



# **Prevention of Sexual Exploitation and Safeguarding policy**

This policy will enable Gender Links to demonstrate its commitment to keeping safe the vulnerable adults with whom it works alongside. Gender Links acknowledges its duty to act appropriately to any allegations, reports or suspicions of abuse.

It is critical to note that this policy should be read in conjunction with the following Gender Links policies:

- Staff wellness extract of the Gender Links Human Resources policy
- Code of conduct extract of the Gender Links Human Resources policy
- Gender Links Health and Safety policy
- Gender Links Green Policy
- Gender Links HIV and AIDS policy
- Gender Links Disability policy
- Gender Links Sexual Harassment Policy

The purpose of this Safeguarding policy is to ensure that Gender Links staff, interns, Board members, service users and management can work to prevent abuse and know what to do in the event of abuse.

The Policy Statement and Procedures have been drawn up in order to enable Gender Links to:

- promote good practice and work in a way that can prevent harm, abuse and coercion occurring.
- to ensure that any allegations of abuse or suspicions are dealt with appropriately and the person experiencing abuse is supported.
- and, to stop that abuse occurring.

The Policy and Procedures relate to the safeguarding of vulnerable adults. Gender Links has defined vulnerable adults as: people aged 18 or over who may have the following circumstances:

- Adults who are receiving or may need community care services because of learning, physical or mental disability<sup>1</sup>, old age, or terminal illness such as HIV and Aids<sup>2</sup>
- Adults who are or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.
- Women or girls who may be survivors of Gender-based violence

The policy applies to all staff, including senior managers, Board members, interns and anyone working on behalf of Gender Links. It is acknowledged that significant numbers of vulnerable adults are abused and it is important that Gender Links has a Safeguarding Adults Policy, a set of procedures to follow and puts in place preventative measures to try and reduce those numbers.

In order to implement the policy Gender Links will work:

- to promote the freedom and dignity of the person who has or is experiencing abuse
- to promote the rights of all people to live free from abuse and coercion
- to ensure the safety and well being of people who do not have the capacity to decide how they want to respond to abuse that they are experiencing
- to manage services in a way which promotes safety and prevents abuse
- recruit staff and interns safely, ensuring all necessary checks are made
- provide effective management for staff and interns through supervision, support and training

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<sup>1</sup> Disability Policy page 55 of GL HR Policy 2018

<sup>2</sup> HIV & Aids Policy page 45-48 of GL HR Policy 2018

## **Gender Links:**

- will ensure that all management, board members, staff, interns, service providers and partners are familiar with this policy and procedures;
- will act with confidentiality and gain permission from service users before sharing information about them with another partner organization;
- will inform stakeholders that where a person is in danger, a child is at risk or a crime has been committed then a decision may be taken to pass information to another agency without the service user's consent e.g. South African Police;
- will make a referral to the Adult Social Care Direct team as appropriate;
- will endeavor to keep up to date with national developments relating to preventing abuse and welfare of adults; and
- will ensure that the Designated Named Person understands his/her responsibility to refer incidents of adult abuse to the relevant statutory authorities.

The Designated Named Person for Safeguarding Adults in Gender Links is the Director of Operations and in his absence, the Company Secretary. They should be contacted for support and advice on implementing this policy and procedures.

## **PROCEDURES**

### **1. Introduction**

These procedures have been designed to ensure the welfare and protection of any adult who accesses services provided by Gender Links. The procedures recognise that adult abuse can be a difficult subject for workers to deal with. Gender Links is committed to the belief that the protection of vulnerable adults from harm and abuse is everybody's responsibility and the aim of these procedures is to ensure that all managers, Board members of the organisation, staff, interns and partners act appropriately in response to any concern around adult abuse.

### **2. Preventing abuse**

Gender Links is committed to putting in place safeguards and measures to reduce the likelihood of abuse taking place within the services it offers and that all those involved within Gender Links will be treated with respect.

Therefore, this policy needs to be read in conjunction with the following Gender Links policies:

- Risk Management policy
- Human Resources -Disciplinary and Grievance
- I.T Policy
- Human Resources -Recruitment and Selection
- Health and Safety Policy
- Human Resources -Code of Conduct

Gender Links is committed to safer recruitment policies and practices for paid staff, board members and interns. This may include Criminal Records disclosures for staff and interns, ensuring references are taken up and adequate training on Safeguarding Adults is provided for staff and interns.

Management, staff and board members will be required to provide two references and where appropriate have a Criminal Records Bureau disclosure before taking on employment.

The organisation will work within the current legal framework for reporting staff or interns that are abusers. Information will be available about abuse and Safeguarding Adults policy statement will be available to service users, partner organisations and staff.

### **3. Recognising the signs and symptoms of abuse**

Gender Links is committed to ensuring that all staff, management, the board and interns undertake training to gain a basic awareness of signs and symptoms of abuse. Gender Links will ensure that the Designated Named Person and other members of staff, board and interns have access to training around Safeguarding Adults.

#### **Abuse "is a violation of an individual's human and civil rights by any other person or persons" and includes:**

- physical abuse: including hitting, slapping, punching, burning, misuse of medication, inappropriate restraint;
- sexual abuse: including rape, indecent assault, inappropriate touching, exposure to pornographic material;
- psychological or emotional abuse: including belittling, name calling, threats of harm, intimidation, isolation;
- financial or material abuse: including stealing, selling assets, fraud, misuse or misappropriation of property, possessions or benefits;
- neglect and acts of omission: including withholding the necessities of life such as medication, food or warmth, ignoring medical or physical care needs;
- discriminatory abuse: including racist, sexist, that based on a person's disability and other forms of harassment, slurs or similar treatment; and
- institutional or organisational: including regimented routines and cultures, unsafe practices, lack of person-centered care or treatment.

### **4. Designated person for safeguarding adults**

Gender Links has appointed individuals who are responsible for dealing with any Safeguarding Adults concerns. In their absence, a deputy will be available for staff to consult with. The Designated Named Person(s) for Safeguarding Adults within Gender Links are:

Company Secretary  
+27 11 029 0006  
+27 11 028 2410  
+27 11 487 2829

Name of deputy person  
Director Of Operations  
+27 11 029 0006  
+27 11 028 2410

**Should either of these named people be unavailable then management, staff or interns should contact the South African Police.**

The roles and responsibilities of the named person(s) are:

- to ensure that all staff including interns and board members are aware of what they should do and who they should go to if they have concerns that a vulnerable adult may be experiencing, or has experienced abuse or neglect.
- to ensure that concerns are acted on, clearly recorded and referred to an Adult Social Care Direct team or to the allocated social worker/care manager or South African Police
- to follow up any referrals and ensure the issues have been addressed.
- to reinforce the utmost need for confidentiality and to ensure that staff and interns are adhering to good practice with regard to confidentiality and security. This is because it is around the time that a person starts to challenge abuse that the risks of increasing intensity of abuse are greatest.
- to ensure that staff and interns working directly with persons who have experienced abuse, or who are experiencing abuse, are well supported and receive appropriate supervision.
- if appropriate staff or interns will be given support and afforded protection if necessary: they will be dealt with in a fair and equitable manner and they will be kept informed of any action that has been taken and its outcome

## **5. Responding to people who have experienced or are experiencing abuse**

Gender Links recognises that it has a duty to act on reports, or suspicions of abuse or neglect. It also acknowledges that taking action in cases of adult abuse is never easy.

How to respond if you receive an allegation:

- Reassure the person concerned.
- Listen to what they are saying.
- Record what you have been told/witnessed as soon as possible.
- Remain calm and do not show shock or disbelief.
- Tell them that the information will be treated seriously.
- Don't start to investigate or ask detailed or probing questions.
- Don't promise to keep it a secret.

If you witness abuse or abuse has just taken place the priorities will be:

- To call an ambulance if required.
- To call the police if a crime has been committed.
- To preserve evidence.
- To keep yourself, staff, or any affected parties safe.
- To inform the Designated Named Person(s) in the organisation.
- To record what happened in the Safeguarding Incidents Register.

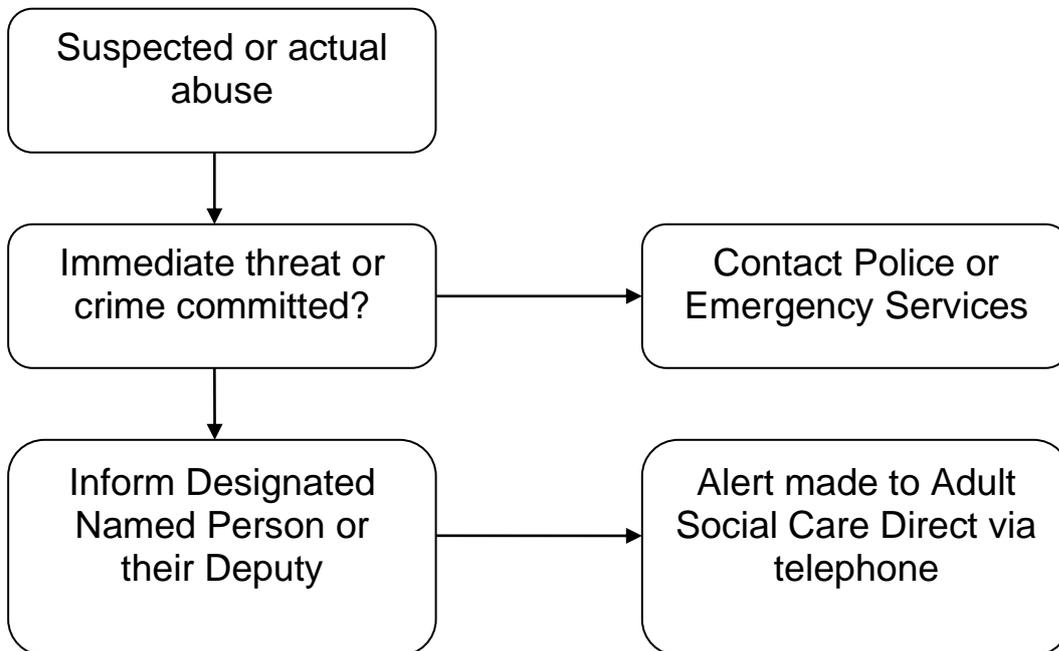
All situations of abuse or alleged abuse will be discussed with the Designated Named Person or their deputy. If a member of the management committee, staff member or intern feels unable to raise this concern with the Designated Named Person or their deputy then concerns can be raised directly with Adult Social Care Direct. The alleged victim will be told that this will happen. This stage is called the alert.

If it is appropriate and there is consent from the individual, or there is a good reason to override consent, such as risk to others, a referral (alert) will be made to Adult Social Care Direct team or the South African Police Service (SAPS)

If the individual experiencing abuse does not have capacity to consent a referral will be made without that person's consent, in their best interests.

## Raising a Safeguarding Adults Alert

All safeguarding adult alerts (referrals) should be made by telephone to the relevant authorities as per contact details provided above. In an emergency situation outside of these times please contact the nearest Police Station. You should ask to make a safeguarding adults alert.



A Safeguarding Adults Manager in the relevant office will then decide if the safeguarding process should be instigated or if other support/services are appropriate. Feedback will be given to the person who raised the safeguarding adults alert.

If the Safeguarding Adults Manager decides the safeguarding process needs to be investigated this will then lead to the implementation of the next stages.

The Designated Named Person will have an overview of this process so they can explain it to the person concerned and offer all relevant support to the person and process. This could be practical support e.g. providing a venue, or information and reports and emotional support.

Information should be provided to the individual. This could be about other sources of help or information that could enable them to decide what to do about their experience, enable them to recover from their experience and enable them to seek justice.

## 6. Managing allegation made against member of staff or volunteer

Gender Links will ensure that any allegations made against members or member of staff will be dealt with swiftly as per the Gender Links Code of Conduct<sup>3</sup> in the Human Resources Policy.

Where a member of staff/intern is thought to have committed a criminal offence the police will be informed. If a crime has been witnessed the police should be contacted immediately.

<sup>3</sup> Code of conduct page 35 of the GL HR Policy 2018( clause 194)

The safety of the individual(s) concerned is paramount. A risk assessment must be undertaken immediately to assess the level of risk to all service users posed by the alleged perpetrator. This will include whether it is safe for them to continue in their role or any other role within the service whilst the investigation is undertaken.

The Designated Named Person will liaise with Adult Social Care Direct to discuss the best course of action and to ensure that the Gender Links' Disciplinary and Grievance procedures<sup>4</sup> are coordinated with any other enquiries taking place as part of the ongoing management of the allegation.

## **7. Recording and managing confidential information**

Gender Links is committed to maintaining confidentiality<sup>5</sup> wherever possible and information around Safeguarding Adults issues should be shared only with those who need to know. For further information, please see Gender Links' confidentiality policy contained within the Human Resources Policy.

All allegations/concerns should be recorded in the Safeguarding Incidents register. The information should be factual and not based on opinions, record what the person tells you, what you have seen and witnesses if appropriate.

The information that is recorded will be kept secure and will comply with data protection.

This information will be secured in a locked filing cabinet in the Director of Operations office. Access to this information will be restricted to the Designated Named Persons.

## **8. Disseminating/Reviewing policy and procedures**

This Safeguarding of Vulnerable Adults Policy and Procedure will be clearly communicated to staff, Board members, interns, service providers and partner organizations. The Designated Named Person will be responsible for ensuring that this is done.

The Safeguarding Adults Policy and Procedures will be reviewed annually by the Organisational Development committee during the Annual General meetings. The Designated Named Person for Safeguarding Adults will be involved in this process and can recommend any changes. The Designated Named Person will also ensure that any changes are clearly communicated to staff, board members and interns.

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<sup>4</sup> Maximum penalty guidelines page 68 of GL HR Policy 2018

<sup>5</sup> Code of Conduct page 35 of GL HR Policy 2018 (clause 194)