

# CERP

## Safeguarding Policy

# **Safeguarding of Vulnerable People and Children**

## **Definition**

A vulnerable adult is a person who is aged 18 years or over and who is living in residential accommodation, such as a care home; who may need community care services by reason of mental or other disability, age and illness; detained in lawful custody and who may be unable to take care of themselves or unable to protect themselves against significant harm; who may have substantial learning and cognitive challenges.

For the purpose of this policy children will be treated to have the same rights to protection from abuse and harm as other vulnerable individuals.

Abuse / harm to a vulnerable individual:

The below instances constitute abuse and harm to children and vulnerable adults:

- Physical, sexual, or emotional injury or threat of injury,
- Compromising the dignity or treating disrespectfully,
- Neglect of needs of a vulnerable individual,
- Failure to protect a vulnerable individual from danger and harm,
- Financial or material exploitation of all/any kind, or
- Any action/omission which would jeopardize the well-being of the child/vulnerable individual.

This definition of harm includes portraying children and vulnerable adults in a compromising situation (situation of dependency, helplessness or vulnerability of any kind).

CERP expresses and commits to zero tolerance of abuse/harm of children and vulnerable people. CERP will ensure that the communication material which is produced by it or its partners (including but not limited to videos, images, brochures, etc.) will be screened from this perspective. The material will also respect the privacy and confidentiality of the children and individuals.

CERP may come into contact with vulnerable people in its field research work – specially where CERP is working with the beneficiaries of an aid / financial or in-kind support program.

## **Scope of Application**

This policy applies to CERP staff, board, PI's, consultants, partners, and affiliates.

## **Responsibilities and Prevention**

It is the responsibility of all CERP employees, consultants, partners, and affiliates to be aware of the issue and be sensitive to all situations where there is potential of abuse. In case any information is shared with them about actual/suspected abuse, they should report it to the safeguarding focal person at CERP.

A dedicated email ID has been created. All Safeguarding related information, concerns, complaints and suggestions should be sent to this email: [safeguarding@cerp.org.pk](mailto:safeguarding@cerp.org.pk).

## **Training**

At the time of interview, all prospective employees who are likely to come in contact with vulnerable individuals will be asked behavioral questions related to safeguarding in order to understand their potential for abuse or lack of sensitivity of the issue – as early warnings on subsequent harmful behavior.

All CERP employees will be given a training/awareness session on the policy:

1. At the time of their joining the organization – as part of their orientation process
2. Periodical training or refresher on annual basis

All partners, affiliates, vendors who work with CERP will be provided a copy of the policy and asked to confirm that they have read the policy and commit to abide by the principles laid therein. They will be given an adequate opportunity to ask questions and understand the policy.

## **Safeguarding Officer**

A member of the Harassment Committee will be appointed as the Safeguarding Officer, who will be the focal person on all issues pertaining to the protection and safeguarding of vulnerable individuals.

The focal person will keep a log of all these issues and will be responsible to investigate, escalate and resolve these appropriately. Field workers will report the issues to their line managers who will notify the focal person accordingly. When the issue involves the line manager, the focal person will be notified directly.

## **Job-Description of the Safeguarding Officer**

The Safeguarding Officer will be responsible for the below deliverables and for upholding the processes:

### **1. Hiring checks & Training:**

- Ensure that all employees getting onboard with CERP undergo training on the issue of
- safeguarding and about CERP's relevant policies and practices, within 2 months of joining.
- Hold annual refresher trainings on Safeguarding.
- Curate and monitor the content of these trainings.
- Work with HR, Project Managers and members of CERP Management who are involved in hiring decisions in order to:
  - Screen job roles where there is a likelihood of working with children and vulnerable individuals
  - Ensure that all candidates for the job are behaviorally tested to prove suitability to work with children and vulnerable adults

### **2. Reporting, Recording and Resolving Breaches**

- The Safeguarding officer will ensure that CERP's procedures on raising/reporting breaches of the policy are reported immediately
- The safeguarding officer will record all the proceedings, evidence and follow-up actions
- The officer will develop and maintain a safeguarding register, which will record all complaints, their status, resolution, and any follow-up actions (template provided below)

### **3. Ensuring compliance from the Downstream Partners**

- The officer will also keep the downstream partners aware of CERP's safeguarding policy. A necessary clause will be made part of the standard contract terms and conditions with all the downstream partners. This will ask the partner to acknowledge awareness of and commitment to comply with CERP's safeguarding policy.
- The downstream partners will also be asked to appoint a safeguarding focal person to anticipate, mitigate and report safeguarding instances.
- The Safeguarding focal person at the Downstream partner level will report all cases to the CERP Safeguarding officer on immediate basis
- The focal person can escalate the issue directly to the Board level (Dr. Adnan Khan, Chairman Ethics Committee of the Board), if appropriate e.g.: the complaint is against CERP Safeguarding Officer/the Safeguarding Officer is not responding effectively, or if the issue is of a serious nature.

## **Mechanism to Resolve Safeguarding Reports**

Safeguarding incidents fall in the following categories and will be resolved differently:

1. A child or vulnerable adult is at risk of neglect
2. A child or vulnerable adult is at risk of harm / is being harmed by person who is not in employment of CERP or of a downstream partner of CERP
3. A child or vulnerable adult is being harmed and the accused/suspected person is CERP's employee or a downstream partner's employee

In case of category (1) and (2), it will be the responsibility of CERP's employee/partner who has witnessed the neglect/abuse to bring the matter to Safeguarding Officer's notice immediately. The safeguarding officer will decide whether the matter should be reported to the authorities i.e. local police station, government agencies for child protection and government agencies for the welfare of vulnerable individuals (e.g. Social Welfare Department, Child Protection Bureau). Alternately, depending on the nature of the case, the Safeguarding Officer will provide the necessary support & counselling to the individual at risk and to his/her guardian, family member, etc.

In cases where the accused or suspected person is an employee of CERP's downstream partner, the matter will be reported to the management of the partner organization. The Safeguarding Officer will ensure that this matter is resolved by the partner organization. Depending on the nature or magnitude of the case, CERP management may decide to escalate the matter to the police and government agencies.

In such instances, where the accused/suspect is a CERP Employee, a disciplinary case will be initiated against the accused. The Inquiry Committee for the Sexual Harassment / Harassment cases will deal with such Safeguarding-related cases also and will collect information and evidence within a stipulated time. They will present their recommendations to the Competent Authority. To avoid any conflict of interest, Inquiry Committee's composition may be changed.

## **Inquiry Process of the Safeguarding Reports**

The Inquiry Committee, within three days of receipt of the report, shall:

- a. Communicate to the accused individual the charges and statement of allegations leveled against them, the formal written receipt of which will be given
- b. Require the accused within seven days from the day the charge is communicated to them to submit a written defense. If they fail to do so without reasonable cause, the Committee shall proceed ex-parte; and
- c. Enquire into the charge and may examine such oral or documentary evidence in support of the charge or in defense of the accused as the Committee may consider necessary.

## **During the investigation**

1. Assistance in the inquiry procedure can be sought from any member of CERP. CERP expects its staff and other members of the community to cooperate fully in the investigation process. Any staff member who is the subject of, or potential witness regarding, a safeguarding complaint and refuses to cooperate in an investigation is subject to disciplinary action.
2. CERP shall do its best to temporarily adjust so that the accused and the victim do not have to interact. CERP can also decide to send the accused on leave or suspend the accused in accordance with the applicable procedures for dealing with the cases of misconduct if required. In addition:

Within thirty days of the initiation of the formal inquiry

- The Inquiry Committee shall submit its findings and recommendations in writing to the Competent Authority
- If the Inquiry Committee finds the accused to be guilty it shall recommend disciplinary action to the Competent Authority

## **After the investigation is concluded:**

The Competent Authority shall impose the disciplinary action recommended by the Inquiry Committee within one week of the receipt of the recommendation

## **Confidentiality**

The reporting and subsequent proceedings will keep the identity of the vulnerable individuals as confidential. All details of the incident will be kept confidential and will only be shared on a need-to-know basis.