



POLICY FOR SAFEGUARDING VULNERABLE GROUPS

Vision Action, formally known as Vision Aid Overseas, is committed to the highest standards of ethical conduct and integrity in its activities. This policy outlines the organisation's position on safeguarding Vulnerable Groups, which include those at risk by their identity or circumstances, including women, children¹ and people with disabilities.

The nature of our work puts Vision Action staff in direct contact with vulnerable groups. Further, in order to effectively deliver some of our core functions, such contact by its nature will be private.

The protection and safeguarding of vulnerable groups is paramount in this policy, but it also enables the organisation to have some protection, both at a reputational level and for the individual.

Vision Action will not tolerate any contravention of this Policy and it is applicable to all employees of the organisation, and to trustees, volunteers, temporary workers, consultants, contractors, agents and subsidiaries acting for, or on behalf of Vision Action and who may come into contact with vulnerable groups, within the UK and on Vision Action business internationally.

This Vision Action policy also applies to any international / national partners and creates the requirement for appropriate "due diligence" in the selection and monitoring of these Partners.

Every employee and associated person acting for, or on behalf of, the organisation is responsible for maintaining the highest standards of professional and moral conduct. Any breach of this policy is likely to constitute a serious disciplinary, contractual and criminal matter for the individual concerned and may cause serious damage to the reputation and standing of Vision Action.

A handwritten signature in black ink, appearing to read "Nicola Chevis", is written over a horizontal line.

Nicola Chevis
CEO
Updated March 2021

¹ Children are defined as those individuals aged 18 years and younger



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Vision Action Policy for Safeguarding Vulnerable Groups seeks to ensure that the protection of Vulnerable Groups is paramount in every area of our work. The policy applies to all Vision Action trustees, staff and volunteers (including staff employed overseas), who may come into contact with vulnerable groups (normally on overseas trips, outreach etc).

Cross-cutting every element of this policy are the following themes:

- **Confidentiality**
- **Sensitivity**
- **Ownership**
- **Consultation**
- **Transparency**
- **Equality and Diversity**

RECRUITMENT

Vision Action is committed to ensuring that the safeguarding of vulnerable groups is rigorously mainstreamed into our recruitment processes

KPIs:

- **Every staff member, Trustee and volunteer has signed a commitment to safeguarding vulnerable groups policy (Annex A).**
- **This safeguarding policy is referenced with all new job advertisements**

All jobs and volunteer roles advertised will be with a job description and person specification and will state that Vision Action has a safeguarding policy that the successful candidate will be expected to comply with.

Particular attention will be paid to gaps in an individual's employment history and frequent changes of employment and/or address.

Where given references cannot be verified via telephone, Vision Action reserves the right to contact other previous employers other than those cited as referees.

All staff and volunteers will undergo a DBS check as appropriate to their role and in line with Vision Action's policy on Recruitment of Ex-offenders.

EDUCATION AND TRAINING

Vision Action's organisational atmosphere encourages opportunities to question and learn about safeguarding issues.

KPIs:

- **All Volunteer Development Programmes (VDP) will have a Safeguarding briefing.**
- **Country Director Conferences will include a Safeguarding briefing.**
- **Country Directors, Programme Staff, Trustees, Volunteers and Consultants (who have contact with vulnerable groups) will undertake appropriate Safeguarding training**
- **Country Directors and Programme Staff will follow Ministry of Health and Education guidelines in their respective countries when interacting with vulnerable groups in hospitals, schools and communities**

All new members of staff, Trustees and volunteers will receive an induction into Vision Action Safeguarding Policy.

Refresher training in Safeguarding will be delivered to all Directors on a yearly basis. Safeguarding will form part of the programme for all VDPs and assignment preparation.

Employees, Trustees and volunteers and any third parties who are to have direct contact with vulnerable groups as part of an overseas project visit will receive a Safeguarding brief by the respective Country Director.

The International Programme Director will monitor and review the effectiveness of the safeguarding training on a bi-annual basis. Local partners will receive a copy of Vision Action's Safeguarding policy

BEHAVIOUR PROTOCOLS

The Vision Action Code of Conduct outlines appropriate and expected standards of behaviours of adults towards vulnerable groups, there may be minor variance depending on cultural norms, but those accepted in the UK should always be used as the base reference point.

KPIs:

- **Code of Conduct briefed to visiting Volunteer Teams**
- **Vulnerable groups report feeling 'safe' around Vision Action staff**

Vision Action Code of Conduct should be interpreted in a spirit of transparency and common sense

Vision Action staff and trustees and those on volunteers' projects must make an attempt to understand the local norms around physical contact between adults and vulnerable groups. Whilst engaged in Vision Action activities, all staff, Trustees and volunteers who come into contact with vulnerable groups are required to:

- Treat the vulnerable groups we interact with, with respect and dignity
- Ensure that their health and safety is paramount at all times during our interactions
- Liaise openly with parents/guardians and other family members
- Only use physical contact if absolutely necessary, during eye examinations explain what that contact may be

- Avoid being alone with vulnerable groups
- Listen to any disclosures/allegations/concerns of abuse either from the vulnerable groups or other adults
- Report any such disclosures/allegations/concerns immediately to the Team Leader or Country Director. In the case of the allegation being made about the Team Leader or Country Director, to the International Programme Director

COMMUNICATIONS ABOUT VULNERABLE GROUPS

Vision Action has a duty of care to the vulnerable groups with whom it comes into contact and at all times must put their interests first. Any depiction of vulnerable groups – in words or images - must protect their identity, preserve their dignity and be accurate, balanced and fair

KPIs:

- **Informed consent forms obtained for each case study utilised by the communication team from the field**

Permission of vulnerable groups (or, in the case of children, their guardian and/or NGO responsible for the child) should be obtained before pictures are taken and images used for publicity, fundraising or awareness-raising purposes. If possible, the individual /guardian/relevant NGO should sign an informed consent form, which should subsequently be filed in a secure location.

- No personal information (such as location) which could put a vulnerable person at risk, should be posted on the Vision Action website or published in public-facing literature.
- Images of vulnerable groups should not be manipulated; they should be appropriately clothed, and photos should not be sexually provocative
- Any journalist gaining access to vulnerable groups at Vision Action projects must be briefed fully on the Vision Action Safeguarding Policy
- Social media – e.g. blogs, Facebook entries - generated by Vision Action should be subject to the same safeguarding guidelines as outlined in this policy.

REPORTING AND REACTION

In reporting and reacting to safeguarding issues the best interests and welfare of the vulnerable person should be paramount.

KPIs:

- **All staff, Trustees, partners, family members, vulnerable person involved in Vision Action projects are aware of the procedure for reporting a concern**

It is the responsibility of the Team Leader and Country Director for each Project to ensure that all understand – what to do if they feel uncomfortable and want to report something, concerning inappropriate behaviour towards vulnerable individuals.

The reporting of suspected or actual abuse is a professional and legal obligation. Failure to report information can lead to disciplinary action and/or legal action

When there is suspicion of abuse overseas the person to whom it has been reported or who has concerns will immediately inform the Country Director, or if appropriate (see above), the International Programme Director. Country Directors must always inform the International Programme Director. In all cases, the CEO and Board Chair will be informed.

Suspicions of abuse involving personnel from Vision Action's local implementing partners should be reported in the same way.

Procedures for Making a Disclosure

On receipt of a complaint of malpractice, the member of staff who receives and takes note of the complaint, must pass this information as soon as is reasonably possible, to the appropriate designated investigating officer as follows:

- Complaints of malpractice will be investigated by the appropriate Director unless the complaint is against the Director or is in any way related to the actions of the Director. In such cases, the complaint should be passed to the Chief Executive Officer for referral.
- In the case of a complaint, which is any way connected with but not against the Director, the Chief Executive Officer will nominate a Senior Manager or external party to act as the alternative investigating officer.
- Complaints against the Chief Executive Officer should be passed to the Chair who will nominate an appropriate internal / external investigating officer.
- The complainant has the right to bypass the line management structure and take their complaint direct to the Chair or Chief Executive Officer. The Chair or Chief Executive Officer has the right to refer the complaint back to management if he/she feels that the management without any conflict of interest can more appropriately investigate the complaint.
- Medical and clinical concerns, the safeguarding of children, at-risk adults, vulnerable groups and immediate risks in the field should be reported to the Country Director for immediate action. Follow up will be reported to and investigated as above.

Should none of the above routes be suitable or acceptable to the complainant, then the complainant may approach one of the following individuals who have been designated and trained as independent points of contact under the Whistle-Blowing procedure. They can advise the complainant on the implications of the legislation and the possible internal and external avenues of complaint open to them:

Prof. Nora Colton, Chair of Trustees n.colton@ucl.ac.uk

The **Vision Action whistle-blowing policy** also gives additional guidance if senior managers, directors or the organisation fails to act to safeguard vulnerable groups.

RAMIFICATIONS OF MISCONDUCT

In reporting and reacting to safeguarding issues the best interests and welfare of the vulnerable individual should be paramount. Vision Action recognises that it may not always be best placed to ascertain whether a person has been abused – in which case referral to relevant agencies will take place.

KPIs:

- **Investigations are prompt and follow standardised procedures**
- **HR documentation of disciplinary action**

Following an allegation of abuse/violation, an initial clarification will be coordinated by the Country Director.

If the alleged incident involves a Vision Action employee, Trustee or volunteer, that individual will be suspended (on contractual pay) until the investigation has been completed and / or the volunteer removed from the Project. The decision to suspend or remove must be taken by the CEO and is not open to challenge. (Removal from a Project may mean the volunteer being asked to remain in the hotel whilst clarification is being sought)

The investigation process will be confidential, and information limited only to those who need to know. All parties involved will be required to keep all information relating to the case confidential and documentation will be filed securely

If any individual associated with Vision Action is found to have violated the organisation's Safeguarding Policy or committed acts in relation to vulnerable individuals which are criminal or grossly infringe their rights, immediate disciplinary action will take place. This may include:

- Employees – disciplinary action or dismissal. (International staff will be repatriated to their country of origin and police reports will be filed.)
- Volunteers, trustees, interns – ending the relationship with Vision Action
- Local partner organisations – withdrawal of funding/support and ending the relationship with Vision Action
- Consultants/contractors – termination of contract
- Criminal prosecution

All parties concerned will be notified of Vision Action processes and the outcome of the investigation in a timely manner.

The media will be dealt with by the Director of Fundraising and Communications, guided in their response at all times by the CEO. The CEO will assess reputational risk and brief the Board accordingly.

Victims and survivors will be supported by the Country Office in liaison with relevant organisations.

SUPPORTING POLICIES AND GUIDELINES

UK professional guidance documents and information for the optical profession can be found at (for AOP members):

[Safeguarding \(aop.org.uk\)](http://safeguarding.aop.org.uk)



ANNEX A TO
SAFEGUARDING POLICY
POLICY COMPLIANCE

I have received and been briefed on the Vision Action Policy for Safeguarding and fully understand my responsibilities to comply with and promote the Policy.

Signed	
Name	
Position within Vision Action	
Date	