

# Safeguarding Policy

Effective from 11 May 2024

*Hasan Amir*

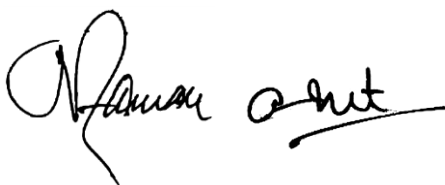


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## 1. Policy Statement

Dr. K. Zaman BNSB Eye Hospital (“the Organization”) has zero tolerance for the abuse and exploitation of vulnerable people. The Organization also recognizes that safeguarding is everyone’s responsibility and that it has an obligation to put in place reasonable measures to ensure, as far as possible, the safety and wellbeing of vulnerable people with whom we work and those in the communities in which we live.

The Organization recognizes that it has an obligation to put in place all reasonable safeguarding measures to ensure, as far as possible, the safety and protection of children, young people and vulnerable adults, including those with whom we work and those in the communities where the program of the Organization is undertaken.

This policy and associated procedures provide clarity to all on how they should engage with children, young people, and vulnerable adults when working for, on behalf of, or in partnership with the Organization. It also helps us to make sure that employees, volunteers, and other representatives are protected.

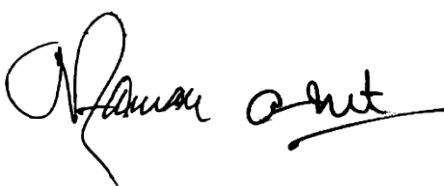
It is intended to help us have a common understanding of safeguarding issues, develop good practice across the diverse and complex areas in which we operate, and increase accountability in this crucial aspect of our work.

Any breach of this policy will be treated as a disciplinary matter, which may result in immediate termination of employment or contract, withdrawal of volunteer status, and reporting to the police, relevant regulatory authority or other body.

## 2. Key Principles

The Organization works to the following key principles to protect vulnerable people:

- Everyone has an equal right to protection from abuse and exploitation regardless of age, race, sex, sexual orientation, marriage and civil partnership, pregnancy or having a child, gender reassignment, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status.
- The best interests of the vulnerable people are paramount and shall be the primary consideration in our decision-making.
- The Organization will take responsibility to meet our obligations regarding our duty of care towards vulnerable people, and take action where we believe that a child, young person or vulnerable adult is at risk or is actually harmed.
- The Organization will ensure that employees and volunteers are inducted into our Safeguarding Standards (Appendix and procedures as a key part of the recruitment and onboarding process.
- The Organization will ensure that all partners are informed and in compliance with our Safeguarding Standards. When working with or through partners or sub-contracted agencies, the Organization will ensure that its safeguarding procedures are consistent and in line with the principles and approaches set out in this policy. The Organization recognizes that an element of risk exists, and while we may never be able to totally remove this, we need to do all we can to reduce it or limit its impact.



- The Organization respects confidentiality and has a responsibility to protect sensitive personal data. Information should only be shared and handled on a *need-to-know basis*, that is, access to the information must be necessary for the conduct of one's official duties. Only individuals who have legitimate reasons to access the information are allowed to receive it.

### 3. Purpose of the Policy

The primary goal of the policy is to protect children, young people, and vulnerable adults from abuse, neglect, and exploitation. The specific purpose of the policy is:

- ❑ To ensure a friendly working environment where children, young people, and vulnerable adults, directly and indirectly, are involved with the Organization are protected from any form of abuse and exploitation.
- ❑ To sensitize all level staff, board members, volunteers, interns, consultants, visitors and other individuals/organizations involved with the Organization to the safeguarding issue.
- ❑ To reflect safeguarding policy to all the policies, strategies, planning of the organization as well as implemented and monitored.
- ❑ To empower vulnerable people to be aware and challenge any kind of abuse against them.

### 4. Scope of the Policy

This policy is mandatory for all employees of the Organization. For the purposes of this policy, 'employee' is defined as anyone who works for or on behalf of the Organization, either in a paid or unpaid capacity. This, therefore, includes directly employed staff, EC members, suppliers, employees and volunteers of partners, agency workers, consultants, volunteers, interns, and all visitors to the programs and offices of the Organization. This policy demonstrates how the Organization will meet its legal obligations and reassure employees, partners and members of the public:

- a) On what they can expect the Organization to do to protect and safeguard vulnerable people.
- b) That they are able to safely voice any concerns through an established procedure.
- c) That all reports of abuse or potential abuse are dealt with in a serious and effective manner.
- d) That there is an efficient recording and monitoring system in place.
- e) That employees, sub-contracted agencies and partners receive appropriate induction on safeguarding.
- f) That a robust 'safe' recruitment procedure is in place.

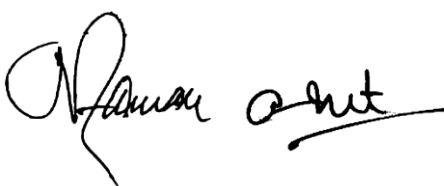
Additional procedures apply to those who work or have contact with, either directly or indirectly, children, young people or vulnerable adults or who live in communities alongside them.

### 5. Responsibilities of all related persons

All employees, volunteers, consultants, agency staff, partner organizations and visitors are obliged to follow this policy and maintain an environment that prevents exploitation and abuse and which encourages reporting of breaches of this policy using the appropriate procedures.

#### 5.1. All people working with the Organization will (DO):

- Read, understand, and adhere to the Safeguarding Policy of the Organization



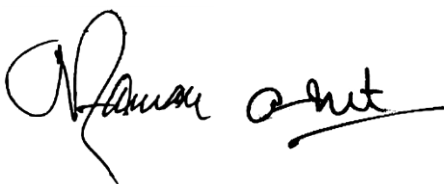

- Read, understand and adhere to the Sexual Harassment Elimination (SHE) Policy, Child Protection Policy and Workplace Bullying and Violence Prevention Policy, and Code of Conduct of the Organization.
- Strive to promote a zero-tolerance approach to discrimination, sexual harassment, and abuse in all working environments
- Strive to develop relationships with all stakeholders which are based on equality, trust, respect, and honesty
- Place the safety and welfare of children and vulnerable people above all other considerations. Report any concerns they may have about the welfare of a child or vulnerable person
- Report any concerns they may have about the behavior of a representative of the Organization in relation to safeguarding
- In a one-to-one situation with a child or young person, where privacy and confidentiality are important, try to make sure that another adult knows the contact is taking place and why. If possible ensure another adult is in sight and that the child or young person knows another adult is around

## 5.2. All people working with the Organization will not (Do):

- Violate the Code of Conduct, the Sexual Harassment Elimination (SHE) Policy, the Child Protection Policy and the Workplace Bullying and Violence Prevention Policy
- Sexually harass, assault, or abuse another person,
- Physically harass, assault, or abuse another person
- Emotionally abuse another person, such as engaging in behavior intended to shame, humiliate, belittle, or degrade
- Condone, or participate in behavior that is abusive, discriminatory, illegal, or unsafe
- Develop, encourage, or fail to take action of relationships with children or other vulnerable people which could in any way be deemed sexual, exploitative or abusive
- Act in ways that may be violent, inappropriate, or sexually provocative
- Agree with a child to keep a secret that has implications for their safety or the safety of other young people.

## 5.3. Managers/ In-charges

Managers/ In-charges at all levels are responsible for ensuring employees, volunteers, consultants, visitors and partner organizations are aware of the policy and are supported to implement and work in accordance with it, as well as creating a management culture that encourages a focus on safeguarding. They must ensure that they are responsive, acting immediately if they become aware of any safeguarding concerns and supportive towards employees or volunteers who complain about breaches in this policy.




## 5.4. Designated Safeguarding Officers

Designated safeguarding officers are responsible for handling reports or concerns, about the protection of vulnerable people, appropriately and in accordance with the procedures that underpin this policy. The lead designated safeguarding officer is responsible for:

- monitoring and recording safeguarding concerns
- ensuring referrals to the relevant authorities happen without delay
- updating safeguarding training for all staff
- ensuring it is implemented throughout the organization
- ensuring monitoring and recording procedures are implemented

## 5.5. The Management of the Organization

The Management of the Organization is responsible for ensuring the effective implementation of this policy and associated procedures and ensuring that everyone linked with the Organization is equipped and supported to meet their responsibilities.

## 6. Procedure Overview

### 6.1. Recruitment and Selection

Safe recruitment and due diligence processes are followed for all volunteers, employees, consultants, and partners. Where an employee, volunteer or partner is engaged in direct work with vulnerable individuals, a criminal background check will be undertaken as part of the recruitment process.

All employees and volunteers must sign the Code of Conduct. The code sets out the standards of practice we expect of employees and volunteers - in terms professional competence, integrity, acting as a representative and in safeguarding - which support our vision, mission, values and principles.

### 6.2. Induction and Support

Training on safeguarding will be provided to all employees and volunteers for their Induction, on:

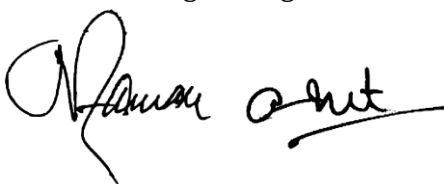
- What they should do in the event of a disclosure
- How to recognize signs of abuse
- What to do if they have concerns about an employee, volunteer of the Organization, or employee of a partner organization
- Where to go for advice and support within the organization

### 6.3. Data Protection

All the persons need to ensure that personal information is kept confidential unless we have the agreement of the individual and/or their parent/guardian, except where it is necessary to pass this to a specialized law enforcement agency in relation to a safeguarding incident.

### 6.4. Minimum Standards

Where employees or volunteers are contracted by other employers, or when working with partners, or sub-partner agencies, the Organization will brief them on our safeguarding policy and ask for information on how the organization works to protect vulnerable people and ensure that they meet our Safeguarding Standards.



## 6.5. Social Media

The Organization will be careful with the use of actual names, and images, including photographs and recordings for Social Media. This should be applied in all situations. Specifically relating to the protection of children, young people, and vulnerable adults, the Organization will:

- Use names and images of children, young people or vulnerable adults which are respectful and not expose them to further vulnerability (not degrading or showing sexual images of children naked or partially clothed).
- Reproduce images and use names of children only where we have the written permission of their parents/guardians using a consent form (Appendix 2).
- Reproduce images and use names of young people and vulnerable adults only where we have their written permission or that of their parents/guardians, whichever is the most suitable.
- Make clear to vulnerable people and their families that agreement to providing information or images is not a condition of involvement in activities and programs of the Organization.
- Inform employees, volunteers and partners about the organization's policy in relation to the use of technology, and understand that they must not use this technology for the purpose of accessing, producing or distributing any information or violent or sexual images that are harmful to vulnerable people. This includes adult pornography.
- Ensure that the Organization has a format for carrying out and implementing risk assessments at all levels of the organization.
- Train and support the designated safeguarding officers in their work and in any action they may need to take in order to protect vulnerable people.

## 6.6. Raising concerns

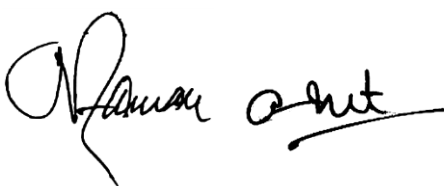
It is the mandatory obligation of all employees, volunteers, contractors and partners to report concerns, suspicions, allegations, and incidents that indicate actual or potential abuse or exploitation of vulnerable people or which suggest this policy may have in any other way been breached. It is not the responsibility of the employees to decide whether or not abuse has taken place, however, concerns should be raised with an individual's line manager, functional lead, or a designated safeguarding officer who will initiate the procedure for dealing with suspected or actual incidents of abuse.

## 6.7. Responding to concerns

### 6.2.1. Investigation

The Safeguarding Focal will refer the concern to the Sexual Harassment Elimination Committee (SHEC), the Child Protection Committee (CPC) and the Workplace Bullying and Violence Prevention Committee (WBVPC) as appropriate. They will arrange the investigation as per their policy and procedure.

Considering the weight of the violence, he/she in consultation with Hony. General Secretary will form an investigation committee to investigate the incidence which was reported by any means. If possible, there is a female member in the committee. For serious issues, the investigation will be carried out within six hours and for less serious issues, it will be done within three days of the incidence. The team will submit a report with proper evidence not more than three days after the investigation.



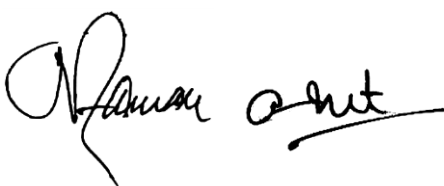
### 6.2.2. Action following Investigation:

The Investigation Committee will recommend necessary action for safeguarding children, youths, and vulnerable adults. For any disciplinary measure, prior approval of the Hony. General Secretary will be a must.

Sometimes the Organization may not be the investigative authority. It is essential that referrals are made to the relevant law enforcement agency to ensure that appropriate protection and support are given to the vulnerable individuals and that any evidence is collected in accordance with the law.

### 6.2.3. Confidentiality:

All documents and information of safeguarding issues will be kept in absolute confidentiality. No person or organization shall communicate any information concerning the alleged event except as necessary to ensure proper and neutral investigation. Limited additional disclosure can be made as an example to protect other vulnerable people from harm in the near future. Any breach of confidentiality shall be cause for utmost punishment as per the policy of the Organization.





## Appendix 1: Dr. K. Zaman BNSB Eye Hospital Safeguarding Standards

This standard framework is from the Keeping Vulnerable Safe “Safeguarding Standards” and adapted for use for the Organization. Each standard can be met in whole, in part, or not met.

Standard		Potential evidence of standard being met
1. Policy	1.1 The organization has a clear safeguarding policy that seeks to prevent harm to children, young people and vulnerable adults	<ul style="list-style-type: none"> <li>A copy of the policy, signed by the management for program or partners</li> </ul>
	1.2. Policies are publicized to staff, beneficiaries and wider communities	<ul style="list-style-type: none"> <li>Policy or summary translated into Bengali</li> <li>Examples of ways the policy has been promoted, including to children, young people or other community members as necessary</li> </ul>
2. People	2.1 The organization places clear responsibilities and expectations on its staff and associates and supports them to understand and act in line with these	<ul style="list-style-type: none"> <li>Clear responsibilities for a Designated Safeguarding Officer at appropriate level</li> </ul>
	2.2 Key staff are designated at different levels with clearly defined roles and responsibilities.	<ul style="list-style-type: none"> <li>Job descriptions with clear expectations on those with contact with vulnerable</li> <li>Job descriptions for DR. K. ZAMAN BNSB EYE HOSPITAL long-term volunteers include details of any contact</li> </ul>
	2.3. There are written guidelines for appropriate and inappropriate behavior	<ul style="list-style-type: none"> <li>A written code of conduct; evidence of this being shared with staff and volunteers</li> </ul>
	2.4 There are appropriate learning opportunities to develop and maintain the necessary attitudes, skills and knowledge to keep vulnerable people safe.	<ul style="list-style-type: none"> <li>A copy of training plans, course attendance records, and course evaluations.</li> <li>Evidence of induction for Dr. K. Zaman BNSB Eye Hospital staff and volunteers</li> </ul>
3. Procedures	3.1 Organizations carry out local mapping exercises which provide information on the legal, social welfare and child protection arrangements.	<ul style="list-style-type: none"> <li>Legal requirements are included in policies</li> </ul>
	3.2 Safeguarding risks and mitigation strategies are incorporated into existing risk assessment processes at all levels.	<ul style="list-style-type: none"> <li>Risk assessments include appropriate and relevant risks</li> <li>Evidence of mitigation strategies implemented</li> <li>Risk assessments shared with Dr. K. Zaman BNSB Eye Hospital</li> </ul>
	3.3 Safeguarding issues are integrated into program design, delivery and evaluation	<ul style="list-style-type: none"> <li>Evidence of safeguarding issues in project proposals, plans, needs</li> </ul>
	3.4 There are procedures for responding to safeguarding concerns arise	<ul style="list-style-type: none"> <li>A copy of a concern/allegation management</li> </ul>

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4. Accountability	4.1. Implementation of safeguarding policies and procedures is monitored	<ul style="list-style-type: none"> <li>• Copies of reporting to EC Committees, donors, etc</li> <li>• Copies of minutes of meetings to review practice</li> </ul>
	4.2 Learning from issues captured and informed future policy and procedure reviews	<ul style="list-style-type: none"> <li>• Incident reports produced</li> </ul>
	4.3 Policies and procedures reviewed at least every three years	<ul style="list-style-type: none"> <li>• Evidence of review in annual plans/ strategies</li> </ul>

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**Appendix 2: Sample Parental Consent for Photographic/Film Use of Children under 18 years of age/vulnerable adult:**

I, (adult's name)-----

Of (address) -----

Being the child/children's/ parent or legal guardian, hereby give permission for to take and use publicity photographs/film of -----

Age of child-----

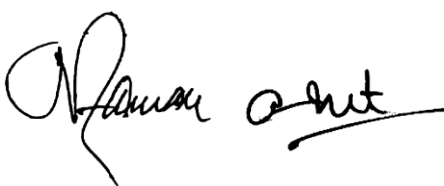
I also consent to use of the photos for publicity, marketing, and advertising for Dr. K. Zaman BNSB Eye Hospital projects. I agree that the photos/film may be combined with other images, text and graphics and be cropped, altered or modified in any way that Dr. K. Zaman BNSB Eye Hospital deems appropriate.

I consent to the provision of this form and the details within it to DR. K. ZAMAN BNSB EYE HOSPITAL-Mymensingh, and to their storing these on a database.

I understand that the child's/children's name/s will not be given to press or public without my consent. I also understand that I may cancel this permission in writing, and that Dr. K. Zaman BNSB Eye Hospital will take all reasonable steps to ensure that the photograph/film is withdrawn from future use.

I further understand that I shall receive no remuneration for this assistance.

Signed: \_\_\_\_\_ Date: \_\_\_\_\_



### Appendix 3: Definitions

**Abuse** - a violation of an individual's human and civil rights by any other person or persons. It can take the form of physical, psychological, financial or sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the health, survival, development or dignity of a child, young person or vulnerable adult.

Abuse can be a single act or repeated acts and can be unintentional or deliberate. Abuse often involves criminal acts.

**Discriminatory abuse** – abuse motivated by a vulnerable person's age, race, nationality, sex, sexual orientation, disability, or other personal characteristic.

**Financial or material abuse** - including theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

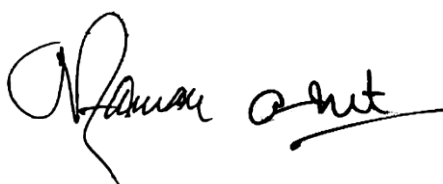
**Neglect**- the persistent failure to meet a vulnerable person's basic physical and/or psychological needs, likely to result in the serious impairment of his/her health or development. Examples include failure to provide adequate food, clothing and shelter, failure to protect them from physical or psychological harm or danger; failure to ensure adequate supervision (including the use of inadequate care-givers); or failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a vulnerable person's basic emotional needs.

**Physical abuse** – includes hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm, misuse of medication, restraint, or inappropriate sanctions.

**Psychological abuse** - includes emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks. Examples include not giving a vulnerable people opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on a vulnerable person, which may include interactions that are beyond a vulnerable person's developmental capability. It may involve serious bullying (including cyberbullying), or the exploitation or corruption of a vulnerable person.

**Sexual abuse** - involves forcing, enticing or coercing someone to take part in sexual activities, whether or not the vulnerable person is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving a vulnerable person in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse can be carried out by adults or other children.

**Child** – The Organization regards a child as anyone under the age of 18 years. It is widely recognized that children are generally more vulnerable to abuse and exploitation due to factors such as age, gender, social and economic status, developmental stage, and dependence on others.



**Vulnerable person/people** – for the purposes of this policy this is an umbrella term that covers children, young people, and vulnerable adults.

**Vulnerable adult** - a person, 18 years and above, who by reason of disability, age, gender, social and economic status, or illness, the context they are in, may be unable to take care of or to protect himself or herself from abuse, harm or exploitation.

**Youth or young people** - individuals aged 15 to 25 – The Organization recognizes that this group spans the categories of 'children and 'adults' but regards young people as having particular safeguarding needs and requiring distinct consideration aside from younger children and older adults.

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