

Adopted by The Leprosy Mission Sweden's Board the 15 September 2022

# Safeguarding Children and Vulnerable Adults Policy

## The Leprosy Mission Sweden

Organisationsnummer: 875001-4063

Based on The Leprosy Mission International Safeguarding Policy

### A. TLM Commitment Statement

1. The Leprosy Mission (TLM) is a Global Fellowship of Members and Affiliates that are autonomous legal entities in their own countries. The Global Fellowship Board<sup>1</sup> has overall responsibility for TLM entities around the world. For the purposes of this Policy “The Leprosy Mission” (“TLM”) includes 31 Members<sup>2</sup> and Affiliates<sup>3</sup> who are signatories to The Leprosy Mission Global Fellowship Charter and use the name and brand of The Leprosy Mission.<sup>4</sup> It also includes the International Office, based in London, and TLM Trading, based in Peterborough, United Kingdom.
2. This Policy binds the following persons within the TLM Global Fellowship:
  - “**Staff**” includes all TLM employees, working part-time or full-time.
  - “**Representatives**” includes TLM volunteers, interns, Board members, advisors, consultants, community health workers, visitors, media and journalists, and all who represent or associate with TLM in any way.

The relevant parts of this Policy also bind within the TLM Global Fellowship:

- “**Partners**” (\*) - local, national or international organisations with whom TLM enters into a contractual agreement to undertake activities, projects and programmes. (refer to section 8 in procedures)
- “**Suppliers**” (\*) - those who supply TLM Members, Affiliates, and partners with materials or supplies delivery of operations, fundraising, and programmes. (refer to section 8 in procedures)

(\*) Partners and suppliers may vary in size and operational capacity from country to country and each Member will define which stakeholders fall into these categories for the purpose of this policy.

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<sup>1</sup> <https://www.leprosymission.org/about-us/who-s-who>

<sup>2</sup> “**Member**” - A national entity registered or recognised in that country and self-identifies as part of the “The Leprosy Mission” of that country. The entity has signed the TLM Charter thus agrees with TLM’s vision, mission and values; has a minimum income of £20, 000 or a programme budget of at least £20, 000.

<sup>3</sup> “**Affiliate**” - A national entity registered or recognised in that country and self-identifies as part of the “The Leprosy Mission” of that country. The same commitments as a Member however is smaller in size with an annual income less than £20,000.

<sup>4</sup> A list Members and Affiliates can be found here <https://www.leprosymission.org/about-us/global-fellowship>.

3. This Policy aims to protect and safeguard children and vulnerable adults from the **different forms of abuse, exploitation and neglect (Appendix A)**. More specifically, these terms mean the following:
- A “**child**” is defined as any person under the age of 18 and in accordance with Article 1 of the UN Convention on the Rights of the Child, 1989. TLM recognises that some children may be more vulnerable to abuse due to personal and/or external circumstances, e.g. sexual orientation, physical and/or mental disabilities, orphaned and/or single carer household.
  - A “**vulnerable adult**” is someone aged 18 or over who has care and/or support needs by reason of being affected by personal circumstances such as leprosy,<sup>5</sup> physical, learning or mental disability, old age, gender, sexual orientation, illness, or external circumstances such as poverty, conflicts or disaster. They are, or may be, unable to protect themselves against harm, abuse or exploitation.
  - **Survivor/Victim** - The person who has suffered harm or injury from abuse, exploitation, harassment and neglect. The term ‘survivor’ is often used in preference to ‘victim’ as it implies strength, resilience and the capacity to survive. It is the individual’s choice whether they wish to identify themselves as survivor or victim.
  - **Abuse, Exploitation and Neglect:** All forms of action or inaction by a TLM staff or representative in a position of power, trust and authority that may result in different forms of harm (or risk of harm), injury, or even death of a child or vulnerable adult.
4. The Leprosy Mission expects the **highest standards of professional practice and behaviour** by TLM staff and representatives in our work and when in direct or indirect contact with all people, particularly children and vulnerable adults. It is committed to safeguarding such persons from abuse, exploitation and harassment and has **zero tolerance** towards behaviour that may harm anyone.
5. **Safeguarding** refers to the responsibility and duty of care exercised by all TLM staff and representatives who are in positions of power, authority, trust and responsibility to safeguard all people, especially children and vulnerable adults, from the risk of harm, abuse, exploitation and harassment that may be caused by them through their behaviour, activities, projects and programmes, both directly and indirectly. **Managers have a specific role to play in raising awareness of safeguarding procedures and ensuring a safe environment for all.**
6. This Policy is a **cross cutting policy** and seeks to ensure that the safeguarding of all people, especially children and vulnerable adults, is paramount in **every area of work** at TLM. This includes Finance, Operations, Fundraising, Programmes, Procurement, Research, Monitoring and Evaluation, Media and Communications (internal and external), Human Resources, and IT.

## B. Key Principles

1. This policy, and all related policies, are underpinned or reinforced by TLM’s values (**Compassion, Justice, Integrity, Inclusion and Humility**) and international safeguarding standards including:
- (i) Keeping Children Safe Standards<sup>6</sup>

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<sup>5</sup> For the purpose of this document, this includes anyone that is being treated for leprosy (i.e. on multi-drug therapy) or complications arising from leprosy (reaction, ulcer, eye problems), or has leprosy-related disability.

<sup>6</sup> <https://www.keepingchildrensafe.org.uk/how-we-keep-children-safe/accountability/accountability>

- (ii) Core Humanitarian Standard and 9 Commitments<sup>7</sup>
- (iii) IASC 6 Principles on Protection from Sexual Abuse and Exploitation<sup>8</sup> and
- (iv) DFID's Enhanced Due Diligence Safeguarding Principles<sup>9</sup>

It is also based on the following International Human Rights Instruments:

- UN Convention on the Elimination of Discrimination against Women (CEDAW), 1979;<sup>10</sup>
- UN Convention on the Rights of the Child (UNCRC), 1989;<sup>11</sup> and
- UN Convention on the Rights of Persons with Disabilities (UNCRPD), 2006.<sup>12</sup>

2. Based on these standards, TLM will carry out its duty of care and responsibility in implementing this policy and procedures and all related processes based on the following **key principles**: -

- **Non-discrimination** - Without exception, all people have the right to protection from abuse, neglect and harm regardless of gender, age, race, disability, sexuality, sexual identity, or beliefs. No individual or group should be treated any less or more favourably than others in being able to access services which meet their needs.
- **Best interest**- All actions must be taken in best interest of the victim(s) or survivor(s), employing a survivor-centred approach ([Section E](#)).
- **Confidentiality** - All care must be taken to ensure information regarding safeguarding concerns should only be shared to those who need-to-know only. All reports will be handled with strictest confidentiality to protect the identity of the individuals concerned and ensure there is an environment of no reprisals against those who report. Information about concerns will only be shared with agencies and or individuals who need to know on a risk-assessed basis.
- **Cooperation** - Working in cooperation with children, vulnerable adults, carers, communities and relevant agencies is essential to promoting the welfare of everyone.
- **Accountability and transparency** - The creation of a culture and environment in which staff, representatives, and beneficiaries, such as children and vulnerable adults, are valued, listened to, and feel safe to raise their concerns. Also, where safeguarding concerns are reported and dealt with quickly and appropriately.
- **Commitment** - Sharing this policy and the Code of Conduct with all TLM staff and TLM representatives for their signature as a sign of acceptance.
- **Prevention** - Ensuring that safety is built in to all activities and service provision, including the reduction and management of risk.
- **Clear reporting** - Clear reporting and management lines where concerns can be raised and managed in a timely and appropriately manner are made known to TLM staff, representatives, partners and beneficiaries.
- **Appropriate response** - Immediate steps taken to prevent further harm and investigate and deal with concerns appropriately, including, when possible, working together with other organisations that have a responsibility to safeguard children and vulnerable adults.
- **Learning** - Ensure recommendations from lessons learnt are incorporated back into improving this policy, procedures, and safeguarding practice by TLM and ensuring systems are in place to monitor and review the progress.

<sup>7</sup> <https://corehumanitarianstandard.org/files/files/Core%20Humanitarian%20Standard%20-%20English.pdf>

<sup>8</sup> <https://interagencystandingcommittee.org/inter-agency-standing-committee/iasc-six-core-principles-relating-sexual-exploitation-and-abuse>

<sup>9</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/767037/safeguarding-external-partners.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/767037/safeguarding-external-partners.pdf)

<sup>10</sup> <https://www.un.org/womenwatch/daw/cedaw/>

<sup>11</sup> <https://www.unicef.org.uk/what-we-do/un-convention-child-rights/>

<sup>12</sup> <https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities.html#Fulltext>

- **Resourcing** - Maintain and allocate the necessary resources in terms of time and budget to support the implementation of this policy and other related policies and procedures.
  - **Clear goal setting** - to prevent, report and respond to safeguarding concerns
3. TLM is also committed to **safeguarding its staff and representatives** from any harm or injury caused by bullying, harassment, and sexual harassment. Those matters are dealt with in the **Bullying and Harassment Policy**<sup>13</sup> and related HR policies and procedures.

### C. Responsibilities under this policy

1. **Safeguarding is everyone's responsibility.** TLM staff and representatives have a responsibility to safeguard children and vulnerable adults in all aspects of our work. This includes understanding this policy and related processes and being committed to creating an environment where children and vulnerable adults feel safe and supported. More detailed responsibilities are defined in the [procedures document](#).
2. TLM staff and representatives **must report safeguarding concerns** to the **Designated Focal Person** (when applicable), the **Designated Safeguarding Lead** at [johan.backrud@lepramissionen.se](mailto:johan.backrud@lepramissionen.se) or the **Global Designated Safeguarding Officer** ([DSO@theleprosymission.org](mailto:DSO@theleprosymission.org)) at the earliest and, as far as possible, within 24 hours.<sup>14</sup>
3. TLM staff and representatives can also opt to report safeguarding concerns to the national Board at [bo.arvidsson@gmail.com](mailto:bo.arvidsson@gmail.com) or to the Global Fellowship Board at [safeguarding@leprosymission.org](mailto:safeguarding@leprosymission.org) if the other safeguarding reporting channels available (point 2) do not seem adequate to address the concern.
4. In certain circumstances, staff, representatives or those with whom we come in contact, may feel more comfortable using an **external independent reporting channel** and to this effect reports can be submitted to <https://www.safecall.co.uk/file-a-report/> or to the relevant contact number in each country.
5. **Reporting safeguarding concerns is a mandatory and professional obligation and failure to do so could lead to appropriate disciplinary action.** This applies even to those staff or representatives who have no direct contact with children and vulnerable adults during their work.

### D. Adoption and Implementation of this Policy

This policy, the accompanying procedures, and the Code of Conduct set the **minimum standards expected by TLM Fellowship Members, their staff and representatives** however, it is understood that each Member Country is different and they may contextualise and/or expand on its requirements in their country context in a manner that is consistent with this Global standards. In the event of discrepancy between country and global standards, the higher standard will apply.

The [Safeguarding Children & Vulnerable Adults Procedures](#) supports the implementation of this policy and sets out the main steps for TLM Members and Affiliates to undertake:

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<sup>13</sup> <https://tmi.glasscubes.com/share/s/3gm333jd7gd8qrrms69vs3pi6d>

<sup>14</sup> <https://www.leprosymission.org/about-us/reporting-concerns>

- **Signing of the Safeguarding Code of Conduct** by all TLM staff and representatives. The [Code of Conduct](#) sets minimum standards of behaviour in and outside of work, which are mandatory. This Code may be added to for country-specific contextualisation, however, original standards of behaviour cannot be removed. This Code will form part of the terms and conditions of any individual's contract or engagement with TLM.
- **Safe People - recruitment and selection and other HR procedures** applicable to all TLM staff and representatives (Procedures Section 2).
- **Mandatory induction and training** and regular communications regarding this policy (Procedures Section 2 and 9).
- **Clear and confidential ways to provide feedback, report and respond to safeguarding concerns** for staff, representatives, and beneficiaries. (Procedures Sections 3 and 4).
- **Implementing Safeguarding Risk Assessments** (Procedures Section 5)
- **Gathering, storing and using images and personal data of children and vulnerable adults** for marketing, communications, fundraising, research and evaluations, including the use of Informed Consent Forms (Procedures Section 7)
- **Fundraising** recognises that some supporters will be vulnerable and they must be protected and adjustments made to meet their needs (Procedures Section 7)
- **Working with Partners and Suppliers**, TLM shares and expects compliance of this Policy and Procedures by its partners and suppliers for their context. Partners should also undergo a safeguarding due diligence process where gaps in their policies, procedures and or capacity are identified and TLM supports them to develop and improve (Procedures Section 8)
- **Responsibility of the implementation of this policy** lies with all staff and representatives, particularly Managers, Country Leaders, and their Board. They will be supported by the Global Designated Safeguarding Officer (DSO) situated at TLM International Office and the in-country Designated Safeguarding Leads and Safeguarding Focal Persons (Procedures Section 9)

## E. Survivor-centred approach

1. TLM will prioritise the rights, needs, and wishes of the survivor by taking a human rights approach. This approach aims to create a supportive environment in which the survivor's rights are respected and in which the survivor is heard and treated with dignity and respect. TLM will promote the survivor's recovery and their ability to identify and express needs and wishes, as well as to reinforce their capacity to make decisions about possible interventions.
2. All actions will be risk-assessed, and decisions taken with the best interest of the survivor(s) using the following criteria where the survivor has a right to:
  - be treated with dignity and respect instead of being exposed to victim-blaming attitudes.
  - choose the course of action in dealing with the abuse instead of feeling powerless.

- privacy and confidentiality instead of exposure.
  - non-discrimination based on age, disability, ethnicity, sexuality or sexual orientation, status, language; and
  - receive appropriate and comprehensive information to help them make their own decisions instead of being told what to do.
3. Where TLM becomes aware that a TLM staff member or representative may pose a risk to children or vulnerable adults, TLM will comply with the applicable in-country legislation in respect of disclosing this information to the appropriate authorities, if it does not pose a serious risk to the survivor(s).
  4. Every practicable effort will be made to assist the survivor in coping with any post-traumatic stress they may be experiencing. This may include psychological counselling, or another form of assistance deemed necessary or appropriate. TLM has a responsibility to map services for possible referrals (Procedures Section 5).

## F. Monitoring this Policy

### Global Level:

1. Safeguarding will be included in the organisational Risk Register with clear risk owner and mitigating measures in place. The TLM Board will review this register at least annually.
2. Safeguarding will be included as a standing item on the agenda of the TLM Board and the Designated Safeguarding Trustee and Global Designated Safeguarding Officer will provide a report on the implementation of the policy, any concerns that have arisen, and the outcome of any investigations.

### Country Level:

1. Safeguarding will be included in the organisational Risk Register with clear risk owner and mitigating measures in place. The local TLM Board will review this register at least annually.
2. Safeguarding will be included as a standing item on the agenda of the local TLM Board and the Designated Safeguarding Lead (DSL) will provide a report on the implementation of the policy, any concerns that have arisen and outcome of any investigations.
3. For countries without a local TLM Board, safeguarding risks, mitigations, policy implementation, any concerns and the outcome of any investigations will be included in the formal meetings between the International Director and the Country Leader three times a year.

## G. Breach of this Policy and Procedures

1. Anyone found to have breached this Policy, including failing to report safeguarding concerns or failing to co-operate with safeguarding investigations, or breaching the Code of Conduct or committing acts against children or vulnerable adults which are criminal in nature or grossly infringe upon the rights of a child or vulnerable adult, will face appropriate action from TLM according to the limit of our authority. The consequences may amount to one or more of the following (this is not an exhaustive list):”
  - Disciplinary action, which could amount to dismissal for staff.
  - Termination of engagement for Board members, volunteers, and other representatives.

- Termination of contract for Consultants/contractors.
- Suspension/withdrawal of funding/support and ending the relationship with TLM for Members, Partners and Suppliers.
- Matters reported to law enforcement and other agencies (where is it appropriate to do so).

2. TLM views the safety of children and vulnerable adults as paramount. We encourage an open culture of reporting without reprisals. We believe that it is always better for staff and representatives to report their concerns, even if they are uncertain.

## H. Revision

The Safeguarding Policy will be reviewed every two years to ensure compliance with international standards and updated legislation, as well as incorporating lessons learned.

The Procedures may be updated more frequently if internal or external circumstances significantly change and to ensure high standards of practice.

## I. Acknowledgement

I acknowledge that I have read and understood the TLM policy on Safeguarding Children and Vulnerable Adults and what is expected of me.

I agree to adhere to the expectations and behaviour contained within.

I am clear that there is a mandatory requirement to report any concerns I have about possible exploitation, abuse or neglect and to cooperate with all investigations and follow-up.

Name:

Position with TLM Sweden:

Signature:

Date:

Witnessed by (name):

Position with TLM Sweden

Signature

Date:

## Appendix A: Recognised Forms of Significant Harm

- **Physical Abuse** results in actual or potential physical harm from an interaction or lack of interaction. There may be single or repeated incidents. Examples include smacking, hitting, shaking, poisoning, burning, drowning or suffocating, or deliberately making someone ill.
- **Emotional Abuse** includes the failure to provide a developmentally appropriate, supportive environment, including the availability of a primary attachment figure, so that the child or vulnerable adult can develop a stable and full range of emotional and social competencies. Acts of emotional abuse may include restriction of movement, patterns of belittling, denigrating, scapegoating, threatening, scaring, discriminating, ridiculing, or other non-physical forms of hostile or rejecting treatment.
- **Sexual Abuse** is the involvement of a child or vulnerable adult in sexual activity which they do not want or truly understand, violates the laws or social taboos of society or to which they are unable to give valid or effective consent. This may involve being touched in a way that is inappropriate; being forced to look at sexual pictures or videos; being forced to watch someone do something sexual; being forced to make sexually explicit pictures or videos, or have them shared through technology; being made to do something sexual to someone that may feel uncomfortable or wrong. Any kind of sexual activity involving a child constitutes sexual abuse, whether or not the child is aware of, or consents to, what is happening. This includes rape, incest, fondling genitals, masturbation, voyeurism, exhibitionism, exposing a child to adult sexual material, or making them take part in any sexual activity, real or simulated, whether face-to-face, online, or in any other medium.
- **Sexual or Commercial Exploitation** includes using children or vulnerable adults to work or perform other activities for the benefit of others where the abuser profits monetarily, socially, politically, or in other ways where there is an exchange of gifts, **money**, or in kind for sex. This includes, but is not limited to, child labour, forced recruitment into armed groups, prostitution, trafficking, and pornography. These activities will risk the physical or mental health, education (e.g. depriving them from schooling, or combining school with long hours at work, in the case of children), moral, or social-emotional development (e.g. early or forced marriage) of the child or vulnerable adult.
- **Neglect or Negligent Treatment** is the inattention or omission on the part of the caregiver to provide for the development of the child or vulnerable adult in all spheres such as health, education, emotional development, nutrition, shelter, and safe living conditions. This includes the failure to properly protect children and vulnerable adults from harm as much as is feasible.

- **Traditional Harmful Practices** these are practices based on cultural beliefs and values that have harmful consequences for children or vulnerable adults (e.g. early or forced marriage, female genital mutilation, honour-killing, scarring).
- **Spiritual Abuse** is when someone in a position of spiritual authority controls, manipulates or abuses others.
- **Modern Slavery** includes the crimes of human trafficking, slavery, and slavery-like practices such as servitude, forced labour, forced and/or early marriage, the sale and exploitation of children and vulnerable adults, and debt bondage. ([Modern Slavery Act, 2015](#))
- **Financial and Material Abuse** includes theft, fraud, exploitation, and pressure in connection to Wills, property, inheritance, and financial transactions, or inciting a child or vulnerable adult to do any of these things on another individual's behalf; it may also involve the misuse or misappropriation of property, possessions, and benefits belonging to children or vulnerable adults.
- **Domestic Abuse or Intimate Partner Violence** is any incident or pattern of incidents of controlling, coercive, or threatening behaviour, violence, or abuse of adults, by intimate partners, previous intimate partners, or family members regardless of gender or sexuality. (Home Office Guidance: Domestic Violence and Abuse)
- **Bullying** is behaviour directed either against an individual or a group of individuals that creates a threatening or intimidating environment, undermining the confidence and self-esteem of the recipient(s). It could be an abuse or misuse of power that humiliates or injures the recipient(s).
- **Harassment** means unwelcomed verbal, non-verbal or physical conduct, that is related to a person's characteristics, whether they are actual or perceived, which include: age, disability, gender, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.
- **Sexual harassment** - Any unwelcome sexual advance, request for sexual favour, verbal or physical conduct or gesture of a sexual nature, or any other behaviour of a sexual nature that might cause offence or humiliation to another. Sexual harassment is particularly serious when it interferes with work, is a condition of employment, or creates an intimidating, hostile or offensive environment. Sexual harassment may be unintentional and may occur outside the workplace and/or outside working hours. While typically involving a pattern of behaviour, it can take the form of a single incident. Sexual harassment may occur between or amongst persons of a different or same sex.