

Safeguarding Policy



**Centre for Community Development (CCD)
Paralakhemundi, Gajapati District – 761200
Odisha**

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1. Introduction

Centre for Community Development (CCD) is a State level Voluntary organisation committed to supporting the development of poor, marginalized and vulnerable sections of the community in Gajapati District of Odisha State and to facilitate in accessing the rights and improving the quality of life of people with disabilities. Our major interventions are focusing on Natural Resource Management, Women empowerment, Mainstreaming of the Persons with Disabilities, Sustainable livelihood promotion, child rights, health and social inclusion interventions in Gajapati District. Many of those benefitting are adults at risk¹, women, children and youth. We are working at grassroot level with poor and marginalized with the support and convergence of Government and donors emphasizing on their rights and entitlements of persons with disabilities.

This Safeguarding Policy is in addition to the existing Child Protection Policy 2006. It provides clear definitions, sets standards across the organisation, and gives clear guidance on how to apply and implement the policy throughout the organisation and in relation to partner community.

What is safeguarding?

Safeguarding means promoting & protecting people's health, wellbeing, and human rights, enabling them to live free from harm, exploitation and abuse. A safeguarding approach means identifying and minimising the risk of harm to children and adults from staff, representatives and partners; our operations and programme activities including and includes responding appropriately to any safeguarding concerns about children and adults within communities where we work. It entails a wide potential range of policies, procedures and activities seeking to address child and adult safety and wellbeing.

As per the understanding of CCD, a safeguarding approach means minimising the risk of harm, exploitation or abuse of children and adults from staff, operations and programme activities. It includes reporting to the appropriate authorities regarding any safeguarding concerns about a child or adult within communities where we work. This policy focuses on addressing those risks by developing standards and mitigating measures to target and reduce residual risk.

Following the widespread and serious allegations of sexual exploitation and abuse by aid workers in West Africa at the turn of the millennium, the UN Secretary General's Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse was issued in 2003. It has been applied by all major humanitarian agencies and integrated into their policies and procedures.

Subsequently the "do no harm" principle is now widely recognised as an important element in the wider strengthening of safeguarding systems at both national and local level when providing health, education and social protection services.

¹ An adult at risk (Care Act 2014) is someone aged 18 or over who has care and support needs due to their age or frailty, gender, mental or physical health problems, learning or physical disabilities or the impact of disasters and conflicts, who is as a result unable to protect themselves from harm, exploitation or abuse.

It is known that children and adults especially women and children with disabilities are at particular risk of harm, exploitation and abuse. This policy recognises that these specific risks are best addressed through a broader (twin-track) safeguarding approach with specific actions focused on women, children and adults with disabilities where relevant.

2. Target groups of the policy

The Safeguarding Policy is to be applied across all organisational activities and in all of the programme themes of CCD, including health, education, social inclusion and research. All Board members, staff, partner community as well as donors and visitors should be aware of and adhere the policy.

In addition to complying with the policy all representatives must sign and will be held accountable to CCD's Safeguarding Code of Conduct².

It is recognised that, for government partners in particular, national policy and legal frameworks take precedence. However, where the national legal framework is considered weaker than CCD's policy, it may be a specific national advocacy activity to strengthen that framework, particularly with regards to provision for women, children and adults with disabilities.

3. Purpose and commitment

The purpose of this policy is to ensure that in all CCD activities are implemented in a safe and protective environment where harm, exploitation and abuse are effectively prevented as far as reasonably possible, and responded effectively.

The policy has three specific objectives:

- 1) Keeping children and adults safe
- 2) Safeguarding the reputation of CCD from false allegations or from operating within an unclear framework
- 3) Ensuring the highest standards of behaviour from representatives and minimising the risk of abusers entering the organisation.

CCD is committed to doing whatever we can to keep everyone safe, with a specific focus on those with disabilities. CCD's work is guided by:

- Protection of Children from Sexual Offences (**POCSO Act**, 2012)
- **Sexual Harassment** of Women at Workplace (**Prevention**, Prohibition and Redressal) **POSH Act**, 2013
- Convention on the Elimination of Discrimination against Women (CEDAW)
- the UN Convention on the Rights of the Child (CRC), with specific reference to article 19 on protection from all forms of violence, injury, exploitation, abuse, neglect, mistreatment and sexual abuse; and
- the UN Convention on the Rights of Persons with Disabilities (CRPD) including its special provisions for the protection of children with disabilities

² See CCD's Code of Conduct for Representatives, included as Annex 3

from cruel, inhuman or degrading treatment or punishment (article 15) and exploitation and abuse, including gender-based violence (article 16).

- the recognition of the rights of children and adults with disabilities to access services, justice, and full participation in their communities, in line with the CRPD. This means that effective safeguarding from the additional risks faced by those with disabilities must not include preventing them from accessing these rights.

In all activities involving children, including fundraising, communications and programme activities, primary consideration should be given to children's rights, following the four key principles of the CRC, namely, the "best interest" of the child, the child's right to life and development, the child's right to be heard/participate, and the child's right to non-discrimination.

Principles of safeguarding

CCD is committed to the six key principles that should underpin all safeguarding functions, actions and decisions, as set out by the UK Care Act 2014. These principles are relevant for both child and adult safeguarding.

- 1) **Empowerment.** People being supported and encouraged to make their own decisions and informed consent.
- 2) **Prevention.** It is better to take action before harm occurs.
- 3) **Proportionality.** The least intrusive response appropriate to the risk presented.
- 4) **Protection.** Support and representation for those in greatest need.
- 5) **Partnership.** Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse.
- 6) **Accountability.** Accountability and transparency in delivering safeguarding.

Children and adults with disabilities

CCDs has a specific mandate to protect and promote the rights of people with disabilities of categories irrespective of caste and gender.

Recent research on child protection and disability³ has found that children with disabilities experience far higher levels of abuse than their peers. Girls and boys with different impairments are vulnerable to many forms of abuse but most at risk are children with intellectual impairment and communication difficulties. Emotional and sexual abuse are mostly reported by girls with disabilities, but boys with disabilities are also targeted.

Negative cultural norms around disability contribute to putting people with disabilities at risk of violence and abuse, including factors such as stereotyping, prejudice, discrimination, isolation, difficulty in protecting oneself or inadequately understanding and/or communicating that abuse has occurred. People with visual impairments are especially vulnerable as they are dependent on tactile guidance. They are also likely to be particularly vulnerable in care situations, where they require assistance with toileting, dressing, bathing etc.

CCD will work with its partner communities to make sure that the particular risks of harm, exploitation or abuse facing people with disabilities will be properly assessed, addressed and monitored within the local context.

CCD commits to communicate this policy throughout the organisation, to partners and, where it is relevant, to children themselves, their parents and other beneficiaries in programme activities; as part of a broader programme to challenge stereotypes and cultural norms around disability, particularly with regards to children's potential and rights.

4. Standards

Standard and aim	Specific areas of activity / indicators	Owner
<u>Awareness and communication:</u> All CCD representatives are aware of the policy and the organisation communicates its approach to key stakeholders	1.1 All CCD representatives are responsible for complying with the policy and code of conduct, including following all reporting and response procedures outlined. 1.2 CCD representatives will be introduced to the policy and sign the code of conduct as part of their induction, contracting or ongoing management process. 1.3 CCD will communicate the policy through its website and directly to core stakeholders, to demonstrate its commitment and the importance of the policy 1.4 In particular, CCD will communicate about and where available share research of safeguarding issues specifically in relation to those with disabilities	
Standard and aim	Specific areas of activity / indicators	Owner
<u>Putting the policy into context:</u> All CCD field offices apply and implement the policy	3.1 Each office location has a Safeguarding Focal Person (SFP) in place with clear responsibilities for coordinating the implementation of the policy as well as mapping the local / external context (including legislation) for safeguarding. 3.2 CCD has in place a safeguarding reference group which develops and reviews annually the field level safeguarding plan based on this policy, outlines the members of the reference group, contact details for the SFP, any specific contextual adaptations to the policy (agreed with the Safeguarding Manager) and any advocacy, training and awareness plans. 3.3 The plan will specifically include a communication plan including how it will be rolled out with partners, children, parents, communities. 3.4 Each SFP will work with the Safeguarding Manager (SM) and reference group to assess any contextual issues with the policy and develop country specific procedures if relevant. These will include guidance for CCD representatives about appropriate official	

	<p>reporting procedures in the case of an incident.</p> <p>3.5 Country procedures will be reviewed each time the global policy is reviewed, instigated by the SM, or a specific incident occurs or the national legislative environment changes, instigated by the SFP.</p>	
<p><u>Putting the policy into practice I:</u></p> <p>Recruitment, selection and training</p>	<p>4.1 CCD will ensure safeguarding is part of any relevant job description. This will include all positions reporting into the CEO, as well as specific positions where employees will be expected to come into direct contact with children and/or adults at risk.</p> <p>4.2 Recruitment processes for these employees will include relevant questions on experience working with children and/or adults at risk, and additional references or background checks will be undertaken for posts identified as high risk.</p> <p>4.3 CCD will provide necessary training and support to its staff and stakeholders to ensure effective implementation of the policy.</p> <p>4.4 CCD will ensure that the SM and the SFP have the capacity and capability to fulfil their roles. We will do this through training, support and the revision of roles and responsibilities.</p>	
Standard and aim	Specific areas of activity / indicators	Owner
<p><u>Putting the policy into practice II:</u></p> <p>Programme activities</p>	<p>5.1 Specific programme guidance will be developed for each thematic area: inclusive education; social inclusion; livelihood and women empowerment, by the Technical Advisor. This should be developed in consultation with children and adults or their representative organisations to ensure its robust and responsive to actual needs</p> <p>5.2 A safeguarding focused risk assessment will take place during every new project as part of the risk assessment process, during either the Project Design Process (PDP) or the induction phase, with a specific section on children and adults with disabilities in all cases.</p> <p>5.3 A risk assessment will also be conducted for any other activity directly involving adults at risk and/or children, including fundraising and communications activities where contact is made and information on individuals is gathered.</p> <p>5.4 The risk assessment will include mitigating actions, which will be incorporated into project design/documentation. This may include supporting training of partner staff.</p>	

<u>Putting the policy into practice III:</u> Communications activities	6.1 CCD representatives will ensure that appropriate consent is obtained before images or stories of adults and children are captured or shared. 6.2 CCD will ensure that adults and children are represented in an appropriate way that does not victimise or sexualise them. 6.3 CCD will only collect data on individuals for a specific authorised purpose and it will only be used as intended. It will be stored in a way that complies with relevant legislation and our own data protection procedures. 6.4 Any breaches to the security of personal data must be reported and acted on immediately. 6.5 CCD staff will not use CCD equipment to view, share or access illegal or inappropriate material, including any that specifically includes children.	
<u>Reporting and responding to child safeguarding incidents</u>	7.1 CCD will ensure that reporting and incident management procedures to handle incidents of abuse are in place, communicated to staff and effectively used to enable an appropriate and swift investigation of any given case. 7.2 All CCD representatives must also follow appropriate and relevant national legislative and criminal reporting procedures as advised by the SFP.	

5. Measures to implement the policy

The safeguarding policy requires the following steps for its implementation.

Staffing including the designation and training of a global Safeguarding Manager (SM), as well as Safeguarding Focal Persons (SFP) at Head office level.

Prevention measures including awareness raising, training of relevant staff, risk analysis, recruitment procedures, induction of staff in the policy and codes of conduct for CCD representatives and incorporation of the policy into relevant existing systems.

Reporting and responding measures including steps for alerting and reporting safeguarding concerns, investigation and incident management, duties and responsibilities of assigned managers and safeguarding focal point persons.

Implementing and maintaining the policy, including training and capacity building of staff and board members, monitoring, reporting and review of the policy.

5.1 Staffing

Safeguarding Manager (SM) and Safeguarding Focal Persons (SFP)

CCD will designate a Safeguarding Manager (SM) and Safeguarding Focal Persons (SFPs) to cover in the District of operation (these may be outside of the District where relevant). These roles will be added to the job descriptions of existing staff, with the workload of those staff being adjusted to reflect safeguarding activities. The selection of the SFP will be undertaken in discussion between the most senior staff member of the office and the SM. The contact details of the SFP must be included on all State information documentation provided to visitors to the State / District of operation.

There are two fundamental aspects to these roles, with specific levels of responsibility within each for the SM and each SFP:

- 1) To build the understanding and capability of the organisation required to implement this policy. This will include direct knowledge and information transfer, and accessing appropriate external expertise.
- 2) To act as the reporting mechanism for any safeguarding concern and use lessons learned from specific incidents to improve policy and practise.

CCD will ensure sufficient time is given to the SM and SFPs to acquire the necessary skills and knowledge and to undertake the above activities. Line managers will recognise the priority of SFP roles in incident reporting and response when an incident occurs and the dual reporting line required for this area of work.

The members of this group should be noted in the national safeguarding plan, but may need to be adapted in response to the specific nature of a safeguarding concern or incident, see below.

5.2 Prevention

Staff recruitment

All recruitment of staff will include a full induction to the safeguarding policy and code of conduct, including procedures to follow should any safeguarding concern arise.

When recruiting staff, CCD will make sure that questions regarding safeguarding are included in any relevant job interviews, and that any roles with safeguarding responsibilities have those responsibilities explicitly outlined within the job description. Where possible, references should be sought from previous employers to get more information of the suitability of candidates.

Access to adults at risk and children is incidental to the work we carry out and is not part of any staff members' direct responsibilities. Our programmes are developed and delivered and it is our program staff and management who provide services, and work directly with beneficiaries.

On the rare occasion that a role at CCD would qualify for a DBS check, this will be undertaken as part of the recruitment process. Our Safer Recruitment statement (see Annex 6) outlines our approach to recruitment in more detail.

All CCD representatives will be required to acknowledge receipt of and compliance to the Safeguarding Policy and sign up to the Code of Conduct prior to their employment.

Awareness

CCD will designate staff with the responsibility of building internal awareness and supporting relevant capacity development of the organisation in safeguarding, as detailed in section 5.1 of this policy. All CCD representatives will be duly notified of the Safeguarding Policy and be made aware of how they will be expected to comply with it.

The policy will be translated into the appropriate local languages where CCD operate. It will be the responsibility of all CCD staff to share the policy and approach as relevant to external stakeholders.

CCD will provide necessary training and support to its staff and other stakeholders to enhance understanding and ensure effective implementation of the policy.

The donor agencies of CCD will be requested to review and analyse their country context, and produce a local plan outlining how they will operationalise the policy in their context. Implementation processes may therefore differ from country to country, but in all circumstances, the policy and code of conduct will remain the same. If any situations arise where national legislation conflicts with the policy, CCD must raise and discuss this with the Safeguarding Manager of concern donor agencies. Each country will develop a country policy schedule, including naming the SFP and country safeguarding reference group.

CCD will ensure all supporters, board members, donors, sponsors and media representatives involved with CCD work have access to the Safeguarding Policy through its website and will take appropriate steps to communicate that availability.

Risk analysis

When working with different donor partners, CCD will endeavour to ensure that the programmes it supports are safe for the adults and children they serve. To ensure that appropriate safeguarding measures have been put in place, CCD will work with the donor partner, either during the project development process, or the inception phase, to carry out a safeguarding risk analysis which specifically includes any safeguarding issues and propose actions to mitigate these risks, prior to the activities taking place.

Such risk analysis will be an integral part of project proposals, programme planning guidelines and partnership assessment tools.

Code of Conduct

All CCD representatives are required to understand their responsibility to keep adults at risk and children safe, and to sign and abide by the CCD Code of Conduct (Annex 1), which lists acceptable and unacceptable behaviour, primarily designed to safeguard others. It also serves to guard the name and reputation of CCD and its representatives from false accusations. All staff are responsible for encouraging and promoting the implementation of the Code of Conduct.

The adherence to this code is mandatory for all CCD representatives. Any violation of the Code of Conduct will result in disciplinary procedures in addition to any relevant

legal action. To give maximum protection to beneficiaries, the organisation and staff, the Code of Conduct is to be applied both within and outside of working hours.

5.3 Reporting and responding to incidents

CCD will ensure that reporting and incident management procedures to handle safeguarding concerns are in place and effectively used to enable an appropriate and swift investigation of any given case. CCD representatives should be properly informed of the reporting and incident management procedures. Any CCD representative who has a concern or suspicion regarding harm, exploitation or abuse by someone representing another agency must report such concerns to the Safeguarding Manager or designated SFP.

Confidentiality

All reports and the information herein will be handled with strictest confidentiality to protect the identity of the individuals concerned, the informer and the accused, both appropriately and in accordance with relevant British or other national legislation.

Procedures to be followed in the case of an incident

Agreed procedures to be followed are included as Annex 2.

Consequences of harm, exploitation or abuse

Any behaviour towards children or adults, which results in harm, exploitation or abuse, or the failure to follow the general requirements and specific code of conduct of this policy, is grounds for the following measures:

- **Representatives**

If an employee has been under investigation by CCD or by official law enforcement authorities for any area of harm, exploitation or abuse as defined under this policy, they will be subject to employee disciplinary procedures. Under these procedures they may be temporarily suspended during the investigation. If an employee is dismissed for proven harm, exploitation or abuse, CCD will inform the relevant authorities, disclose this to prospective future employers and/or refuse a reference, depending on details.

5.4 Implementing, maintaining and reviewing the policy

CCD will integrate safeguarding measures into relevant core internal processes and tools such as programme technical guidelines, partner assessments and agreements, training modules, programme design, monitoring and accountability systems and recruitment procedures.

CCD will make sure that proper induction and training in safeguarding will be made available to all staff, permanent and temporary, consultants and volunteers with a particular focus on children and adults with disabilities.. The SM and SFPs will receive additional training in order to manage their responsibilities for rolling out, managing and coordinating the safeguarding policy and procedures.

The policy will be monitored on a regular basis by the designated SM and the SFPs. An annual summary report, including all concerns received, will be submitted by the SM to

senior management. Any findings requiring a change in policy will be discussed with the board of directors and legal advisor of CCD.

CCD will develop an annual implementation plan for the policy, including actions to be taken, details of the FSP and country safeguarding reference group and relevant policy amendments adopted.

Review

A full policy review should take place every three years, instigated and led by the SM, to include a review of external changes to safeguarding standards that apply nationally and internationally.

6. Communications

CCD is committed to adhering to ethical guiding principles on communications to minimise the risks of people misusing photographs and related information beyond the agreed purpose and consent. The best interests of the featured adult or child are to be safeguarded as a primary consideration. To this effect, CCD representatives and partners will abide by the following guidelines.

- Ensure all interviews and images of adults and children are undertaken with sensitivity to safeguard the individual's rights to dignity, identity, confidentiality and privacy. Where possible individuals should be prepared for interviews prior to being interviewed. In the case of children, a parent or guardian should be present during interviews, where appropriate, or their permission sought beforehand for a professional adult with agreed responsibility (such as medical or educational professionals) to be present on their behalf.
- Pictures of adults and children should be decent and respectful and should not stigmatize community, family or the individual. All children, both girls and boys, should wear decent clothing appropriate to the local custom.
- Prior consent to use information collected in interviews and / or images of adults and children should be obtained from the individual themselves (if they possess the maturity to do so), and in the case of children, consent must also be obtained from their parents and/or guardians. To help keep adults and children, consideration should be given to how much information is published.
- CCD is committed to guard carefully any information about adults and children who feature in their publications, ensuring that their personal data are used appropriately. This also applies when material is made available to third parties. Full names should never be provided alongside other identifiers such as date of birth or community.
- Pictures, materials and personal information regarding individuals will be held in a secure database and according to the appropriate CCD's data security protocols. Access to these materials will be employees only through a password-protected system. The misuse of images accessed will be treated in the same way as other breaches of this policy. Applicable data protection laws for all stored images will be followed.

Annex 1: definitions, acronyms and glossary

Definitions

Child

The term 'child' has the specific legal meaning of anyone below the age of 18 years (as defined by the United Nations Convention of the Rights of the Child 1989).

Adult

The term adult therefore refers to anyone aged 18 years or over.

Adult at risk

An adult at risk (Care Act 2014) is someone aged 18 or over who has care and support needs due to their age or frailty, mental or physical health problems, gender, learning or physical disabilities or the impact of disasters and conflicts, and who is unable as a result to protect themselves from harm, exploitation or abuse.

Abuse

Abuse occurs when an individual or individuals hurts another adult or child, either physically or mentally. In the majority of cases, the abuser is someone the victim knows well, such as a parent, other caregiver, relative or friend. Abuse can be intentional or unintentional. There are several forms of abuse including:

a) Physical abuse

Physical abuse is causing deliberate injury to a person, however slight. This may involve hitting, shaking, throwing, poisoning, biting, burning or scalding, drowning, suffocating or otherwise causing or attempting to cause physical harm to a person. Physical harm may also be caused through the misuse of medication, restraint or inappropriate sanctions (for example, corporal punishment) or being given alcohol or a substance that is known to cause harm.

b) Emotional/psychological abuse

Emotional or psychological abuse is the emotional ill-treatment of a person that adversely affects their wellbeing or development. Some level of emotional abuse is involved in all types of ill treatment, though it may occur alone. It includes threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or support networks. Other harmful experiences such as frequently being forced to witness violence in their domestic environment are also classified as emotional abuse.

c) Neglect

Neglect is the continuing failure to prevent harm that damages or impairs health and/or development by not meeting a person's basic physical and/or psychological needs. This includes ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services, withholding medication, inadequate hygiene, nutrition, housing or heating, or preventing someone from interacting with others. Neglect of women, children and adults with disabilities is more common than neglect of those without disabilities and is often under-reported.

In an international development context, some of the individuals of CCDs works with may experience some form of neglect to basic needs. Professional judgement is needed to decide whether the experience of neglect is intentional or due to material deprivation, and should be based on the severity of the neglect and how the individual is being treated relative to their peers in the community and wider cultural norms.

d) Sexual abuse

Sexual abuse is the involvement of a person in sexual activities which they do not want or truly understand, or to which they are unable to give valid or effective consent. This may involve rape, sexual assault, inappropriate sexual contact or exposure to inappropriate material.

Any kind of sexual activity involving a child constitutes sexual abuse, whether or not the child is aware of, or consents to, what is happening. This includes rape, incest, fondling genitals, masturbation, voyeurism, exhibitionism, exposing a child to adult sexual material, or making them take part in any sexual activity, real or simulated, whether face-to-face, online, or in any other medium.

e) Financial or material abuse

Financial or material abuse is the theft or misuse of a person's property or assets. This includes money being withdrawn or stolen, goods or services purchased in someone's name without their consent, being deliberately overcharged for goods or services, misappropriation of property, possessions or benefits, or money being borrowed by someone who is providing a service to the vulnerable person.

f) Discriminatory abuse

Discriminatory abuse is repeated, ongoing or widespread discrimination due to a person's age, sex, gender, disability, racial heritage, religious belief, sexual orientation, appearance or cultural background, marriage or civil partnership, pregnancy and maternity. This can include unfair or less favourable treatment, sexual or gender preference, slurs, harassment, name-calling, breaches of civil liberties, and unequal access to health or social care.

g) Organisational abuse

Organisational abuse is the mistreatment, abuse or neglect of children or adults by an organisation or its personnel. It can take place within settings and services that children or adults live in or use, and it violates their dignity, resulting in a lack of respect for their human rights. It can take the form of an organisation failing to respond to or address incidents of poor practice brought to its attention.

h) Exploitation

Those who want to exploit children and adults will seek out those who are in vulnerable circumstances to use them for their own purpose, activity or gratification. This could be financial, commercial, sexual or related to extremism and terrorism. Exploitation involves a process of grooming; when someone builds an emotional connection with a child or adult to gain their trust for the purpose of exploitation. They may also manipulate their environment, so they become isolated from those who could help or support them. Those affected may not realise they have been groomed, or that what has happened is abuse.

Types of exploitation include:

- **Sexual exploitation:** a type of sexual abuse in which children or adults are sexually exploited for money, power or status. Some children and adults are trafficked into or within a country for this purpose. They may be tricked into believing they are in a loving, consensual relationship. Abusers will use various means to gain compliance such as drugs, alcohol, gifts, threats and bribes.
- **Modern slavery (human trafficking):** this includes forced labour, domestic servitude or coercing, deceiving and forcing an individual into a life of abuse. People are trafficked for sexual exploitation, domestic servitude, labour, benefit fraud and involvement in criminal activity such as pick-pocketing, theft and illegal work. Some people are coerced, but most are trapped in subversive ways. For example, promised education or 'respectable' work in restaurants or as domestic servants, or parents may be persuaded that their children will have a better life elsewhere.
- **Radicalisation:** the process by which those who are vulnerable come to support terrorism or violent extremism and, in some cases, to directly participate in or support terrorist groups. There is no obvious profile of a person likely to become involved in extremism or a single indicator of when a person might move to adopt violence in support of extremist ideas. The process of radicalisation is different for every individual and can take place over an extended period or within a very short time frame. It may follow experience of racism or discrimination. They believe that joining a movement offers social and psychological rewards such as adventure, camaraderie and a heightened sense of identity.

i) Harmful traditional practices

Harmful traditional practices are forms of violence which have been committed (primarily against women and girls) in some communities and societies for so long that they are considered, or presented by abusers, as part of accepted practice. Such traditions include Female Genital Mutilation (FGM) and forced early marriage. They may also include different forms of ritual ceremonies involving individuals in harmful religious or spiritual activities. Children and adults with disabilities may be at higher risk of becoming victims of witchcraft beliefs in certain contexts for example individuals with albinism.

Acronyms/glossary

Best interest of the child

An overarching principle in the Convention on the Rights of the Child:

“in all actions concerning children, whether undertaken by public or private institutions, the best interest of the child should be a primary consideration. In all matters affecting the child, the views of the child should be seen as important and given due weight in accordance with the age and maturity of the child.”

Child and adult protection

Child or adult protection is specifically about the steps and measures an organisation or society puts in place to protect individuals identified as either suffering, or likely to suffer from harm, exploitation, and abuse.

Safeguarding

Safeguarding means promoting and protecting people's health, wellbeing and human rights, and enabling them to live free from harm, exploitation and abuse. A safeguarding approach means minimising the risk of harm to children and adults from staff, representatives and partners; our operations and programme activities including and includes responding appropriately to any safeguarding concerns about children and adults within communities where we work.

CRC The UN Convention on the Rights of the Child (1989)

CRPD The UN Convention on the Rights of Persons with Disabilities (2008)

SFP Safeguarding Focal Person

SM Safeguarding Manager

CCD representatives

CCDs' employees, permanent and temporary, consultants and volunteers employed by CCD.

Safeguarding concern

A safeguarding concern is when someone is worried about the safety or well-being of a child or adult because of something seen or heard, or information that has been given to them. A safeguarding concern can involve a CCD representative, or a representative from another organisation, endangering the safety or wellbeing of others, for example, by not following the code of conduct.

Annex 2: Incident management procedures

Procedures to be followed in the case of an incident

1. Any representative of CCD who has a safeguarding concern must report it immediately to the designated SFP in the District / State where the incident occurred. If the representative cannot contact the SFP, the SM must be informed before other staff in the District / State is informed.
2. From the point when they are aware of the incident, the SFP must submit a written report⁴ to the SM wherever possible within 24 hours or, if this isn't possible, to call, email or text a summary report within this period, with a written report to follow as soon as possible. The SM should then inform the Head of Governance and Assurance (HGA). The HGA maintains a formal record of all such reported incidents, which must be summarised and reported, in the annual return made to the Charities Commission.
3. The SM and HGA will assess the severity of the incident and decide whether to invoke the global crisis response process. In all cases, CCDs' Secretary will be informed of the incident and crisis response, with all relevant staff and governance level communication initiated. In all instances, the Secretary will inform, as a minimum, one of the following Trustees: the Chairman, Vice Chairman, Treasurer or Chairman of the Audit Committee.
4. If the incident is deemed not to require a crisis response, it will be dealt with by the relevant country safeguarding reference group, the SM will communicate with the most senior member to initiate the group. This may involve adding an additional member or members, including external members such as a lawyer.
5. Once constituted, the group will determine the immediate steps to be taken including:
 - a) Reporting immediately, or as soon as possible after becoming aware, to relevant local law enforcement agencies or any other external body if the matter is of a criminal nature. All incidents at State / District level must be reported the major donors and other regulatory bodies.
 - b) Referring the individual concerned to the relevant support services, or ensuring the partner community directly in contact with the child or adult does so.
 - c) Monitoring and reporting on the progress of the investigation and providing information and guidance as appropriate,
 - d) Supporting staff in any related legal procedures, such as giving of evidence.
 - e) Liaising with the SM to determine if an internal investigation is required and if the matter is viewed as a breach of this policy, including whether disciplinary procedures should be invoked.
 - f) Subsequent to the investigation, the SM will compile a written report including all necessary information on the nature of the case, safeguarding concerns, investigation process and any learning to inform policy, practice, programmes or country plans.

⁴ Annex 4: Reporting form for suspected cases of abuse

Annex 3: Code of Conduct

To be applied within and out of working hours⁵

I, (insert name), acknowledge that I have read and understand CCDs' Safeguarding Policy.

By signing this document, I agree:

- To comply with CCDs' Safeguarding Policy and this Code.
- To report any concerns or incidents in line with procedures set out in the policy.
- To raise awareness of the policy and Code of Conduct in my work environment.

I will:

- Be committed to playing my part in creating a culture of openness and mutual accountability in the work place. This culture will enable all safeguarding concerns to be both raised and discussed. This will in turn ensure inappropriate and abusive behaviour is challenged.
- Help create and/or uphold an environment that is safe, positive and encouraging, where people are listened to and respected as individuals.
- Ensure the use of the 'Two Adult Rule'. This means, when interacting with at-risk adults and/or children in a work context, I will ensure that another adult is present or within reach at all times.
- Ensure physical contact is at all times appropriate and not an invasion of the individual's privacy.
- Use positive, non-violent methods to manage behaviour.
- Respect an individual's dignity and their need to be safeguarded at all times when taking photographs, filming or writing reports.
- Ensure that when photographing, filming or interviewing children and adults, the guidelines within the policy are followed and that consent has been obtained, individuals are properly dressed and are not depicted in a way that is abusive, sexually provocative, demeaning or culturally inappropriate or that characterises them as being reliant on the viewer⁶.
- Protect and handle personal data of others with care, to minimise the risks posed by third parties who receive information about children and adults from CCD.
- Respond to safeguarding concerns according to the reporting protocol⁷.
- Comply with any investigation led by official bodies (including interviews) and make available any information necessary.

⁵ For consultants and volunteers, this only applies while undertaking CCD programmes, but this includes out of working hours while on CCDs programmes.

⁶ Consent Form is in Annex 5 of the Safeguarding Policy

⁷ Reporting form for safeguarding concerns is in Annex 4 of the Safeguarding Policy

I will never:

- 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 defence.
- Condone or in any way force an adult at risk, or a child, to participate in any form of sexual activity, real or simulated, on the internet or in any other medium.
- Make sexually suggestive comments or actions to a child, even as a joke.
- Touch, hold, kiss or cuddle an adult at risk, or a child, in an inappropriate and/ or culturally insensitive way.
- Marry a person below the age of 18, regardless of consent or local custom.
- Help at-risk adults or children with acts of an intimate or private nature, which they can do for themselves. Such actions may only be undertaken for an individual who has acknowledged the need for that assistance directly, or through a parent/guardian.
- Engage in activities involving close body contact with at-risk adults and/or children, beyond professional requirements
- Hit or otherwise physically assault, or physically abuse anyone, nor use any form of corporal punishment as a disciplinary measure.
- Condone, or participate in behaviour with at-risk adults or children that is illegal, unsafe or abusive, including being part of harmful traditional practices, spiritual, ritualistic or substance abuse.
- Act in ways intended to shame, humiliate, belittle or degrade others, or otherwise perpetrate any form of emotional abuse.
- Exploit adults or children for their labour (e.g. domestic servitude, street begging) or for sexual purposes, or participate in the trafficking of children. 'Child domestic servitude' does not include occasional house help, babysitting, kitchen gardening during school holidays or general domestic tasks out of school time.
- Develop relationships with children or adults that could be deemed exploitative or abusive.
- Spend excessive time alone with an at-risk adult, or a child, away from others, behind closed doors or in a secluded area (in line with the 'Two Adult Rule')
- Take an at-risk adult, or a child, who has been involved in our programmes, to my home, or visit them in their home where I may be alone with them.
- Sleep in the same bed or the same room as an at-risk adult or a child met through work, or allow them to stay overnight at my home.
- Take an at-risk adult or a child met through work alone in a vehicle unless it is absolutely necessary, and only with parental/guardian and managerial consent.

Location and date: _____

Signature: _____

Annex 4: Incident reporting form

Safeguarding incident reporting form

Send to CCDs' **Safeguarding Manager** (safeguarding@ccdodisha.org.in).
Use the email subject: 'URGENT: Attention, please treat this email confidentially'

This form is for reporting safeguarding concerns, including potential violations of CCDs' Safeguarding Policy and/or Code of Conduct. The information in this form is confidential. Please provide as much information as possible.
Areas where you have nothing to report should be left blank.

1. Please indicate the nature of your concern (tick any that apply)

1a. Concerns that specific children or adults may have been harmed or are at risk of harm if no action is taken	Tick if relevant
You have evidence that an adult or child has been, or may be at risk of, being harmed, abused, or exploited (e.g. eyewitness accounts of abuse, visible injuries, victim confided in someone)	
You are concerned about someone's behaviour towards an adult or child (e.g. signs of aggression, obsession, or unhealthy interests have been observed)	
You are concerned for the safety or welfare of an adult or child. (e.g. signs or indicators of harm/abuse have been observed in the adult or child)	
How did this concern come to your attention? Please give details, including whether you observed it in person, if someone else reported it to you, or if the victim told you directly.	

1b. Concerns about general behaviour, practices or infrastructure, that could be putting people at risk	Tick if relevant
Concern about someone's general behaviour (e.g. breaking a condition of the Code of Conduct)	
Concern about the infrastructure, protocols or practices of a school, hospital, clinic or other organisation that could be putting people at risk (e.g. unclean/unsafe facilities, use of corporal punishment, lack of fire exits)	
How did this concern come to your attention? Please give details, including whether you observed it in person or if someone else reported it to you.	

2. Information about you

Name	
Position at CCD (Or relationship to CCD)	
Phone no	
Email	

3. Information about your concern

Nature of concern/suspicion/incident Describe your concerns, what you have witnessed or what has been reported to you. Give as many details as possible; take as much space as needed.
Name of the Place where the incident or concern has arisen
If the concern is linked to the CCDs project, please give project no/name
Date (or time period) of the incident or concern
Is there a concern that specific individuals still are, or could be, at risk of harm? If yes, please provide details below.

4. Observations and actions

Conversation report

If the concern was reported to you by someone else, or if you have spoken to any individuals who are directly affected, please describe here what he or she told you, and what you said.

Observations

Such as injuries, emotional state of the child or adult affected, or the physical state of facilities.

Cultural factors

Please mention any specific cultural factors that need to be taken into consideration.

Action taken

Have any measures been taken, for example to improve the safety of facilities, and/or to protect any affected individuals? If so, please describe.

Any additional measures not yet undertaken

Do you feel that any other measures – in addition to those already undertaken – are necessary, to ensure people's immediate safety? If so, please give details.

What communication (if any) have you had with the suspected individual/organisation (if relevant) regarding this concern?

What communication (if any) have you had with the victim (if relevant) and/or any authorities/bodies regarding this incident?

Your signature:

Date:

Annex 5: Permission form

Permission for collection and use of content

Translate and/or read this statement: “CCD uses photos, video, interview answers and audio to tell the stories of those affected by disability and/or sight loss and its causes, and to show people how our work can help. To do this, we request your permission to take an interview, audio, photos and/or videos. The material may be used in external communications by CCD, in the State / country and internationally, and will be held securely in the CCDs image library.

Date: _____

Translator/field worker: “I confirm I have translated and/or explained the information above.”

Signed: _____ Name: _____

Participant: “I understand the information above, and give my permission for my content to be collected and used as indicated below.”

1) Participants/group’s name: _____ **Age:** _____

2) I am [tick as appropriate]:

- ☐ Over 14 and I sign for myself
- ☐ Age 7-14 and I sign for myself, with my parent/guardian’s consent
- ☐ A parent signing for a child under 14: My name is _____
- ☐ Signing for a group:
My relationship to the group/job role is _____

3) I agree to the CCDs’ representative [tick all that apply]:

- ☐ speaking to me and recording my words
- ☐ taking my photograph
- ☐ making a video

4) I agree to CCD representative using my [tick all that apply]:

- ☐ Story
- ☐ Voice audio
- ☐ Photos
- ☐ Video

5) I agree for my content to be used in [tick all that apply]:

- ☐ Newspapers
- ☐ The internet
- ☐ Social media
- ☐ Radio
- ☐ Television
- ☐ Publications/educational materials

6) In [tick all that apply]:

- ☐ In the State
- ☐ My country
- ☐ Internationally, except the following country [if applicable]

☐

Signature/thumbprint

Participant: _____

Parent: _____

For field worker: Identifier/Description: _____

Annex 6: Safer Recruitment statement

CCD is committed to minimising the risk of harm to children and adults at risk from staff, operations and programme activities. We will carefully select, train and support all staff in line with our Safer Recruitment principles.

This means we will:

- Ensure that our recruitment and selection processes are inclusive, fair, consistent and transparent;
- Take all reasonable steps to prevent those who might harm children or adults from working for us;
- Adhere to safer recruitment guidance and standards, responding positively to changing understandings of safer recruitment practice; and
- Always seek advice from the HR Operations Team to achieve best possible practice in relation to recruitment.

What is Safer Recruitment?

Safer recruitment means giving consideration to safeguarding issues at every stage of the recruitment process. It is known that people who seek to harm others by using their professional or volunteer status will look for an organisation or project with weak recruitment practices, where they can have access to at-risk adults or children.

CCDs' safer recruitment guideline means that potential employees must:

- Complete the specified application process for the role to which they have applied, indicating whether they know anyone who works for CCD and if so their relationship to that person or persons;
- Where determined by HR, complete a self-disclosure form to disclose previous spent/unspent convictions and disciplinary or capability issues;
- Undertake an interview to assess suitability and capability to carry out the role. Please note that interview panels consist of a minimum of two people with no prior connection to the interviewees. Interview records are retained for six months following the date of the interview and may be held longer for successful candidates that become employees;
- If offered a role, provide references covering the previous three year period, accounting for any gaps in employment; and
- If offered employment, provide identity documents including photographic identity and evidence of their right to work in the respective country.

Criminal records checks

Access to adults at risk and children is incidental to the work we carry out and is not part of any staff members' direct responsibilities. Our programmes are developed and delivered by CCD who provide services and work directly with beneficiaries. Our programmes team work with target community to ensure they have good safeguarding policies and procedures in place, and where appropriate the Compliance Team will encourage criminal records checks be carried out by CCD for eligible staff and volunteers.

How do we reduce the risk of adults or children being harmed by CCD staff?

We believe that the best safeguard is a high standard of management practice and quality control consistently applied to employees at recruitment and selection and subsequently through induction, performance management and review, support & supervision and monitoring.

We do this through:

- Ensuring all potential applicants are aware of our safeguarding commitments via the job advert pages on our website;
- A clear recruitment and selection process which ensure employment checks and references are completed before an individual starts work and gaps in employment are questioned;
- Providing training and guidance to recruiting managers on all aspects of recruitment and safeguarding training to senior members of staff and Safeguarding Focal Persons (see Safeguarding Policy for more details)
- Our safeguarding policy which makes it clear that child abuse is unacceptable and will result in disciplinary measures and notification of relevant law enforcement agencies;
- Our Safeguarding Code of Conduct which clearly identifies acceptable and unacceptable behaviour;
- A 'two adult rule' which means that no member of staff should ever be alone with an adult at risk or a child;
- Ensuring all staff read the Safeguarding Policy and sign the Safeguarding Code of Conduct as part of their induction;
- Reviewing staff performance throughout their employment with the organisation including probation reviews in the organization that operate a probation rule;
- Providing clear, accurate references for leavers reflecting conduct where appropriate;
- Having clear reporting and incident management procedures for safeguarding concerns, including concerns about staff members' behaviour as detailed in the Safeguarding Policy; and
- Publicising our Whistle blowing policy which protects employees, officers, consultants, contractors, volunteers, casual workers and agency staff who raise a concern, and allows concerns to be reported in confidence.

If you have a safeguarding concern

If you are concerned about the safety or wellbeing of an adult or child, or if you are concerned about a colleague's behaviour, contact safeguarding@ccdodisha.org.in