



SILIGURI GREATER LIONS EYE HOSPITAL

Safeguarding Policy

Implementation: Human Resource Manager with support from Chief Executive Officer
Approved by: Siliguri Greater Lions Eye Hospital Board
Date of Approval: November 2019, Date of next review: March 2020
Applicable to: All Department and Offices of Siliguri Greater Lions Eye Hospital and Training Centre
Direct and indirect stakeholder of SGLEH

Purpose:

This document is the “Safeguarding Policy” for SILIGURI GREATER LIONS EYE HOSPITAL(SGLEH) which will be followed by all members of the organisation and followed and promoted by those in the position of leadership within the Siliguri Greater Lions Eye Hospital. Siliguri Greater Lions Eye Hospital and its various systems safeguards the interests of all in working within the organizational framework and them who come in direct contact with hospital including direct beneficiaries, programme beneficiaries, indirect stakeholders including vendors, donors, people whom we meet and interact during our direct engagement initiatives within the hospital premise/ Camp location/ Event duration/ with their community, family/ school settings. Parents/ teachers/ carers ensuring safeguarding and welfare throughout all the work undertaken by Siliguri Greater Lions Eye Hospital.

The purpose of this policy is to make sure that the actions of any adult in the context of the work carried out by Siliguri Greater Lions Eye Hospital are transparent and safeguard and promote the welfare of all people. If any person has any concerns about the conduct of any member of Siliguri Greater Lions Eye Hospital, this should be raised in the first instance with Devdutta Ray (+91 9733300990).

Scope of the Safeguarding Policy:

The policy applies to everyone working for or associated with Siliguri Greater Lions Eye Hospital. This encompasses the whole organization, agents who are formally or informally attached to the organization and includes without limitation:

- Employees at all levels – in office, in field or elsewhere.
- SILIGURI GREATER LIONS EYE HOSPITAL Associates – these include board members, volunteers, interns, consultants and vendors. Also the employees and/or representatives of partner organizations and local governments who have been brought into contact with children by Siliguri Greater Lions Eye Hospital.
- SILIGURI GREATER LIONS EYE HOSPITAL Visitors – (e.g doctors, Health professionals, donors, journalist, media, researchers etc) who may come into contact with direct/indirect stakeholder adult or young through SILIGURI GREATER LIONS EYE HOSPITAL are also bound by this policy



1. Introduction

The type of organisation we are and what we do “Siliguri Greater Lions Eye Hospital” is a Lions Club Charity Eye Care Hospital and system committed to supporting the development of eye care health systems in low and middle-income population of North Bengal and Sikkim making it accessible to all in the region. Hence, it works towards empowering people through taking quality eye care services to their doorstep and making affordable, super speciality eye care accessible to all. Thus, it works towards advancing the rights and improving the quality of life of people with visual disabilities. Our programmes include health, education and social inclusion interventions in more than 2 hospitals and 20+ Vision Centres spread across North Bengal and Sikkim.”

Who benefits from our projects. “Many of those benefitting are adults at risk, children and young people.”

Purpose of the policy. This Safeguarding Policy... provides clear definitions, sets standards across the organisation, and gives clear guidance on how to apply and implement the policy throughout the organisation and in relation to partner organisations.”

How we define safeguarding, and what it means to us as an organisation. “Safeguarding means promoting and protecting people's health, wellbeing and human rights, and enabling them to live free from harm, exploitation and abuse. A safeguarding approach means identifying and minimising the risk of harm to children and adults from staff, representatives and partners; our operations and programme activities including and includes responding appropriately to any safeguarding concerns about children and adults within communities where we work.”

- Types of people we want to specifically protect. “It is known that children, and adults with disabilities are at particular risk of harm, exploitation and abuse.”
- Who the policy applies to. “The Safeguarding Policy is to be applied across all organisational activities and in all of Siliguri Greater Lions Eye Hospital’ programme themes, including health, education, social inclusion and research. All Siliguri Greater Lions Eye Hospital’ representatives and partner organisations should be aware of and adhere to the policy.”

2. Policy statement

Your statement about why safeguarding is important to our organisation.

This should include:

The purpose. The main aim of a safeguarding policy is to ensure that those on our programmes or who use our services are protected from any harm, abuse or exploitation through their contact with SGLEH systems.

The principles. The organisation through its purpose, vision and values and inculcate the same through continuous engagement initiative and proactive managements push to bring all stakeholders within and outside the organization to exercise a common goal. This provides the basis for us to set out our commitment to building a culture of safeguarding. It should set out the principles and expectations which we consider non-negotiable. Where appropriate this should be supported by international and national policy, legislation and conventions and help us meet our primary vision of making accessible and affordable quality eye care to all through highly skilled and empathetic staff/ volunteers/ interns/ Trustees/ Board Members etc.

3. Implementing the policy

- Roles and responsibilities
- Prevention
- Reporting and responding to safeguarding concerns
- How the policy will be monitored and reviewed

“The purpose of this policy is to ensure that Siliguri Greater Lions Eye Hospital activities are implemented in a safe and protective environment where harm, exploitation and abuse are effectively prevented as far as reasonably possible and responded to effectively.



The policy has three specific objectives:

- 1) Keeping children and adults safe
- 2) Safeguarding the reputation of Siliguri Greater Lions Eye Hospital, including guarding Siliguri Greater Lions Eye Hospital' representatives from false allegations or from operating within an unclear framework
- 3) Ensuring the highest standards of behaviour from representatives and minimising the risk of abusers entering the organisation.

Siliguri Greater Lions Eye Hospital is committed to doing whatever we can to keep everyone safe, with a specific focus on those with disabilities. Siliguri Greater Lions Eye Hospital' work is guided by the UN Convention on the Rights of the Child (CRC) the UN Convention on the Rights of Persons with Disabilities (CRPD)”

Roles and responsibilities

Siliguri Greater Lions Eye Hospital we have two main roles:

- **Safeguarding Manager (SM)** at the organizational level.
- **Designated Safeguarding Leads (DSL)** to cover all Internal and External engagements of the Hospital systems.

There are two fundamental aspects to these roles, with specific levels of responsibility within each for the SM and each DSL:

- 1) To build the understanding and capability of the organisation required to implement this policy. This will include direct knowledge and information transfer and accessing appropriate external expertise.
- 2) To act as the reporting mechanism for any safeguarding concern and use lessons learned from specific incidents to improve policy and practise.

Prevention

At Siliguri Greater Lions Eye Hospital we use our seven standards to set out how we meet our commitments. However, you could create a set of simple statements to cover your approach.

- Anyone acting/working on behalf of [the organisation] will receive safeguarding training appropriate to their role and responsibilities.
- We will design and undertake all our programmes and activities in a way that protects people from any risk of harm or abuse.
- Anyone acting/working on behalf of [the organisation] will know how to respond when they are concerned that someone may be at risk of harm, abuse or exploitation.
- We have procedures in place for responding to safeguarding concerns and will act quickly and appropriately when concerns are reported.
- We will Implement stringent safeguarding procedures when recruiting, managing and deploying staff and associated personnel
- Ensure staff receive training on safeguarding at a level appropriate to their role

Prevention during health emergency

At Siliguri Greater Lions Eye Hospital we keep the safety of our employees and our stakeholders with whom we interact on a daily basis paramount. Under a situation where an employee or any beneficiary or third party stakeholder is found in any kind of health emergency would be followed with specific guidelines:

1. In case of non-communicable emergency or accident within the hospital premises the hospital would take necessary provisions and resort to referrals to avail best treatment to the employee or to the stakeholder.
2. The hospital focusses on increasing skills of primary care providers, practitioners, nurses, and community health workers—to be equipped with basic occupational health awareness and work towards improving working



conditions, monitoring the health status of self and other workers and detecting the most common occupational diseases among employees.

3. Expanding early detection and rehabilitation of occupational diseases; promotion of health; and the provision of first aid at the workplace.

In case of Communicable Diseases and State Emergency

1. The organization is liable to take all precautionary measures to early detect and take necessary precautionary measures on symptomatic or regulatory basis to check the spread of the communicable disease.
2. The hospital when identified a person employee or beneficiary to be a carrier of infection, can take necessary action to put the person in isolation to restrict the spread of the infection.
3. This self-isolation can be in the form of referral to other hospital, hospital isolation ward or restricting the person to enter or come in contact with other employees or stakeholders of the Hospital depending on the nature of communicable disease or infection.
4. In case of a state emergency the hospital can declare all its services as non-life threatening/saving i.e. non-emergency services which are subjected to a complete lock down to encourage social distancing, and isolation of the employee and hospital subjects to come in contact of any communicable health hazard. Under such situation the hospital may or may not keep the emergency services open which will be completely under its own discretion.
5. The hospital believes that self isolation, and social distancing are the most dominant methods to play an active and responsible role in controlling the spread of the infection and hence, protecting and safeguarding health of its employees and all its subjects until further notice.
6. Under all measures the hospital and all its systems are subjected to comply with regulations set by the government time to time in a situation of such health emergency.

Code of conduct. Siliguri Greater Lions Eye Hospital Child Protection Policy is based on the principles of the United Nation's Universal Declaration of the Rights of the Child, - a declaration India signed in November 1999. "States Parties shall protect the child from all forms of physical or mental violence, injury or abuse, neglect, maltreatment or exploitation, including sexual abuse."(UN Convention on the Rights of the Child (1989), Article 19).

We would request all the visitors/ volunteers/ interns/ vendors to adhere to the Code of Conduct while participating/ visiting any SGLEH programme. We would also request the supervisor/ the person in charge of the visit/ the person guiding the intern or volunteer to ensure that visitors/ volunteers/ interns read through this code of conduct, SGLEH Child Protection policy and the Photography and Audio-visual Consent Policy, sign the declaration form and abide by the code of conduct and the above mentioned policies.

Safe programme design. What measures are in place to make sure your programmes and services are safe for users. You might have tools you use to carry out safeguarding risk analysis during programme design or planning.

Recruitment Procedures. The recruitment process and whether there are steps you will take such as requiring references or criminal records checks to ensure employees are of good character. It may also include interview techniques, and other pre-employment checks.

- **Training.** The induction and on-going training of staff and volunteers on safeguarding awareness. For example, most policies cover this by stating they will require staff and volunteers to read and sign the policy, plus have regular awareness days.
- **Governance structures.** Any governance structures that you will put in place to ensure safeguarding is a top priority. For example, having a designated Board member as a focal point for safeguarding, having safeguarding as a standing item on the Board agenda, appointment of a safeguarding officer, safeguarding committee, and any arrangements you have with partners.

Reporting and responding to safeguarding concerns

Here, explain the steps for reporting and responding to safeguarding concerns. This should include the following:



SILIGURI GREATER LIONS EYE HOSPITAL employees, associates and visitors must:

- Never act/ behave in any way that places an adult, young, adolescent or child at risk of harm.
- Report any adult or child abuse and protection concerns they have to their reporting officer. This is a mandatory requirement for Employees. Failure to do so may result in disciplinary action.
- Respond to a child or adult who may have been abused or exploited keeping his/her privacy and security to utmost importance.
- Do not be judgemental or decline if a child or an adult speaks of any matter of concern that deals with any form of abuse directly to him/her or to another child.
- Cooperate fully and confidentially in any investigation of concerns and allegations.
- Contribute to an environment where children or an adult irrespective of gender are respected and encouraged to discuss their concerns and rights.
- Always touch, take charge of a child's or adults body in presence of the parent/guardian with consent / ask permission from the adult or child (or, in the case of adult or adolescent and young children, their partner, parent or guardian).
- Be aware that a certain behavior which may appear normal and an everyday affair for a health workers like in case of Siliguri Greater Lions Eye Hospital employee may occur objectionable to the person whom you are engaging with whether an adult or a child/ guardian or parent of the child.
- Hence be sensitive to the adult's/ child's and parent/partner/guardian personal behavior/ cultural construct and comfort zone and do not act or comply to any action that could become objectionable or put the interest of the employee or organization at stake.
- Before taking images (e.g. photographs, videos) of them take prior permission/ consent from the person in case of an adult or parent/ guardian were the consent from the child must be equally given importance to. Respect their decision to say no to an image being taken. Ensure that any image taken of an adult or children are respectful (For example: children should have adequate clothing that covers up their body. Images of children or adult in any way that may impact negatively on their dignity or privacy are not acceptable). Stories and images of children should be based on the child's best interest.
- Be aware that where concerns exist about the conduct of Employees or Associates in relation to adult and child protection and/or where there has been a breach of this Safeguarding Policy, this will be investigated under this policy either: by consideration of referral to statutory authorities for criminal investigation under local laws with in India and/or by SILIGURI GREATER LIONS EYE HOSPITAL in accordance with disciplinary procedures. This may result in disciplinary sanctions and/or dismissal for Employees.
- Be aware that SILIGURI GREATER LIONS EYE HOSPITAL will sever all relations with any SILIGURI GREATER LIONS EYE HOSPITAL Associate or Visitor who is proven to have committed child abuse.
- Be aware that, if a legitimate concern about suspected towards adult or child abuse is raised, which proves to be unfounded on investigation, no action will be taken against the reporter. However, any employee who makes false and malicious accusations will face disciplinary action.
- Be aware that SILIGURI GREATER LIONS EYE HOSPITAL will however take appropriate legal or other action against SILIGURI GREATER LIONS EYE HOSPITAL Employee, Associates and Visitors who make false and malicious accusations of abuse.

SILIGURI GREATER LIONS EYE HOSPITAL employees, associates and visitors must not:

- Disclose information that identifies any adult/adolescent/child who may come in touch with SILIGURI GREATER LIONS EYE HOSPITAL or make it available to the general public.

All directors, managers, and associates must:

- Ensure that each employee member understands and adheres to the Safeguarding Policy of SILIGURI GREATER LIONS EYE HOSPITAL and whenever there is a field visit by any other employees, intern, associates and visitors, where they may meet children, the Protection Policy of SILIGURI GREATER LIONS EYE HOSPITAL has to be clearly spelled out.

Personal conduct outside Work:



- We are committed to ensuring that our employees and representatives apply high standards of behaviour towards children and adults within both their professional and their private lives.
- Unlawful or other conduct by SILIGURI GREATER LIONS EYE HOSPITAL employees which jeopardises SILIGURI GREATER LIONS EYE HOSPITAL's reputation or position whether during or after working hours will not be permitted. Such conduct includes, but is not limited to: any unlawful activity related to sexual abuse; sexual harassment; physically/verbally abusive behaviour; and public disorderly conduct.
- Employees are required to bear in mind the principles of the Safeguarding Policy and heighten their awareness of how their behaviour may be perceived both at work and outside work.

Complementary Policies.

A list of any other policies that complement your safeguarding policy. For example:

- o Sexual Harassment at Work Place
- o Child Safeguarding Policy
- o Code of Conduct
- o Employee Handbook
- o Grievance Procedure
- o Disciplinary Procedure
- o Employee Rights and Responsibility
- o Patient Rights and Responsibilities



DO's

- Be alert and support the SGLEH team to protect the children from any physical, emotional or sexual injury or harm.
- Respect the surroundings – littering, spitting, defacing anyone's property and the physical environment in any way is against SGLEH ethic.
- Treat all children equally and with dignity. Be polite, respectful, and mindful towards children. Maintain a safe appropriate distance from children.
- We don't allow any visitors to directly distribute gifts/ snacks/ refreshments/ stationery items to the children/adolescents.
- Recognise the developmental needs and capacities of children, young people, and people with disabilities.
- Wear clothing that is culturally appropriate for the place being visited
- Be sensitive to the issues of children who are especially vulnerable in given contexts. For instance, the girl child, children with disabilities, children from backward socio-economic groups etc.

DO NOT

- Carry any separate snacks or refreshments for yourself during sessions unless advised by a Doctor.
- Take photographs of the children during the health session without prior permission.
- Counsel children on a one-on-one basis.
- Conduct any games/ sports activities with the children unless SGLEH authorises you to do so, and is absolutely required.
- Give your phone numbers, email address or postal address to the child. Do not take personal numbers, address of the children. Your contact point with the children is Siliguri Greater Lions Eye Hospital.
- Use foul language, inappropriate words, tease, ridicule or humiliate children.
- Bully or harass any child.

AVOID

The following should be avoided except in emergencies. Where unavoidable (e.g. the child sustains an injury and needs to go to hospital) ensure that action is taken only with the full knowledge and consent of person in charge/ parent or guardian/ Medical Superintendent and Human resource manager).

Otherwise, avoid completely:

- Spending excessive amounts of time alone with children away from others.
- Taking children or dropping them to and from hospital or any event.
- Do not smoke, drink alcohol, take drugs, and consume paan/ ghutka in the presence or in immediate vicinity of the children. Advisable to avoid during visit to SGLEH implementation area.
- Do not enter a bathroom or toilet being used by the children, unless the child/ children are in danger.

NEVER

SGLEH will not tolerate and will take immediate legal action if the following happens:

- Rough physical or sexually provocative games.
- Invite or allow children to stay with you at your home.
- Share a room with a child.
- Any form of inappropriate touching. Including doing anything of a personal nature for children or anyone with disabilities that they can do for themselves.
- The use of inappropriate language, including sexually suggestive comments made to a child, even in fun, and/ or reducing a child to tears as a form of control.

