

seed **madagascar**
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Safeguarding at Risk Adults Policy

1. Introduction

- 1.1. SEED Madagascar is a UK registered charity (1079121) which supports people living in extreme poverty in one of the poorest countries in the world, thus by nature all of SEED's work is with inherently vulnerable people.
- 1.2. SEED believes that a thorough and transparent Safeguarding at Risk Adults framework is fundamental to operating ethically and ensuring that all adults who come into contact with its representatives have a positive experience free from harm and/or abuse.
- 1.3. SEED operates a zero-tolerance approach to safeguarding at-risk adults.
- 1.4. The effectiveness of SEED's ability to do this relies on a clear understanding of the context in which it works, as both overreaction and inaction based on misunderstanding and misinterpretation of different cultural patterns can lead to failure to meet the needs of vulnerable and at-risk adults. However, although SEED Madagascar will be culturally sensitive to the environment it works within, it will be clear on its own organisational standpoint.
- 1.5. SEED recognises that by protecting and safeguarding those it works with, it is also providing a framework that identifies and promotes best practice and minimises uncertainty for staff and volunteers working with vulnerable adults regarding appropriate behaviours and conduct.
- 1.6. The Trustees have overall responsibility for safeguarding across SEED Madagascar with the Managing Director and the Director of Programmes and Operations being accountable for implementing the policy and safeguarding procedures.

2. Scope

- 2.1. This Policy covers concerns of abuse, harassment or exploitation by SEED representatives against any adult who may be thus seen as vulnerable.
- 2.2. This Policy is approved and endorsed by the Board of Trustees and applies to all staff, volunteers, Trustees, and representatives of SEED Madagascar. SEED Madagascar will also ensure its approach to safeguarding vulnerable adults whilst working with partner organisations and adherence to this governed in individual MOUs.

3. Key Definitions

- 3.1. Safeguarding is defined as the action taken to promote the welfare of at-risk adults and protect them from harm. Safeguarding includes, but is not restricted to, protecting at risk adults from any kind of abuse, harassment, maltreatment, or the withholding of their



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human rights and taking action to report concerns, either by members of SEED or others, in order to bring about a safer environment for them.

- 3.2. Defining vulnerability and abuse in a global context is problematic as many people throughout the world suffer horrendous poverty, abuse, and exploitation due to the circumstances in which they live. They may feel forced into a situation where they are unable to protect themselves, and where the other has ultimate power to withhold or deny goods or services, or demand an unacceptable ask for these for personal gain. SEED defines vulnerable adults as;

Vulnerable/at risk – those who are at risk of abuse, harassment, the abuse of power or exploitation for reasons of disability, race, gender, age, religion, sexual orientation, social background, culture, geographical isolation, poverty or relative dependency will fall under this policy and the procedures relating to it.

Adults - Those over 18 years of age. Those under 18 will fall under the separate Safeguarding Children and Young Adults Policy and procedures.

- 3.3. SEED defines abuse, whether intentional or unintentional, as:

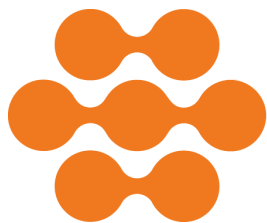
Physical: Non-accidental harm to the body. This includes hitting, slapping, pulling, pushing, kicking, and misuse of medication or restraint.

Sexual: Actual or threatened physical harm of a sexual nature, including rape, sexual assault, sexual acts to which the individual has not consented, could not consent or was pressured into consenting and in a situation of inequality or under coercive conditions. Sexual exploitation is also a form of sexual abuse, actual or attempted, that includes the involvement of a person or people in sexual activities where one party misuses their position of trust, power or authority over others more vulnerable for financial, social, political or other benefit.

Psychological: Any action which has an adverse effect on an individual's mental wellbeing causing suffering and affecting their quality of life and ability to function to their full potential. Including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, bullying, verbal abuse, isolation or withdrawal of services or supportive networks.

Financial or material: The theft or misuse of money or personal possessions, which involves an individual's resources being used to the advantage of another person. This includes theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

Neglect and acts of omission: Including ignoring medical or physical care needs, not providing access to appropriate health, social care or educational services, the withholding of essential items like medication, adequate food and heating.



- 3.4. Harassment, bullying, and intimidation are not formal categories of abuse. However, they can be very damaging and fall within SEED's Safeguarding Vulnerable Adults Policy and supporting procedures. They are defined as:

Harassment – the act of systematic and/or continued unwanted and annoying actions of one party or a group, including threats and demands.

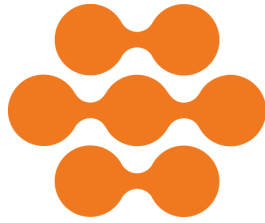
Bullying - the act of intentionally causing harm to others through verbal harassment, physical assault, or other more subtle methods of coercion such as manipulation.

Intimidation - intentional behaviour that "would cause a person of ordinary sensibilities" to fear injury or harm.

- 3.5. Abuse does not always fit neatly into one of these categories and when considering abuse of power or exploitation, this can be subjective. SEED is clear that all concerns involving a question of whether behaviour can be viewed as abuse, harassment, abuse of power or exploitation should be reported by staff, even if they are seemingly trivial. SEED views it important that all concerns are reported in order that patterns of seemingly trivial concerns emerge and can be effectively dealt with under these procedures.

4. Roles and Responsibilities

- 4.1. It is essential that all staff, volunteers, trustees, beneficiaries, donors are aware of this Policy, supporting procedures, and any duties or responsibilities it places on them.
- 4.2. All Trustees, staff, volunteers and others representing SEED have a responsibility to report any concerns that they have concerning safeguarding, while the Trustees, Managing Director and Director of Programmes and Operations hold responsibility to report concerns to the Charity Commission, local courts and British Embassy as appropriate.
- 4.3. The Board of Trustees has approved this Policy, retains an overview of the safeguarding issues and has ultimate responsibility for safeguarding throughout the organisation. The Board supports SEED's ability to function as an effective learning organisation in relation to any incidents, allegations and concerns.
- 4.4. The Managing Director and Director of Programmes and Operations will take into account safeguarding issues when policies and programmes are developed and/or decisions are made which are likely to have an impact on our safeguarding work.
- 4.5. The Managing Director and Director of Programmes and Operations are also responsible for ensuring that an awareness of SEED's safeguarding policy is provided to partner organisations and, if requested, support given to them to develop promote an awareness of safeguarding in their organisation. Partner organisations are expected to align with SEED's approach to safeguarding.
- 4.6. Managers have responsibility to ensure that volunteers and staff are familiar with the content of this Policy, in order to ensure an environment where these people are confident in bringing forward their concerns. Managers also hold responsibility for reporting potential policy breaches and investigating as required.



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- 4.7. The Trustee Safeguarding Lead is Ms. Mimi Coultas (Mimi.Coultas@seedmadagascar.org) and SEED's Executive Safeguarding Lead is Ms. Lisa Bass (Lisa@seedmadagascar.org).

5. Reporting

It is the responsibility of SEED Madagascar staff, volunteers and trustees to be alert to the potential signs of abuse and report these immediately to their line manager, the safeguarding leads or in their absence another manager. The procedures for doing this are contained within the Safeguarding procedures document.

6. Key Performance Indicators

- 6.1. To ensure that all staff and volunteers are aware of this Policy and relating procedures, awareness sessions will take place during the probation period and annually thereafter, copies of the procedure made available and regular reviews of the procedures maintained.
- 6.2. Reports of any investigation, resulting in disciplinary action or external reporting on concerns will be kept for 7 years after the employee leaves the company.
- 6.3. Reports will be submitted to the Board annually confirming that all staff/volunteers have passed reference checks and background checks. The number of staff/volunteers who have been declined due to failure of a reference check or background check will also be reported. Reports will be submitted quarterly to the Board quarterly outlining any reports and investigations that have taken place.

7. Access to Policy

- 7.1. In the UK, SEED's Safeguarding At Risk Adults Policy can be found in the policies and procedures folder of the google drive and in the Trustees section of the google drive.
- 7.2. In Madagascar, SEED's Safeguarding At Risk Adults Policy can be on the google drive under Policies and Procedures and in the International and National team Handbooks.

8. Adherence

Awareness raising will be tailored to the specific roles and conditions in which SEED Madagascar representatives work and will include an awareness of the policy, individuals' responsibilities and the reporting procedures detailed in the operational safeguarding procedures found in the policy and procedure section of the google drive.

The policy will be reviewed when any changes are made or every two years whichever is sooner.



9. Version Control

Version	Changes made	Date	Author of activity
Version 1.0	Draft submitted for approval to HR/Remuneration Committee.	25.5.2018	Lisa Bass
Version 2.0	Additional clarification added to the reporting section.	29.6.18	Lisa Bass
Version 3.0	Updated KPI section; Board approved June 2018, Final version.	20.8.18	Melissa Kantor
Version 4.0	Updated definition and name of policy	1.5.20	Lisa Bass
Version 5.0	Update to definition of Sexual abuse to include sexual exploitation	20.11.20	Lisa Bass
Version 6.0	Update to include names of safeguarding leads and zero tolerance statement	16.3.21	Lisa Bass
Version 7.0	Removal of Codys name as safeguarding lead Removed mention of policy stored in the Finance office Added UK registration number Added in timeframe for review	18.5.22	Lisa Bass
Version 8.0	Added in responsibilities towards partners, and	15.12.24	Lisa Bass



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	reviewed policy		
Version 8.1	Agreed by the Trustees Board	12.3.2024	

9.1.Document Governance

Document owner (name)	Title
Sue Hillman	Trustee, Chair HR/ Remuneration Committee
Related procedure document owner (name)	Title
Lisa Bass	Director of Programmes and Operations