



CHILD AND VULNERABLE ADULT SAFEGUARDING POLICY

Our Commitment:

The **Joint National Association of Persons with Disabilities (JONAPWD)** definition of Safeguarding is: **Safeguarding is a way of working that promotes the safety and welfare of people involved in the delivery or receipt of development supports, thereby protecting them from harm. The definition applies to both Nigeria and overseas activities and it includes the full breadth of safeguarding, including harassment, intimidation, sexual exploitation and abuse, as defined in Annex**

JONAPWD acknowledges that there are potential risks to children and vulnerable adults through our work in country, including sub-contractors delivering services on JONAPWD' behalf or through JONAPWD staff living and delivering services in country. We take our safeguarding duty of care very seriously. This means we are committed to:

- i. **Safeguarding children:** by minimizing the risk of intentional or unintentional harm, abuse and exploitation of children and within JONAPWD' operations, and responding appropriately if harm and abuse occurs.
- ii. **Safeguarding vulnerable adults:** by protecting the safety and well-being of all adults and providing additional measures to protect those least able to defend themselves from harm or abuse.
- iii. **Safeguarding staff:** by avoiding ambiguous workplace situations and behaviors, which may be misinterpreted and potentially lead to false allegations against them.
- iii. **Safeguarding JONAPWD:** by showing our genuine commitment to safeguarding children, vulnerable adults and staff preventing cases of abuse from happening which may tarnish JONAPWD' reputation and affect our ability to continue work and receive funding.

Note: *This policy applies to all JONAPWD employees, consultants, all forms of partners and donors, casual and agency staff, interns and volunteers (collectively referred to as 'staff' in this policy).*

1. SCOPE: WHY IS SAFEGUARDING IMPORTANT?

Children: Each year the lives and physical, mental and emotional well-being of millions of children are affected by various forms of abuse, neglect, violence and exploitation. This occurs in every country, culture and context in the world. At JONAPWD, it is our duty to ensure we have a “zero tolerance” to the abuse or exploitation of children within the scope of our work.

Adults: Throughout the world there are adults who may be subject to a greater risk of abuse, harassment, bullying, or sexual exploitation due to their own circumstances or a context outside of their control. Safeguarding adults is about protecting the safety and wellbeing of all adults and providing additional measures to protect those least able to defend themselves from harm or abuse.

We recognize our responsibility to make sure that our staff does no harm to children and/or vulnerable adults, and we take active measures to prevent the harm and abuse of children and/or vulnerable adults, and vice versa. We will never knowingly employ (or let any other organizations employ) a known abuser or exploiter of children or vulnerable adults. We will never turn a “blind eye” or tolerate any form of behavior that abuses, neglects or exploits children and/or vulnerable adults.

2. DEFINING A CHILD AND VULNERABLE ADULT

For the purposes of this policy, a child is any person under the age of 18, regardless of whether a nation’s laws recognize adulthood earlier. For the purposes of this policy vulnerable adults may be considered as individuals 18 years and above who are, or may be, unable to take care of themselves and/or are unable to defend themselves against significant harm or exploitation. This vulnerability could be both temporary and permanently experienced. It may result from: a mental health illness; a learning or physical disability; a sensory impairment; an imbalance of power from a dependent or unequal relationship; the influence of alcohol or drugs, the affected of trauma or for any other reason.

3. GUIDING PRINCIPLES

JONAPWD’ commitment to **child safeguarding** is guided by the following principles:

1. **Zero tolerance of child abuse:** JONAPWD does not tolerate child abuse in any form by anyone who works for or is associated with the organization in any capacity.
2. **Non-discrimination:** JONAPWD is committed to safeguarding children in its operations regardless of their nationality, culture, ethnicity, gender, sexual orientation, religious or political belief, socio-economic status, family or criminal background, or physical or mental health.
3. **Shared responsibility:** All JONAPWD staff must commit to and uphold the principles and standards of JONAPWD' Child Safeguarding System.
4. **Prevention:** JONAPWD understands that child abuse could happen within its operations and that it could be a hidden and under-reported phenomenon. By accepting that child abuse could happen, JONAPWD is committed to its prevention.
5. **Confidentiality, safety and best interests of the child:** All matters raised and dealt with under the child safeguarding system will respect the privacy of the child and be dealt with in ways that put the best interests of the child first. Information will be shared only on a *need to know basis*, to protect individuals.
6. **Use of images:** Pictures, images or other likenesses of children and vulnerable adults and/or information related to children that could compromise their care and protection will not be made available through any form of communication media without proper approvals, protection and understanding of their use. Images with corresponding texts which may identify a child, or young person or vulnerable adult should be removed. Names will be changed as appropriate.
7. **Accountability:** JONAPWD has systems in place to document, monitor and report on the implementation of its child safeguarding system, as well as mechanisms to ensure that management and team members are committed to, and are undertaking their child safeguarding roles and responsibilities to the best of their capacity.

JONAPWD commitment to **vulnerable adult safeguarding** is guided by the following principles:

1. **Zero tolerance:** JONAPWD does not tolerate bullying, harassment, sexual exploitation or abuse of any adults, in any form, by anyone who works for or is associated with the organization in any capacity.
2. **Empowerment:** JONAPWD promotes a culture of respect, dignity, empowerment and autonomy of vulnerable adults by promoting and respecting their own decisionmaking process, through client-led decision-making and informed consent. Where clients are unable to act on their own behalf, their interests are represented by a person authorized to make decisions on their behalf.

3. **Shared responsibility:** All JONAPWD staff must commit to and uphold the principles and standards of JONAPWD Safeguarding Policy.
4. **Prevention:** JONAPWD understands that abuse of vulnerable adults can happen anywhere, including within JONAPWD operations. By accepting that this could happen, JONAPWD is committed to its prevention.
5. **Confidentiality, safety and best interests of the vulnerable adults.** All matters raised under the safeguarding system are handled with integrity and with the utmost respect for the privacy of the adult at risk, putting their best interests first. Information will be shared only on a *need to know basis*; respecting client/provider confidentiality while protecting individuals. The level of response should be proportional to the risk presented, and least intrusive to the vulnerable adult.
6. **Equality and Diversity:** JONAPWD is committed to supporting the well-being of vulnerable adults and safeguarding them regardless of their age, nationality, culture, ethnicity, gender, sexual orientation, religious or political belief, socio-economic status, family or criminal background, or physical or mental health.
7. **Partnership:** Communities have an important role to play in preventing, detecting and reporting neglect and abuse. By forming strategic partnerships with existing services and experts in the local community, JONAPWD works with those services to respond quickly and appropriately to the needs of vulnerable adults. JONAPWD will identify and refer vulnerable clients, where possible, to other service providers who have expertise in the specific risk area.
8. **Accountability and Transparency:** JONAPWD has systems in place to document, monitor and report on the implementation of its safeguarding policy, as well as mechanisms to ensure that managers and team members are committed to, and are undertaking, their safeguarding roles and responsibilities to the best of their capacity.

4. CORE STANDARDS

JONAPWD capacity to ensure the protection of children and vulnerable adults that the company may work with depends on the ability of staff to uphold and promote the highest standards of ethical and professional conduct.

All JONAPWD staff is personally and collectively responsible for maintaining these standards. Line managers have a responsibility to uphold these standards, to set a good example, and to create a working environment that supports and empowers staff.

It is expected that all JONAPWD staff will:

- Treat all children and vulnerable adults (and indeed all of those we come into contact with) fairly and with respect and integrity.
- Act in a way that seeks to care for and protect the rights of children and vulnerable adults and act in their best interests.
- Use information and resources in a safe and responsible way. This includes the exercise of due care in all matters of official business, and not divulging confidential information.
- Ensure that personal and professional conduct is, and is seen to be, of the highest standard and in line with the Code of Conduct.
- Ensure that another adult is present when working in the proximity of children and vulnerable adults.
- Never engage in any exploitative relationships – sexual, emotional, financial or employment related.
- Refrain from any involvement in criminal or unethical activities that contravene human rights.

5. IMPLEMENTATION

Training

All staff has a role to play in the safeguarding of children and vulnerable adults. To fulfill that role effectively and with confidence, they need to: maintain knowledge of JONAPWD Child and Vulnerable Adults Safeguarding policy and procedures and it is mandatory for all staff to undertake training and refresher sessions as instructed. Some programs and positions will carry with them a greater risk. Additional support will be provided in those cases.

Recruitment and Vetting

JONAPWD is committed to vetting the staff it hires carefully to help ensure children and/or vulnerable adults are not placed at risk through contact with JONAPWD staff. For this reason, JONAPWD adopts child and vulnerable adult safeguarding recruitment procedures for the selection of staff, whether full time or part time, temporary or long term. The procedures not only aim to identify possible child offenders and staff not suited to work in contact with children or vulnerable adults, but also to deter these staff from seeking work with JONAPWD in the first place.

These procedures include:

- Ensuring that safeguarding is covered at the interview stage with the candidate's knowledge and appreciation of this area being assessed.
- Ensuring formal and valid documentation is provided to confirm the identity of a candidate and proof of relevant qualifications and background checks.
- Only confirming appointment when satisfactory references and satisfactory reference checks have been received.
- That all new staff sign a "self-declaration" statement stating adherence to JONAPWD Safeguarding employment criteria and acknowledgement of the potential disciplinary measures in the event of a Child or Vulnerable Adult Safeguarding / Code of Conduct breach.

All job advertisements will include a statement that JONAPWD has a Child and Vulnerable Adult Safeguarding Policy in operation and those successful candidates will need to sign it and be prepared to undergo a background check.

Note: *JONAPWD reserves the right to carry out enhanced Disclosure and Barring (DBS) checks on staff where appropriate.*

Code of Conduct

JONAPWD has included Child and Vulnerable Adult Safeguarding in its Code of Conduct and this is applicable to all staff. New staff will sign the code with their offer of employment with consultants doing so as part of their contractual engagement. An annual review will be undertaken to ensure that all current staff have signed and submitted a Code of Conduct.

Risk Assessment

Each office and/or programme will be responsible for undertaking an annual risk assessment of the positions in the programme or structure and the level of risk in relation to children and vulnerable adult safeguarding. Where positions are deemed to be of medium to high-risk additional support and training will be provided.

6. REPORTING CONCERNS

JONAPWD demands from anyone to **Speak Up** If anyone becomes aware of an JONAPWD' staff member or representative causing or potentially causing harm to JONAPWD clients or other employees or breaches of the Code of Conduct. They must speak up and raise their concerns by getting in touch with:

- Executive Director/President/Board
- An appropriate line manager
- Programme Team Leader
- Head of national secretariat or the Human Resources Manager

- JONAPWD' confidential, independent, dedicated Speaking Up Glo toll free line +234 7058890037 email Reportsafeguarding@jonapwdng.org

Incident Reporting

It is essential that all allegations of child or vulnerable adult abuse or breaches of the Code of Conduct are detected and quickly brought to the attention of the appropriate line manager, who will then take action based on established internal principles and procedures. This means: the safety, wellbeing, dignity and best interests of the child or vulnerable adult remain the overriding concerns at all times; that we treat every report of potential abuse seriously, ensuring that all parties are treated fairly and procedures are transparent and in line with local law; and we work in a confidential and timely manner, keeping in mind the protection of the victim, the reporter and the alleged perpetrator.

All JONAPWD staff and their representatives are obligated to report any witnessed, suspected or alleged cases of:

- Child or vulnerable adult abuse or exploitation by a member of staff or anyone associated with or acting on behalf of the company.
- Breaches of the Child and Vulnerable Adult Safeguarding Policy or Code of Conduct by another member of staff.
- Child or vulnerable adult abuse or exploitation within the community by someone outside the organization.

All reported safeguarding incidents must be communicated to the Safeguarding Designated Officer and the Human Resources Department within 24 hours of the allegation being made. The Safeguarding Lead will report as appropriate to the relevant funding organization / statutory bodies and record the allegation on the confidential safeguarding register. Confidentiality will be maintained at all times and appropriate action will be taken to safeguard all those involved. The Safeguarding Lead is responsible for informing the Executive Director/President/Board, as appropriate

The Safeguarding Lead in conjunction with the Human Resource Manager will appoint an appropriate and experienced member of staff as the decision maker for handling the report. If the report alleges a serious safeguarding violation, a Safeguarding Decision Committee will be convened and a case conference meeting held before proceeding. The findings of any subsequent investigation will be managed through the appropriate channels. JONAPWD's management will assume accountability for team adherence to this policy.

Team Leaders are accountable for their programme adhering to the JONAPWD Child and Vulnerable Adult Safeguarding policy in-country and to communicate a clear and fully understood Incident Reporting Process and guidelines reflecting their local internal structures, operational context and management composition.

The Head of secretariat will maintain a confidential central register of all allegations along with the results of any investigations and management action. They will also be responsible for ensuring the Board is informed as appropriate.

JONAPWD will not tolerate any form of coercion, intimidation, reprisal or retaliation against any member of staff who reports any form of abuse or exploitation or provides any information or other assistance in an investigation.

7. BREACH OF THE POLICY OR CODE OF CONDUCT

Following an investigation, any breach of the Safeguarding Policy or the Code of Conduct will result in one or more of the following actions, as appropriate:

- Meeting to discuss the breach. Providing an opportunity for the accused to detail their account/understanding of the situation
- Suspension from work
- Dismissal
- Termination of contract (where the contract is for service as opposed to employment)
- Formal warning and monitoring
- Transfer to other duties
- Performance management
- Further education on the Child and Vulnerable Adult Safeguarding Policy and Code of Conduct
- Reporting to the Police

These measures will be applied in a transparent and fair manner, alongside any criminal investigation where relevant.

8. MONITORING & REVIEW

This policy has been agreed by the JONAPWD management and Board and will be reviewed regularly and its operation monitored.

9. Any false allegation or concern made with malicious intent or for personal gain or any kind of unfunded reasons will be considered a serious disciplinary offense and will lead to outright dismissal

10. Policy Review Schedule

Policy to be reviewed annually, with additional reviews as needed in response to significant incidents or changes in legislation.

ANNEX 1

DEFINITIONS

1. Safeguarding

The definition adopted is: **“Safeguarding is a way of working that promotes the safety and welfare of people involved in the delivery or receipt of development support, protecting them from harm, including all forms of exploitation, abuse and harassment”** The definition applies to all local, regional and international activities and it includes the full breadth of safeguarding, including harassment, intimidation, sexual exploitation and abuse.

Safeguarding is a preventative approach and involves promoting the safety and wellbeing of all adults who come into contact with our organization; with particular attention paid to the welfare of vulnerable people by protecting them from harm and recognizing risks to their safety. Organizations have a responsibility to ensure that their employees, operations, and programmes do no harm to vulnerable adults. They do this through implementation of standards and measures to prevent abuse, exploitation, neglect and/or violence; responding adequately to any cases that may occur or be witnessed.

2. Vulnerable Adults (detailed definition)

Individuals who are 18 years and above; Who are, or may be, unable to take care of themselves and/or are unable to defend themselves against significant harm or exploitation. This vulnerability could be both temporary or permanently experienced. It may result from: a mental health illness; a learning or physical disability; a sensory impairment; an imbalance of power from a dependent or unequal relationship; the influence of alcohol or drugs, the affected of trauma or for any other reason.

Adults may experience vulnerability either temporarily or permanently, due to:

- Reduced capacity to understand information, process information, or communicate opinions or decisions. This capacity may be task-specific and may fluctuate, as changes in a person’s condition can impair their ability to understand, retain, weigh up information and communicate their decisions.
- Their lack of freedom or ability to engage voluntarily. This could be a consequence of coercion or undue influence by means of force; threats; retribution; manipulation (including emotion-laden appeals); persuasion and inducements; or the undue influence of a partner; guardian; employer; or government authority.
- Their dependent and/or unequal relationships which can occur with either a partner, guardian, employer or government or local authority amongst others. These relations can put them at increased risk of being unable, or unwilling, to express their

independent views. Their dependence or lack of status can also put them at *real or perceived risk of suffering* consequences should they not agree.

- Their circumstances can put individuals in a situation which incurs risk of significant harm, exploitation or abuse by people around them. The risk could be inflicted upon individuals by family members, friends, health providers, and other persons within a position of authority.

Bullying is offensive, intimidating, malicious or insulting behavior, an abuse or misuse of power through means that undermine, humiliate, denigrate or injure the recipient.

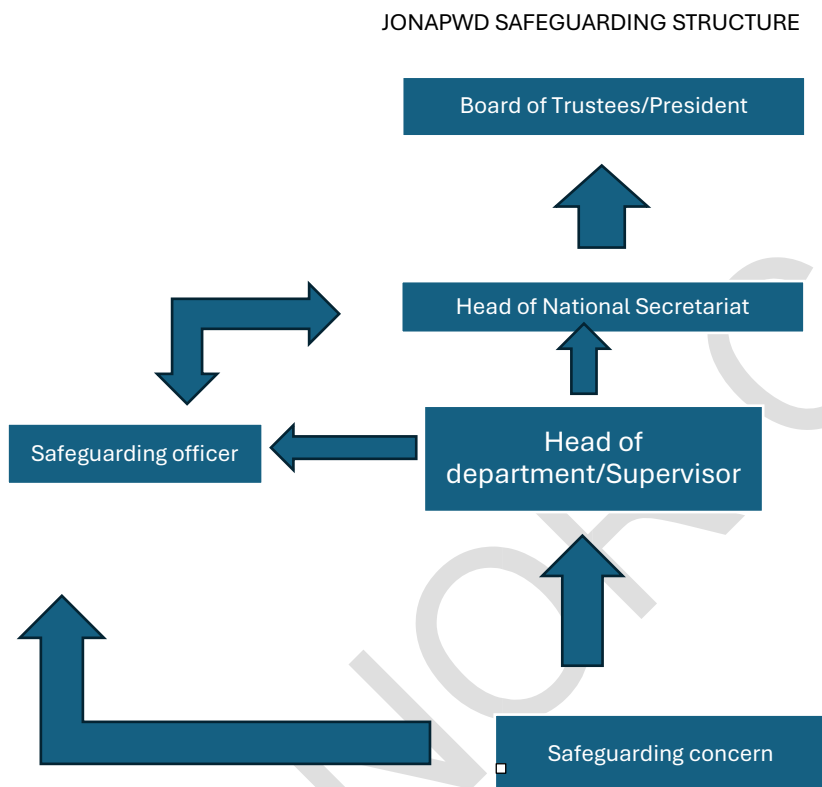
Harassment is unwanted conduct which has the effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating, threatening, or offensive environment for that individual.

Sexual Exploitation, Abuse and Harassment (SEAH): is any unwelcome conduct of a sexual nature which makes a person feel offended, humiliated and/or intimidated. JONAPWD recognizes that SEAH often occurs in unequal power relationships, as well as situations which create an environment which is hostile, intimidating or humiliating for the recipient.

SEAH can comprise of one or more incidents and/or actions, which may be physical, verbal and/or non-verbal. Examples of conduct or behavior which constitute sexual harassment include, but are not limited to:

- Unwelcome physical contact including patting, pinching, pushing, groping, stroking, kissing, hugging, fondling or any other form of inappropriate touching
- Unwelcome sexual advances or suggestive behavior, gestures or language (which the harasser may perceive as harmless)
- Physical violence, including sexual assault or rape
- The use of threats or rewards to solicit sexual favor
- Comments or persistent questions on a team-member's appearance, age, private life etc.
- Sexual comments, stories and jokes
- Sexual advances
- Offensive and/or sexually explicit e-mails, text messages or social media content
- Repeated and unwanted social invitations for dates or physical intimacy
- Condescending remarks, whistling or leering
- Insults based on the individual's sex
- Display of sexually explicit or suggestive material (physical or electronic)

Any person can be a victim of sexual harassment, regardless of their sex and of the sex of the harasser. JONAPWD recognizes that SEAH may also occur between people of the same sex.



ROLE

SAFEGUARDING OFFICER

1. Advise and support the senior team in developing and establishing JONAPWD safeguarding policy and procedure
2. Manage safeguarding concerns, allegations or incidents reported
3. Play a lead role in maintaining, implementing and reviewing JONAPWD’s plan for safeguarding.
4. Coordinate the distribution of policies, procedures and safeguarding resources in the organization.
5. Advise on training needs and development, providing training where appropriate on safeguarding
6. Provide safeguarding advice and support to staff and volunteers.
7. Manage referrals to key safeguarding agencies (eg social services or police) of any incidents or allegations of abuse and harm.
8. Ensuring all staff and relevant stakeholders are aware of and understand the organization's safeguarding policies and procedures.

HEAD OF THE NATIONAL SECRETARIAT

1. The Head of National secretariat in collaboration with the president, Board members, safeguarding officer is responsible for developing and implementing safeguarding policies that protect vulnerable populations.
2. Promoting a culture of awareness around safeguarding within the organization and among stakeholders.
- 3, Regularly reviewing and monitoring safeguarding practices and reporting mechanisms to ensure they are effective and adhered to .
- 4, Engaging with the community to promote safeguarding initiatives and gather feedback.
5. Overseeing and monitoring investigations into safeguarding allegations and ensuring they are handled sensitively and appropriately.

JONAPWD BOARD OF TRUSTEE/PRESIDENT

1. Establishing a clear vision for safeguarding within the organization and promoting a culture of safety.
2. Ensuring that robust safeguarding policies are developed, implemented, and regularly reviewed.
3. Integrating safeguarding considerations and objectives into the organization's overall strategic planning and mission.
4. Collaborating with the board and staff to identify potential risks to the safety of persons with disabilities and developing strategies to mitigate them.
5. Increasing awareness of safeguarding issues among board members, staff, and the community.
6. Supervising the handling of investigations into safeguarding allegations, ensuring they are conducted impartially and sensitively.
7. Collaborating to create and review safeguarding policies that protect the rights and well-being of individuals with disabilities.
8. Assessing the impact of safeguarding initiatives and making necessary adjustments based on feedback and results
9. Engaging with other organizations and stakeholders to enhance safeguarding efforts and share best practices

Approval Page:

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