

PD-079 SAFEGUARDING OF VULNERABLE PERSONS POLICY

(children, young people and vulnerable adults)

1. Commitment to Safety

Retina South Africa is committed to a safe, inclusive and respectful environment for children, young people and vulnerable adults, including people affected by retinal conditions. We will take reasonable steps to prevent abuse, exploitation and neglect linked to our work, including counselling, support groups, research and clinical trial activity, outreach and awareness initiatives, and fundraising events.

2. Purpose

- 2.1 Protect vulnerable persons from harm.
- 2.2 Set clear safeguarding expectations, responsibilities and reporting routes.
- 2.3 Support consistent, lawful and timely responses to safeguarding concerns.

3. Scope of Application

This policy applies to all Retina South Africa officials, staff, volunteers, contractors, service providers, researchers and outreach participants who may engage with vulnerable persons through Retina South Africa, whether in person, at events, during home or facility visits, or online.

4. Definitions

- 4.1 **Vulnerable person** means anyone who may be at higher risk of harm, abuse, neglect or exploitation because of their age, disability (including visual impairment), illness, reliance on others for care or support, or their circumstances. In this policy, this includes both children and vulnerable adults.
- 4.2 **Child** means a person under 18 years old.
- 4.3 **Vulnerable adult** means a person who is 18 years or older and meets the definition of a vulnerable person in clause 4.1.
- 4.4 **Abuse** means doing something, or failing to do something, that causes harm or puts a vulnerable person at risk of harm. Examples are listed in Annexure 1.
- 4.5 **Safeguarding concern** means any suspicion, observation, allegation, disclosure or complaint that a vulnerable person may be at risk of, or is experiencing, abuse, neglect or exploitation.
- 4.6 **Designated Safeguarding Officer (DSO)** means the person (or people) appointed by Retina South Africa to receive, record and manage safeguarding concerns under this policy.

- 4.7 **Retinal conditions** includes inherited retinal conditions and all other retinal diseases and disorders (including, without limitation, age-related macular degeneration and diabetic retinopathy).

5. Legal Compliance

- 5.1 Retina South Africa complies with applicable laws, including the Children's Act 38 of 2005, Older Persons Act 13 of 2006, Protection of Personal Information Act 4 of 2013 (POPIA), National Health Act 61 of 2003, Domestic Violence Act 116 of 1998, and relevant HPCSA ethical guidelines.
- 5.2 Where the law requires mandatory reporting (for example, suspected child abuse or neglect), Retina South Africa will report promptly to the appropriate authority and cooperate with law enforcement and relevant statutory bodies.

6. Roles and Responsibilities

6.1 Governance & Risk Management Sub-Committee (oversight)

- 6.1.1 Oversee safeguarding governance and compliance, and ensure this policy and related procedures are reviewed and updated.
- 6.1.2 Receive trend and summary reporting (without unnecessary personal details) and ensure any corrective actions are implemented.

6.2 CEO and management (implementation)

- 6.2.1 Make sure this policy is communicated, understood and followed across Retina SA.
- 6.2.2 Provide appropriate resources, training and safe working practices.
- 6.2.3 Support the DSO to manage safeguarding concerns promptly and independently.
- 6.2.4 Approve interim protective measures when needed (for example, pausing an activity or removing a person from contact duties).

6.3 Designated Safeguarding Officer (DSO) (case management)

- 6.3.1 Receive safeguarding concerns and record them promptly and securely.
- 6.3.2 Acknowledge reports and do an initial risk assessment to identify any immediate safety actions.
- 6.3.3 Escalate to the CEO/management and/or external authorities when required (including mandatory reporting).
- 6.3.4 Coordinate and document the response, including any internal fact-finding where appropriate.
- 6.3.5 Maintain safeguarding records, monitor patterns, and provide regular summary reporting to management and governance.
- 6.3.6 Manage confidentiality and information sharing lawfully and ethically.

6.4 **Everyone's responsibilities**

- 6.4.1 Promote the safety and dignity of vulnerable persons in all Retina SA activities.
- 6.4.2 Report any safeguarding concern immediately (or as soon as reasonably possible). See **Section 8** for reporting routes.
- 6.4.3 Do not investigate yourself or promise secrecy. Explain that information may need to be shared to keep people safe.
- 6.4.4 Cooperate with safeguarding processes, including providing information when requested.
- 6.4.5 Follow the Retina SA Code of Conduct and any role-specific safeguarding procedures.

7. **Safeguarding principles**

- 7.1 **Prevention:** safer recruitment and vetting where needed, clear boundaries, appropriate supervision, and safeguarding built into our programmes.
- 7.2 **Clear reporting:** everyone knows how to report concerns and does so quickly.
- 7.3 **Respect, dignity and accessibility:** we use person-centred, disability-aware communication and make information and services accessible where reasonably possible.
- 7.4 **Prompt, proportionate response:** we act quickly to reduce risk and to support the person affected.
- 7.5 **Non-discrimination and accountability:** safeguarding applies equally to everyone, with clear roles, records and oversight.

8. **Reporting mechanisms**

- 8.1 Safeguarding concerns must be reported in writing to the DSO using the **SF-045 Safeguarding Concern Form** (preferred), submitted to dso@retinasa.org.za. If the concern involves the DSO, or if you are unable to reach the DSO, report to the CEO/management. Anonymous reports will be accepted and assessed.
- 8.2 If a person is in immediate danger or needs urgent medical attention, contact emergency services and/or the South African Police Service first, then notify the DSO as soon as possible.
- 8.3 The DSO (or delegate) will acknowledge receipt within **24 to 48 hours** (or sooner where risk indicates urgency).
- 8.4 An initial risk assessment will be completed as soon as reasonably possible (normally within **2 working days**) to decide whether immediate protective actions or escalation are required.
- 8.5 If there is potential criminal conduct, mandatory reporting obligations, or immediate risk, the DSO will escalate to the CEO/management and relevant authorities without delay.

- 8.6 Where internal escalation is required, the hierarchy is: **DSO → CEO/management → Governance & Risk Management Sub-Committee.**

9. Consequences for Non-Compliance

- 9.1 Breaches of this policy may result in action, including:

- 9.1.1 For staff: disciplinary action, up to and including termination of employment.
- 9.1.2 For officials or volunteers: removal from their role.
- 9.1.3 For contractors or service providers: termination of the contract (which may be immediate, depending on the circumstances).
- 9.1.4 Depending on the case, this may include reporting a criminal offence and/or other action allowed by law.

- 9.2 Retina SA may also refer matters to law enforcement or relevant authorities and may take legal action where necessary to protect vulnerable persons.

10. Policy Review and Approval

- 10.1 **Review Responsibility.** This Policy will be reviewed regularly by the Governance & Risk Management Sub-Committee to ensure continued relevance, effectiveness, and alignment with organisational objectives, legal requirements, and governance standards.
- 10.2 **Approval Authority.** All amendments to this Policy require approval by the governing body or authority delegated with policy approval responsibility.
- 10.3 **Record-Keeping.** All revisions to this Policy will be documented and retained in a formal revision history to ensure traceability, transparency, and auditability.

*** END OF POLICY ***

REVISION HISTORY				
Document Type	Policy	Document Number		PD-079
Effective Date	This policy is currently under review and pending formal approval.			
Governing Authority	Governance & Risk Management Sub-Committee			
Revision Details		Rev No.	Date	Approver
Origination for approval		1.0	2026-05-15	
MC Ratification				

PD-079 Safeguarding of Vulnerable People Policy		Page 4 of 5
Effective Date: This policy is currently under review and pending formal approval.		

Annexure 1

1. Types of Abuse and Non-inclusion

To ensure clarity and shared understanding, **Retina South Africa** defines the following types of abuse:

- 1.1 **Physical abuse:** Intentional acts that cause physical harm, such as hitting, slapping, pushing, kicking or burning.
- 1.2 **Emotional/mental abuse:** Behaviour that causes emotional distress, including verbal insults, humiliation, manipulation, coercive control, isolation, mocking or belittling a person's disability, or using language that undermines independence or self-worth.
- 1.3 **Sexual abuse and sexual harassment:** Any non-consensual sexual act or behaviour, including inappropriate touching, sexual comments/jokes, grooming, sexual exploitation, and exposing a person to explicit material.
- 1.4 **Neglect:** Failure to provide necessary care, support, supervision or basic needs, including neglect of accessibility needs (for example, not providing accessible information or safe navigation support where reasonably required).
- 1.5 **Financial abuse/exploitation:** Misuse of a person's money or property, theft, fraud, coercion or undue influence, including exploiting a person's inability to visually verify transactions or documents.
- 1.6 **Bullying and harassment:** Repeated behaviour intended to intimidate, humiliate or harm, including verbal abuse, physical aggression, social exclusion and discriminatory conduct.
- 1.7 **Domestic violence:** Abuse occurring within domestic settings, including physical, emotional, sexual and financial abuse and coercive control.
- 1.8 **Online abuse (including cyberbullying):** Abuse conducted through digital platforms (email, messaging apps, social media or virtual meetings), including harassment, threats, intimidation, non-consensual sharing of images, or discriminatory conduct.
- 1.9 **Child abuse:** Any form of abuse, neglect or exploitation that harms a child, including failure to provide basic needs.