

Safeguarding Policy and Procedures

Enriching Lives, Empowering Livelihoods

Lupin Human Welfare & Research Foundation
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1. Policy Statement

Lupin Human Welfare & Research Foundation is committed to upholding the highest standards of safety, dignity and respect for all individuals engaged in or affected by its work. The Foundation does not permit any form of abuse, exploitation, neglect, harassment or harm towards children, vulnerable adults or any other stakeholders.

Any action or conduct that compromises the safety or wellbeing of others is considered a serious breach of organisational values and professional responsibility. Such conduct shall result in prompt and appropriate action, including internal disciplinary measures and where required, reporting to statutory or law enforcement authorities in accordance with applicable laws.

2. Objective

The objective of this Safeguarding Policy is to establish a safe, respectful, and protective environment for all individuals associated with Lupin Human Welfare & Research Foundation. The policy aims to prevent, identify and respond to all forms of harm, abuse, exploitation and harassment, particularly against children and vulnerable adults, in the course of the Foundation's programmes, operations and engagements. It seeks to promote a culture of accountability, dignity and zero tolerance for misconduct, while ensuring compliance with applicable legal, ethical and organisational standards.

3. Scope

This policy shall apply to all employees of LHWRF, third-party employees, interns, volunteers, vendors and any other individuals representing or associated with Lupin Human Welfare & Research Foundation, irrespective of the nature or duration of their engagement. It covers all activities, programmes and interactions conducted by or on behalf of the Foundation, including fieldwork, office-based operations, travel, training sessions, events, digital platforms and community engagements.

The policy shall be applicable across all geographic locations where LHWRF operates and extends to both professional and informal interactions with children, beneficiaries, community members and other stakeholders encountered during the course of work.

4. Definitions

1. Sexual Abuse and Sexual Exploitation

Sexual abuse includes any actual or threatened sexual act, physical or non-physical, carried out through force, coercion, manipulation, intimidation, or abuse of authority or trust.

Sexual exploitation also refers to any misuse or attempted misuse of a position of power, influence, or responsibility for sexual purposes, including seeking sexual favours, services, or advantages.

Any form of sexual contact, activity, or behaviour involving a child (any person under 18 years of age) is strictly prohibited and constitutes a serious safeguarding violation, regardless of perceived consent. LHWRF follows a zero-tolerance policy toward all forms of child sexual abuse and exploitation.

2. Sexual Harassment

Sexual harassment includes any unwelcome act or behaviour of a sexual nature, whether physical, verbal, non-verbal or digital that violates a person's dignity or creates an intimidating, hostile, humiliating or offensive environment. This applies across workplaces, field sites, training programmes, events, travel and virtual or online workspaces.

3. Bullying, Emotional Abuse, and Psychological Harm

Bullying or emotional abuse includes repeated or significant conduct that is intimidating, degrading, threatening, humiliating or abusive, including misuse of authority or position, which causes psychological harm or distress. Such behaviour shall be prohibited regardless of whether it occurs between peers, supervisors and subordinates or external stakeholders.

4. Abuse, Neglect, and Exploitation of Children and Vulnerable Adults

This includes physical abuse, emotional abuse, neglect, abandonment, or failure to protect individuals who are dependent, marginalised, or at heightened risk due to age, disability, illness, or social circumstances. LHWRF recognises that neglect whether intentional or due to omission shall be as harmful as direct abuse.

5. Child Labour, Forced Labour, and Human Trafficking

Any form of child labour, bonded labour, forced labour, trafficking, or coercive work practices encountered during programme implementation or partnerships may constitute a safeguarding concern.

Where such violations involve harm, exploitation, or risk to individuals, LHWRF shall address them through safeguarding mechanisms in coordination with statutory authorities and relevant institutional processes.

6. Discrimination Leading to Harm or Exclusion

Any act or omission that results in harm, exclusion, or increased vulnerability based on gender, caste, disability, age, religion, ethnicity, sexual orientation, or gender identity particularly where it exposes individuals to abuse or exploitation falls within the scope of safeguarding.

7. Digital and Information-Related Harm

Safeguarding includes protection from harm arising through misuse of digital platforms, electronic communication, photographs, videos, personal data, or online interactions, including non-consensual sharing of images, inappropriate communication with children or beneficiaries, or breaches of privacy and confidentiality.

8. Abuse of Power, Authority, or Trust

Any misuse of organisational position, authority, or influence that results in coercion, intimidation, dependency, or exploitation of beneficiaries, community members, or colleagues shall constitute a safeguarding violation.

5. Prevention Measures

Lupin Human Welfare & Research Foundation is committed to preventing safeguarding risks through its organisational systems, ethical practices, and clear accountability. Preventive measures are integrated across recruitment, capacity building, governance, and programme implementation and are supported by complementary organisational policies.

1. Safe Recruitment and Engagement

LHWRF adopts safe recruitment practices to reduce the risk of engaging individuals who may pose a safeguarding concern.

- Recruitment, reference verification and background checks shall be conducted in accordance with the LHWRF Recruitment and Selection Policy.
- Safeguarding considerations shall be integrated into role descriptions, interview processes and selection decisions, particularly for roles involving direct contact with children, vulnerable adults or community-facing responsibilities.
- Safeguarding commitments and expected standards of behaviour shall be incorporated into all employment contracts, agreements, volunteer undertakings and partnership MoUs, as outlined in the LHWRF's Administrative Policies.

2. Code of Conduct and Professional Behaviour

All employees of LHWRF, Third-party employees, interns, volunteers, and partners are required to comply with the LHWRF Code of Conduct, which sets out expected standards of professional behaviour, ethical engagement and responsibilities.

Any breach of the Code of Conduct, including safeguarding-related misconduct, shall be addressed in accordance with LHWRF's internal procedures and applicable laws, and may result in appropriate action and may result in termination of engagement and referral to statutory authorities where required.

3. Capacity Building and Training

LHWRF ensures that safeguarding awareness and competence are maintained through structured learning mechanisms:

- Safeguarding orientation shall be an integral part of the onboarding process for all personnel.
- Role-specific safeguarding training shall be provided for individuals working in higher-risk contexts.
- Periodic refresher training shall be conducted in line with the LHWRF Learning and Development Policy.

6. Safeguarding Roles and Responsibilities

Safeguarding is a shared responsibility across the organisation and is supported by defined oversight and operational roles.

1. Senior Management Oversight

Overall accountability for safeguarding rests with the Senior Management, as detailed in the LHWRF Governance Framework. DGM-CSR shall provide strategic oversight, ensure policy compliance and review serious safeguarding concerns.

2. Safeguarding Committee / Incident Review Mechanism

Safeguarding concerns and incidents shall be reviewed through a designated internal investigation mechanism in line with LHWRF procedures.

This mechanism is responsible for:

- Reviewing reported safeguarding concerns
- Determining appropriate response and investigation pathways
- Ensuring timely and fair decision-making

3. Designated Safeguarding Officer

LHWRF shall appoint a Designated Safeguarding Officer (DSO) to manage safeguarding concerns operationally. The Designated Safeguarding Officer is responsible for the day-to-day management of safeguarding within LHWRF and shall:

- Act as the primary point of contact for receiving, recording, and assessing safeguarding concerns and incident reports.
- Ensure that safeguarding concerns are responded to promptly, confidentially and in accordance with LHWRF's investigation mechanism and applicable laws.
- Coordinate internal reviews or investigations and liaise with senior management, legal advisors and statutory authorities where required.
- Support survivor-centred responses by facilitating access to appropriate support services and ensuring protection against retaliation.

4. Responsibilities of All Personnel

All individuals associated with LHWRF shall be required to:

- Familiarise themselves with this Safeguarding Policy and related organisational policies
- Uphold professional boundaries and ethical conduct
- Report safeguarding concerns promptly through designated channels

Mandatory reporting obligations, confidentiality requirements and protection against retaliation shall be governed by the LHWRF Whistleblower Policy, POSH Policy and other applicable statutory compliance policies.

7. Safeguarding Incidents and Reporting

LHWRF recognises that safeguarding incidents can occur in diverse forms and contexts, and that timely, appropriate response is essential to prevent further harm. The organisation is committed to ensuring that concerns are raised, received and addressed in a manner that is ethical, confidential and respectful of all parties involved.

1. Raising a Safeguarding Concern

- All individuals associated with LHWRF including employees, consultants, interns, volunteers and partners shall have a responsibility to report any safeguarding concern that they witness, experience, are informed of, or reasonably suspect.
- Safeguarding concerns shall be reported as soon as practicable, and no later than the timelines specified in the LHWRF Safeguarding Reporting and Response Procedures.
- A person raising a concern is not required to have proof; it is sufficient to report concerns based on a genuine belief that harm or risk may exist.
- Individuals who raise concerns in good faith shall be protected from retaliation in accordance with the LHWRF Whistleblower Policy, even if the concern is later found to be unsubstantiated.
- Concerns raised with malicious intent or knowingly false information may result in disciplinary action.

- Failure to report a known or suspected safeguarding concern shall be treated as misconduct and addressed through applicable disciplinary processes.

2. Receiving Safeguarding Disclosures

LHWRF acknowledges that survivors or witnesses may disclose safeguarding concerns through formal or informal means and may not always use established reporting channels.

Safeguarding information may come through:

- Written complaints or grievance mechanisms
- Verbal disclosures to staff members or focal persons
- Informal communication, including digital or community-based channels
- Third-party reports, observations, or concerns raised about others

All LHWRF personnel shall be required to respond appropriately if a safeguarding concern is disclosed to them.

When receiving a safeguarding disclosure, individuals shall:

- Listen attentively and respectfully
- Respond with empathy and without judgement
- Seek basic factual information (what happened, where, and when), without probing or assigning blame
- Clarify their understanding of what has been shared
- Explain next steps and reporting obligations clearly
- Obtain consent where possible before escalating information, except where mandatory reporting applies

Individuals shall not:

- Conduct their own investigation
- Make promises about outcomes or confidentiality beyond policy limits
- Share information with unauthorised persons
- Dismiss, minimise, or challenge the disclosure

3. Reporting and Documentation

- Safeguarding concerns shall be documented and escalated through designated internal channels.
- Reports/incidents shall be submitted/reported to the Designated Safeguarding Officer (DSO), in line with the LHWRF Safeguarding Reporting and Response Procedures.
- If the Designated Safeguarding Officer is involved in the concern or may have a conflict of interest, concerns may be escalated through alternative reporting channels specified in the Whistleblower Policy.
- Information recorded may include details of the concern, individuals involved, timeframes, and locations, while ensuring sensitivity and confidentiality.
- Once a report is submitted, the reporting individual shall refrain from further action or informal discussion, unless requested to assist by authorised personnel.

4. Confidentiality and Information Sharing

- Safeguarding information is treated as strictly confidential and shared only on a need-to-know basis.
- Details of safeguarding concerns shall be restricted to designated personnel involved in assessment, response, or investigation.
- Breaches of confidentiality may place individuals at risk and shall be addressed seriously.

5. Assessment and Initial Response

Upon receipt of a safeguarding report:

- The concern shall be reviewed through the internal safeguarding mechanism as defined in the LHWRP Safeguarding Investigation Procedure.
- An initial assessment shall determine whether the matter constitutes a safeguarding incident and the appropriate course of action.
- Where there is an immediate or ongoing risk, interim protective measures may be implemented, including temporary removal from duties or other risk mitigation steps, without prejudice.

6. Investigation of Safeguarding Incidents

Where a safeguarding incident is identified, LHWRP shall initiate an investigation proportionate to the nature and seriousness of the concern.

Investigations may be conducted internally or by external, independent experts, particularly in cases involving:

- Children
- Sexual abuse or exploitation
- Physical violence
- Senior management or governance members

Investigations shall be conducted in accordance with principles of fairness, confidentiality, and survivor sensitivity.

LHWRP endeavours to conclude safeguarding investigations within a reasonable timeframe, recognising that complexity or legal processes may require extensions.

7. Purpose of Safeguarding Investigations

Safeguarding investigations aim to:

- Establish whether organisational policies or codes have been breached
- Protect individuals from harm or further risk
- Identify systemic or operational weaknesses
- Inform corrective action, disciplinary measures, or referrals
- Strengthen organisational safeguards and practices

At all stages, the safety, dignity, and wellbeing of survivors, witnesses, and all involved parties remain the primary consideration.

8. Escalation and External Reporting

Where required by law, or where internal mechanisms are insufficient, LHWRF shall cooperate with statutory authorities and external bodies. Individuals who escalate concerns in good faith shall be protected under applicable organisational policies.

8. Safeguarding Investigation Process

LHWRF shall follow a structured, fair, and survivor-centred process to assess and investigate safeguarding incidents. Each step shall be guided by confidentiality, impartiality, and compliance with applicable laws and organisational policies.

Step 1: Initial Review

- Review the safeguarding concern to determine whether it falls within the scope of the Safeguarding Policy.
- Assess whether an investigation is required or whether the concern should be addressed through another internal mechanism.
- Define the purpose, scope, and authority of the investigation through clear Terms of Reference.
- Nominate an investigation lead and identify an investigation team with appropriate skills, independence, and contextual understanding.

Step 2: Investigation Planning

- Develop an investigation plan outlining timelines, responsibilities, and methods.
- Identify individuals who may need to be interviewed, including the complainant/survivor, subject of concern, and potential witnesses.
- Identify the types of information and evidence that may be required and appropriate methods for collection.
- Initiate contact with relevant parties in a sensitive and confidential manner.

Step 3: Conducting Interviews and Meetings

- Determine who may accompany individuals during interviews, in line with organisational policy.
- Prepare neutral, non-leading questions focused on establishing facts.
- Conduct interviews with care, respect, and sensitivity, ensuring psychological safety for all participants.
- Document discussions accurately and objectively.

Step 4: Collection and Review of Evidence

- Obtain written statements where appropriate.
- Gather and review relevant records, documents, correspondence, or digital material.
- Secure and assess any physical or contextual evidence, ensuring proper handling and confidentiality.
- Maintain a clear record of all evidence reviewed.

Step 5: Analysis and Reporting of Findings

- Analyse all information using a fair and balanced approach.
- Prepare a written investigation report summarising findings, conclusions, and reasoning.
- Identify any policy breaches, systemic gaps, or risk factors.

- Make recommendations for corrective, disciplinary, or preventive action.

Step 6: Decision-Making and Follow-Up Actions

- Submit the investigation report to the CSR Head or designated decision-making authority.
- Ensure appropriate actions are taken, including disciplinary measures, referrals, or organisational improvements.
- Retain investigation records securely for the prescribed period in accordance with the Data Protection and Record Retention policies.
- Monitor implementation of approved recommendations and close the case formally.

9.Guiding Principles Throughout the Process

LHWRF’s safeguarding responses shall be guided by the following core principles:

Safety first: The wellbeing of survivors, witnesses, and all involved parties shall be paramount.

Confidentiality: Information shall be shared strictly on a need-to-know basis.

Fairness: All parties shall be treated with respect and impartiality.

Non-retaliation: Individuals raising concerns in good faith shall be protected.

Legal compliance: Mandatory reporting and statutory obligations shall be observed at all times.

Survivor-Centred Approach

Lupin Human Welfare and Research Foundation adopts a survivor-centred approach in responding to all safeguarding concerns, placing the safety, dignity, rights, and wellbeing of the survivor at the core of all actions and decisions. All responses shall be respectful, non-judgmental, confidential and conducted in line with applicable Indian laws and LHWRF’s internal policies.

LHWRF seeks to empower survivors by clearly explaining the options available to them without imposing any particular course of action, except where reporting is legally mandated. Survivors’ decisions shall be respected to the extent permitted by law, and a contextual risk assessment shall be undertaken to identify and mitigate any potential harm arising from investigation or reporting processes.

Safeguarding concerns, where required, shall be addressed through fair, timely, and confidential investigations, conducted in accordance with LHWRF’s Safeguarding Procedures and relevant linked policies, including the POSH Policy, Whistleblower Policy, and Code of Conduct Policies. Throughout the process, due regard shall be given to confidentiality, procedural fairness, and the wellbeing of all parties involved.

LHWRF recognises its duty of care towards survivors and shall facilitate access to appropriate support services as outlined in relevant LHWRF policies. The organisation shall also fulfil donor, regulatory, and statutory safeguarding reporting obligations, while maintaining confidentiality on a need-to-know basis. Following the closure of safeguarding cases, LHWRF shall undertake learning and review processes to strengthen safeguards and prevent recurrence.

10.Supporting Organisational Processes

Risk Management

Safeguarding risks shall be identified, assessed and mitigated through processes outlined in the LHWRF Risk Management Framework and relevant programme guidelines and procedures.

Ethical Communication

All communication, documentation, and representation of beneficiaries and communities shall comply with the LHWRF Communication Policy and Data Protection and Privacy Policy.

Note on Policy Integration

This Safeguarding Policy shall be read in conjunction with LHWRF's:

- Code of Conduct
- Recruitment and Selection Policy
- POSH Policy
- Whistleblower Policy
- Risk Management Framework
- Communication and Data Protection Policies

Together, these policies strengthen LHWRF's approach to safeguarding and responsible organisational practice.

11. Policy Review

This policy shall be reviewed periodically and updated as required to reflect changes in organisational priorities, applicable labour laws or statutory requirements.