

ZERO TOLERANCE FOR ABUSE POLICY

Organization	Nimota Care Foundation
Effective Date	September 1, 2021
Current Revision	September 30, 2026
Approved By	Board of Trustees
Applies To	Trustees, employees, volunteers, interns/students, consultants, contractors, partners and other persons representing NCF

1. Purpose

Nimota Care Foundation (NCF) is committed to protecting every person who receives, provides or participates in its services from abuse, neglect, exploitation, harassment and mistreatment. NCF maintains zero tolerance for abuse in any form. Every person has the right to be treated with dignity, respect, compassion and fairness and to receive services in an environment that promotes safety and well-being.

2. Scope

This policy applies to all NCF trustees, employees, volunteers, interns/students, consultants, contractors, partner representatives and any other person acting for or on behalf of NCF. It applies to conduct involving program participants, older adults, family members, caregivers, colleagues, visitors and community members in connection with NCF activities.

3. Policy Statement

NCF prohibits abuse, neglect, exploitation, degrading treatment, retaliation and deliberate failure to protect a person from known or reasonably suspected harm. No person may use an NCF role, authority, relationship of trust or access to services to harm, intimidate, exploit, punish, humiliate or control another person.

A person's age, disability, health status, financial circumstances, gender, social isolation, dependence on services or other vulnerability must never be used to take advantage of them.

4. Forms of Abuse

Abuse may be a single incident or a pattern of conduct. It may include:

- Physical abuse — hitting, pushing, shaking, inappropriate restraint, rough handling, deliberate injury or other non-accidental physical harm.
- Emotional or psychological abuse — threats, humiliation, intimidation, coercion, insults, bullying, controlling behaviour, isolation or conduct that causes fear or emotional distress.
- Verbal abuse — shouting, degrading comments, threats, discriminatory language, ridicule or persistent disrespect.

- Sexual abuse or exploitation — any non-consensual sexual contact or conduct, sexual coercion, exploitation of vulnerability or power, sexual harassment, or exchange of assistance or benefits for sexual activity.
- Financial or material abuse — theft, fraud, coercion involving money or property, misuse of funds, unauthorized transactions, pressure concerning gifts or property, or exploitation for financial gain.
- Neglect — deliberate or unreasonable failure by a person with a duty or assigned responsibility to provide necessary care, assistance, supervision or protection.
- Discriminatory abuse — harmful, degrading or unequal treatment based on a person's protected or personal characteristics.
- Abandonment or improper isolation — intentionally leaving a person without appropriate support where a duty of care exists, or improperly restricting social contact.
- Digital or technology-facilitated abuse — harassment, threats, exploitation, unauthorized sharing of private information or images, or misuse of technology to control or harm another person.

5. Safeguarding Older Adults and Other Vulnerable Participants

NCF recognizes that older adults may experience heightened risks associated with social isolation, disability, dependence on others, economic insecurity, health needs, ageism or unequal power relationships. Staff and representatives must respect each participant's autonomy and must not assume that age or disability removes a person's right to make decisions.

Where a participant may require additional assistance, NCF will use reasonable safeguards while preserving dignity, privacy, participation and independence to the greatest extent possible.

6. Professional Boundaries

Persons representing NCF must maintain appropriate professional boundaries. They must not solicit personal loans, pressure participants to give money or gifts, misuse participant information, use threats or favouritism, or make access to NCF programs dependent on personal, financial or sexual favours.

Any actual or potential conflict of interest involving a participant must be disclosed to the appropriate supervisor or Board representative.

7. Prevention

NCF will promote prevention through clear behavioural expectations, appropriate orientation and training, supervision, accessible reporting mechanisms, attention to program risks, and prompt response to concerns. Safeguarding responsibilities will be communicated to relevant personnel and partners.

8. Duty to Report

Anyone covered by this policy who witnesses, suspects, receives a disclosure of, or becomes aware of possible abuse, neglect or exploitation connected with NCF must report the concern promptly. A person does not need to prove that abuse occurred before raising a good-faith concern.

Reports may be made to the Founder/CEO, a designated safeguarding focal person or a designated member of the Board of Trustees. If the concern involves the person who would normally receive the report, it must be directed to another appropriate recipient. Anonymous reporting will be accepted where practicable.

9. Immediate Safety and Emergency Response

Where there is an immediate threat to life or safety, priority must be given to protecting the person from further harm and obtaining appropriate emergency assistance. NCF will consider medical, psychosocial, protective, legal or community referrals according to the person's circumstances and wishes, subject to applicable legal obligations.

10. Response to a Disclosure

A person receiving a disclosure should listen respectfully, remain calm, avoid blaming or interrogating the person, explain that the concern will be handled as privately as possible, record relevant information accurately, and report through the appropriate NCF channel. Staff and representatives must not promise absolute confidentiality when safety or legal obligations may require limited disclosure.

11. Confidentiality, Privacy and Non-Retaliation

NCF will restrict information about an allegation to persons who need it for safety, assessment, investigation, referral, legal compliance or organizational accountability. Records will be handled securely.

Retaliation, intimidation or punishment against a complainant, survivor, witness, reporter or person participating in an investigation is prohibited. A report made in good faith will not result in discipline merely because it is ultimately unsubstantiated.

12. Assessment and Investigation

NCF will assess reported concerns promptly and determine appropriate next steps based on the nature and seriousness of the allegation. Investigations will be fair, impartial, appropriately documented and as confidential as reasonably possible. A person with an actual or perceived conflict of interest must not lead the investigation or determine the outcome.

NCF may use an independent investigator or seek external professional advice when the seriousness or complexity of a matter requires additional expertise. Procedural fairness will be provided to a person accused of misconduct.

13. Reporting to Authorities and Other Required Bodies

NCF will comply with applicable legal and contractual reporting obligations. Where there is reasonable concern about criminal conduct, immediate danger, or another matter requiring external reporting, NCF will consider referral to the appropriate authority while taking reasonable steps to protect the affected person's safety and privacy.

Where donor or funding agreements impose specific safeguarding reporting requirements, NCF will follow those requirements.

14. Corrective and Disciplinary Action

A substantiated breach may result in corrective or disciplinary action proportionate to the circumstances, including additional training, supervision, restriction or removal of duties, suspension, termination of employment or volunteer service, termination of a contract or partnership, removal from an NCF role, and referral to appropriate authorities where required or appropriate.

15. Support and Follow-Up

NCF will take reasonable steps to support affected persons and reduce the risk of further harm. Follow-up may include safety planning, service referrals, program adjustments, additional supervision, policy or training changes, and review of systemic factors that contributed to the incident.

16. Training and Responsibilities

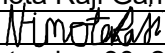
All persons covered by this policy are responsible for understanding and complying with its requirements. NCF will provide appropriate safeguarding orientation or training and may require personnel to acknowledge that they have read and understood the policy.

Management is responsible for implementing the policy and maintaining reporting arrangements. The Board of Trustees has oversight responsibility for serious safeguarding matters and for periodic review of the policy.

17. Policy Review

This policy reflects NCF's zero-tolerance safeguarding commitment effective September 1, 2021 and has been revised in September 30, 2026 to provide a more detailed framework for prevention, reporting, response and organizational accountability. It will be reviewed periodically and updated when necessary.

18. Approval

Approved by	Board of Trustees, Nimota Care Foundation
Name/Title	Nimota Raji Gambari/Chairperson/Trustee
Signature	
Date	September 30, 2026