



Children and Vulnerable Adults Safeguarding Policy

May 2018

A. Introduction

The Children and Vulnerable Adults Safeguarding Policy seeks to manage effectively the risks associated with activities and events involving children and vulnerable adults through NRTs activities

This policy requires that any suspicions and allegations involving harm to children and vulnerable adults are referred to Senior Human Resources Officer, who in consultation with the Operations Manager, will determine what action, if any, must be taken. This will enable each situation to be investigated thoroughly, whilst treating the parties involved fairly and with sensitivity. It will also ensure that suitable steps are taken as a result of any investigations, which may include contacting the police and/or fulfilling any legal duty necessary.

The procedure for managing suspicions and allegations aims to strike a balance between the need to protect children and vulnerable adults from abuse and the need to protect staff, students and volunteers from false or unfounded accusations.

The Children and Vulnerable Adult Safeguarding Policy should be used as the basis of each department/institution's approach to preventing and reducing harm to children and vulnerable adults. However, departments/institutions are encouraged to develop their own local policies and procedures to address any safeguarding matters of particular relevance to them.

B. Definitions

A child is any person under the age of 18.

Adults aged 18 and over have the potential to be vulnerable (either temporarily or permanently) for a variety of reasons and in different situations. An adult may be vulnerable if he/she:

- Has a learning or physical disability; or
- Has a physical or mental illness, chronic or otherwise, including an addiction to alcohol or drugs; or
- Has a reduction in physical or mental capacity; or
- Is in the receipt of any form of healthcare; or
- Is detained in custody; or
- Is receiving community services because of age, health or disability; or
- Is living in sheltered or residential care home; or
- Is unable, for any other reason, to protect himself/herself against significant harm or exploitation.

It is recognized that people who meet one or more of the criteria above may not be vulnerable at all, or all of the time. However, until there has direct contact with people on an individual

basis, it may be impossible to identify whether vulnerability exists in relation to an activity or event involving adults that they are planning.

Therefore, in order to support departments/institutions in identifying and managing potential risks of harm to people effectively, and for the purposes of this policy only, a vulnerable adult should be identified (for the purposes of this policy only) as a person aged 18 or over who meets one or more of the criteria listed above.

C. Representatives of NRT:

Employees, volunteers, interns, consultants, Board members, Partners and others who work with children on NRT's behalf, visit NRT's programs, or who have access to sensitive information about children and vulnerable adults in NRT's programs.

POLICIES

1. Policy on Commitment to Children

NRT is committed to conducting its programs and operations in a manner that is safe for children and vulnerable adults it serves and helping protect those with whom NRT is in contact. All NRT Representatives are explicitly prohibited from engaging in any activity that may result in any kind of Abuse.

In addition, it is NRT's policy to create and proactively maintain an environment that aims to prevent and deter any actions and omissions, whether deliberate or inadvertent, that place children and vulnerable adults at the risk of any kind of Abuse.

All NRT are expected to conduct themselves in a manner consistent with this commitment and obligation. Any violations of this policy will be treated as a serious issue and will result in disciplinary action being taken, including termination and any other available legal remedy.

In furtherance of this Policy, NRT has adopted Procedures, described below, to promote:

- a. **Prevention of Child and Vulnerable Adult Abuse:** Striving, through awareness, good practice and training, to minimize the risks to children and vulnerable adults and take positive steps to help protect those who are the subject of any concerns.
- b. **Reporting of Child and Vulnerable Adult Abuse:** Ensuring that all NRT Representatives know the steps to take and whom to contact where concerns arise regarding the safeguarding of children and vulnerable adults.
- c. **Responding to Child and Vulnerable Adult Abuse:** Engaging in action that supports and protects children and vulnerable adults when concerns arise regarding their well-being; supporting those who raise such concerns; investigating, or

cooperating with any subsequent investigation; and taking appropriate corrective action to prevent the recurrence of such activity.

- d. **Training to Promote Awareness of Child and Vulnerable Adults Safeguarding Obligations:** Ensuring that all NRT Representatives are notified of and made aware that they are expected to comply with the policy.

2. Policy to Comply with Applicable Laws and Regulations

It is NRT's Policy to ensure compliance with all local child and vulnerable adult welfare and protection legislation, or international standards, whichever affords greater protection.

3. Policy Regarding Sexual Activity with Children

It is NRT's Policy that any individual under the age of 18 is a child. An underage child cannot legally give informed consent to sexual activity. NRT considers that sexual activity with a child with or without their consent will be treated as a serious issue and will result in disciplinary action being taken, including termination, and the pursuit of any other available legal remedy.

4. Policy on Confidentiality in Child and Vulnerable Adults Safeguarding Matters

NRT has a duty to manage sensitive information in a manner that is respectful, professional and that complies with the applicable law. Staff must keep all information about any suspected or reported incidents strictly confidential, and must divulge only that information to the Child and Vulnerable Adult Safeguarding Focal Point, Human Resources team and any other senior staff directly involved in the investigation, except as required by law.