse. Engaging a child sexually regardless of consent.
- Psychological abuse - emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidating, coercion, harassment, verbal abuse, isolation or withdrawal from services or support networks.
- Financial or material abuse – theft, fraud, exploitation, pressure regarding wills, property, inheritance or financial transactions. Misuse or misappropriation of property, possessions, or benefits.

- Neglect and acts of omission – ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services. Withholding of necessities of life: medication, adequate nutrition, clothing, and shelter.
- Discriminatory abuse: ageism, racism, sexism, based on disability or other forms of harassment, slurs, or hate-crime.

5. Reporting Abuse

In no circumstance should concerns of abuse and inappropriate behaviour be ignored. The need to ensure the immediate physical and psychological safety of the vulnerable adult or child should always be of paramount importance, and reporting your concerns can help to ensure that all appropriate and practical guidance can be sought.

You must report in situations where:

- You see or suspect abuse
- An allegation of abuse is made to you
- The person or child tells you of abuse

The confidentiality of all parties must be observed at all stages, and information must be recorded in writing. Records should be kept securely and only shared with those who have a legitimate need to know.

Reports should be made to the appropriate MANEPO staff member as soon as possible (within 24 hours), giving as much detail as is possible whilst preserving confidentiality. If there is any delay in contacting the appropriate MANEPO staff member all efforts should still be made to protect the individual concerned.

If you are uncomfortable reporting to the responsible person then you should escalate the matter to their line manager or to a higher level. If you witness a breach of the protection policy and the incident is not involving a member of MANEPO staff or those covered under the policy the guiding principle is that you should still not ignore this.

The usual channel of reporting would be to send a detailed written account of the incident to the relevant programme manager or Executive Director. Given that partners actually work in the community and are often best placed to discuss the issue with the community, the programme manager can discuss it directly with the partner. It will then be the responsibility of the programme manager to ensure appropriate action is taken to ensure that breaches of protection policy e.g. discrimination do not take place within our programmes and projects. It is a process of raising the issues within the community to minimise acts of abuse.

The following scenarios illustrate this point further:

1. The incident reflects an issue of "approach" e.g. discrimination, exclusions, neglect, which would need a revision of approach in the project, and a general review of the training and awareness-building in partner staff and discussions with the community. This scenario might not need one to "act" immediately, but to raise the issue with tact to the most relevant partner manager.
2. The incident is serious enough to raise the issue immediately with partner staff, e.g. physical or sexual abuse, as in these cases there may be a need to ensure the safety of the individual.

It is not the responsibility of the member of staff to whom the allegation is made to ascertain whether or not it is true. It is his/her responsibility to report the concern via the process outlined in this protocol.

6. Behavioural protocols to minimise risks to (accusations of) abuse:

The following protocols should be interpreted with the best interests of the vulnerable adult or child as the primary consideration. Understanding good practice that we can apply in our everyday work and life situations must be a priority in all we do:

It is expected that you will always:

- Respect everyone as an individual.
- Provide a good example of acceptable behaviour, in a way that is in line and truthful to the MANEPO vision, mission and core values in and out of work hours.
- Be aware of any "power" relationships that exist.
- Respect everyone's right to personal privacy.
- Try to ensure that your actions cannot be misunderstood or cause offence and are acceptable within a relationship of trust.
- Show understanding when dealing with sensitive issues including cultural differences and human diversity.
- Be responsive to reports of abuse and investigate appropriately.
- Plan where possible to have at least one other responsible adult present during activities, such as in a car no matter how short the journey, in your home, or the home of the vulnerable adult/child.
- Remember that you are accountable to the vulnerable adult/child, their carers/parents (if any) and MANEPO.

You should never:

- Permit or use abusive behaviour, e.g. bullying, ridiculing or taunting.
- Have inappropriate physical or verbal contact with others.
- Jump to conclusions or make assumptions about others without checking facts.
- Encourage inappropriate attention-seeking behaviour such as infatuations or 'crushes' from, including sleeping in the same bed as, a vulnerable adult/child or doing things of a personal nature that a vulnerable adult/child could do for him or herself e.g. grooming, dressing or bathing.
- Show favouritism to anyone or spend excessive amounts of time on one vulnerable adult/child.
- Make suggestive remarks or actions, even in jest.
- Engage in or allow sexually provocative games to take place.
- Deliberately place yourself or others in a compromising situation.
- Believe 'it could never happen to me'. Minimising risk situations
Everyone should keep in mind that actions, no matter how well intended, can be subject to misinterpretation by a third party. We recognise that some family and cultural situations do not pose a real risk to abuse but can be misinterpreted by a third party and you must be mindful that MANEPO has an obligation to treat any accusation with full seriousness and investigate the matter fully when reported.

Typically:

- Whenever meeting vulnerable adults and/or children, where possible be accompanied by a responsible adult. Choose open, public locations for meetings
- Inform supervisors/line managers of any situation which you believe may be subject to misinterpretation.

- Avoid inappropriate use of the internet or email, such as visiting “adult” websites.
- Avoid relationships with adult beneficiary populations and these are actively discouraged.
- Sexual behaviour
 - Do not engage in or allow sexually provocative games with vulnerable adults/children to take place.
 - Do not touch a vulnerable adult/child in an inappropriate or culturally insensitive way.
 - Do not engage in transactional sex or prostitution in any form.
- Physical behavior
- Wait for appropriate physical contact, such as holding hands, to be initiated by the vulnerable adult/child.
- Psychosocial behaviour
 - Be aware of the power relationship between an adult and vulnerable person, and between NGO workers and beneficiaries, and avoid taking any advantage this may provide.
 - Use language that mentally and emotionally empowers vulnerable adults and children. Do not embarrass, humiliate or degrade vulnerable people.
 - Show neutrality and impartiality according to race, culture, age, gender, disability, religion, beliefs, sexuality or political persuasion.

7. Requirements of the Policy

MANEPO will meet its commitment to safeguard vulnerable adults and children by promoting and taking action on awareness-raising, prevention, reporting, responding, and monitoring. To ensure that the policy is fully implemented, MANEPO in all of its offices will: Refer to Guidelines on implementation.

Systems and procedures

- Provide guidance to all who work with MANEPO on how to provide immediate responses to risks and abuse
- Disseminate clear procedures on how to report abuse, appropriate to the local context
- Operate MANEPO’s procedures on recruitment and selection and the specific actions required as a result of this policy
- Display MANEPO’s “Statement of Commitment to Vulnerable Adults and Children” which include points of contact for reporting
- Train and support “focal points” and senior managers to implement the policy
- Integrate this policy with other policies including recruitment and selection, Code of Conduct, Whistle-blowing, etc
- Ensure that all staff understand the guidelines relating to confidentiality and security of storing confidential information.

Awareness Raising and Training

- Provide training that describes appropriate behaviour with vulnerable adults and children and develops understanding of the risks and threats to protection in the local context.
- Develop and maintain an action plan, including through induction.
- Ensure appropriate staff understand how to respond to allegations against a MANEPO staff member, volunteer, consultant or other people associated with

8. Consequences of breach of protection policy

If there is an allegation of a violation of the policies, guidelines, principles or practice of the protection policy from a verifiable source, the individual concerned may be suspended from all activity/association with MANEPO pending the outcome of an independent investigation. The investigation must comply with MANEPO's reporting procedures. Failure to report and breaches of confidentiality in the process will be subject to investigation and disciplinary procedures where applicable. Staff will continue to receive full pay during this time, in line with MANEPO's disciplinary and grievance procedures.

Following the outcome of the investigation, if it has found that an act had been committed in relation to vulnerable adults/children whether within or outside the context of the organisation's work, which are either criminal, grossly infringe the vulnerable adult's/child's rights, or contravene the principles and standards of this policy, MANEPO will take immediate disciplinary action and any other action which may be appropriate to the circumstances.

- Employees and interns– disciplinary action/dismissal
- Volunteers, trustees – ending the relationship with the organisation
- Consultants – termination of contract
- Partners – withdrawal of funding/support
- Inform other NGOs if there are reported protection issues relating to their organization

MANEPO may involve the authorities such as the police at any stage of the investigation if appropriate to ensure the protection of vulnerable adults/children and pursue a criminal prosecution where this is applicable.

9. Roles and Responsibilities

All staff and others must become acquainted with the requirements of the policy and act in accordance with these.

In order to ensure that the policy is effective within the organisation, some staff will have specific responsibilities relating to the policy.

Action	Responsible person
Resourcing the Protection Policy	Trustees, Executive Director
Action plan for staff development and training	Executive Director
Displaying the Statement of Commitment	Executive Director
Induction and training of the Protection Policy, Guidelines, and the Statement of Commitment to all bound by the policy.	Head of Programmes
Supported reading of the Protection Policy.	All those under the scope of the policy
Basic assessment, awareness-raising and training, with questions and answers.	Head of Programmes
Identification of further training needs. This includes setting a date for follow-up training at 3 months in post.	Executive Director, Head of Programmes

Signing of the induction sheet for the Protection Policy as finalisation of the recruitment /employment process. Submission of signed Protection Policy to HR for filing.	All MANEPO staff and new employees.
Induction report on any issues arising (confidential).	Line managers

10. Queries relating to the Protection Policy:

Should any staff member wish further information, clarification or support in the implementation of this policy, they should contact the Executive Director



Protection Policy

I confirm that I have read and understood the content of MANEPO International Protection Policy and have been given full opportunity to discuss or ask questions to clarify any points that I did not understand.

I am clear about my obligations to act and to report where abuse or suspected abuse is or has been taking place, and understand the consequences if I fail to act and report.

Name: _____

Signature: _____

Date: _____