

Vulnerable Persons Protection Policy

SNEHA has been working in urban slums for over 11 years, encouraging vulnerable women and children to access antenatal and postnatal care, changing infant feeding practices to prevent malnutrition, working with women and their families to identify and rehabilitate victims of violence, and with adolescent girls for sexual health education. SNEHA primarily supports the public health system in Mumbai which delivers services to vulnerable women. SNEHA focuses on the health of women and does not implement any direct child protection programs, with the exception of running two day care centres in partnership with the central government's Integrated Child Development Services. SNEHA recognises the importance of protecting all women and children, particularly the vulnerable, from abuse of all forms: commercial, neglect and the absence of primary care. SNEHA ensures that protection of the disadvantaged is integrated into all areas of its work. This policy seeks to provide a framework upon which SNEHA's engagement with vulnerable persons, directly or indirectly, is based.

SNEHA, through its work and the behaviour of all trustees, employees and volunteers, strives to ensure that:

- (i) Everyone has the right to protection from abuse and neglect and should be able to live a life of inclusion and participation.***
- (ii) Everyone has the right to lead a life in which they fulfil their potential for dignity, health and security.***

This is in accordance with the Convention on the Rights of the Child, Adopted and opened for signature, ratification and accession by General Assembly resolution 44/25 of 20 November 1989. Entry into force 2 September 1990, in accordance with article 49 "States Parties shall take all appropriate measures to ensure that the child is protected against all forms of discrimination or punishment on the basis of the status, activities, expressed opinions, or beliefs of the child's parents, legal guardians, or family members".

Thus, SNEHA is committed to ensure that all those with whom we work and with whom we have contact can live a life free from:

- Sexual, mental and physical abuse
- Humiliation
- Fear
- Neglect and exclusion
- Discrimination
- Exploitation

The organisation seeks to prevent abuse on the basis of a recognition of human rights. As our work grows and develops we will strive to take practical actions to protect all vulnerable people potentially at risk of harm as a direct result or consequence of our support and programming. We will ask of our partners that they adhere to the same principles and codes of conduct, based on the unquestioning recognition of human rights.

This policy seeks to complement and expand on the core value of nurture and value for every person that SNEHA has identified as being important, specifically in relation to vulnerable adults and children.

“Vulnerable Parties” include the following stakeholders from urban slums

- Children
- Disadvantaged women
- People with disabilities
- Youth
- Senior Citizens

Principles

The following protocols should be interpreted with the best interests of vulnerable people as the primary consideration. Those working for SNEHA should always:

- Respect everyone as individuals, and not discriminate against anyone¹
- Always act in the best interest of the vulnerable person² .
- Respect everyone’s right to develop and survive.
- Respect and honor everyone’s right to participation.
- Respect and facilitate access to services.
- Provide a good example of acceptable behaviour.
- Respect everyone’s right to privacy.
- Never compromise the safety and security of children³
- Try to ensure actions cannot be misunderstood or cause offence and that they are always acceptable within a relationship of trust.
- Show understanding when dealing with sensitive issues, including cultural differences and human diversity.
- Be responsive to reports of abuse and investigate appropriately.
- Plan, where possible, to have at least one responsible person with them during activities with a vulnerable person.
- Remember that they are accountable to the vulnerable person, to their carer or parents and to SNEHA.

Moving forward, SNEHA plans to work through Community Resource Centres (CRCs) that will form the hub of all health-based interventions in the slums. SNEHA will encourage community ownership and participation in identifying key child protection issues. SNEHA follows a system-based approach, working in close partnership with existing government health systems, and

¹ Article 2: Convention on the rights of the child, UNICEF.

² Article 3: Convention on the rights of the child, UNICEF.

³ Article 19: All Parties shall take all appropriate legislative, administrative, social and educational measures to protect the child from all forms of physical or mental violence, injury or abuse, neglect or negligent treatment, maltreatment or exploitation, including sexual abuse, while in the care of parent(s), legal guardian(s) or any other person who has the care of the child.

does not subscribe to an issue-based approach. SNEHA believes that working with existing systems – both formal and non formal - is more sustainable in the long run. In our work with urban slum communities, we adopt a continuum of care beginning with promotion, identification, referral, early intervention and care. All our programs are enshrined within the human rights and child rights conventions and principles.

Our partners include the Municipal Corporation of Greater Mumbai and the Integrated Child Development Services. Our funding partners include The Wellcome Trust, UK; PATH, Sir Dorabjee Tata Trust, Tech Mahindra and the UK Department for International Development. Our research partner is the Institute for Global Health, University College London.

Our domestic and international partners should never:

- Permit abusive behaviour
- Have inappropriate physical or verbal contact with others
- Jump to conclusions or make assumptions about others without checking facts
- Make suggestive remarks or actions, even in jest
- Deliberately place themselves, or others, in a compromising situation

Undertakings made by SNEHA:

Communications about Vulnerable People

- SNEHA will not portray vulnerable people in a manipulative or sensational manner, either in words or images. Everyone has a right to be accurately represented and will only be presented by SNEHA in a manner that preserves dignity
- SNEHA will seek to avoid depicting vulnerable persons as helpless victims, but instead as dignified humans.
- Any information that could be used to identify the location of a vulnerable person and cause them to be put at risk will not be used in any form of communication for general, or public, purposes.
- SNEHA will carefully screen the use of cameras and mobile phones by visitors and staff and the use of photographs taken will follow the following guidelines:
 - No photograph will be used without prior permission of the Executive Director of SNEHA.
 - The identity of the vulnerable person will be protected at all times.
 - Consent from the photographed party will always be obtained before use.

Implementation

- Acceptance of the Vulnerable Persons Protection Policy and Code of Conduct will be signified, respectively, by signing the Statement of Commitment (Appendix 1).
- All Trustees, employees and volunteers must read, understand and accept compliance with the SNEHA Vulnerable Persons Protection Policy.
- All Volunteers must be given information about the policy.

- International and national visitors to projects supported by SNEHA (whether trustees or volunteers) should receive a copy of SNEHA's Vulnerable Person Protection Policy and agree to compliance with it.
- Appropriate checks will be made on all employees and volunteers solely to ensure that their involvement with the disadvantaged people supported by SNEHA is not inappropriate.

Education and Training

- Trustees, employees and volunteers should be made familiar with this policy as part of their induction.
- The induction training will include modules to help recognise abuse and the action that needs to be taken.
- Any instance or concern thus raised will be reported to the Executive Director for further action.
- Volunteers with access to information about the lives of vulnerable people, including contact details, must receive guidance to understand what constitutes acceptable and unacceptable sharing of information regarding vulnerable people.
- SNEHA will nominate a staff member to assist the Executive Director to ensure that the policy is appropriately implemented.
- If any person working for SNEHA has any concerns regarding protection of vulnerable people, they should raise them with the responsible trustee.

Reporting and Reacting

- When responding to concerns raised regarding vulnerable person's protection, the best interests of the vulnerable person will be paramount. Decisions will be made that attempt to ensure the best outcomes for the vulnerable person.
- Any incidents or concerns will be recorded in a Vulnerable Persons Protection File kept in safe custody with the Human Resource Manager and signed and dated by the person who raised the concern and the responsible trustee. If the concern is raised overseas the file will be signed by the responsible trustee and another trustee.
- All those working for SNEHA are obliged to report any suspicions, allegations or witnessed actions, however uncertain, that might, in any way, breach the SNEHA Vulnerable People Policy to the responsible trustee.
- SNEHA will encourage overseas partners to adopt a similar policy of their own that is sensitive to their cultural setting. Principles that SNEHA would expect to be part of such a policy are set down below.
- Any accusations brought up will be heard from all concerned parties and discussed by the Staff, the CEO and a responsible trustee and appropriate action – legal, criminal or otherwise will be taken.
- Support will be provided for those involved by the responsible staff member and the executive director following an incident or allegation.

Vulnerable People Protection Principles expected of SNEHA Staff and all Partner Agencies

Partner agencies will be required to adopt a formal policy which incorporates the following principles as a condition of partnership:

- The organisation's ethos should support a positive, supportive and secure environment, giving disadvantaged people a sense of being valued and listened to.
- Whilst the partner agency will be clear that some behaviour by children is not acceptable, it will also be clear that they are valued and not to be blamed, nor any abuse inflicted on them.
- Children should know that there are members of staff they can approach if they have concerns for themselves or others.
- There should be a designated senior person for vulnerable people protection who has received appropriate training and support for this role.
- All members of staff, volunteers and members of the governing body should know the name of that senior person and their role.
- All staff, volunteers and members of the governing body should understand their responsibility to be alert to signs of abuse and their responsibility to refer concerns to the designated senior person.
- Written records should be maintained of concerns about disadvantaged people. Such records should be kept securely, separate from the main file on the person.
- Procedures should be developed to cover the circumstances where an allegation is made against a member of staff or a volunteer, and such procedures should be followed.

Monitoring and Review

- The Executive Director will report to the board of trustees on an annual basis on the implementation of the Vulnerable People's Protection Policy.
- The Policy will be reviewed once every 3 years by the staff and trustees of SNEHA.
- SNEHA follows an inclusive and democratic model of working. In accordance with this model, vulnerable people will be asked their views on and to input into the review of the vulnerable person's policy and practice.



Appendix 1

STATEMENT OF COMMITMENT TO SNEHA'S VULNERABLE PERSON PROTECTION POLICY

'I,, have read and understood the standards and guidelines outlined in SNEHA's Vulnerable Person Protection Policy. I agree to abide by the principles contained therein and accept the importance of implementing child protection policies and practice while working with SNEHA. I will adhere to SNEHA's Code of Conduct at all times.'

(Print name)

(Signature)

(Date)

Appendix 2

SNEHA CODE OF CONDUCT

As a Volunteer / employee/ Trustee for SNEHA, your behaviour should illustrate, through example and action, model ways of working with vulnerable people. By always striving to attain the highest standards of interaction with, and support for, clients and other stakeholders, you will not only contribute to the success of SNEHA, but will also be working to positively impact vulnerable people, their families and communities.

- The Code of Conduct should be interpreted in a spirit of transparency and common sense, with the best interests of vulnerable people as the primary consideration.
- The Code of Conduct sits alongside the Vulnerable People Protection Policy, and must be considered an integral part of it.

Ethical Behaviour

- Demonstrate respect for all human rights and challenge discrimination on the grounds of age, gender, disability, ethnicity, religion and any other criteria.
- Treat everyone with dignity and respect and create an environment that prevents physical, sexual or emotional abuse or neglect.
- Take positive action to reduce the risk of harm to vulnerable people.
- Always ensure that dignity for clients and field partners is paramount.
- Actively work to eliminate discrimination, harassment, abuse and exploitation, including of a sexual nature, which infringe the rights of others.
- Be respectful of local customs and cultures.

Relationship to local cultures and communities

- Take all responsible action to avoid prejudice to SNEHA's reputation by refraining from inappropriate behaviour or action that might offend local sensitivities.
- When involved in local political, religious or community leadership activities, commit to ensure that SNEHA's mission and objectives in India are not compromised.

Duty to Report

- Report, immediately, any breaches of this Code to the Board.
- Ensure that all information about breaches of this Code is handled with the utmost discretion.
- All suspected breaches of the Code will be investigated and treated with confidentiality.

I have received SNEHA's Code of Conduct, which I have read and understood.

I understand that failure to comply with any principles of the Code of Conduct may result in an investigation by the Board of SNEHA into the appropriateness of my continued involvement with the organisation.

NAME _____



SIGNED _____

DATE _____