Brighter Communities Worldwide Policy on protecting Vulnerable Adults

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Safeguarding Introduction

Safeguarding is the responsibility of everyone in an organisation to ensure that their people, operations and programmes **do no harm** to the individuals they work to support, and do not expose them to abuse or exploitation.

Brighter Communities Worldwide are signatories to the Dóchas *Leadership Safeguarding Charter*. This means "we pledge to exhibit leadership behaviours that show we are committed to safeguarding principles and advocate the implementation of organisational actions that align with international standards to foster positive safeguarding cultures".

Our safeguarding measures as an organisation include -

- Recruitment and screening processes for staff and volunteers (see our HR & Volunteer policies).
- Child Safeguarding policy and **Vulnerable Adults safeguarding policy** – these include annual training for staff and volunteers in Ireland and in Kenya.
- HR policies - safeguarding our staff from harm and inappropriate behaviour such as sexual harassment in the workplace.
- Healthy & Safety policy – safeguarding staff and volunteers in the workplace.
- Data Protection Policy – commitment to the safeguarding of personal data shared with the organisation.
- BCW AI Usage Policy – governing the responsible and ethical use of artificial intelligence tools across all BCW operations, including strict restrictions on the use of AI in connection with safeguarding matters and an absolute prohibition on generating synthetic images of beneficiaries or community members. Staff must not use AI tools in connection with any safeguarding case, record, or investigation without prior written approval from the CEO/CD. See BCW AI Usage Policy, Section 8.
- Our Communications – we adhere to the Dóchas *Guide to Ethical Communications* to safeguard the people whose stories and images we share and we uphold the principle of Do No Harm in our communications both internal and external.
- Feedback model – we welcome feedback and have a model in place that includes a Beneficiary Feedback Mechanism and a Feedback & Complaints Procedure
- Anti Fraud & Whistle Blowing Policy – to safeguard the integrity of Brighter Communities Worldwide and ensure that those we work with act in the best interest of the organisation.

Purpose of the policy

- Brighter Communities Worldwide recognises that the Irish Government's legislation to protect children also covers protection of vulnerable adults.
- Brighter Communities Worldwide has a Child safeguarding policy and the purpose of this policy is to describe how Brighter Communities Worldwide are also committed to protecting the rights of Vulnerable Adults.
- It includes a code of behaviour for use by staff and volunteers. This policy is for sharing with our partners, volunteers, staff, donors and any other person or organisation who wants to know how Brighter Communities Worldwide aims to safeguard vulnerable adults.
- This policy applies to Brighter Communities Worldwide in Ireland and our partner organisation Brighter Communities Worldwide in Kenya.
- All stakeholders who sign up to a Memorandum of Understanding (MOU) with Brighter Communities Worldwide will also agree to abide by this policy.

Aims of the policy

- To define what is meant by the term 'vulnerable adult' and to define the types of abuse they may be susceptible to.
- To provide guidelines to be followed which will protect vulnerable adults. This includes adults who are disabled, from minority ethnic/faith groups and regardless of gender, sexuality or culture.
- To provide guidelines on how to respond to any incidences or allegations of abuse to vulnerable adults.
- To raise awareness of the need to safeguard vulnerable adults and how to do that among Brighter Communities Worldwide staff, volunteers and the partners we work with.
- To demonstrate our commitment to a culture of safeguarding in the Irish humanitarian and development sector as signatories to *the Dochas Leadership Safeguarding Charter*

Definition of a vulnerable adult

Vulnerable adult (adult at risk)**:** 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 him or herself against abuse, harm or exploitation. This may include overseas volunteers, not just local volunteers or community members. For example - students by virtue of the power dynamic in a supervised placement setting are a considered vulnerable adults.

Prevention of harm to vulnerable adults

Brighter Communities Worldwide recognises that safeguarding vulnerable adults is about identifying situations that could put them at risk and managing those risks to minimise them. The prevention of harm to vulnerable adults follows similar lines.

Recruitment of staff and volunteers will include –

- Garda vetting/Police checks within the bounds of the relevant vetting authority guidelines.
- References from previous employers or voluntary organisations describing any previous experience of working with vulnerable adults
- Interviews where staff and volunteers will be given the opportunity to state if there is any reason why they might not be suitable for working with vulnerable adults.

Management of staff & volunteers will include -

- The code of behaviour for safe guarding vulnerable adults to be followed and signed will also apply to vulnerable adults (see annex for copy)
- Provision of a copy of Brighter Communities Worldwide policy on Safeguarding Vulnerable Adults
- Familiarity with the list of Do's and Don'ts around working with vulnerable adults will also apply to working with vulnerable adults (see annex)
- Use of images and reference to the Dochas *Guide to Ethical Communications* to which Brighter Communities Worldwide are signatories.
- Awareness of BCW's AI Usage Policy, including the prohibition on using AI tools in connection with safeguarding matters without CEO/CD approval, the absolute prohibition on generating synthetic images of beneficiaries or community members, and the data classification rules that prevent entry of safeguarding information (L3 data) into AI tools.
- Training on Safe Guarding Vulnerable Adults (similar to Child Safeguarding) which will be renewed every two years.

Working with partners

- Brighter Communities Worldwide draw up a Memorandum of Understanding with all partners we work with to agree how the partnership will operate.
- As part of this MOU, Brighter Communities Worldwide policies on safeguarding children and vulnerable adults are taken into consideration.
- Partners will also be informed that Brighter Communities Worldwide have a similar policy on protecting vulnerable adults and copy will be supplied to the partner.

Public Awareness

- Each of the offices of Brighter Communities Worldwide will display a notice outlining a summary of the policy, and appropriate contact numbers. The notice will be accompanied by an organigram explaining the processes in the policy.

Cross reference to Child Safeguarding policy

The same measures that Brighter Communities Worldwide use to respond to safeguarding children from harm will be used to protect vulnerable adults.

Response to Vulnerable Adult Safeguarding issues

To aid staff, volunteers and partners to respond sensitively and seriously to a vulnerable adult who discloses information about abuse, and be confident and able to take appropriate action swiftly.

- **Response to a vulnerable adult making a disclosure -**

These are the steps to follow for immediate response to a vulnerable adult who discloses they are being, or have been, abused –

  - Listen to and accept what the vulnerable adult is saying.
  - Do not investigate, and do not inform, question or confront the alleged abuser.
  - Take the alleged abuse seriously.
  - Reassure the vulnerable adult that they have done the right thing by telling you.
  - Let them know you need to tell someone else. Do not promise total confidentiality.
  - In the case of a vulnerable adult in a school or other organisational setting, encourage the vulnerable adult to speak to an adult they trust within that organisation.
  - Let the vulnerable adult speak freely but do not press for information.
  - Let the vulnerable adult know what you are going to do next and that you will let them know what happens.

  - Make a record of what you have heard whilst it is still fresh in your mind. Include the date and time of your conversation and any incident disclosed. Use the report template in the annex to help you.

  - Inform Brighter Communities Worldwide that a vulnerable adult has spoken to you – a staff member should bring this to their manager and a volunteer to their project leader (if in Kenya) or the operations manager (if in Ireland).

- **Response from Brighter Communities Worldwide -**

If any staff member or volunteer reports that a vulnerable adult has made a disclosure of abuse to them, the following steps will be taken by Brighter Communities Worldwide -

- **Avoid any delay** – best practice is to respond within 24 hours.
- Brighter Communities Worldwide will have a board member on both the Irish and Kenyan boards who will have **special responsibility for vulnerable adult safeguarding**.
- In the event of the **disclosure coming from a vulnerable adult in Ireland** – the office manager in Ireland will take the report to the relevant authorities in Ireland (Tusla Child & Family Agency and the Gardai) following guidelines from the Department of Children and Youth Affairs Children First – National Guidance for protection and welfare of children. If the disclosure is made in a school then the report will be made to the school's vulnerable adult safeguarding office. The office manager should inform the relevant board member in Ireland that this is happening.
- In the event of the **disclosure coming from a vulnerable adult in Kenya** – the project leader will take the report to the project manager in Kenya (in some cases this may be the CEO if in country) and that person will consult with the relevant member of the board in Kenya as to what steps to take next.
- In all cases, a record will be kept by the office manager or project manager of the steps being taken and made available to the appropriate social services department and/or police station if required.

If a vulnerable adult alleges that a Brighter Communities Worldwide staff member or volunteer has abused them, the following steps will be taken by Brighter Communities Worldwide -

- **Avoid any delay** – best practice is to respond within 24 hours.
- That staff member or volunteer will be **asked to take leave from their duties immediately** until an investigation has been completed. In the case of a staff member, they will remain on full pay. In all cases, it should be made clear that suspension does not imply guilt but rather protects all parties whilst an investigation is undertaken.
- In the event of the **allegation coming from a vulnerable adult in Ireland** – the office manager in Ireland will take the report to the relevant authorities in Ireland following guidelines from the Department of Children and Youth Affairs Children First – National Guidance for protection and welfare of children. The office manager should inform the relevant board member in Ireland that this is happening.
- In the event of the **allegation coming from a vulnerable adult in Kenya** – the project leader will take the report to the project manager in Kenya (in some cases this may be the CEO if in country) and that person will consult with the relevant member of the board in Kenya as to what steps to take next.

- If the allegation happens in Kenya, it will be **treated as an incident** and the Brighter Communities Worldwide Incident Management chain of communication will be followed should it escalate further.
- **Confidentiality** around all records kept about the allegation will be scrupulously maintained and information will only be released to those in positions of authority.
- If the allegation against a Brighter Communities Worldwide staff member or volunteer is proved to be true, disciplinary action taken will include removal of the person from their position and no further engagement with Brighter Communities Worldwide will be considered.

Policy review

Brighter Communities Worldwide will ensure that this policy is reviewed **every two years** and that an annual report on any incidents relating to safeguarding vulnerable adults is made to its board of directors.

Annex

Definitions of Abuse

Abuse is the violation of an individual's human and civil rights by any other person or persons. This occurs in many forms and may consist of a single act or repeated acts. It may also be shown by a failure to act in order to protect vulnerable people.

- There are several kinds of abuse:
  - **Physical abuse** is actual or likely physical injury to a person, such as hitting, kicking or shaking, where there is definite knowledge, or reasonable suspicion, that the injury was inflicted or knowingly not prevented.
  - **Emotional abuse** is harm done by persistent or severe emotional ill-treatment or rejection, such as degrading punishments, threats, not giving care and affection and bullying, resulting in adverse effects on the behaviour and emotional well-being of a vulnerable adult.
  - **Neglect** occurs when basic needs such as food, warmth and medical care are not met, or when there is failure to protect a vulnerable adult from exposure to any kind of danger, resulting in serious impairment to their health or development.
  - **Sexual abuse** is the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. It includes sexual slavery, pornography, child abuse and sexual assault. Sexual abuse may involve siblings or other family members, or persons outside the family.
    - **Sexual Exploitation** – is defined as an actual or attempted abuse of someone's position of vulnerability (e.g. a person depending on another person for survival, foot rations, school books, transport, sanitary pads) differential power or trust, to obtain sexual favours including not only offering money or other social, economic or political advantages. It includes trafficking and prostitution.

  - **Financial exploitation** including misusing or stealing the person's property, possessions or benefits, cheating them, using them for financial gain, putting pressure on them about wills, property, inheritance or financial transactions.
- Abuse may be current or recent, or in some cases, historical, i.e. an adult may disclose sexual abuse that took place when he/she was a child. Abuse may be carried out by adult men or women, or by siblings or other young people.
- There are some groups of adults who are especially vulnerable - adults with physical disabilities, mental health issues or adults living in residential care.

Definitions with reference to this policy

- Brighter Communities Worldwide **staff** refers to individuals who receive a regular salary for work in any part of Brighter Communities Worldwide including staff in Kenya and Ireland. Also included are individuals who are contracted to work for Brighter Communities Worldwide on short term basis.

- Brighter Communities Worldwide **volunteers** refers to a range of individuals who are committed to working with and supporting Brighter Communities Worldwide. It includes individuals on Harambee projects; visitors who travel to Kenya; members of board in Ireland and Kenya; volunteers who support the work done in Ireland on awareness raising, fundraising etc; volunteers involved in school link programmes. Brighter Communities Worldwide acknowledges that on occasion volunteers can be under 18 and as such are themselves within the age range that this policy is designed to protect. (See our Volunteer Policy)
- Brighter Communities Worldwide **partners** are all those people who work with Brighter Communities Worldwide in implementing programmes, from donors to volunteer to organisations in Kenya.

Dóchas Leadership Safeguarding Charter

Brighter Communities Worldwide is a member of Dóchas and a signatory to the Dóchas Leadership Safeguarding Charter.

The leaders of Ireland's International development and humanitarian NGOs are dedicated to building a world where justice, equality, solidarity and respect for human rights prevail. We are responsible for ensuring that our staff, operations and programmes do no harm to the individuals we work to support, and do not expose them to abuse or exploitation.

We pledge to exhibit leadership behaviours that show we are committed to safeguarding principles and advocate the implementation of organisational actions that align with international standards to foster positive safeguarding cultures.

https://www.dochas.ie/resources/safeguarding/dochas-safeguarding-charter/

Code of Behaviour

There are some simple rules of behaviour that will help to create a safe and secure environment for vulnerable adults we are working with and avoid situations where abuse or allegations of abuse may occur.

- Treat each vulnerable adult with dignity, care, acceptance and respect.
- Adopt an approach whereby vulnerable adults are treated fairly and equally.
- Listen and encourage vulnerable adults to feel comfortable enough to talk to others about any concerns they have and to point out attitudes and behaviour they do not like.
- Consider situations which may present risks to vulnerable adults and manage them so that the risks are minimised.
- Understand the definition of abuse (see policy) and be aware that this policy offers protection from sexual exploitation as well as sexual abuse.
- Do not spend time alone with vulnerable adults – plan activities so that more than one adult is present or, at least, other people are within sight and hearing.
- Ensure that adults and vulnerable adults have separate sleeping accommodation if it is a residential event.
- Do not take vulnerable adults alone in a vehicle, even for short journeys, unless this is unavoidable for safety reasons. If this is unavoidable, make sure that another adults or another member of staff is aware it is happening.
- Do not engage in inappropriate physical or verbal contact with vulnerable adults such as hugs or horseplay - suggestive remarks or gestures even in fun.
- Do not engage in sexually proactive or provocative games.
- Do not do things of a personal nature for vulnerable adults that they can do themselves, e.g. using the toilet/latrine.

N.B. If it is absolutely necessary to do things of a personal nature for vulnerable adults, particularly if they are very young or are disabled, then the tasks should only be carried out with the full understanding and consent of their parents/carers. In an emergency situation that requires this type of help, you should endeavour to have someone present and fully inform the parent/carers as soon as it is reasonable possible. In such situations it is important that you ensure that all staff etc. are sensitive to the vulnerable adult and undertake personal care tasks with the utmost discretion.

- Do not use the internet to access child pornography sites.
- Do not use AI tools to generate synthetic images or representations of real or realistic vulnerable adults, beneficiaries, or community members. Do not use AI tools in connection with any safeguarding matter, case note, or investigation record without prior written approval from the CEO/CD. Do not enter any identifying information about a vulnerable adult or their circumstances into an AI tool. See BCW AI Usage Policy for full requirements.
- Do not trivialise or exaggerate vulnerable adult abuse issues.
- Do not rely on just your good name to protect you or believe that an allegation of vulnerable adult abuse could never happen to you.
- Make it clear to the adults you are working with that Brighter Communities Worldwide do not tolerate any kind of abuse by staff, volunteers and associates.

Reporting concern of Vulnerable Adult abuse - Report template

Part One: Person Reporting

Name

Please circle relevant one:

- Brighter Communities Worldwide Staff Member
- Brighter Communities Worldwide Volunteer
- Other

Details of any other organisation involved

Your relationship to the vulnerable adult concerned

Part Two: About the Vulnerable Adult (s)

Name(s)

Male or female?

Age

Address

Who does the vulnerable adult live with?

Part Three: About Your Concern

How did you come to have a concern: was abuse observed or suspected?

Was an allegation made?

Did a vulnerable adult disclose abuse?

Date, time and place of any incident(s)

Nature of concern/allegation

Observations made by you (e.g. vulnerable adult's emotional state, any physical evidence)

Write down exactly what the vulnerable adult said and what you said.

Any other relevant information? (e.g. disability? language?)

Were other vulnerable adults involved or aware?

Who have you reported this incident/concern to?

Time and date of reporting

Advice given and action taken

DECLARATION

Brighter Communities Worldwide is fully committed to safeguarding the well-being of vulnerable adults by protecting them from abuse of all kinds e.g. neglect, physical, sexual and emotional harm.

Working as an employee, contractor or volunteer with Brighter Communities Worldwide it is important that you have taken time to thoroughly read this Vulnerable Adult Safeguarding Policy.

By being made aware of the policy it is our intention to ensure that we are all pro-active in providing a safe and secure environment for the vulnerable adults we come across in our work.

Declaration:

I have read and understand Brighter Communities Worldwides Vulnerable Adult Safeguarding Policy. I have also read and understand the *Dóchas Leadership Safeguarding Charter.*

I accept the aims of this policy.

I agree to abide by its principles and follow the guidelines set out and adhere to the Code of Behaviour.

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Signed:_____ Date:___/___/___

Name:_____

(Please print)

Position: _____

Office: _____

This will be kept in on file.