



CFK AFRICA POLICY: SAFEGUARDING/CHILD PROTECTION POLICY

1.0: INTRODUCTION

CFK Africa is a nonprofit organization with 88 staff registered under the Non-Governmental Organization (NGO) Coordination Board of Kenya through the NGO Coordination Act of 1992 with headquarters in the informal settlement of Kibera in Nairobi County. It is also registered in the United States of America as a 501(c) (3) nonprofit organization and an associated entity of the University of North Carolina with three staff utilizing offices in Chapel Hill, NC. CFK Africa's mission is to empower youth in slums.

Safeguarding is the responsibility that an organisation has to ensure that their employees and volunteers, partners, vendors, operations, and programs do no harm to children, young people or vulnerable adults together referred to as 'vulnerable people' under this policy; that they do not expose them to the risk of discrimination, neglect, harm and abuse; and that any concerns the organisation has about the safety of vulnerable people within the communities in which they work are dealt with and reported to the appropriate authorities. It is also the responsibility of the organisation to protect its employees and volunteers when they are vulnerable, for example, when ill or at risk of harm or abuse.

Child protection is a central part of but not separate from safeguarding. It is the process of protecting individual children identified as either suffering or at risk of significant harm because of abuse or actions, interventions or initiatives that may affect the safety and well-being of children. It includes measures and structures designed to prevent and respond to abuse.

CFK Africa recognizes it has an obligation to put in place all reasonable safeguarding measures to ensure, as far as possible, the safety and protection of children, young people and vulnerable adults, including those with whom we work and those in the communities where CFK Africa work is undertaken.

1.1: Applicability

All CFK Africa staff, and stakeholders including but not limited to secondees, volunteers, interns and third parties connected to CFK Africa, including partners, implementing partners, consultants, contractors, suppliers and visitors of CFK Africa.

1.2: Publication

The safeguarding policy and any amendments thereto shall be published/posted on the website of the organisation and in a public place at CFK Africa Headquarters.

1.3: Purpose

The purpose of this policy and associated procedures is to provide clarity to ALL on how they should engage with children, young people and vulnerable adults when working for, on behalf of, or in partnership with CFK Africa. It is also to help us make sure that employees, volunteers and other representatives are protected.

It is intended to help us to have a common understanding of safeguarding issues, develop good practice across the diverse and complex areas in which we operate and thereby increase accountability in this crucial aspect of our work. Any breach of this policy will be treated as a disciplinary matter, which may

result in immediate termination of employment or contract, withdrawal of volunteer status, and reporting to the police, relevant regulatory authority or other body.

CFK Africa will take prudent measures to make itself safe for vulnerable people both as an organisation and in the conduct of all aspects of its day-to-day operations, including humanitarian, advocacy, media and communications.

1.4: Compliance and Principles

Child safeguarding is grounded in the Constitution (2010), Kenya Children Rights Act (2001), UNHCR (1989) and other optional/additional protocols on keeping children safe, observing children's safeguarding standards and international good practice which include but are not limited to:

- ✓ All children have equal rights to protection from any form of harm.
- ✓ Everybody has a right to support and protect children.
- ✓ All children should be encouraged to fulfil their potential.
- ✓ Inequality and discrimination are not tolerated.
- ✓ Abuse and any concern the organisation has about beneficiaries, and safety within the communities of operation should be reported.

1.5: Scope

This policy is mandatory for all CFK Africa employees. For this policy, "employees" are defined as anyone who works for or on behalf of CFK Africa, either in a paid or unpaid capacity. This therefore includes directly employed staff, trustees, board members, contractors, employees and volunteers of subcontractors, agency workers, consultants, volunteers, interns and all visitors to CFK Africa work programs and offices.

This policy demonstrates how CFK Africa will meet its legal obligations and reassure volunteers, employees, partners and members of the public:

- a) What they can expect CFK Africa to do to protect and safeguard vulnerable people.
- b) That they can safely voice any concerns through an established procedure.
- c) That all reports of abuse or potential abuse are dealt with seriously and effectively.
- d) There is an efficient recording and monitoring system in place.
- e) Employees, volunteers, subcontracted agencies and partners receive appropriate induction on safeguarding.
- f) That a robust 'safe' recruitment procedure is in place.

There are additional procedures in place that apply to those who work or have contact with, either directly or indirectly, children, young people, vulnerable adults or those who live in communities alongside them.

2.0: CFK AFRICA CODE OF CONDUCT

[CFK Code of Conduct \(Acknowledgement\).pdf](#)

2.1: Acceptable Behaviour for Employees and Associates

All employees, volunteers, consultants, sub-contractors, partner organisations and visitors must follow this policy and maintain an environment that prevents exploitation and abuse and encourages reporting of policy breaches using the appropriate procedures.

All people working with CFK Africa will:

- ✓ Read, understand and adhere to the CFK Africa Safeguarding Policy and CFK Africa Code of Conduct Policy.

- ✓ Promote a zero-tolerance approach to discrimination, sexual harassment and abuse in all working environments.
- ✓ Strive to develop relationships with all stakeholders which are based on equality, trust, respect and honesty.
- ✓ Place the safety and welfare of children and vulnerable people above all other considerations.
- ✓ Report any concerns they may have about the welfare of a child or vulnerable person.
- ✓ Report any concerns they may have about the behaviour of a CFK Africa representative concerning safeguarding.
- ✓ In a one-to-one situation with a child or young person, where privacy and confidentiality are important, try to make sure that another adult knows the contact is taking place and why. If possible, ensure another adult is in sight and that the child or young person knows another adult is around.

2.2 Unacceptable Behaviour for CFK AFRICA Employees and Associates

- ✓ Sexually harass, assault or abuse another person.
- ✓ Physically harass, assault or abuse another person.
- ✓ Emotionally abuse another person, such as engaging in behavior intended to shame, humiliate, belittle or degrade.
- ✓ Condone, or participate in behavior which is abusive, discriminatory, illegal, or unsafe.
- ✓ Develop, encourage or fail to act on relationships with children or other vulnerable people which could in any way be deemed sexual, exploitative or abusive.
- ✓ Act in ways that may be violent, inappropriate or sexually provocative.
- ✓ Agree with a child to keep a secret which has implications for their safety or the safety of other young people.

3.0 PREVENTION AND RESPONSE PROTOCOL

CFK Africa will protect the interests of children and beneficiaries at all costs and prevent harm at all levels. As part of protecting the subject's identity, CFK Africa has introduced an official reporting email – report@cfkafrika.org and phone number (+254742509999) to be used in cases of identified abuse or injustices within the community.

3.1 Risk Assessment and Mitigation

CFK Africa will conduct a risk assessment and develop risk mitigation strategies during the implementation of any activities to ensure children and parents have been provided with information on child protection procedures and prevention of harm during child participation activities. CFK Africa will identify risks associated with the activities to identify potential risks to children, understand factors that place children at risk, identify controls that are in place to mitigate the impact of the risk and explore additional controls with a timeline to address the risks.

Prevention of Harm in Child Participation:

CFK Africa will work to empower children as citizens and participants in their well-being and to minimize any risk of harm or negative consequence resulting from participation in activities promoted by CFK Africa. Child participation programs and activities are based on context analysis with clearly identified needs and expected results, along with how the project will measure progress towards achievement while mitigating risks through risk assessments.

Providing information, advice and support to the children when aware of the needs of the child(ren) in your care and assisting in meeting these needs as appropriate or making referrals where you are not able to meet them.

3.2 Reporting

- ✓ All CFK Africa employees and affiliates must report any suspicions of child or adult abuse, safeguarding issues, or policy violations within 48 hours.
- ✓ Report any credible concerns or suspicions of sexual abuse or exploitation by humanitarian workers outside CFK Africa programs within 24 hours. All reports should be submitted to the official office email.

3.3: The Scope

- ✓ All staff, volunteers, interns, associates, and visitors must comply with the beneficiary protection policy and understand potential repercussions for violations. This policy will be established as a minimum worldwide standard for all employees; if needed by law or local practice, this commitment will be demonstrated by signing the policy.

Assessing child safeguarding hazards for mitigation.

Before encouraging children to participate in programs or community activities, CFK Africa will conduct an initial risk assessment using a risk assessment tool (to be developed). For routine or continuous activities, repeat the assessment at least once a year. Risk assessments for project operations will include:

- ❖ Identification of possible/potential risks to children.
- ❖ Understanding the level of risk.
- ❖ Integrating strategies to mitigate risk to children into the design, delivery and evaluation of programs, operations and activities which involve or impact upon children. Encourage children to get involved in their protection in an empowering and safe manner, respecting their cultural sensitivities. This can be done by giving them the space to contribute ideas and solutions.
- ❖ When involving children in a major public event where they will be advocating against sensitive issues in the public eye, review the risk assessment and modify based on any concerns for children's safety.

3.4 Code of Conduct

- ✓ All staff and associates, including volunteers, should agree to the code of conduct when they are employed and/or start their job. It will also be made clear what action the organization will take if the code is broken or not followed correctly.
- ✓ CFK Africa Child Protection and Safeguarding Policy forms an attachment to the Code of Conduct. The Policy has been designed to enable staff, volunteers, Interns, consultants and contractors to raise legitimate concerns about violations of the Code of Conduct without fear of intimidation.

3.5 Education and training

All staff and associates will receive child safeguarding training to help them understand why it is necessary to safeguard and protect children and to be fully aware of the procedure for reporting concerns.

- ✓ Staff will receive an induction on child protection and safeguarding at the time of their engagement with CFK Africa. Staff with responsibilities relating to child protection and safeguarding will be provided with more in-depth training within 6 months of their engagement.
- ✓ Associates (volunteers, contractors or consultants, and partner organizations) will be briefed on child protection and safeguarding and their responsibilities under the policy upon engagement with the organization.
- ✓ Children and families will be informed of CFK Africa's commitment to child protection and safeguarding and what to do if they have concerns about a child.

3.6 Safe program design

As a strategy for risk reduction, a risk assessment of all CFK Africa operations, programs and project activities will be conducted periodically.

- ✓ Risk mitigation strategies will be developed and incorporated into the design, delivery and evaluation of programs, operations and activities which involve or impact children.

3.7 Responding

Breaches of this policy and failure to comply with these responsibilities may incur the following response/sanctions:

- ❖ For CFK Africa Staff or Managers - Disciplinary action leading to possible dismissal.
- ❖ CFK Africa visitors/volunteers/interns /consultants/affiliates - Up to and including termination of all relations including contractual and partnership agreements with CFK Africa.
- ❖ Where relevant - Appropriate legal or other such actions.
- ❖ Where concern exists about the conduct of CFK Africa staff, volunteers, and interns concerning child protection and/or where there has been a breach of the child protection policy, this will be investigated under this policy by consideration of referral to statutory authorities for criminal investigation, and/or by CFK Africa in accordance with disciplinary procedures. This may result in disciplinary action for CFK Africa staff and Managers.
- ❖ Be aware that if a legitimate concern about suspected child abuse is raised, which proves to be unfounded on investigation, no action will be taken against the reporter, however, appropriate sanctions will be applied in cases of false and malicious accusations of child abuse.

4.0 COMMUNICATIONS, SOCIAL MEDIA AND DIGITAL TECHNOLOGY

CFK Africa will address harm or risks linked to the use of online social media digital platforms to ensure the following for consideration.

- ❖ Digital technologies are not misused to facilitate sexual exploitation and abuse of children.
- ❖ Children are protected from harmful digital marketing practices.
- ❖ Children are aware of their digital rights and have the necessary information and knowledge to protect themselves from possible harms and risks that they may encounter in the digital world.
- ❖ Children are protected from inappropriate collection and processing of their data.

4.1 Respect

CFK Africa will respect the dignity of the child/beneficiary during photo taking or video taking and will use their consent to document case studies and at the same time not manipulate the subject to show desperation. CFK Africa will ensure that children and beneficiaries are treated and portrayed with dignity in all forms of communication, and not as helpless victims or in sexually suggestive poses.

4.2 Consent

Children or beneficiaries who are primary subjects of text, photo and/or video resource gathering by CFK Africa employees must provide the media consent form. If the primary subject is a child, written consent is also collected from the parent, guardian or other legally required entity or individual. In line with this CFK Africa will keep confidentiality of the subject while making use of social media and communication material.

4.3 Digital Awareness

CFK Africa will actively support parents/caregivers--as well as any children participating in CFK Africa organized Information and Communication Technology (ICT) activities to understand how to safely

and appropriately utilize social media and digital technology while avoiding risks and appropriately respond to threats or incidents.

4.4 CFK Africa's Commitment to Prevention of Harm in Communications:

- ✓ Committed to telling stories that raise awareness and promote solutions to ending violence and abuse against children and adult beneficiaries.
- ✓ Take steps to prevent any harm to children and adult beneficiaries that may arise through communications, social media and digital technology (including photographs/ videos/audio clips, stories, articles, or any other communication materials).
- ✓ Discourages direct, unfacilitated, undocumented communication through social media.
- ✓ Report communications, social media and digital technology policy violations: All violations of this policy should be reported to the office's official email

This Policy applies to all staff, volunteers, Interns, consultants and contractors who are expected to demonstrate full commitment to the organizational values and conduct themselves in a manner consistent with their role.

Their actions and relationships with children and vulnerable adults must fully align with the organizational policies and standards and in particular child protection & safeguarding policy and standards.

Agreements with partners will include a statement that partners who do not have a child protection and safeguarding policy will always abide by CFK Africa's child safeguarding policy.

Online Safeguarding

CFK Africa believes that online safety is an essential part of safeguarding. CFK Africa will evaluate online safety mechanisms periodically to ensure that this policy and any linked policies are consistently applied.

CFK Africa will, as far as possible:

- ❖ Identify approaches to educate and raise awareness of online safety throughout our programs.
- ❖ Enable all staff to work safely and responsibly to role model positive behaviour online and to manage professional standards and practice when using technology: including their own personal social media use identify clear procedures to use when responding to online safety concerns.
- ❖ CFK Africa will develop, where appropriate, project interventions that can influence online behaviour change, teach resilience and promote prevention, in addition to providing general guidance on online safety where possible.

5.0: HUMANITARIAN RESPONSES

- ✓ CFK Africa has a commitment to protecting children affected by natural disasters and human-induced crises and to prevent and reduce the violence, exploitation and deprivation faced by people in such situations.
- ✓ CFK Africa recognizes that children living in areas affected by humanitarian crises are particularly at risk of harm and abuse. All organisations and third parties implementing CFK Africa disaster risk reduction and humanitarian preparedness, and response activities must assess safeguarding risks, apply and build on this policy's minimum child safeguarding requirements. Development and implementation of humanitarian response strategies and

activities must identify, mitigate and manage child safeguarding risks. This includes safer recruitment and safer programming approaches.

6.0: RECRUITMENT, INDUCTION AND TRAINING OF STAFF

- ✓ Safer recruitment: CFK Africa ensures its recruitment processes are rigorous and in line with statutory requirements and best practice guidance. These processes include checking with three references.
- ✓ CFK Africa has committed to sharing relevant HR information relating to sexual misconduct with other NGOs when references are requested.
- ✓ CFK Africa reserves the right to terminate contract negotiations or refuse to engage an individual if appropriate criminal record checks are not undertaken or cannot be undertaken for roles that are identified as working with or having contact with children.
- ✓ This will also apply if background and reference checks reveal that the person is not suitable to work with CFK Africa or has omitted key information.
- ✓ All staff, volunteers and interns are required to complete mandatory child protection and safeguarding training within a designated period from joining the organisation and attendance is recorded.
- ✓ CFK Africa staff, volunteers and interns are required to attend a child protection and safeguarding face-to-face induction training within 90 days of starting.
- ✓ All staff are required to attend refresher child protection and safeguarding training at least once every two years.

7.0: DATA PROTECTION

- ✓ Compliance with data protection laws and policies must be central to all our processing of children's data. All CFK Africa staff, representatives and third parties collecting children's data on CFK Africa's behalf or concerning any of our work must adhere to CFK Africa policies, procedures and practice or ensure their mechanisms comply with legal requirements for data protection.

8.0: IMPLEMENTATION AND MONITORING OF THE CODE

- ✓ CFK Africa is responsible for ensuring the development, implementation and periodic review of the safeguarding policy; ensuring CFK Africa staff and affiliates understand and perform their safeguarding responsibilities.
- ✓ The Management committee that comprises the Executive Director representing the board together with program leads is responsible for ensuring the implementation and monitoring of the code.
- ✓ This code of conduct forms part of staff contracts of employment, and volunteer/consultancy/contractor agreements. Failure to adhere to it could result in their employment, agreements, or engagement with CFK Africa being terminated and or criminal prosecution.

CFK Africa will:

- ❖ Take all concerns and reports seriously at all levels.
- ❖ Investigate and act on reports immediately.
- ❖ Take appropriate legal or other action against anyone making a false and/or malicious accusation.

9.0: MONITORING AND REVIEW

- ✓ Child Protection and safeguarding is incorporated into the organization's risk register and quarterly and annual reporting processes. The management committee and the Board of Directors will regularly review the risk register and organization reports to ensure that child safeguarding measures are in place and effective.
- ✓ This policy will be reviewed every 3 years or whenever necessary where additional issues need to be identified and addressed through this policy.

9.1: Compliance and Audit

- ✓ Compliance with policy and procedures is monitored through reviews and a program of safeguarding audits and spot checks. This includes downstream partners, sub-grantees, contractors and suppliers. 'Minimum Safeguarding Requirements' will be applied across CFK Africa programs and during spot checks.

10.0: REPORTING TO THE BOARD

All serious child safeguarding cases will be reported to the CFK Africa Board of Directors at their board meetings. Safeguarding will be a standing agenda item on the Board agenda. An annual Safeguarding Report will be submitted to the CFK Africa Board.

11.0: RELEVANT LAWS & ENDORSEMENTS

This policy will be implemented per:

- ✓ Applicable laws and by-laws in Kenya where CFK Africa operates; and
- ✓ The United Nations Convention on the Rights of the Child (UNCRC), The UN Secretary General's Bulletin: Special measures for protection from sexual exploitation and sexual abuse (ST/SGB/2003/13) and other applicable international treaties, laws, and conventions.

Definition of terminologies

A child – in line with the UNHCR Convention (Article 1) is described as any person under the age of 18 years. Irrespective of the age of majority in the country in which the child lives or in their home country. It is widely recognized that children are generally more vulnerable to abuse and exploitation due to factors such as age, gender, social and economic status, developmental stage, and dependence on others.

Youth or young people – individuals aged 15 to 26 (15 to 35 in some countries) – CFK Africa recognizes that this group spans the categories of 'children and 'adults' but regards young people as having safeguarding needs and requiring distinct consideration aside from younger children and older adults.

Vulnerable person/people – for this policy this is an umbrella term which covers children, young people and vulnerable adults.

Abuse - a violation of an individual's human and civil rights by any other person or persons. It can take the form of physical, psychological, financial or sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the health, survival, development or dignity of a child, young person or vulnerable adult.

Abuse can be a single act or repeated acts and can be unintentional or deliberate. Abuse often involves criminal acts.

Discriminatory Abuse – abuse motivated by a vulnerable person's age, race, nationality, sex, sexual orientation, disability, or other personal characteristic.

Financial or Material Abuse - including theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

Neglect - the persistent failure to meet a vulnerable person's basic physical and/or psychological needs, likely to result in serious impairment of his/her health or development. Examples include failure to provide adequate food, clothing and shelter, failure to protect them from physical or psychological harm or danger; failure to ensure adequate supervision (including the use of inadequate caregivers); or failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a vulnerable person's basic emotional needs.

Physical Abuse – includes hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm, misuse of medication, restraint, or inappropriate sanctions.

Psychological Abuse - includes emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks. Examples include not giving a vulnerable person opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on a vulnerable person, which may include interactions that are beyond a vulnerable person's developmental capability. It may involve serious bullying (including cyberbullying), or the exploitation or corruption of a vulnerable person.

Sexual Abuse - involves forcing, enticing or coercing someone to take part in sexual activities, whether or not the vulnerable person is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving a vulnerable person in looking at or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse can be carried out by adults or other children.

Staff -refers to individuals who receive a regular salary for work in any part of the organization, or group including all, Regional/satellite offices. Add Interns, Volunteers, mentors, Locums etc.

Consultants- Contractors refer to people who are not CFK Africa staff but who receive payment from services offered.

A Volunteer- refers to any person providing non-salaried work in the service of CFK Africa's business benefits at any part of the organization, whether in the service of child sponsorship at the community level, in CFK Africa offices, as a Board member or any other type of activity.

A Visitor- refers to people going to CFK Africa, field programs or meetings with CFK beneficiaries or children. Upon arrival, visitors will receive orientation and sign a code of conduct acknowledgement.

Interns – refers to placement students from learning institutions that are placed within the organization for purposes of learning.

Affiliates/Associate – An associate is defined as any partner at work. They include but are not limited to contractors, suppliers, board members, local community-based partners, guests and visitors.

Appendix 1: CFK Africa Safeguarding Standards

This standard framework is from the Keeping Children Safe “Child Safeguarding Standards” and adapted for use for CFK Africa. Each standard can be met as a whole, in part or not met.

Standard	Potential evidence of standard being met
1. Policy	1.1 The organisation has a clear safeguarding policy that seeks to prevent harm to children, young people and vulnerable adults <ul style="list-style-type: none"> • A copy of the policy, signed by the management, board or trustees for programs and stakeholders
	1.2 Policies are publicized to staff, beneficiaries and wider communities <ul style="list-style-type: none"> • Policy or summary translated into local languages • Example of ways the policy has been promoted including to children, young people or other community members as necessary.
2. People	2.1 The organisation places clear responsibilities and expectations on its staff and associates and supports them to understand and act in line with these <ul style="list-style-type: none"> • Clear responsibilities for a Designated Safeguarding Officer at appropriate level
	2.2 Key staff are designated at different levels with clearly defined roles and responsibilities. <ul style="list-style-type: none"> • Job descriptions with clear expectations on those with contact with vulnerable people
	2.3 There are written guidelines for appropriate and inappropriate behaviour <ul style="list-style-type: none"> • A written code of conduct; evidence of this being shared with all staff (fulltime and contracted)
	2.4 There are appropriate learning opportunities to develop and maintain the necessary attitudes, skills and knowledge to keep vulnerable people safe. <ul style="list-style-type: none"> • A copy of training plans, course attendance records and course evaluations. • Evidence of induction for CFK Africa staff
3. Procedures	3.1 The organisation carries out local mapping exercises which provide information on the legal, social welfare and child protection arrangements. <ul style="list-style-type: none"> • Legal requirements are included in policies
	3.2 Safeguarding risks and mitigation strategies are incorporated into existing risk assessment processes at all levels. <ul style="list-style-type: none"> • Risk assessments include appropriate and relevant risks • Evidence of mitigation strategies implemented • Risk assessments shared with CFK Africa
	3.3 Safeguarding issues are integrated into program design, delivery and evaluation <ul style="list-style-type: none"> • Evidence of safeguarding issues in project proposals, plans, and needs
	3.4 There are procedures for responding to safeguarding concerns that arise <ul style="list-style-type: none"> • A copy of a concern/allegation management
4. Accountability	4.1 Implementation of safeguarding policies and procedures is monitored <ul style="list-style-type: none"> • Copies of reporting to boards, donors, etc. • Copies of minutes of meetings to review practice
	4.2 Learning from issues captured and informed future policy and procedure reviews <ul style="list-style-type: none"> • Incident reports produced
	4.3 Policies and procedures reviewed at least every three years <ul style="list-style-type: none"> • Evidence of review in annual plans/strategies