

# **THE ETSOSEN FOUNDATION**

# **SAFEGUARDING POLICY**

**Revised on: 31 October 2025**

**Next revision date: 31 October 2026**

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## 1. INTRODUCTION

Etsoseng Foundation is a non-profit company actively working to transform the South African society in the fields of education, human development, youth policy, social welfare, reconciliation, moral regeneration and culture.

The mission of Etsoseng is to promote the full development of the person through educational projects that foster intellectual and academic excellence as well as personal and social growth. Our beneficiaries are girls and women from all backgrounds irrespective of creed, race or culture.

In achieving its mission, Etsoseng Foundation is guided by the following values:

### **Diversity**

Everyone is included, irrespective of creed, race or culture.

### **Equality**

In status, rights, opportunities.

### **Integrity**

We strive to act with personal and institutional integrity, and promote virtues such as honesty, honour, and truthfulness in all we do.

### **Compassion**

Empathy and understanding for all.

### **Respect**

Recognition, admiration and high regard for each person.

## 2. POLICY STATEMENT

The purpose of this policy is:

- To ensure that every child and vulnerable adult served by Etsoseng and its partners is safe and protected from harm.
- To ensure that any abuse of children and vulnerable adults that occurs in the context of Etsoseng's projects and activities is reported and addressed.

As an organisation committed to the excellence of girls and women, safeguarding and ensuring their safety and wellbeing is of importance to us and our utmost priority. It is at the heart of everything we do, and it is therefore the responsibility of every staff, volunteer or personnel associated with Etsoseng.

In line with its mission and fully committed to it, Etsoseng Foundation believes that everyone who comes into contact with the Foundation or its activities regardless of age, gender identity, disability, sexual orientation, or ethnic origin has the right to be protected from all forms of harm, abuse, neglect or exploitation. Etsoseng will not tolerate abuse and exploitation by staff, volunteers or personnel associated with Etsoseng and will apply the outlined procedures and provisions to ensure that the matter is addressed.

### 3. DEFINITIONS

**Associated personnel** are persons who are not employed by Etsoseng but who are connected in some way and assist in its activities. Associated personnel include (but are not limited to) consultants, contractors, and other program visitors.

**Child** in the context of this document is a person under the age of 18 years.

**Child Abuse** is neglect, physical abuse, injury, sexual abuse, emotional or psychological abuse to a child, inflicted or knowingly not prevented, which may cause significant harm or death. Abuse may occur when somebody inflicts harm on a child or fails to act to prevent harm. Abuse may also result when a threat to harm is made even if it is not acted upon. Children may be abused in a family or in an institutional or community setting by those known to them or by a stranger.

**Child Exploitation** refers to the use of children or vulnerable adults for someone else's advantage, gratification or profit often resulting in unjust, cruel, and harmful treatment of the child or vulnerable adult. Exploitative activities are to the detriment of the child's physical or mental health, education, moral or social-emotional development of the child. It covers situations of manipulation, misuse, abuse, victimization, oppression or ill-treatment.

**Emotional abuse** is the persistent emotional ill-treatment of a child, young person, or other vulnerable person such as to cause severe and persistent adverse effects on their emotional development. Acts of emotional abuse may include restriction of movement, patterns of belittling, threatening, scaring, discrimination, ridiculing or other non-physical forms of hostile or rejecting treatment.

**Long Term Volunteer** is someone who takes on a non-paid position with the Foundation and undertakes or assists in a project, activity or event that lasts more than six months. These volunteers will be required to have full safeguarding checks and undergo the training as specified in the Policy.

**Neglect** occurs when basic needs such as food, warmth, shelter and medical care are not met which may result in serious physical and psychological impairment of the development of the child, young person or vulnerable adult. It may also involve failure to protect the child or vulnerable adult from harm or danger and may also include unresponsiveness to a child's basic emotional needs.

**Partner** is an external third-party entity that provides services to Etsoseng or in some way collaborates in its activities.

**Physical abuse** is abuse which involves contact that is intended to cause pain or injury or any other physical suffering or harm to an individual. This includes hitting, kicking, punching and other ways of inflicting pain or injury such as poisoning (perhaps with harmful drugs or alcohol), drowning or smothering. The threat of physical harm to a person will also be considered as physical abuse even if the harm does not happen physically.

**Psychological abuse** includes sarcasm, degrading punishments, threats and not giving love and affection, which can have adverse effects on the behaviour and emotional development of a child, young person or vulnerable adult. It may involve conveying to a child or vulnerable adult that he/she is worthless, unloved, inadequate, or not valued. It could feature having unrealistic expectations of a child, eliciting fear in the child and exploiting or corrupting a child.

**Safeguarding Focal Point (SFP)** is the person appointed by Etsoseng and designated to play this role. The role of the SFP will be the point of contact on all safeguarding matters, and to advise, support and assist the organisation in the implementation of the Safeguarding Policy. The SFP will oversee the implementation of procedures for responding to allegations or suspicions of abuse. She is responsible for providing statutory safeguarding services including assessment, intervention, casework and case management in accordance with policies, practices and guidelines of Etsoseng.

**Safeguarding** means protecting the health and wellbeing of persons and enabling them to live free from harm, abuse and neglect.

**Sexual abuse** involves forcing or enticing a child, young person or vulnerable adult to take part in sexual activities including prostitution, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative acts (e.g. rape, anal or oral sex) or non-penetrative acts. They may include contact and non-contact activities, such as involving children in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways.

**Short Term Volunteer** is someone who takes on a non-paid position with the Foundation to facilitate or support an activity or event that lasts for a period not exceeding one month. These volunteers will not be required to undergo the full training as outlined in the Policy, it will suffice that they attend an information session to learn about the requirements under

the policy. They must always be supervised in their work by staff or long-term volunteers. They will not have unsupervised access to children or vulnerable adults.

**Staff member** is a person who is employed by and has signed a contract for work with Etsoseng Foundation.

**Aggrieved person** is someone who makes an accusation or complaint of being abused or harmed, or is suspected of having been abused or harmed.

**Vulnerable adult**, for purposes of this policy, is any woman who may be at risk or in need of support due to mental health problems, learning disability, physical disability or other reasons which make her unable to protect herself against harm or exploitation, and put her at risk of harm and abuse. Our Safeguarding Policy aims to be inclusive of both children and vulnerable adults.

**Whistle Blower** means any co-worker or external stakeholder who raises a concern in accordance with this Policy in relation to the actions of co-workers or within the Foundation.

**Whistle Blowing**, also referred to as 'Concern' or 'Complaint' can be described as attracting management's attention to information about potentially illegal and/or unacceptable practices in the organisation by either a fellow co-worker or external stakeholders.

#### 4. RESPONSIBILITIES OF ETSOSENK FOUNDATION WITH REGARDS TO SAFEGUARDING

Etsoseng is committed to:

- Ensuring all staff, volunteers and associated personnel have access to, are familiar with and know their responsibilities under this policy.
- Designing and undertaking all its programs and activities in a way that protects all persons involved from any risk of harm that may arise from their having come to Etsoseng Foundation, attended or facilitated its activities.
- Implementing stringent safeguarding procedures when recruiting, managing, and deploying staff, volunteers, and associated personnel.
- Ensuring staff, volunteers and associated personnel receive training on safeguarding at a level commensurate with their role in the organisation.
- Following up on reports of safeguarding concerns promptly and apply the laid-out procedures where a complaint is made against a member of staff, volunteer or associated personnel to address and resolve the complaint promptly.
- Developing effective links with relevant agencies and co-operate as required with their enquiries regarding safeguarding matters.
- Keeping written records of concerns about incidents and aggrieved persons, even where there is no need to refer the matter immediately. Ensure all records are kept securely in locked locations.

This policy gives a clear direction for those working for and on behalf of Etsoseng about the expected behaviour and their responsibilities to safeguard and promote the welfare of all, especially children and vulnerable adults.

This policy covers all persons, children and vulnerable adults supported by Etsoseng's activities. They are mostly girls and women.

This policy applies to all staff, volunteers or personnel associated with Etsoseng Foundation or involved in the design and implementation of its programs and activities, its Board members, contractors and partners.

The most senior person in the management of Etsoseng has ultimate responsibility for safeguarding and ensuring the implementation of this Policy.

## 5. WHISTLEBLOWING

### **Whistle Blower Guidelines**

- Whistle blowers are required to provide initial information relating to a reasonable belief that an activity, event or behaviour harmful to a child or vulnerable adult has occurred as a result of the acts or omissions of co-workers or of the Foundation.
- Whistle Blowers have a responsibility to be candid with the Investigators.

### **Confidentiality and Anonymity**

Strict confidentiality shall be maintained with regard to the identity of the whistle blower, both during and post investigation. The identity of the complainant shall not be released unless required by law.

Upon disclosure of identity, protection will be provided to the co-worker/ stakeholder. Disclosure of identity would not have any impact on the co-worker's performance appraisal, assignment of work or other matters related to employment with the Foundation if the whistleblower is from within the Foundation.

This Policy does not preclude the Foundation from taking appropriate action against a co-worker or external stakeholder who improperly and/or in violation of the Code of Conduct, discloses the fact that he or she has lodged the complaint in whole or in part to any member of the public in any form or manner including over social media platform/s.

Any proceedings undertaken by the Foundation in such circumstances, and any ensuing action taken by the Foundation against a co- worker or stakeholder, are intended to be separate and distinct from the provisions of this Policy. The foregoing is not intended to undermine protections afforded by this Policy in cases where the Foundation is satisfied that the co- worker or external stakeholder has blown the whistle in good faith.

Co-workers/associated personnel/stakeholders/external stakeholders can raise concerns or issues on child safety concerns, general feedback or complaints about activities organised, run or facilitated by Etsoseng or related kinds of matters.

The SFP shall be the authorised recipient of the whistleblower complaints.

### **Reporting of a Whistle Blower concern/complaint**

Co-workers/associated personnel/stakeholders/external stakeholders report a concern in one or more of the following ways:

1. Send a communication directly in writing through a letter to the SFP or
2. Send a communication through an e-mail addressed to the SFP at [vicki@etsosengfoundation.org](mailto:vicki@etsosengfoundation.org)
3. Call the Foundation's phone number 011 486 0995 and ask to be put in contact with the SFP.

Additional modes of communication or access would be made available to co-workers/associated personnel/stakeholders/external stakeholders in appropriate or exceptional situations.

Within a reasonable time of receipt of the concern by the SFP, an acknowledgment shall be sent to the sender of the concern (where a return address or email address is available). The acknowledgment shall confirm receipt of the concern and inform the sender that the concern would be inquired into, appropriately addressed and reported to Etsoseng's Management as appropriate.

In case the concern does not fall within the ambit of the Safeguarding Policy, the sender shall be informed that the concern is being forwarded to the appropriate department/authority for further action, as may be deemed necessary.

## 6. SAFEGUARDING FOCAL POINT

Etsoseng will appoint a Safeguarding Focal Point (SFP) and ensure she has the appropriate training, resources and support to provide guidance and advice to other Staff, volunteers or associated personnel on safeguarding matters.

The Safeguarding Focal Point plays a critical role in facilitating the creation of an environment where everyone who comes into contact with Etsoseng or participates in its activities feels safe and can engage without fear.

The role of the Safeguarding Focal Point is to be a point of contact and to advise, support and assist the organisation in the implementation of the safeguarding policy.

To enable her to play her role effectively, the SFP is assured of and will be given the full support of management and the cooperation of all those working with and for Etsoseng. Etsoseng will ensure that the name and contact details of the SFP are readily available and kept up to date.

The SFP is tasked to:

- Receive reports of suspicions or disclosure of abuse in any form, formal or informal, from staff, volunteers, associated personnel or others
- Investigate the allegations and interview those implicated, the aggrieved persons, the alleged perpetrator and witnesses
- Investigate the incidents reported following procedures laid out in the policy
- Write an investigative report and assess how to proceed with the matter and report to the head of Johannesburg or Pretoria
- Determine whether the reported incident(s) represent a breach of safeguarding policy
- If the reported incident does not represent a breach of policy, determine the appropriate action to take depending on the nature of the incident e.g. violation of code of conduct
- Act as a support person for aggrieved persons during the investigation process and organize to get psychosocial care, counselling and/or medical care where needed
- Inform parents of a minor of a reported incident
- Report to the police or other relevant authority if a criminal offense has been committed and follow their advice

- Ensure the safety of the aggrieved person, including moving them to a safe location if necessary
- Document all decisions made
- Handle all child safeguarding records securely and store all information relating to the case confidentially
- Record anonymized data relating to the case to feed into organizational reporting requirements.

The Safeguarding Focal Point will be appointed for a three-year period and will hold the position for three years.

If the SFP is unavailable or not able to take up her role for any reason, she will be deputised by the Head Manager of Johannesburg or the Head Manager of Pretoria.

#### **Details of the appointed SFP**

Name:	Vicki Bolton
Email address:	vicki@etsosengfoundation.org
Appointment date:	01 January 2023

## 7. RISK ASSESSMENT<sup>1</sup>

Everyone dealing with children and vulnerable adults in Etsoseng will work with care and due diligence. However, all activities carry an element of risk which will be identified beforehand and managed.

Risk assessment will be completed beforehand for each new activity or event type using the form in **Annexure 5**. If there has been a change which could impact the associated risk, the risk assessment will be reviewed. Where no relevant change has occurred for over a year, the risk assessment will also be subject to a review.

A person-centred approach will be applied in the risk assessment process where the participants or their parents/guardians and activity instructors and volunteers are consulted where appropriate.

The activity organizer and those working with them are the experts in assessing the risk involved in an activity and should therefore make the assessment themselves.

### **Activities of Etsoseng Foundation**

The following is an overall risk assessment of Etsoseng's main activities.

Etsoseng Foundation organizes:

- leadership programs for tertiary students
- girls' clubs for primary and high school children
- camps for primary, high school and university students
- picnics, hikes and other outings for children and adults
- spiritual retreats, study seminars, different workshops for women and girls, including university students
- home economic sessions women and girls
- visits to old age homes and orphanages
- sport activities

Most of the activities are held on the premises of Komati Foundation, i.e. Arbor Study Centre, Lakeview Study Centre and Ducks Dam Hall. Etsoseng Foundation also carries out outreach activities at St Hubert Parish in Alexandra, Johannesburg, with children aged between 8-18 years. The activities carried out include:

- demonstrations and practical classes on how to maintain a clean environment

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<sup>1</sup> See also Risk Assessment guide in Annex.

- gardening
- crafts
- sports and games
- cookery
- practical talk on some positive aspects of interpersonal relationships

The interaction with the learners aims at preparing the participants for the moral, academic and social challenges they will face and to form young adults committed to social change. Below are the potential risks that could occur during the typical activities facilitated by Etsoseng Foundation staff and volunteers or attended by its beneficiaries, along with procedures undertaken to mitigate the risks.

Etsoseng Foundation staff will carry out individual risk assessments for each new activity type organized, especially if not listed below, to ensure that all possible risks are identified and addressed.

<b>Event Profile</b>	<b>Potential risks to children and vulnerable adults</b>	<b>Procedures to mitigate risks</b>
Activities carried out on the premises of Komati Foundation	Unsupervised children are at risk of bullying by other children participating in the activities.	Schedule children’s activities to enable realistic monitoring. Have one adult volunteer for every fifteen children.
	Discrimination by staff, volunteers or the girls among themselves.	All children should always be in view of volunteers during activities.
	Children are at risk of sexual, physical, psychological or emotional abuse.	All staff to be vigilant and briefed of potential risks and response procedures if safeguarding issues arise.  An adult interacting with one child should always be in view of another adult.
	Exposure to dangerous or inappropriate behaviour (e.g. strong or offensive language, inappropriate touching) by volunteers given that there are few Etsoseng staff and they rely	An adult interacting with one child should always be in view of another adult.  Obtain and authenticate written references from long term

	<p>on volunteers, including short term volunteers, to run the activities.</p>	<p>volunteers. Ensure that long term volunteers are trained on safeguarding policy and the ethos of the foundation.</p> <p>Ensure that short term volunteers are always accompanied by Etsoseng Foundation staff or a volunteer who has undergone training in the Foundations' safeguarding policy.</p>
	<p>Volunteers not being well prepared to run activities.</p> <p>Children exposed to unsuitable electronic material containing violent/aggressive images or sounds.</p>	<p>Ensure that short term volunteers are always accompanied by Etsoseng Foundation staff or a volunteer who has undergone training in the Foundations' safeguarding policy.</p> <p>Review teaching material prepared by short term volunteers before it is transmitted to the children.</p>
	<p>Physical harm such as falls on stairs or during sporting activities, cuts while doing craft activities and burns/ cuts while cooking.</p> <p>Drowning during swimming activities.</p>	<p>Have a fully stocked and regularly checked First Aid Kit.</p> <p>Schedule children's activities to enable realistic monitoring.</p> <p>Have trained swimmers with the children whenever children are at the pool.</p> <p>Ensure that children who do not know how to swim remain on the shallow end of the pool.</p>
	<p>Children at risk of dog bites.</p>	<p>Ensure that dogs are locked up during the activities.</p>
	<p>Possibility of children running out of the premises or being hit by</p>	<p>Staff/volunteers in charge of activities will ensure children are</p>

	cars entering or leaving the premises.  Children being picked up from the premises by persons who are not their parents or guardians.	picked from the activities by the appropriate persons.
	Electric fence on premises being touched by the children.	Activities to be organised away from electric fences.  All children should always be in view of volunteers during activities.
Overnight activities in Komati Foundation's premises or other facilities.	Risk of accidents while in transit.	Obtain credible transport companies or Etsoseng staff with Professional Drivers Permit (PDP) to transport children.
	Children at risk of sexual, physical abuse, psychological abuse or harm.  Exposure to dangerous or inappropriate behaviour (e.g., strong or offensive language, inappropriate touching) by volunteers given that there are few Etsoseng staff and they rely on volunteers, including short term volunteers, to run the activities.	Children travelling in one vehicle should always be accompanied by two adults.  Adults should not sleep in the same room as children unless there are two adults (one of which must be a staff member or long-term volunteer)  Short-term volunteers should always be in view of long-term volunteers.
	Risk of children falling sick during an activity due to unknown underlying conditions.	Consent obtained from parents for each activity should include specifications of any allergy/ conditions that a child might have, of which the facilitators of the activity should be aware.
	Children at risk of dog or snake bites while camping	Ensure that children are always accompanied during hiking so they can always stay in safe areas/ trails.

<p>Outdoor activities such as hikes, tours to museums, old age homes, children's homes etc. carried out by Etsoseng staff, associated personnel and volunteers</p>	<p>Unsupervised children at risk of bullying by other children participating in the activities.</p>	<p>Schedule children's activities to enable realistic monitoring.</p> <p>Have one volunteer for every five children.</p>
	<p>Children at risk of sexual, physical abuse or psychological/ emotional abuse or exposure to dangerous or inappropriate behaviour (e.g., strong or offensive language, inappropriate touching) by volunteers given that there are few Etsoseng staff and they rely on volunteers, including short term volunteers, to run the activities.</p>	<p>Ensure that there are always two adults supervising any activities by the children.</p> <p>All staff will be vigilant and briefed of potential risks and response procedures if safeguarding issues arise.</p> <p>An adult interacting with one child should always be in view of another adult.</p> <p>Obtain and authenticate written references from long-term volunteers. Ensure that long term volunteers are trained on safeguarding policy and the ethos of the foundation.</p> <p>Ensure that short term volunteers are always accompanied by Etsoseng Foundation staff or a volunteer who has undergone training in the Foundations' policies.</p>
	<p>Physical harm such as falls, cuts and burns while cooking or doing craft activities</p> <p>Drowning during swimming activities</p>	<p>Have a fully stocked and regularly checked First Aid kit.</p> <p>Schedule children's activities to enable realistic monitoring.</p> <p>Have trained swimmers with the children whenever children are at the pool.</p>

		Ensure that children who do not know how to swim remain on the shallow end of the pool.
Activities carried out in St Hubert Parish	Unsupervised children are at risk of bullying by other children participating in the activities.	<p>Schedule children’s activities to enable realistic monitoring.</p> <p>Have at least one staff member or long-term volunteer for every fifteen children.</p> <p>Ensure that there is constant supervision of children’s activities.</p>
	<p>Discrimination by staff, volunteers or the girls among themselves.</p> <p>Children at risk of sexual, physical abuse or psychological abuse or harm or exposure to dangerous or inappropriate behaviour (e.g., strong or offensive language, inappropriate touching) by volunteers given that there are few Etsoseng staff and they rely on volunteers, including short term volunteers, to run the activities.</p>	<p>All staff and volunteers to be vigilant and briefed of potential risks and response procedures if safeguarding issues arise.</p> <p>An adult interacting with one child should always be in view of another adult.</p> <p>Obtain and authenticate written references from long-term volunteers. Ensure that long term volunteers are trained on safeguarding policy and the ethos of the foundation.</p> <p>Ensure that short term volunteers are always accompanied by Etsoseng Foundation staff or a long-term volunteer who has undergone training in the foundations’ protocols.</p>
	Volunteers not being well prepared to run activities.	Etsoseng staff will review teaching material prepared by short term

		volunteers before it is transmitted to children in an activity.
	Children exposed to unsuitable material containing violent/aggressive images or sounds.	Etoseng staff will review teaching material prepared by short term volunteers before it is transmitted to children in an activity.
	Physical harm such as falls, cuts and burns while cooking or doing craft activities.	<p>Have a fully stocked and regularly checked First Aid Kit.</p> <p>Schedule children’s activities to enable realistic monitoring.</p> <p>All activities should be supervised by a trained volunteer.</p>
	<p>Exposure to dangerous or inappropriate behaviour (e.g., strong or offensive language, violence, bullying, substance misuse) when walking home after an activity.</p> <p>Children at risk of sexual, physical abuse or psychological abuse or harmful exposure to dangerous or inappropriate behaviour (e.g., strong or offensive language, inappropriate touching) <b>by outsiders.</b></p>	<p>Ensure that the entry points to the premises are closed during the activity.</p> <p>Children may not leave the premises while the activity is going on without parental consent.</p> <p>Advise children to walk home in a group, and parents to pick up children at risk.</p>

## 8. GENERAL CODE OF CONDUCT

All employees, associated personnel, and volunteers of Etsoseng will be required to:

- not abuse children, women or vulnerable adults in any circumstances.
- treat everyone with respect
- provide an example of good conduct
- operate within Etsoseng's principles and guidance and procedures
- be visible to others when working with children and vulnerable adults
- challenge and report potentially abusive behaviour
- develop a culture where children can talk about their contacts with staff, volunteers, and associated personnel openly
- respect each child's boundaries and help them to develop their own sense of rights as well as help them to know what they can do if they feel there is a problem

All short-term volunteers and associated personnel will be required to:

- not spend time with children and vulnerable adults unless they are supervised by staff or long-term volunteers.

Employees, associated personnel or volunteers and others must never:

- hit or otherwise physically assault or physically abuse women and children
- develop sexual relationships with children
- develop relationships with vulnerable adults and children which could in any way be deemed exploitative or abusive
- act in ways that may be abusive or may place a woman or child at risk of abuse.

Employees associated personnel and volunteers must not carry out actions or behaviour that could be construed as poor practice or potentially abusive. Examples of behaviours that will not be tolerated:

- use language, make suggestions or offer advice, which is inappropriate, offensive or abusive
- behave physically in a manner which is inappropriate or sexually provocative
- have a child or children with whom they are working to stay overnight at their home unsupervised
- sleep in the same room as a child with whom they are working (unless there are two adults, one of whom must be a staff member or long-term volunteer)

- do things for children of a personal nature that they can do for themselves
- condone, or participate in, behaviour of children which illegal, unsafe or abusive
- act in ways intended to or that in fact shame, humiliate, belittle or degrade
- discriminate against or favour children to the exclusion of others

All staff, long-term volunteers will be made aware that in general, it is inappropriate to do the following unless there are exceptional circumstances which have been approved in advance by a senior manager and the SFP:

- spend excessive time alone with children away from others
- take children to their own home, especially where they will be alone with them

**Commitment:** Etsoseng Foundation staff, volunteers and associated personnel in contact with children will strive to ensure that the following supervision measures are observed:

- A ratio of one adult to every ten children for activities and trips (unless the activity is in a place where it is easy to supervise them, in which case the ratio can be one adult to fifteen children).
- Ensure no adult is left alone with a minor where there is little opportunity for their activity to be observed by others.
- Where an adult and minor meet one-to-one, it should be in a situation where they can be seen by other adults, e.g., in an open space, in a room with a glass or open door.
- When transporting children, there will be more than one adult in the vehicle, and it will be confirmed beforehand that the vehicle is roadworthy and insured and that the driver has a valid driver's licence.
- The use of IT equipment should be carefully monitored to reduce the risk of harmful online activity.
- Parents' consent will be obtained, especially when events involve trips outside the venue for regular activities or camps. A sample Parental Consent form is attached as Annexure 6.
- A culture of awareness will be maintained among adults and children by ensuring everyone is clear about roles and responsibilities, and people are encouraged to challenge and report any inappropriate conduct with children. Children will be informed, when registering with Etsoseng and in the regular course of their activities, how to report concerns.

Failure to follow the Code of Conduct will result in a decision, within two working days, whether a disciplinary hearing is needed. If found necessary, it will be held within fifteen working days. If formal disciplinary action is not required, Etsoseng will consider any other appropriate action which will be determined within three working days.

## 9. RECRUITMENT AND VETTING OF STAFF AND VOLUNTEERS

Etsoseng commits to taking all possible steps to prevent unsuitable people working with children and vulnerable adults within the organisation. To ensure this, the following measures will be observed in the recruitment process:

- A self-declaration form will be completed for all prospective paid staff, and long-term volunteers. The form to be used is attached as Annexure 2. The self-declaration form will enable the applicant to disclose convictions, or other information, in a confidential manner and discuss with the interviewers the relevance and context of the information. This will help those recruiting to determine if the applicant is suitable to hold the position or not.
- The National Register for Sex Offenders will be consulted to confirm that an applicant is not listed as an offender.
- Applicants will be asked during their interview if they have any convictions relating to the abuse of children and vulnerable adults. A written record of the interview will be kept on file.
- Etsoseng will obtain at least one reference from persons who have experience of the applicant's paid or long voluntary work with children and vulnerable adults.
- All appointments will be conditional on an adequately supervised probation period of 3 to 6 months.
- All staff and long-term volunteers of Etsoseng will be given a copy of this document on Safeguarding. They will be required to read and confirm that they have understood the procedures and guidelines outlined in it and will sign a copy of the Safeguarding Policy agreeing to be bound by its spirit and rules.
- Short term volunteers and associated personnel will get information about Etsoseng Safeguarding Focal Point responsible person on posters on the walls within the premises and on its website.

## 10. AWARENESS RAISING AND TRAINING

Etsoseng will ensure that mechanisms are in place to assist all staff, volunteers and associated personnel to understand the need for safeguarding, including ensuring that they:

- Know the name of the SFP and their role
- Undertake appropriate safeguarding training based on their respective positions
- Understand their responsibilities including being alert to the signs of abuse and how to report it, while being aware that they are not trained to deal with situations of abuse or to decide if abuse has occurred.
- Receive safeguarding updates including keeping up to date with the most recent local and national safeguarding advice and guidance (for example, via email, e-bulletins, staff meetings) as necessary to provide them with the relevant continuous skills and knowledge on safeguarding matters.

Every new member of staff and long-term volunteer that comes into regular contact with children will receive safeguarding training during their induction period. This program will include information on how to manage disclosure of harm from a child, how to record concerns, and the role of the Safeguarding Focal Point. The training will also include information about reporting in the case of concerns about another adult's behaviour or their suitability relating to their work with children and/or vulnerable adults.

Guidance on acceptable conduct will also be given to all staff and volunteers during induction. These are sensible steps that every adult should take in their daily professional work with children. All staff and volunteers will be expected to carry out their work in accordance with the guidance and will be made aware that failure to do so will lead to disciplinary action.

In addition to the safeguarding induction, occasional workshops will be organised for all Etsoseng staff, full-time and part-time, and all long-term volunteers to explain this Safeguarding Policy.

Short term volunteers will commit to not have unsupervised access to children or vulnerable adults and to always be supervised in their work by staff or long-term volunteers. They will not be required to undergo the full training; it will suffice that they be provided with a simplified explanation or version of the Policy to know what is expected of them in terms of safeguarding and reporting concerns.

This policy will be communicated to all staff, volunteers and personnel. There will be effective and clear communication within the Foundation, and in particular:

- A copy of this Policy will be given to all full-time personnel and long-term volunteers
- Simplified versions of the Policy and Procedures (e.g. flyers, posters, child-friendly versions, etc) will be developed to enable persons at all levels to understand them.
- The name and contact details of the Safeguarding Focal Point will be displayed on the notice board of all locations where projects and activities of the Foundation are run (see notices in Annexures 3 and 4), and on the Etsoseng website.

Etsoseng Foundation will ensure that safe, appropriate, accessible means of reporting safeguarding concerns are made available to staff, volunteers and personnel and the beneficiaries of our projects and activities.

See Annexure 7 for examples of signs and types of abuse to look out for.

## 11. COMMUNICATING GUIDELINES

If images of and stories about children, families and their communities are used to promote the work of Etsoseng and engage donors and supporters, the following precautions will be applied to minimise the risk of inappropriate use of information, stories and visual images (photographs, video or social media) of children:

- Images of children must not show them in states of undress or in inappropriate poses
- Details attached to images and included in stories must not allow that child to be traced to his or her home or community
- Distinctive buildings, street signs or landmarks will not be included in an image if they identify where a child lives or works
- Geotagging of images should be disabled when taking photographs
- Ensure the photographer/journalist/ translator contractor has been properly vetted and reference-checked
- Get the permission of children and their parents/carers to take their images and use their information

## 12. PROCEDURES FOR RESPONDING TO HARM AND ABUSE

Allegations of abuse or of failure to comply with this Safeguarding Policy will be reported and investigated according to the procedures set out below and in the Annexures.

The following should be kept in mind:

- The safety of the child will always be the most important consideration
- Every allegation will be treated seriously
- State regulations on reporting will be strictly followed
- Particular care will be taken in regard to confidentiality and the sharing of information with appropriate people.

The purpose of this section is to outline procedures for dealing with reports of breach of Etsoseng Safeguarding Policy, where the alleged safeguarding violation is against staff, volunteers, associated personnel, or other children or adults.

### **Report of abuse**

- Suspicions or disclosure of abuse can reach the organisation through a structured format such as a letter, e-mail, text or message on social media. It may also be in the form of informal discussion or rumour. If staff, volunteers and associated personnel hear something in an informal discussion or chat that they think is a safeguarding concern, they should report this to the Safeguarding Focal Point (SFP).
- Suspicions or disclosure of abuse may be made to anyone within the Foundation, and it is the duty of the person approached to report disclosure of abuse to the SFP.
- It is not for staff, volunteers and associated personnel to decide whether or not a suspicion or allegation is true. All suspicions or allegations must be taken seriously and dealt with according to this procedure.
- Staff, volunteers and associated personnel made aware of suspicions, allegations or actual abuse, are responsible to take the appropriate action according to this procedure.
- The primary responsibility of the person who first suspects or who is told of abuse is to report it to the Safeguarding Focal Point and to ensure that their concern is taken seriously.
- Staff, volunteers or associated personnel should never try to deal with a suspicion, allegation or actual incident of abuse by themselves.

## **Procedure on responding to report**

If a safeguarding concern is disclosed directly to a member of staff or volunteer, the person receiving the report should bear the following in mind:

- Listen
- Empathise with the person
- Ask who, when, where, what, but not why
- Repeat/ check their understanding of the situation

## **Documentation of report**

The person receiving the report should then document the following information about the complaint or suspected, alleged, or actual incidents of abuse, using an Incident Report Form (Annexure 1):

- Name of person making report
- Name(s) of the aggrieved person involved in the safeguarding incident(s) if different from above
- Name(s) of alleged perpetrator(s)
- Description of incident(s)
- Dates(s), times(s) and location(s) of incident

The person receiving the report should then forward this information to the SFP, or other nominated staff member (Head Manager of Johannesburg or Head Manager of Pretoria) if the SPF is unavailable or personally involved in allegation, within 24 hours.

## **Safeguarding Focal Point (SFP), or alternative nominated person investigating**

- The SFP / investigator carries out an investigation, interviews the aggrieved and the alleged perpetrator and witnesses. The SFP / investigator assess how to proceed with the report.
- Due to the sensitive nature of safeguarding concerns, confidentiality must be maintained during all stages of the reporting process, and information shared on a limited 'need to know' basis only. The persons interviewed are informed of this.
- Hard copies must be kept by the SFP/ investigator in a locked filing cabinet, with a coding system in place of names. All envelopes must be marked with 'private and confidential'. All circulation and storage of recordings must be secured with the utmost care and respect for confidentiality. Word Documents must only be accessible by

password, with the password sent to those who require it in separate communication to the document itself (i.e. two emails).

- All safeguarding records are handled and held securely by the Safeguarding Focal Point / investigator.

When the investigations are being conducted, if other relevant institutions or authorities become involved; this may provoke a crisis for the individual and their family. Therefore, after making a report and while investigating, some of the ongoing responsibilities of the SFP can include:

- Acting as a support person for the child or young person during interviews
- Continuing to monitor the child's or young person's behaviour and circumstances for signs of reduced or increased risk
- Informing and working closely with parents
- Informing the police/ external organisations in case of criminal activity
- Psychosocial care or counselling
- Medical assistance
- Protection or security assistance (for example being moved to a safe location)

The SFP will take this report forward. The key question of the investigation is: How does Etsoseng respond to this?

If the reported incident represents a breach of the Safeguarding Policy in so far as it causes harm or abuse to an individual, but the specifics of this breach are not included in the policy, then the SFP must still assess the situation and take appropriate action. They should also update the risk assessment and the policy accordingly.

If the report involves a breach of the Safeguarding Policy, the next key question is "Does the report involve criminal activity which needs to be referred to the relevant authorities?"

If no law has been broken but the Safeguarding Policy has been breached, then the senior staff shall take appropriate action such as going through the disciplinary process, risk assessment, improvement of the procedure etc.

- The SFP will take a decision based on the outcome of the investigation report.
- The decision will be based on the information provided in the investigation report.
- Decisions relating to the alleged staff member should be made in accordance with the Foundation's policies and procedures for staff misconduct, and in coordination with the individual's manager

Thereafter, conclude the case by:

- Documenting all decisions made resulting from the case clearly and confidentially.
- Storing all information relating to the case confidentially, and in accordance with Etsoseng policy and local data protection law.
- Recording anonymized data relating to the case to feed into organisational reporting requirements (e.g., serious incident reporting to Board, safeguarding reporting to donors), and to feed into learning for dealing with future cases.
- In reporting about safeguarding for purposes of accountability, utmost care will be taken to maintain confidentiality. Specific information about the cases will not be shared except on a 'need to know' basis and to those persons who need to be informed of it, and usually just the aggrieved person, perpetrator, potential witnesses, the person who reports it and the SFP.

If at this or any stage in the process criminal activity is suspected, the case should be referred to the relevant authorities unless this may pose a risk to the aggrieved person. In this case, the SFP will need to decide how to proceed. This decision should be made bearing in mind a risk assessment of potential protection risks to the aggrieved.

The SFP will check her obligations on informing relevant bodies when investigating a safeguarding report and consult with the relevant authorities. The following information may be required by the relevant agencies:

- Reporter's name, address, telephone number, position/role within Etsoseng.
- As many details about the child as possible, e.g., name, date of birth, address, home telephone number, school (only when necessary).
- What the reasons are for telephoning, e.g., the suspicions, allegations, what has been said, giving details of times and dates and the child's emotional state, or what the child has said in response to the suspicions/concerns. Make a clear distinction between what is fact, opinion or hearsay.
- What's been done so far.
- Where possible referral to the relevant authority should be confirmed in writing within 24 hours and the name of the contact who took the referral should be recorded.

The relevant agency will then give instructions as to what to do next and take the responsibility for further action.

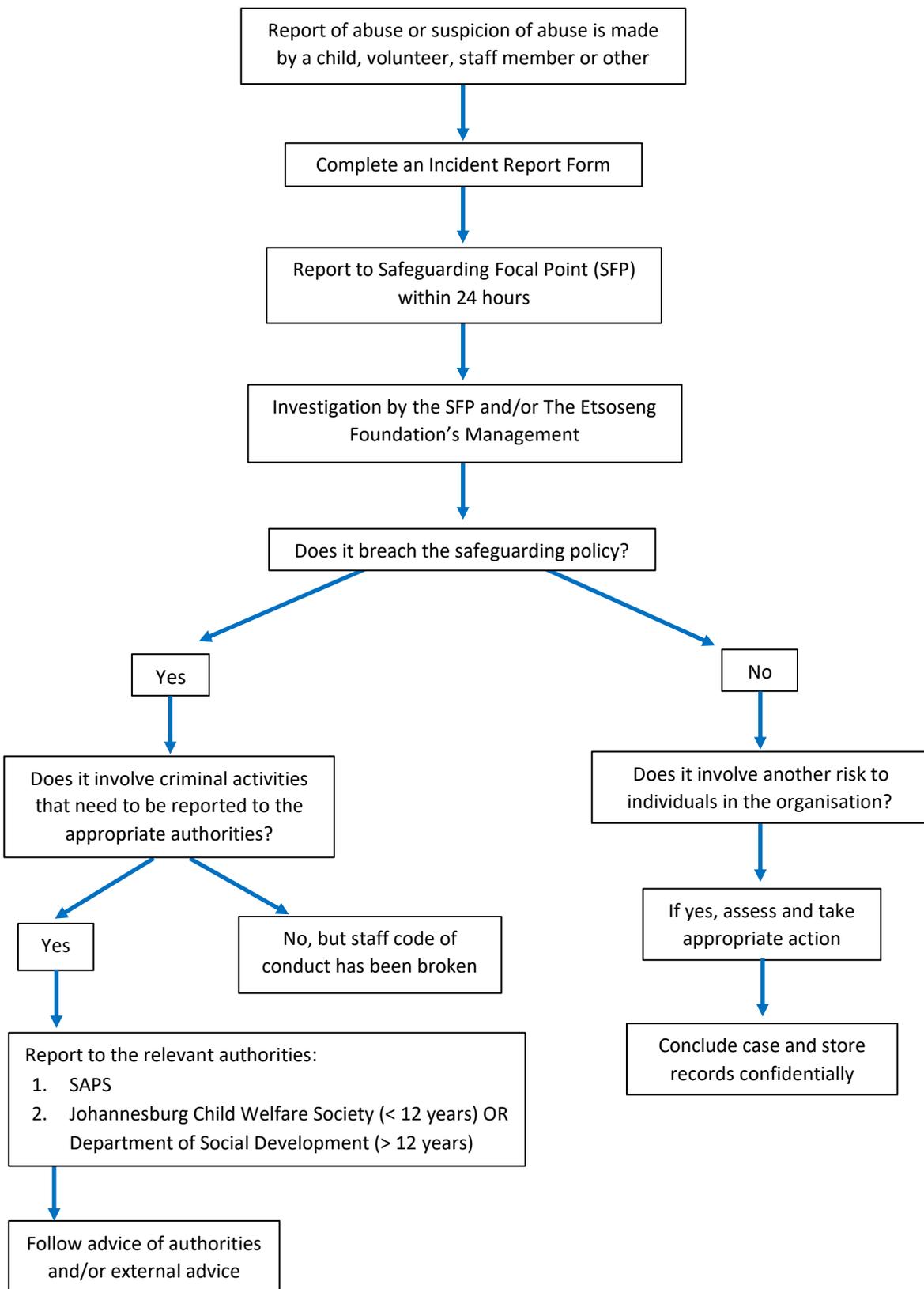
When submitting information to any of these agencies, the SFP will think through the confidentiality implications very carefully.

The SFP will follow the advice of authorities and / external service then conclude the case by:

- Documenting all decisions made resulting from the case clearly and confidentially.
- Storing all information relating to the case confidentially, and in accordance with [NGO] policy and local data protection law.
- Recording anonymised data relating to the case to feed into organisational reporting requirements (e.g., serious incident reporting to Board, safeguarding reporting to donors), and to feed into learning for dealing with future cases.

NOTE: If the report concerns associated personnel (for example contractors, consultants or suppliers), the decision-making process will be different. Although associated personnel are not staff members, Etsoseng has a duty of care to protect anyone who comes into contact with any aspect of our program from harm. Etsoseng cannot follow disciplinary processes with individuals outside the organisation, however decisions may be made for example to terminate a contract with a supplier based on the actions of their staff. Etsoseng will also report the incident to the associated personnel's senior management, and if a crime has been committed, report the incident to the authorities.

## PROCEDURE TO REPORT ABUSE/ SUSPICION OF ABUSE



### 13. LEGISLATION AND STATUTORY GUIDANCE REGARDING REPORTING OF CHILD ABUSE

This policy and associated procedures have been developed in compliance with the following:

*The Children's Act 38 of 2005*

*The Sexual Offences Amendment Act of 2007*

#### **Who can and must report child abuse in South Africa?**

The Children's Act 38 of 2005 and the Sexual Offences Amendment Act of 2007 mandate the reporting of reasonable suspicions of child abuse to the relevant specified authorities. According to The Sexual Offences Act, cases of sexual abuse or exploitation must be reported as soon as they are made known.

Section 54 of the Sexual Offences Act of 2007 provides that

- any person who has knowledge that a sexual offence has been committed against a child must immediately report this to a police official;
- any person who has knowledge, belief, or suspicion that a sexual offence has been committed against a person who is mentally disabled must report this to a police official.

A report must be made to the police immediately upon the person becoming aware of the commission of a sexual offence against the child. Failure to report the aforesaid is a criminal offence and a person convicted under the Act is liable to a fine or imprisonment for a period not exceeding five years or to both such fine and imprisonment.

If an offence is determined, the Foundation must identify an institution that can investigate the issue further.

In all cases, the Department of Social Services will take on the matter and determine whether or not legal action is necessary.

#### **Register of Sexual Offenders**

Every employer is required to apply for a clearance certificate in the prescribed format in respect of any staff member or volunteer of the organization who, during the course of their work will be required to supervise or care for children or who will come in contact with children.

The failure of the employer to obtain the necessary clearance in respect of its employees or volunteers is a punishable offence in terms of the Sexual Offences Act.

### **Who is considered a child or vulnerable adult in need of protection?**

CHAPTER 9 of the Children's Act, stipulates the following:

Child in need of care and protection

150. (1) A child is in need of care and protection if, the child-

- (a) has been abandoned or orphaned and is without any visible means of support.
- (b) displays behaviour which cannot be controlled by the parent or caregiver.
- (c) lives or works on the streets or begs for a living.
- (d) is addicted to a dependence-producing substance and is without any support to obtain treatment for such dependency.
- (e) has been exploited or lives in circumstances that expose the child to exploitation.
- (f) lives in or is exposed to circumstances which may seriously harm that child's physical, mental or social well-being.
- (g) may be at risk if returned to the custody of the parent, guardian or caregiver of the child as there is reason to believe that he or she will live in or be exposed to circumstances which may seriously harm the physical, mental or social well-being of the child.
- (h) is in a state of physical or mental neglect; or
- (i) is being maltreated, abused, deliberately neglected or degraded by a parent, a caregiver, a person who has parental responsibilities and rights or a family member of the child or by a person under whose control the child is.

(2) A child found in the following circumstances may be a child in need of care and protection and must be referred for investigation by a designated social worker:

- (a) a child who is a victim of child labour; and
- (b) a child in a child-headed household.

(3) If after investigation a social worker finds that a child referred to in subsection (2) is not a child in need of care and protection as contemplated in subsection (1), the social worker must, where necessary, take measures to assist the child, including counselling, mediation, prevention and early intervention services, family reconstruction and rehabilitation, behaviour modification, problem solving and referral to another suitably qualified person or organisation.

## **Contacts for Reporting Child Abuse**

### **South African Police Services (SAPS)**

Emergency line: 10111

Child abuse reports: [childprotect@saps.gov.za](mailto:childprotect@saps.gov.za)

### **Department of Social Development**

Tel: 012 312 7727

Website: <https://www.dsd.gov.za/>

### **Child Welfare South Africa**

Tel: 011 298 8500

E-mail: [info@jhbchildwelfare.co.za](mailto:info@jhbchildwelfare.co.za)

Website: <https://jhbchildwelfare.org.za/>

### **LifeLine South Africa**

Tel: 0861 322 322

Website: [www.lifelinesa.co.za](http://www.lifelinesa.co.za)

### **The Child Emergency Line**

Toll-free: 116

### **Women and Men Against Child Abuse**

Tel: 011 789 8815

Website: [www.wmaca.org](http://www.wmaca.org)

### **Childline South Africa**

Emergency line: 116

Tel: 031 201 2059

E-mail: [olcadmin@childlinesa.org.za](mailto:olcadmin@childlinesa.org.za) (Counselling/Case Enquiries)

Website: [www.childlinesa.org.za](http://www.childlinesa.org.za)

## 14. IMPLEMENTATION AND MONITORING

The duty of protecting the children and vulnerable adults who meet Etsoseng falls on the Foundation, its staff, long term and short-term volunteers and associated personnel. Those in positions of leadership in the Foundation including directors, project coordinators and managers have a special duty to make sure this policy is made known to and implemented by the head of each Centre, project, activity.

This policy will be monitored on an annual basis. The purpose of monitoring will be to:

- check on implementation
- ascertain what worked well, what did not work, what needs to be changed or added or removed
- record the number of issues dealt with and how they were resolved.

# **ETSOSENG FOUNDATION**

## **SAFEGUARDING POLICY:**

# ANNEXURES



## ANNEXURE 2 - Staff/Volunteer Declaration Form

### FORM TO BE COMPLETED BY ALL STAFF AND LONG-TERM VOLUNTEERS WORKING IN ETSOSENSG WITH CHILDREN AND VULNERABLE ADULTS AS STAFF OR VOLUNTEERS.

The welfare of children and vulnerable adults must be the paramount consideration. Etsoseng Foundation therefore requires that everyone working or volunteering for the Foundation, who will come into contact with children and vulnerable adults or personal details of children, abide by good practice by completing and signing this declaration.

1. Do you have any prosecutions pending or have you ever been convicted of a criminal offence or been subject of a Caution or of a Bound Over Order (please tick)  Yes  No

If yes, please state below the nature and date(s) of the offence(s)

Date of offence: \_\_\_\_\_

Nature of offence: \_\_\_\_\_

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2. Have you ever been the subject of disciplinary procedures or been asked to leave employment or voluntary activity due to inappropriate behaviour towards a child or vulnerable adult?  Yes  No

If yes, please give details including date(s) below:

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Full name (print): \_\_\_\_\_

Any surname previously known by: \_\_\_\_\_

Address: \_\_\_\_\_

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Date of Birth: \_\_\_\_\_ Place of Birth: \_\_\_\_\_

Declaration:

**I understand that, if it is found that I have withheld information or included any false or misleading information above, I may be removed from my post whether paid or voluntary, without notice. I understand that the information will be kept securely by Etsoseng Foundation. I hereby declare the information I have provided is accurate.**

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

### **ANNEXURE 3 - Notice on Protecting Children and Vulnerable adults**

Children and vulnerable adults have a very important place in our organization. We are always eager to encourage their active participation in the activities we organize. We are committed to doing everything we can to create a safe and welcoming place for our vulnerable adults, where their welfare is of greatest importance. It is our policy to ensure that children and vulnerable adults will always be safe, protected and supported in all activities associated with the Organization.

If you have any concerns about the well-being of a child or vulnerable adult connected to or involved in Etsoseng, or you suspect that a child or young person may be being abused by anyone within Etsoseng, please report the matter immediately to one of the personnel of Etsoseng, and preferably to Vicki: [vicki@etsosengfoundation.org](mailto:vicki@etsosengfoundation.org).

Please provide as much detail as possible, so that the matter can be quickly and fully investigated, in the first place by the Safeguarding Focal Point. It is important that we do everything we can to protect children and to prevent them being harmed in any way.

Thank you for your help in protecting children and vulnerable adults.

## **ANNEXURE 4 - Notice from Etsoseng to all Children and Vulnerable Adults**

### KEEPING YOU SAFE

You are always welcome in Etsoseng and all the activities we organize.

We are committed to keeping you safe from harm.

If you have been hurt in any way by someone, or you are at risk of being hurt, please tell us straight away so that we can help you.

Or

If you know of another child or young person who has been hurt by someone, or is at risk of being hurt, please tell us straight away so that we can help him or her.

Contact Etsoseng Foundation's Safeguarding Focal Point.

Thank You!

*N.B.: This poster will appear prominently in all Centres and places where Etsoseng carries out activities for children and vulnerable adults.*

## ANNEXURE 5 - Risk assessment

### EVENT INFORMATION AND RISK ASSESSMENT

Event/Activity (brief description):			Date/s:	
Leader in charge:	Total attending:	Adults:	Girls/Young women:	General Public:
Consent obtained for Activity/Form completed: <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A			Venue:	
Instructor qualification checked: <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <i>(If working with external instructors and safeguarding checks cannot be done, the external instructor will be supervised at all times by a staff member or a long-term volunteer)</i>				
Decision: once all the actions are carried out, can you eliminate or safely manage the risk of harm to ensure you can safely go ahead with this event/activity (i.e., have degree of challenge, harm and risk whilst being confident the control measures in place will keep children and vulnerable adults safe)?			<input type="checkbox"/> Yes <input type="checkbox"/> No	
If you have answered no to the above decision, please explain why.				
Risk assessment completed by:			Role:	
Has the risk assessment been shared with the leadership team?			<input type="checkbox"/> Yes <input type="checkbox"/> No	
Risk assessment due for review (must be within 12 months):			Date:	

## ANNEXURE 6 – Parental Consent Form

### PARENTAL CONSENT FORM

1. Child's details:

Name: \_\_\_\_\_

Date of birth: \_\_\_\_\_

Age: \_\_\_\_\_

2. I, \_\_\_\_\_ parent/guardian of the above-named child ("Child"), consent to my Child living in Ducks Dam Hall from \_\_\_\_\_ to \_\_\_\_\_ while:

**Tick the appropriate box**

Doing volunteer work

Offering hospitality services

Undergoing studies

Attending a workshop/camp organised by Etsoseng Foundation

Other (specify): \_\_\_\_\_

3. I understand that the organisers will take the utmost care to avoid any injury. However, I will not hold them responsible for any untoward incidents or loss of personal items that may occur in connection with her living on the premises of the Foundation.

4. I confirm that it is my free decision for my child to attend the activity in Ducks Dam Hall and further agrees to indemnify and hold harmless Ducks Dam Hall from and against any and all claims, liability, loss, expenses and costs arising out of any Covid-19 related illness, or consequences of such illness incurred following the decision for her to stay in Ducks Dam Hall.

5. I can be contacted at \_\_\_\_\_ (Contact number:) in the event of an emergency.  
Alternative contact details: Name \_\_\_\_\_ Contact number: \_\_\_\_\_

6. Kindly indicate if the organisers need to know about any medication she is taking, how often or allergies that your child may have.

\_\_\_\_\_  
\_\_\_\_\_

Name of Parent/Guardian: \_\_\_\_\_ ID number \_\_\_\_\_

Signature of Parent/ Guardian: \_\_\_\_\_

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

## **ANNEXURE 7 - Types and Signs of Abuse**

Note: The types of abuse listed here or elsewhere in this document apply equally to children and vulnerable adults. In these situations, the abuse may take slightly different forms in some situations e.g., where there is lack of appropriate supervision, or where restraints are used to confine a child or vulnerable adult to a wheelchair or bed.

### **Physical Abuse**

- Assault, hitting, slapping, punching, kicking, hair-pulling, biting, pushing
- Rough handling
- Scalding and burning
- Physical punishments
- Inappropriate or unlawful use of restraint
- Making someone purposefully uncomfortable (e.g., opening a window and removing blankets)
- Involuntary isolation or confinement
- Misuse of medication (e.g., over-sedation)
- Forcible feeding or withholding food
- Unauthorised restraint, restricting movement (e.g., tying someone to a chair)

Possible warning signs of physical abuse:

- No explanation for injuries or inconsistency with the account of what happened
- Injuries are inconsistent with the person's lifestyle
- Bruising, cuts, welts, burns and/or marks on the body or loss of hair in clumps
- Frequent injuries
- Unexplained falls
- Subdued or changed behaviour in the presence of a particular person
- Signs of malnutrition
- Failure to seek medical treatment or frequent changes of GP

### **Domestic Violence and Abuse**

Domestic violence or abuse can be characterised by any of the indicators of abuse outlined in this briefing relating to:

- Psychological
- Physical
- Sexual
- Financial

Domestic violence and abuse include any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been, intimate partners or family members regardless of gender or sexuality. It also includes so called 'honour' -based violence, female genital mutilation and forced marriage.

Coercive or controlling behaviour is a core part of domestic violence. Coercive behaviour can include:

- Acts of assault, threats, humiliation and intimidation
- Harming, punishing, or frightening the person
- Isolating the person from sources of support
- Exploitation of resources or money
- Preventing the person from escaping abuse

- Regulating everyday behaviour

Possible indicators of domestic violence or abuse:

- Low self-esteem
- Feeling that the abuse is their fault when it is not
- Physical evidence of violence such as bruising, cuts, broken bones
- Verbal abuse and humiliation in front of others
- Fear of outside intervention
- Damage to home or property
- Isolation – not seeing friends and family
- Limited access to money

## **Sexual Abuse**

Types of sexual abuse:

- Rape, attempted rape or sexual assault
- Inappropriate touch anywhere
- Non-consensual masturbation of either or both persons
- Non-consensual sexual penetration or attempted penetration of the vagina, anus or mouth
- Any sexual activity that the person lacks the capacity to consent to
- Inappropriate looking, sexual teasing or innuendo or sexual harassment
- Sexual photography or forced use of pornography or witnessing of sexual acts
- Indecent exposure

Possible indicators of sexual abuse:

- Bruising, particularly to the thighs, buttocks and upper arms and marks on the neck
- Torn, stained or bloody underclothing
- Bleeding, pain or itching in the genital area
- Unusual difficulty in walking or sitting
- Foreign bodies in genital or rectal openings
- Infections, unexplained genital discharge, or sexually transmitted diseases
- Pregnancy in a woman who is unable to consent to sexual intercourse
- The uncharacteristic use of explicit sexual language or significant changes in sexual behaviour or attitude
- Incontinence not related to any medical diagnosis
- Self-harming
- Poor concentration, withdrawal, sleep disturbance
- Excessive fear/apprehension of, or withdrawal from, relationships
- Fear of receiving help with personal care
- Reluctance to be alone with a particular person

## **Psychological/Emotional Abuse**

Types of psychological or emotional abuse:

- Enforced social isolation – preventing someone accessing services, educational and social opportunities and seeing friends
- Removing mobility or communication aids or intentionally leaving someone unattended when they need assistance
- Preventing someone from meeting their religious and cultural needs
- Preventing the expression of choice and opinion

- Failure to respect privacy
- Preventing stimulation, meaningful occupation or activities
- Intimidation, coercion, harassment, use of threats, humiliation, bullying, swearing or verbal abuse
- Addressing a person in a patronising or infantilising way
- Threats of harm or abandonment
- Cyber bullying

Possible indicators of psychological or emotional abuse:

- An air of silence when a particular person is present
- Withdrawal or change in the psychological state of the person
- Insomnia
- Low self-esteem
- Uncooperative and aggressive behaviour
- A change of appetite, weight loss/gain
- Signs of distress: tearfulness, anger
- Apparent false claims, by someone involved with the person, to attract unnecessary treatment

### **Financial/Material Abuse**

Types of financial or material abuse:

- Theft of money or possessions
- Fraud, scamming
- Preventing a person from accessing their own money, benefits or assets
- Employees taking a loan from a person using the service
- Undue pressure, duress, threat or undue influence put on the person in connection with loans, wills, property, inheritance or financial transactions
- Arranging less care than is needed to save money to maximise inheritance
- Denying assistance to manage/monitor financial affairs
- Denying assistance to access benefits
- Misuse of personal allowance in a care home
- Misuse of benefits or direct payments in a family home
- Someone moving into a person's home and living rent free without agreement or under duress
- False representation, using another person's bank account, cards or documents
- Exploitation of a person's money or assets, e.g., unauthorised use of a car
- Misuse of a power of attorney, deputy, or other legal authority
- Rogue trading – e.g., unnecessary or overpriced property repairs and failure to carry out agreed repairs or poor workmanship

Possible indicators of financial or material abuse:

- Missing personal possessions
- Unexplained lack of money or inability to maintain lifestyle
- Unexplained withdrawal of funds from accounts
- Power of attorney or lasting power of attorney (LPA) being obtained after the person has ceased to have mental capacity
- Failure to register an LPA after the person has ceased to have mental capacity to manage their finances, so that it appears that they are continuing to do so
- The person allocated to manage financial affairs is evasive or uncooperative
- The family or others show unusual interest in the assets of the person
- Signs of financial hardship in cases where the person's financial affairs are being managed by a court appointed deputy, attorney or LPA

- Recent changes in deeds or title to property
- Rent arrears and eviction notices
- A lack of clear financial accounts held by a care home or service
- Failure to provide receipts for shopping or other financial transactions carried out on behalf of the person
- Disparity between the person's living conditions and their financial resources, e.g., insufficient food in the house
- Unnecessary property repairs

## **Modern Slavery**

Types of modern slavery:

- Human trafficking
- Forced labour
- Domestic servitude
- Sexual exploitation, such as escort work, prostitution and pornography
- Debt bondage – being forced to work to pay off debts that realistically they never will be able to

Possible indicators of modern slavery:

- Signs of physical or emotional abuse
- Appearing to be malnourished, unkempt or withdrawn
- Isolation from the community, seeming under the control or influence of others
- Living in dirty, cramped or overcrowded accommodation and or living and working at the same address
- Lack of personal effects or identification documents
- Always wearing the same clothes
- Avoidance of eye contact, appearing frightened or hesitant to talk to strangers
- Fear of law enforcers

## **Discriminatory Abuse**

Types of discriminatory abuse:

- Unequal treatment based on age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex or sexual orientation (known as 'protected characteristics' under the Equality Act 2010)
- Verbal abuse, derogatory remarks or inappropriate use of language related to a protected characteristic
- Denying access to communication aids, not allowing access to an interpreter, signer or lip-reader
- Harassment or deliberate exclusion on the grounds of a protected characteristic
- Denying basic rights to healthcare, education, employment and criminal justice relating to a protected characteristic
- Substandard service provision relating to a protected characteristic

Possible indicators of discriminatory abuse:

- The person appears withdrawn and isolated
- Expressions of anger, frustration, fear or anxiety
- The support on offer does not take account of the person's individual needs in terms of a protected characteristic

## **Organisational or Institutional Abuse**

Types of organisational or institutional abuse:

- Discouraging visits or the involvement of relatives or friends
- Run-down or overcrowded establishment
- Authoritarian management or rigid regimes
- Lack of leadership and supervision
- Insufficient staff or high turnover resulting in poor quality care
- Abusive and disrespectful attitudes towards people using the service
- Inappropriate use of restraints
- Lack of respect for dignity and privacy
- Failure to manage residents with abusive behaviour
- Not providing adequate food and drink, or assistance with eating
- Not offering choice or promoting independence
- Misuse of medication
- Failure to provide care with dentures, spectacles or hearing aids
- Not taking account of individuals' cultural, religious or ethnic needs
- Failure to respond to abuse appropriately
- Interference with personal correspondence or communication
- Failure to respond to complaints

Possible indicators of organisational or institutional abuse:

- Lack of flexibility and choice for people using the service
- Inadequate staffing levels
- People being hungry or dehydrated
- Poor standards of care
- Lack of personal clothing and possessions and communal use of personal items
- Lack of adequate procedures
- Poor record-keeping and missing documents
- Absence of visitors
- Few social, recreational and educational activities
- Public discussion of personal matters
- Unnecessary exposure during bathing or using the toilet
- Absence of individual care plans
- Lack of management overview and support

## **Neglect and Acts of Omission**

Types of neglect and acts of omission:

- Failure to provide or allow access to food, shelter, clothing, heating, stimulation and activity, personal or medical care
- Providing care in a way that the person dislikes
- Failure to administer medication as prescribed
- Refusal of access to visitors
- Not taking account of individuals' cultural, religious or ethnic needs
- Not taking account of educational, social and recreational needs
- Ignoring or isolating the person
- Preventing the person from making their own decisions
- Preventing access to glasses, hearing aids, dentures, etc.
- Failure to ensure privacy and dignity

Possible indicators of neglect and acts of omission:

- Poor environment – dirty or unhygienic
- Poor physical condition and/or personal hygiene
- Pressure sores or ulcers
- Malnutrition or unexplained weight loss
- Untreated injuries and medical problems
- Inconsistent or reluctant contact with medical and social care organisations
- Accumulation of untaken medication
- Uncharacteristic failure to engage in social interaction
- Inappropriate or inadequate clothing

### **Self-neglect**

Types of self-neglect:

- Lack of self-care to an extent that it threatens personal health and safety
- Neglecting to care for one's personal hygiene, health or surroundings
- Inability to avoid self-harm
- Failure to seek help or access services to meet health and social care needs
- Inability or unwillingness to manage one's personal affairs

Indicators of self-neglect:

- Very poor personal hygiene
- Unkempt appearance
- Lack of essential food, clothing or shelter
- Malnutrition and/or dehydration
- Living in squalid or unsanitary conditions
- Neglecting household maintenance
- Hoarding
- Collecting a large number of animals in inappropriate conditions
- Non-compliance with health or care services
- Inability or unwillingness to take medication or treat illness or injury