

GLOBAL SAFEGUARDING POLICY

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**PERSON RESPONSIBLE: Richard
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ACRONYMS AND ABBREVIATIONS

CEO – Chief Executive Officer
CfC – Chance for Childhood
CoC – Code of Conduct
CP – Child Protection
DBS – Disclosure and Barring Service
GSL – Global Safeguarding Lead
INGO – International Non-Governmental Organisation
PSEAH – Prevention from Sexual Exploitation, Abuse and Harassment
SEAH – Sexual Exploitation, Abuse and Harassment
SFP – Safeguarding Focal Point
SMT – Senior Management Team
ST – Safeguarding Trustee
SC – Safeguarding Champion
SP – Safeguarding Policy

1. SAFEGUARDING EVERYONE

1.1 Statement of Commitment

Chance for Childhood promotes a proactive response to keeping everyone safer – children, young people, adults at risk and staff.

Throughout our history, Chance for Childhood has focused on the welfare and safety of children, and we continue to recognise our fundamental duty of care towards everyone we work with. As part of this responsibility, we also work to protect anyone who is in contact with Chance for Childhood from accidental harm, as well as deliberate exploitation and abuse from, and within the organisation, intended for their benefit.

Chance for Childhood specifically recognises that children and young people living with disabilities, in street situations, in conflict with the law and affected by conflict are especially at risk from abuse, exploitation, and ill-treatment at the hands of adults in their lives. Additionally, we recognise the challenges these children and young people face in accessing standard protection and safeguarding mechanisms.

As such, this policy serves as a means of rigorously maintaining proper guidelines and procedures to prevent situations that make Chance for Childhood vulnerable to enabling exploitation, harassment and abuse, as well as encouraging the use of inclusive safeguarding practices. Chance for Childhood views safeguarding as both an organisational and an individual responsibility.

Although we recognise that the legal definition of a child varies in different countries, for the purpose of this policy, children are defined as all those under 18 years of age in accordance with the United Nations Convention on the Rights of the Child (UNCRC). An individual aged 18-25 years is considered to be a “young person”.

Chance for Childhood’s Safeguarding Policy aims to be inclusive of children, young people, adults at risk and staff.

We operate a zero-tolerance policy towards exploitation and abuse.

Inclusive Safeguarding

Chance for Childhood believes that inclusion should cut across all the work we do, including inclusion in safeguarding.

We are committed to creating a culture where everyone is included in safeguarding – that every person we work with knows their rights, what to expect

from Chance for Childhood staff and is able to not only know how to be protected, but is able to report any concern and access the support they need through that report.

Chance for Childhood's approach to inclusive safeguarding focuses on placing communities at centre of our policy where their dignity, well-being and safety is prioritised, as well as accessibility being at the heart. Our inclusive safeguarding approach considers communities lived experiences and the structural exclusion, discrimination and injustices they experience and centre those when considering how best they can be protected. Read details of our Inclusive Safeguarding Guide [here](#).

1.2 Safeguarding Values

- The welfare of the children, young people and adults at risk is paramount;
- Everyone has equal rights to protection from abuse and exploitation;
- All children, young people and adults at risk should be encouraged to fulfil their potential and inequalities of potential should be challenged;
- Everybody has a responsibility to support the care and protection of children, young people and adults at risk;

We will seek to safeguard children, young people and adults at risk by:

- Valuing them, listening to and respecting them
- Creating inclusive safeguarding practices and procedures that take children and young people's specific needs into account
- Creating safer spaces for people to speak out and challenge us when things can be better
- Sharing information about safeguarding and good practice

We are committed to active participation in networks and initiatives to promote good safeguarding practices to facilitate mutual learning and good practice.

1.3 Scope

Chance for Childhood's Safeguarding Policy applies to:

- All staff
- All Board Members
- All volunteers and interns
- All partner organisations*
- All those visiting Chance for Childhood Offices and Partner projects including but not limited to partners, donors, corporate sponsors, ambassadors and journalists

*Partners who do not have a robust Safeguarding Policy or Procedures will be required to sign up to the Chance for Childhood's Safeguarding Policy and Procedures until they have such policies and procedures in place.

NOTE: This Policy applies at all times, both within and outside working hours.

1.4 Compliance

Chance for Childhood is committed to exercising legal compliance to all Global Safeguarding, Child Protection, and Prevention of Sexual Exploitation and Abuse legislation and good practice.

Chance for Childhood operates across six countries with varying Safeguarding cultures and contexts. We acknowledge that each country in which Chance for Childhood and our Partners operate has different safeguarding legislation. Each Office is expected to know the National Safeguarding Laws in their country.

Our Global Safeguarding Team plays a key role in supporting our Offices, Programmes and Partners to ensure that they are meeting the Global and National legal requirements and are operating within the Chance for Childhood Global Safeguarding Policy. Where there is a clash between the Policy and National Law, the Safeguarding Team will support the Programme to decide the best course of action.

Key Legislation in the area of Safeguarding includes, but not limited to:

- United Nations Convention on the Rights of the Child (1989)
- Chance for Childhood is also committed to achieving the full, ongoing implementation of the Six Core Principles relating to Sexual Exploitation and Abuse by the Inter-Agency Standing Committee (IASC) Working Group on Prevention and Response to Sexual Exploitation and Abuse.

The Principles can be read here: <https://interagencystandingcommittee.org/inter-agency-standing-committee/iasc-six-core-principles-relating-sexual-exploitation-and-abuse>

We recognise that our international partners and donors may have different Safeguarding legislation and Safeguarding contexts within the countries they work in. We will work with them to identify areas of development for both sides and to ensure we are compliant within all safeguarding laws and reporting requirements for a Programme and/or Partnership.

1.5 Distribution

We acknowledge that to ensure this policy is implemented successfully, we must

commit to the distribution of the policy to all relevant parties and ensure there are accessible versions to all communities we work with that meet the accessibility needs of each specific community.

We commit to widely promoting and disseminating our Safeguarding Policy and will make copies available and accessible to all relevant staff, partners, funders and, of course, the communities we work with.

We commit to producing the Safeguarding Policy in relevant local language versions to ensure that the policy is fully accessible and understood by all relevant parties.

We commit to ensuring that partners clearly understand Chance for Childhood's policy commitments, principles and practices.

2. SAFEGUARDING STRUCTURE, ROLES AND RESPONSIBILITIES

2.1 In line with the UK Charity Commission guidelines, Chance for Childhood recognises that the Board of Trustees are responsible for ensuring that those benefiting from, or working with the charity, are not harmed in any way through engaging with Chance for Childhood and our partners. Chance for Childhood recognises that the Board has a legal duty to take all reasonable steps within its power to ensure that this does not happen. Consequently, the Board has an oversight responsibility for ensuring safeguarding compliance within the organisation.

To effectively fulfil this responsibility, the Board has appointed a Safeguarding Trustee (ST) to provide dedicated Board-level oversight of safeguarding. The ST serves as the designated Board focal person for safeguarding matters and is responsible for reviewing safeguarding risks, incidents, and management responses; ensuring regular and robust reporting to the Board on safeguarding performance; and supporting continuous improvement in safeguarding systems, policies, and practice. The ST shall regularly receive safeguarding updates from the GSL and the CEO.

2.2 Childhood has appointed a Global Safeguarding Lead (GSL) and an East Africa regional Safeguarding Focal Point (SFP). The role of the GSL and SFP is to be the organisational representatives and first points of contact for all matters related to safeguarding, including SEAH. The responsibilities of the GSL include: ensuring the Safeguarding Policy (SP) remains up to date; monitoring safeguarding performance, benchmarking systems against internationally recognised standards and driving continuous improvement; ensuring that all

organisational activity is undertaken in compliance with the Safeguarding Policy and all related procedures; scheduling of required training for staff and Board members; representing the organisation at safeguarding groups and forums; submitting quarterly safeguarding reports to the board; and being the key point of contact the SFP and the SC. The GSL will report to the Senior Management Team (SMT) and Board on any safeguarding matters.

- 2.3 Each Country Office will have a Safeguarding Champion (SC) who will support the GSL and SFP to ensure Safeguarding Policy and Procedures are implemented at Programme level.
- 2.4 The SMT is responsible for ensuring that resources are made available for safeguarding activities. The SMT will support the GSL and SFP to create an organisational culture where safeguarding is at the heart of all Chance for Childhood's work, decision making and strategy. Safeguarding is a standing agenda item at SMT meetings, annual strategy and review meetings and is included within programme evaluations.
- 2.5 In the absence of the GSL or SFP, the CEO takes full responsibility for safeguarding issues. The GSL, SFP and CEO receive adequate training and are fully responsible for the implementation, monitoring and review of Chance for Childhood's Safeguarding Policy.
- 2.6 All staff and volunteers at Chance for Childhood are expected to be aware of, and comply with their roles and responsibilities under this policy. Staff and volunteers should ensure that the safeguarding policy is implemented across the organisation and request support/guidance when required, and inform the GSL or SFP of any concerns. Staff and volunteers must attend appropriate training.
- 2.7 Each Partner Organisation of Chance for Childhood must have a dedicated Safeguarding Focal Point (SFP). This person must not be the Director of any of the programmes in question.
- 2.8 All monitoring and evaluation project reports must include a section on safeguarding.

3. RECRUITMENT

Chance for Childhood follows our Safer Recruitment Procedure, which includes:

- ✓ All job advertisements will state that Chance for Childhood has a Safeguarding Policy, which the successful applicant will be expected to comply with.
- ✓ Candidates selected for interview are asked to read the policy in advance of their interview and are asked questions specific to Safeguarding, including Protection from Sexual Exploitation, Abuse and Harassment (PSEAH) during the interview.
- ✓ We request two professional references from all prospective employees.
- ✓ All new employees are required to undergo a Disclosure and Baring Service (DBS) or relevant police clearance check. Chance for Childhood's commitment is such that the CEO is the final authority on all matters relating to personnel recruitment.

All personnel, employed staff, interns and volunteers, as well as Board members are required to read and sign a statement of commitment in addition to the Safeguarding Policy and Code of Conduct prior to the commencement of their role. **See Appendix 1 for the Code of Conduct.** The Code of Conduct (CoC) will be displayed on the Chance for Childhood website and within the offices of all our programmes.

4. ORGANISATION AND PARTNER TRAINING

4.1 All new members of staff, volunteers and Trustees must attend an induction into Chance for Childhood's Safeguarding Policy and Code of Conduct and necessary procedures by the GSL or the relevant SFP. This must take place at the earliest possible opportunity and certainly within one month of their appointment.

4.2 The GSL and/or the relevant SFP deliver refresher training to all Chance for Childhood staff, Trustee members, Senior Management Team (SMT) and regular volunteers on an annual basis.

4.3 The GSL and SFP will receive refresher training annually and actively participate in training courses and groups to ensure that they are up to date with new developments in good practice.

4.4 Programme staff, with support from the SFP and/or GSL are responsible for orienting children, young people and adults at risk involved in Chance for Childhood's projects in all aspects of Chance for Childhood's Safeguarding Policy and Procedures. Training for children, young people and adults should involve the use of child-friendly and/or accessible materials, such as pictures and flowcharts.

4.5 A review of the SP is made every two years by the GSL, SFP, SC or others when appropriate. However, an update can be conducted within this period if necessary.

Partners

4.6 All new Partners will undergo a safeguarding audit conducted by the GSL or SFP to identify key support needs. In addition to the due diligence audit carried out before approving a partner, quarterly safeguarding audits will also be conducted on all partner organisations.

4.7 Partners who do not have a robust Safeguarding Policy or procedures will be required to sign up to the Chance for Childhood Global Safeguarding Policy until they have such policies in place. Any deviation from Chance for Childhood's GSP while under its jurisdiction will be investigated as a matter of grave concern and may result in a cessation of their grant from and partnership with Chance for Childhood.

4.8 Partners will be required to ensure all staff receive Safeguarding training, including PSEAH training, at least once a year.

4.9 Where necessary and depending on individual organisational requirements, Partners will be supported to build the capacity of their own organisation to develop good practice in all elements of safeguarding and develop their own Inclusive Safeguarding Policies and Procedures that are culturally relevant and uphold legal requirements for their local context, whilst also meeting the requirements of Chance for Childhood's Global Safeguarding Policy.

5. COMMUNICATIONS ABOUT OUR WORK

Please note that as outlined below, differing degrees of permissions are given to staff, volunteers and visitors to communicate the work of Chance for Childhood and the stories of the children and young people we work with. All staff and partners must adhere to the guidance applicable to their roles and relationship to Chance for Childhood.

Communications Guidelines for Chance for Childhood:

In September 2022, Chance for Childhood launched OverExposed, a campaign to encourage the International Development and Humanitarian sector to be more ethical in its storytelling. Alongside this, Chance for Childhood revised its approach to storytelling and communications by strengthening ethical standards, refining its language and tone (in line with the Tone of Voice document), and removing identifiable images of children from its communications and imagery to protect their dignity, privacy and safety.

Below are guidelines that will support staff to uphold the OverExposed values of:

- We will prioritise the rights, wellbeing, dignity, privacy, and agency of every child whose story or image we engage with, wherever they are in the world.
- We recognise that informed consent is complex, may evolve over time, and is not always possible — and we will respect this in all storytelling decisions.
- We will only share or re-share child-centred stories using positive, strength-based language that upholds the child’s humanity and avoids perpetuating negative stereotypes.
- We will pause and reflect before sharing any story or image of a child, asking whether it could put them at risk or cause harm now or in the future.
- We will take responsibility for the power we hold in collecting, sharing, and amplifying children’s stories, and we will encourage others to do the same with care and integrity.

Informed consent must be obtained from parents or carers, and children must be appropriately included in the consent process, BEFORE collecting any stories, case studies quotes or images.

Avoid:

- Language and context in stories and images that could degrade, victimise or shame children and young people (see Tone of Voice document)
- Making generalisations which do not accurately reflect the nature of the situation or placing pictures out of context (e.g. pictures should be accompanied by an explanatory caption where possible)
- Making children easily identifiable. **All images should refrain from showing children and young people’s faces or identifiable features.**
- Using, taking or sharing photos/videos without permission from the child or young person. You **must** gain informed consent from parents/carers to share images.
- Using real names or any identifying features of a story

As far as possible, contributors should be able to give their own accounts in their first language rather than have people speak on their behalf.

Everyone has a right to be accurately represented through both words and images and should not be manipulated or sensationalised in any way.

Contributors should not be easily identifiable. **Do not** include details of their location. Information that could be used to identify them should not be used on Chance for Childhood website or in any other form of communication for general or public purposes.

Even though children's faces will not be captured, ask permission from the children themselves before involving them any content collection.

Chance for Childhood **does not** permit the publishing of images and/or information of any of the communities we work with on personal web-based sites such as Facebook, Twitter or Instagram.

Information published about communities by Chance for Childhood (e.g. website, Facebook, Twitter, newsletters etc.) must adhere to the communications guidelines and where possible be verified by a reliable source.

Please see below for guidance to Chance for Childhood staff when working with external media professionals.

Guidance on storing media involving children and young people

Any and all media involving communities should be kept securely in the Sharing Hub online. Access to this hub should be limited.

Copies of consent forms should be stored safely for as long as images, videos, recording and interviews are stored and used.

Online and social media

Chance for Childhood uses online and social media channels, including a website, Facebook, Twitter, YouTube, Instagram, LinkedIn, and online Newsletters to raise awareness about our work. These channels are managed and monitored by Chance for Childhood.

With regards to Chance for Childhood's use of online and social media channels:

Chance for Childhood ensures that only staff, trustees or volunteers with DBS/Police checks will have the authorisation to act on behalf of Chance for Childhood social media and online channels.

When posting media involving a contributor, Chance for Childhood will first ensure that there is a signed consent form.

Personal use of social media

All Chance for Childhood staff, trustees, volunteers, media professionals and invited guests are asked to follow the below guidelines in relation to their own social media use.

If sharing posts on your own social media channels about Chance for Childhood activities, ensure you are communicating appropriately and in line with the Chance for Childhood Global Safeguarding Policy.

Do not make friends or connect with any of the children or young people you meet at Chance for Childhood on any and all forms of social media.

Unless you are the staff member in charge of official Chance for Childhood online channels, always write in the first person and use a disclaimer that your views do not represent those of Chance for Childhood.

Never upload or post any defamatory, obscene, abusive or harmful content.

Always comply with the site or social media platforms terms of use.

You are personally responsible for the content that you share so always think about what you are posting and sharing.

Social media sites will be monitored and if staff members or volunteers are found in breach of the rules, they are subject to disciplinary procedures as outlined in the Disciplinary Procedure.

Misuse could have serious implications and could break the law, especially in the case of child abuse images, defamation, harassment and bullying.

Communications Guidelines for visitors to Chance for Childhood and Partner Programmes

Chance for Childhood requests that all visitors follow the above guidelines and uphold OverExposed's values, which include:

- Not taking any images or videos without informed consent and permission from Chance for Childhood
- Any images taken must not have identifiable features of children

Details of Chance for Childhood Safeguarding Commitments for Project Visitors can be found here: [CfC Safeguarding commitments for project visitors 2026](#), or contact the GSL for a copy.

Guidance to Chance for Childhood staff when relating with external media professionals:

When contracting a media professional to produce a project at Chance for Childhood, make sure you give a clear brief and contract, of which an outline of

the *Chance for Childhood Safeguarding Policy* and *Code of Conduct* should form a part.

Inform media professionals and invited guests of the *Chance for Childhood Safeguarding Policy* and ensure they have a copy of these guidelines. Ensure they return a signed copy of the Safeguarding Commitment Statement BEFORE visiting the Programmes.

Ensure you are clear about what they are producing and all ways in which the resulting media will be used.

Ensure that the child(ren) and parent or guardian have been taken through the informed consent process before the visit and create space for any further questions on the date.

Ensure that a member of staff or volunteer introduces the media professional and explains their role to the child. Accompany external media professionals at all times during their visit to Chance for Childhood Programmes and Partners and ensure that no child or young person is left alone with an external visitor.

Pay attention to where and how the participant is interviewed. Limit each participant's exposure to the media. Ensure that each participant(s) is comfortable, and without outside pressure, including from the media professional. Ensure that anyone being interviewed has an adult and a translator who they trust.

Ensure that the participant would not be endangered or adversely affected by showing their home, community or general whereabouts.

Guidelines to be shared with media professional

Before any content creation takes place, you must ensure that the informed consent process has been followed and you check if the contributor has any questions for you. This discussion should be made in their own language. They should understand the publishing may be distributed locally, nationally and internationally. Consent must not be coerced.

Do not publish any media, which might put anyone at risk even when identities are changed, obscured or not used.

Do not harm the contributor; avoid questions, attitudes or comments that are judgemental, insensitive to cultural values, that place anyone in danger or expose anyone to humiliation, or that reactivate a contributor's trauma from past life experiences. Always refer to the professional supporting the contributor if you are unsure about topic of the interview.

Ensure that the contributor knows they are talking to a media professional. Explain the purpose of the project and its intended use.

Unsupervised access to children or young people supported by Chance for Childhood is not permitted. Media professionals will be restricted to work within designated spaces identified by Programme Staff.

Do not discriminate in choosing contributors to interview because of sex, race, age, religion, status, educational background or physical abilities.

No staging

Only use images of children and young people in suitable dress to reduce the risk of inappropriate use.

Always provide an accurate context for someone's story or image. Always change the name and obscure the visual identity of any child.

Guidance for use of media involving children and young people

Ensure suitable content/permission exists and that usage and copyright have been agreed between Chance for Childhood and the media professional.

Avoid the use of the first name and surname of children (i.e. John Smith) and an image of a child or young person, unless there is specific rationale and permission from the Chance for Childhood Designated Safeguarding Lead for doing so.

Ensure that Chance for Childhood is aware of the way in which the pictures and interviews will be used and that they are asked ahead of publication as to whether any restrictions need to be applied.

Child online safety and protection

Chance for Childhood is committed to ensuring that all children within its programmes are protected from online abuse, exploitation, and harmful digital content. As part of its safeguarding obligations, CfC will adopt proactive and comprehensive measures to promote safe, responsible, and informed use of digital technologies.

CfC will integrate child online safety into all training programmes for children, teachers, parents and caregivers. These trainings will equip participants with the knowledge and skills to identify warning signs of online risks, avoid or exit potentially harmful situations, and report incidents such as cyberbullying, harmful contact, inappropriate content, or suspicious online behaviour.

For staff who work directly with children, CfC will ensure adherence to safe digital practices, including the use of strong and unique passwords on all work-related

devices. This measure aims to prevent unauthorised access to sensitive information and protect both children and staff from online vulnerabilities.

Additionally, CfC will collaborate with reputable internet safety organisations, cybersecurity agencies and child protection partners to promote awareness, strengthen prevention efforts, and enhance access to online safety resources across its project communities.

6. REPORTING CONCERNS

Confidentiality

It is essential that confidentiality is maintained at all stages of the reporting process when dealing with safeguarding concerns. Information relating to the concern and subsequent case management should be confidential and shared only on a need-to-know basis. Written information should always be kept secure.

In any case of suspicion of abuse, the person to whom it has been reported to must immediately inform the GSL, SFP or CEO and not discuss it with any other person.

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

The informant must fill out or be supported in filling out an incident reporting form as soon as possible and submit to either the GSL or the SFP (Appendix 3: Form for reporting of suspected abuse).

The GSL and/or SFPs are responsible for filing report forms in a secure place in the relevant online folder.

All GSL, SFPs and Programme Managers are to compile a list of local agencies that deal with issues relating to safeguarding and to whom children, young people and adults at risk can be referred (e.g. social services, emergency medical help, psychologist, paediatrician etc.), and update the list on an annual basis.

The GSL is responsible for ensuring that any survivors of abuse have access to the Survivors Support Fund.

The safeguarding reporting flowchart (Appendix 2) should be displayed in all Chance for Childhood offices.

If the allegation is about SFP, then contact the GSL. If the accusation is about the GSL, then contact the CEO (Appendix 2: Safeguarding reporting flowchart).

7. RAMIFICATIONS OF MISCONDUCT

Following an allegation of abuse/violation of the Safeguarding Policy, an initial clarification will be co-ordinated by the GSL. The GSL will immediately assess the severity of the accusation to decide on the relevant authority to inform. The GSL will respond upon the advice of the relevant authority and will record all information, investigate all facts, and assess the condition of the child, young person or adult at risk **within 48 hours**.

If an allegation of a violation of the policies, guidelines or practice of safeguarding is made concerning a named individual from a verifiable source, and the accused is a staff member, trustee, intern, volunteer, consultant or Chance for Childhood contractor, they will be **immediately** suspended on full pay (staff member) or suspended from all activity/association with Chance for Childhood (trustee, intern, volunteer, consultant or contractor) pending the outcome of an independent investigation. The decision to suspend must be taken by the CEO or a Chance for Childhood Trustee and is not open to challenge.

Chance for Childhood will take action against anyone, whether they are the subject of a complaint or not, who seek or carry out retaliatory action against complainants, survivors or other witnesses. Employees may be subject to disciplinary action, up to and including termination of employment.

The investigation process will be confidential, and information limited only to those who need to know (SMT, GSL, SFP and relevant staff at Partner organisation). All parties involved will be required to keep all information relating to the case confidential and documentation will be filed securely.

Depending on the outcome of the independent investigation, if it comes to light that anyone associated with Chance for Childhood commits – whether within or outside the context of Chance for Childhood’s work – which are criminal, grossly infringe children’s rights, grossly infringe human rights or contravene the principles and standards contained in this document, Chance for Childhood will take immediate disciplinary action and any other action which may be appropriate to the circumstances.

The media will be dealt with by the CEO or the Board of Trustees depending on the individual circumstances of the incident in question.

8. MONITORING

The monitoring of the Global Safeguarding Policy will be co-ordinated and supported by the Global Safeguarding Lead.

The Global Safeguarding Lead will also be responsible for designing, implementing and monitoring all training in relation to Safeguarding and PSEAH.

Safer recruitment will be monitored by the Global Management Team with support from the Global Safeguarding Lead.

Safer Programme development and implementation will be overseen by the Programmes Team and the Global Safeguarding Lead.

The Global Safeguarding Lead will be responsible for the reviewing and development of Partner Organisations safeguarding Policies, Procedures and Approaches as well as co-ordinating a Community of Practice amongst Partners and Chance for Childhood staff.

Safeguarding incidents will be collated and analysed and fed into the monitoring of the Global Safeguarding Policy at Global Management and Board Level.

9. DEFINITIONS

Safeguarding

Safeguarding means taking all reasonable steps to prevent harm, particularly sexual exploitation, abuse, and harassment from occurring; to protect people, especially vulnerable children, from that harm; and to respond appropriately when harm does occur.

This definition draws from our values and principles and shapes our culture. It pays specific attention to preventing and responding to harm from any potential, actual or attempted abuse of power, trust, or vulnerability, especially for sexual purposes.

Safeguarding applies consistently and without exception across our programmes, partners and staff. It requires us to proactively identify, prevent and guard against all risks of harm, exploitation and abuse and have mature, accountable and

transparent systems for response, reporting and learning when risks materialise. Those systems must be survivor-centred and protect those accused until proven guilty.

Safeguarding puts communities at the centre of all we do.

Categories of Harm (United Nations)

Physical Abuse

Actual or attempted injury of a child where there is knowledge or reasonable suspicion that the injury was deliberately inflicted (including self-harm) or knowingly not prevented.

Sexual Abuse

The threatened or actual physical intrusion of a sexual or sexualised nature, including inappropriate touching, by force or under unequal or coercive conditions, sexual assault and rape. It may also include threatened or actual non-physical intrusion (unwanted and/or uninvited exposure to pornography, texts, images, and so on, the sharing of images, texts and so on, demands for sexualised photographs etc.). All sex under 18!

Psychological abuse

It involves causing fear by intimidation; threatening physical harm to self, partner or children; destruction of pets and property; “mind games”; or forcing isolation from friends, family, school and/or work.

Neglect

Failure to provide for the child’s essential needs (food, clothing, cleanliness, shelter) to the extent that it affects the physical health and emotional development of the child. Includes failure to secure appropriate medical treatment.

Exploitation

The physical, mental or emotional abuse or neglect of a child, young person or adult at risk for financial or other benefit.

Sexual Exploitation

Actual or attempted abuse of a position of vulnerability, power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.

Protection from Sexual Exploitation and Abuse (PSEA)

The term used by the humanitarian and development community to refer to the prevention of sexual exploitation and abuse of affected populations by staff or associated personnel. The term derives from the United Nations

Secretary General's Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse (ST/SGB/2003/13).

Harassment

Any inappropriate conduct which has the purpose or effect of offending or humiliating others. This conduct may be of a verbal, non-verbal or physical nature and intended to hurt, degrade, intimidate, humiliate or embarrass, or to create a climate of hostility, intimidation or discomfort. Harassment usually supposes a series of incidents.

Bullying/Peer Harm

The inappropriate application of pressure or abuse (see above definitions) by children and young people on their peers to the extent that it causes distress to the recipient.

Survivor/Victim

The person who has been abused or exploited. The term 'survivor' is often used in preference to 'victim' as it implies strength, resilience and the capacity to survive, however, it is the individual's choice how they wish to identify themselves.

At Risk Adult

Sometimes also referred to as a vulnerable adult. A person who is or may be in need of care by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm, exploitation or abuse.

APPENDIX 1: CHANCE FOR CHILDHOOD CODE OF CONDUCT

Chance for Childhood is committed to ensuring that everyone associated with us behaves in a way that respects and protects the communities we work with.

The Code of Conduct should be interpreted in a spirit of transparency and commonsense with the best interests of every child, young person, adult at risk and community as the primary consideration.

The Code of Conduct is applicable to **all** staff, long and short-term contractors, trustees, visitors, and volunteers. Throughout the Code of Conduct where the word “staff” is used, this should be taken to include all the above-mentioned people.

Chance for Childhood has a **zero-tolerance** approach to abuse and exploitation of any kind – physical, verbal, emotional or sexual.

We believe all people have a right to live their lives free from sexual violence and any abuse of power regardless of age, gender, sexuality, sexual orientation, disability, religion or ethnic origin. And everyone we come into contact with should be treated equally.

Whilst recognising that local laws and cultures differ considerably from one country to another, Chance for Childhood is an International Non-Governmental Organisation, and therefore, the Code of Conduct is developed in line with international and UN standards. Chance for Childhood representatives are expected to uphold local law wherever they operate, except where the Code of Conduct is more stringent, in which case the Code applies.

As a part of the Chance for Childhood Team, you are in a position of trust, and this must be taken seriously. You must **always** act professionally and communicate and behave appropriately. You must work with children, young people, adults at risk and communities, respectfully, fairly and equally and in a way that protects them. This Code of Conduct is designed to ensure a safe working environment for all those working for Chance for Childhood and promote the safety of anyone coming into contact with Chance for Childhood’s work.

The Code of Conduct is a binding document and is mandatory under all circumstances. It is to be upheld during and outside of working hours.

Breaching the Code of Conduct is grounds for disciplinary action up to termination of contracts and, where appropriate, referral to other agencies such as the police. (See the Disciplinary Procedure).

During your induction, you will be taken through this Code of Conduct, please ensure that you ask any questions that you are uncertain of or require clarifications before you sign it. You will be expected to sign the Code of Conduct within one week of commencing the post.

RESPECTFUL INTERACTION WITH OTHERS

- I will treat everyone I encounter equally no matter their age, gender, sexuality, sexual orientation, disability, religion or ethnic origin.
- I will be observant of all local laws and respectful towards local culture & customs where they are not in conflict with this Code of Conduct.
- I will not condone or participate in behaviour that is illegal or unsafe, or that could bring Chance for Childhood into disrepute. I will not give, promise to give or offer a payment, gift or hospitality with the expectation or hope that an advantage will be given or to reward an advantage already given (see the Anti-Corruption and Bribery Policy).
- I will not threaten or retaliate against someone who has refused to commit a bribery offence (see the Anti-Corruption and Bribery Policy).

PROTECTING YOURSELF, COLLEAGUES AND COMMUNITIES

- I will not engage in any forms of abusive, degrading or exploitative behaviour.
- I will not sexually abuse, exploit or harass anyone.
- In line with international standards, I will not engage in sexual activity with children under the age of 18, regardless of the age of consent, local customs, or the law in effect in the country I am in.
- I will not pay for sexual services, of any kind, with anyone, of any age. I will not exchange money, employment, goods, or services for sex, including sexual favours or indulge in any other forms of humiliating, degrading or exploitative behaviour.
- I will never watch, publish, produce, or share pornography showing children, and / or show such material to children.
- I will not engage in sexual relationships with adults participating in or linked with Chance for Childhood funded or supported programmes. I will not physically assault anyone or use physical punishment or chastisement, however acceptable or moderate it may seem. I will not emotionally or psychologically abuse anyone nor use any language intended to belittle or humiliate any of the people or communities we work with.

- I understand that it is strictly prohibited to possess, use or be under the influence of alcohol or drugs whilst at work.
- I understand supplying or attempting to supply whilst at work or on work premises any illegal drug is prohibited.
- I will not commit the theft of money or property or unauthorised removal of Chance for Childhood's property or the property of a visitor, colleague, client, customer, service users, guest or member of the public.
- I will follow Chance for Childhood's health and safety rules (Health and Safety Policy).
- I will uphold the Social Media Policy, Electronic Communication Policy and Use of Images guidelines within the Global Safeguarding Policy.

VALUING COMMUNITIES AND PARTNERS

- I will not discriminate against, show differential treatment, or favour particular children, young people, adults at risk or communities to the exclusion of others.
- I will not share personal details, including social media, with any child, young person or adult at risk of Chance for Childhood's programmes or Partner Programmes or contact them in any way.
- I will be aware of the inherent power dynamic in adult-child relationships and avoid taking any advantage this may provide.
- I will avoid doing anything that could be misinterpreted by a third party. I will immediately note the circumstances of any situation which occurs which may be subject to misinterpretation by a third party.
- I will only take photos and/or video where consent has been obtained from the individual and with the prior approval of appropriate staff, and all content gathered will be in line with the OverExposed Campaign (<https://chanceforchildhood.org/overexposed/>) If you have any questions – contact the GSL.

UPHOLDING CONFIDENTIALITY AND DEALING WITH CONFLICTS OF INTEREST

- I will exercise due care in all matters of official business, and not divulge any confidential information relating to colleagues, work-related matters or any sensitive information unless legally required to do so.
- If I embark on a relationship with another member of staff, I will declare this to a manager as soon as reasonably practicable (see Employment Conditions).

REPORTING A COMPLAINT OR CONCERN

- I understand that I am obligated to **immediately** bring to the attention

of my line manager any potential incident, abuse, or concern that I may witness, I am made aware of or suspect which appears to breach the expectations contained in this Code.

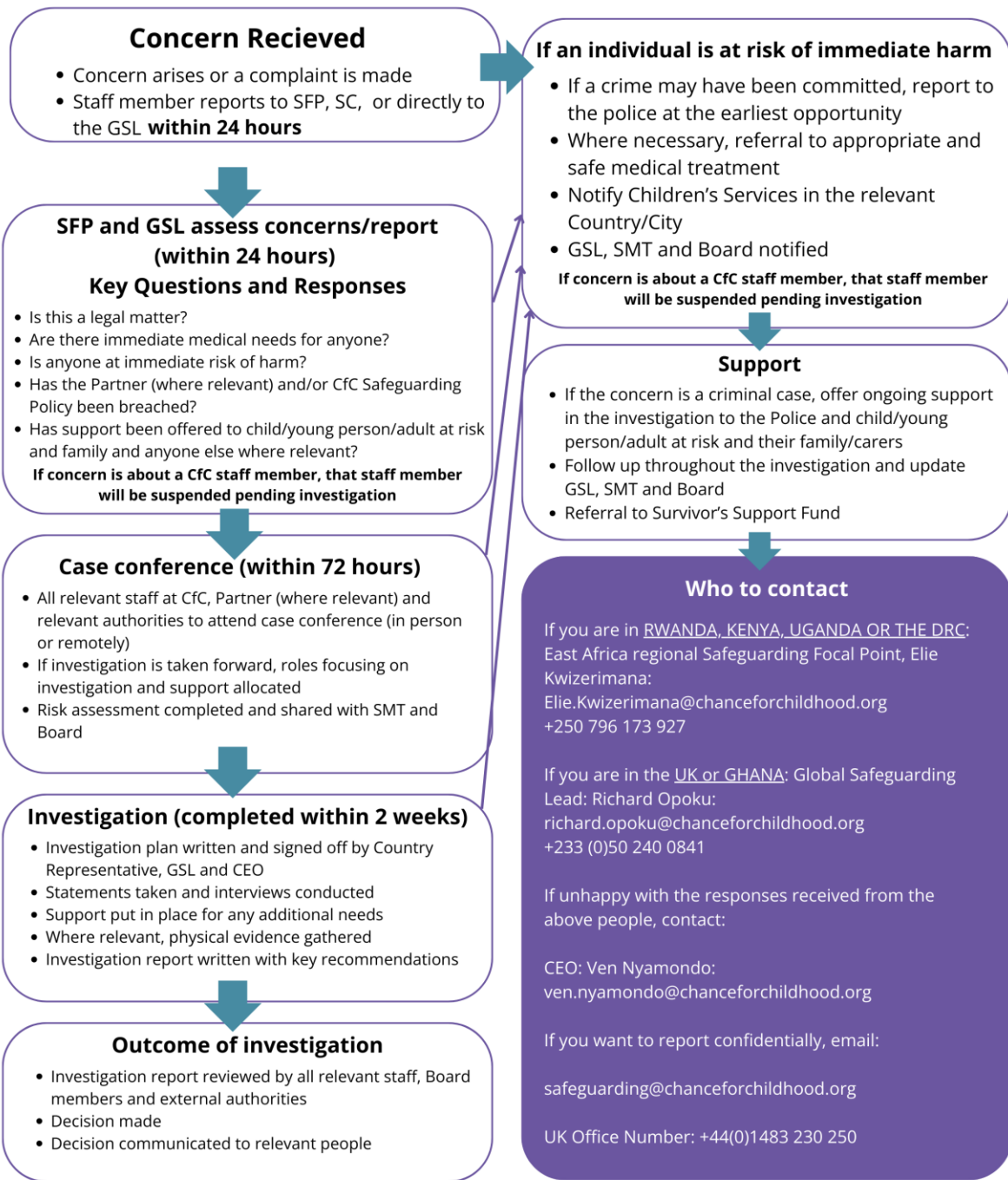
- If I do not feel comfortable reporting to my line manager, I will report my concern to the GSL or another member of the Global Leadership Team or Board of Trustees. You can find all the contact details of these people in our Global Safeguarding Policy.
- I understand that I may face disciplinary action if I witness or suspect a breach of the Code of Conduct or of Chance for Childhood's Policies and do not report it to my line manager or a member of the Global Leadership Team.
- I will not victimise a colleague who has raised concerns, made a complaint or given evidence or information under our Safeguarding Policy, Anti-Harassment and Bullying Policy, Equal Opportunities Policy, Grievance Procedure, Disciplinary Procedure or otherwise.
- I understand that a false accusation about a colleague could lead to disciplinary action (See Disciplinary and Whistleblowing Policy).
- I understand that failure to comply with any aspect of Chance for Childhood's Code of Conduct may result in disciplinary action.
- I will ensure that all information about breaches of the Code of Conduct is handled confidentially and with discretion.
- I understand if I am reporting a concern, I am protected by the Whistleblowing Policy.

CHANCE FOR CHILDHOOD POLICIES

- I will also read and uphold all policies referenced in the Code of Conduct and all others in the Staff Code of Conduct. I understand it is my obligation to familiarise myself with these policies and seek clarification where needed.



C O N F I D E N T I A L I T Y M A I N T A I N E D



Actions after the decision

SUPPORT

- Develop ongoing support plan for survivor and their family/carer that takes into account their needs
- Where relevant, referral made to other support agencies, support plan for witnesses, support for other staff members and partners
- Access to Cfc Survivor’s Support Fund for all of the above if required

COMMUNICATE

Communicate incident, response and outcomes with relevant donors, partners, Charity Commission and any other relevant Governing Body

DISCIPLINARY

If staff are implicated, disciplinary action taken, in line with Cfc Safeguarding Policy and outcome of investigation

REVIEW

Staff, Board and Partners (where relevant)

- Learning from this incident and how we can prevent similar incidents
- Review of how we responded to the incident including quality of support to child/young person/adult at risk and their family/carer
- How can we better prepare and support staff?
- Review of partner’s handling and process (if relevant)
- Training needs for Cfc and partners identified

APPENDIX 2: SAFEGUARDING REPORTING FLOWCHART

Note: When communicating incidents, we follow the Charity Commission’s guidance on what should and should not be reported. Please see the table below for reference.



CHARITY COMMISSION
FOR ENGLAND AND WALES

Serious incidents to report	Incidents not to report
Protecting people and safeguarding incidents	
<p>A beneficiary or other individual connected with the charity’s activities has/alleges to have suffered serious harm</p> <p>Allegation that a staff member has physically or sexually assaulted or neglected a beneficiary whilst under the charity’s care</p> <p>The Chief Executive of the charity has been suspended pending the outcome of an investigation into their alleged sexual harassment of a fellow member of staff</p> <p>Allegation that a trustee, staff member or volunteer has been sexually assaulted by another trustee, staff member or volunteer</p> <p>A staff computer is found to contain images of child pornography</p> <p>An internal investigation has established that there is a widespread culture of bullying within the charity</p> <p>A beneficiary or individual connected with the charity’s activities has died or been seriously harmed; a significant contributory factor is the charity’s</p>	<p>Minor unusual/aggressive behaviour by a beneficiary towards a member of staff</p> <p>Police called to charity premises because a beneficiary is drunk and disorderly</p> <p>Charity becomes aware of allegations of abuse or neglect of a beneficiary that occurred outside the charity; the charity has reported the allegations to the appropriate agencies, and there is no harm to the charity’s reputation</p> <p>Beneficiary in a care home received the wrong medication as a ‘one-off’ error and there was no significant harm</p> <p>Logged accident book reports where there was no significant harm to individuals</p> <p>Details of reports under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) where there has been no significant harm to individuals</p> <p>Minor accidental injury to a charity service user e.g. slipping on a wet</p>

<p>failure to implement a relevant policy</p> <p>Charity failed to carry out DBS checks which would have identified that a member of staff or trustee was disqualified in law (under safeguarding legislation) from holding that position</p> <p>Repeated medication errors to beneficiaries in a care home indicating a systemic problem</p> <p>Charity discovers that an employee or volunteer coming into contact with children or at risk adults is on the sex offenders register</p>	<p>floor</p> <p>A staff member who is not in a senior position or position of specific responsibility (e.g. head of safeguarding) has bullied or harassed a fellow staff member. There is no indication of a widespread culture of bullying or harassment within the charity and the incident is dealt with by minor disciplinary action (for example, the staff member responsible has not been suspended or dismissed).</p> <p>A staff member who is not in a senior position or position of specific responsibility is dismissed for marrying a member of the community in which the charity is working, in breach of the charity's code of conduct but not in breach of local laws</p>
<p>Incidents involving partners</p>	
<p>A delivery partner of the charity is alleged to have links to terrorism and extremism</p> <p>A delivery partner of the charity has ceased to operate and this has prevented the charity from providing assistance to its beneficiaries</p> <p>The charity's subsidiary trading company has gone into liquidation and this has resulted in financial difficulties which place the future of the charity in doubt</p> <p>Staff of another organisation within the same federated structure are found to have been committing systematic abuse of beneficiaries and</p>	<p>A serious incident has taken place involving a partner but it has no or minimal impact on the charity's reputation or the partner's ability to deliver its work with the charity</p> <p>A delivery partner of the charity has ceased to operate and this has had some impact on the charity's ability to provide assistance to its beneficiaries but it is not a material impact and the assistance to beneficiaries hasn't stopped</p>

this has significantly damaged the reputation of the charity	
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APPENDIX 3: REPORTING A CONCERN

Safeguarding Concern Form

What is this form for?

Use this to report a concern or disclosure of abuse against a child, young person or adult at risk. The concern can be from something you have seen or have been told, either directly by the individual or by another person.

Who should complete this form?

Anyone with a concern should complete this form. All Chance for Childhood employees, volunteers, trustees, visitors, consultants, contractors have an obligation under our Safeguarding Policy to report any concern or disclosure of a child, young person or adult at risk suffering physical, emotional, sexual exploitation sexual abuse or neglect. You do not need permission before completing this form, but you can speak to the Global Safeguarding Lead, Safeguarding Focal Point or Safeguarding Champion if you are unsure.

You will also need to complete a consent form to ensure the person is happy for their information to be shared. (See Appendix 4).

When should it be used?

As soon as possible but within 24 hours of the incident/conversation that has given you cause for concern. Reporting is not an investigation and you are not required to verify allegations or seek more information before using this form. This form will help others make decisions about what should be done. Just complete what information you can.

Who should this form be sent to?

UK and Ghana: richard.opoku@chanceforchildhood.org

Rwanda, Kenya, Uganda and DRC: elie.kwizerimana@chanceforchildhood.org

In case of a change of staff or a staff member being on annual leave please also include safeguarding@chanceforchildhood.org in ALL correspondence

Safeguarding Reporting Form

Please put in sealed envelope marked confidential or write confidential in the message subject line if emailing the form.

Note: This form is designed to be a guide. Please include as much information as you can. Please add any additional information not included in these questions.

Your name:	
Your Position:	
Your Organisation:	
Phone number and email:	
Person's name:	
Persons Age:	
Person's location:	
Parents/carers names and contacts (if applicable):	
Nature of Concern/Abuse:	

<p>Please write clearly what you have seen or been told that has given you cause for concern. If this information came from the person experiencing the abuse, please use their words where possible.</p>	
<p> </p>	
<p>Dates and places where incident/s took place e.g. date if your visit to a project or when child/person told you of the incident/s.</p>	
<p> </p>	
<p>Which people were present and what were they doing?</p>	
<p> </p>	
<p>Are there any physical signs of abuse seen or reported to you?</p>	
<p> </p>	
<p>What did you observe about the persons behaviour, or changes in the person's behaviour, if you have met them more than once?</p>	
<p> </p>	
<p>Name of alleged/suspected perpetrator:</p>	<p> </p>
<p>Address/contact:</p>	<p> </p>

Relationship to the person:	
Any other information about alleged/suspected perpetrator:	
Action taken so far:	
What did you say would happen next to person reporting this to you?	
Who else knows about this situation?	
Who else have you discussed it with?	
What actions have been taken already (e.g. medical treatment, contact with police)?	

Has consent been gained to speak to external agencies? (please attach copy of consent)

--

External agencies contacted (please include date & time)

Police	If yes – which:
Yes/No	Name and contact number: Details of advice received/actions taken:
Department of Children's Services	If yes – which:
Yes/ No	Name and contact number: Details of advice received/actions taken:
Health Services	If yes – which:
Yes/No	Name and contact number: Details of advice received/actions taken:
Other	Which: Name and contact number: Details of advice received/actions taken:
Signature:	
Print name:	
Date:	

APPENDIX 4: CHANCE FOR CHILDHOOD'S INFORMATION SHARING CONSENT FORM

INFORMED CONSENT RELEASE FORM

Photography, video, audio, quotes and other works

By signing this release form, I hereby grant to Chance for Childhood (CfC) and its partners the right to reproduce, display and disseminate worldwide and in perpetuity, in any traditional or electronic media format, my likeness as shown in the photographs, audio, videos, quotes and/or other works described below, which are owned by Chance for Childhood, for the purposes of promoting education, health and children's rights.

The photographs, audio, video, quotes and/or other works containing my likeness were taken/filmed on _____ in _____

_____ by _____.

I further confirm that these products are a true representation of me and were taken with my knowledge and consent.

Name of Subject: _____

Signature:

Date: _____

IF SUBJECT IS A CHILD UNDER 18 YEARS OF AGE:

I confirm that I am the legal guardian of the child named above and therefore, may grant permission for this subject release on behalf of the child:

Name of Guardian / Relationship to Child

Date: _____

Signature of Guardian: _____

APPENDIX 5: CHANCE FOR CHILDHOOD'S KEY SAFEGUARDING CONTACTS

For matters involving UK and Ghana, please contact the Global Safeguarding Lead, Richard: richard.opoku@chanceforchildhood.org | +233 (0)50 240 0841

For matters involving Rwanda, Kenya, Uganda and DRC, please contact the East Africa regional Safeguarding Focal Point, Elie:
elie.kwizerimana@chanceforchildhood.org |
+250 796 173 927

In case of a change of staff or a staff member being on annual leave or not having access to their email please also include safeguarding@chanceforchildhood.org in ALL correspondence

If you are unhappy with the responses received from the people above, contact

CEO: Ven Nyamondo - ven.nyamondo@chanceforchildhood.org

UK Office Number: +44(0)1483 230 250

APPENDIX 6: SAFEGUARDING COMMITMENT STATEMENT

- I have read and understood and agree to uphold Chance for Childhood's Global Safeguarding Policy

- I have read and understood and agree to uphold Chance for Childhood's Code of Conduct

(Print name)

(Job title / role)

(Signature)

(Date)

APPENDIX 7: WHISTLEBLOWING POLICY

POLICY STATEMENT

Chance for Childhood is committed to developing a safe and open culture of communication and accountability to mitigate the risk of things going wrong or of unknowingly harboring malpractice.

Chance for Childhood expects all staff to maintain high standards of conduct and integrity and takes misconduct and malpractice extremely seriously. We want everyone who works for us and with us to feel able and secure about raising concerns.

The aims of this policy are:

- To encourage you to report suspected wrongdoing as soon as possible, in the knowledge that your concerns will be taken seriously and investigated as appropriate, and that your confidentiality will be respected.
- To provide you with guidance as to how to raise those concerns.
- To reassure you that you should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken (if those concerns are not malicious).

The policy applies to anyone who works for, or on behalf of, Chance for Childhood in the UK and across our Regional Offices, including all our employees, trustees, consultants, contractors, NGO partners, agency workers, casual workers, and volunteers. This includes whether you work for us as an employee or on a self-employed basis. All the above will undergo mandatory whistleblowing training as part of their safeguarding training within one month of commencement of the role to ensure everyone is comfortable and confident to raise concerns whilst feeling protected.

This policy may be amended at any time.

What is Whistleblowing?

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:

- Criminal activity;
- Miscarriages of justice;
- Danger to health and safety;

- Damage to the environment;
- Failure to comply with any legal or professional obligation or regulatory requirements;
- Financial fraud or mismanagement;
- Negligence;
- Breach of our internal policies and procedures including our Global Safeguarding Policy and Code of Conduct;
- Conduct likely to damage Chance for Childhood's reputation;
- Unauthorised disclosure of confidential information; or
- The deliberate concealment of any of the above matters.

If you have any genuine concerns relating to any of the above, you should report it under this policy. This policy should not be used for complaints relating to your own personal circumstances. In those cases, you should use the **Grievance Procedure** which can be found in the Staff Handbook.

Principles

We are committed to the principles set out in this policy. If you use this policy to raise a concern, we give you our assurance that you will not be treated unfairly or lose your job. We will treat your concern seriously and act according to this policy.

Chance for Childhood will not tolerate the harassment or victimisation of anyone raising a genuine concern and will take all reasonable steps to prevent such detrimental behaviour. It is a disciplinary offence to deter anyone from using the whistleblowing policy and/or bullying, isolating or otherwise victimising anyone who raises a concern in the public interest using the whistleblowing process.

Confidentiality will always be respected. We hope that you will feel able to voice whistleblowing concerns openly under this policy. We do not encourage you to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible. However, if you want to raise your concern confidentially, we will make every effort to keep your identity secret. Chance for Childhood will always act within the remit of the law and, unless the law requires otherwise, will only make disclosures to third parties or other staff with your consent.

Roles, Responsibilities and Reporting

Anyone who works for, or on behalf of, Chance for Childhood are responsible for reporting concerns under the circumstances set out in this document.

Line Managers are responsible for:

- ensuring all staff are aware of this policy and procedure and their responsibilities;

- fostering an open culture within their teams.

Global Safeguarding Lead (GSL), Safeguarding Focal Point (SFP) and Safeguarding Champions (SCs) who will act as Whistleblowing Officers are responsible for:

- Ensuring that all Whistleblowing Reports are logged;
- Ensuring the individual raising a concern is supported;
- Organising the investigation of issues raised promptly and thoroughly;
- Escalating issues/engaging the support of the Global Safeguarding Lead, CEO or nominated Trustee as required.

The Senior Management Team have overall responsibility for the effective implementation of whistleblowing arrangements, including:

- Ensuring learning from whistleblowing cases is fed back to the wider organisation;
- Ensuring all staff are trained in dealing with issues;
- Ensuring the process is regularly monitored and improved where required;
- Presenting an annual report of all logged whistleblowing complaints, including details of:
 - The number and types of concerns raised;
 - An anonymous summary of the outcomes of investigations;
 - Feedback from individuals who have used the arrangements;
 - Any complaints of victimisation;
 - Any complaints of failures to maintain confidentiality;
 - A review of other existing reporting mechanisms (such as fraud, incident reporting or health and safety reports);
 - A review of other adverse incidents that could have been identified by staff (e.g. partner or service user complaints, publicity or wrongdoing identified by third parties);
 - A review of any relevant litigation; and
 - A review of staff awareness, trust and confidence in the arrangements.

The CEO will:

- Appoint the Global Safeguarding Lead, Safeguarding Focal Point and Safeguarding Champions (who act as Whistleblowing Officers) within that role.
- Work with the SMT, Line Managers and GSL and to foster a culture of openness and accountability
- Submit the annual Whistleblowing report to the Board of Trustees

The Board of Trustees will:

- Appoint a trustee(s) with lead responsibility for Whistleblowing [this will be the same Trustee as nominated as the Safeguarding Lead] which will be reviewed and rotated accordingly;

- Review the annual whistleblowing report;
- Review and approve revisions to the Whistle blowing Policy and Procedures;
- Provide advice and support to GSL, SFP and SCs in the event of a complaint and investigation.

WHISTLEBLOWING PROCEDURE

Raising a Whistleblowing Concern

We hope that in many cases you will be able to raise any concerns with your line manager or the CEO. You may tell them in person or put the matter in writing if you prefer. They may be able to agree a way of resolving your concern quickly and effectively.

However, where you feel that your concern has not been addressed, or you prefer not to raise it with the above person for any reason, you should contact the Whistleblowing Officers. The Officer will then launch the formal Whistleblowing Procedure with the SMT and/or the Chance for Childhood Board. (This procedure is explained below and in the Whistleblowing Process flowchart):

Richard Opoku (UK and Ghana):

richard.opoku@chanceforchildhood.org | +233 (0)50 240 0841

Elie Kwizerimana: (Rwanda, Kenya, Uganda, DRC):

elie.kwizerimana@chanceforchildhood.org | +250 796 173 927

UK Office Number: +44(0)1483 230 250

safeguarding@chanceforchildhood.org

Police if appropriate (see also external disclosures).

All our Whistleblowing Officers will have received additional training in how to support you during the process of reporting concerns and during an investigation.

How to Raise a Concern

It is preferable if you raise a concern in writing, but you can raise a concern by telephone, in person or in writing.

Although you are not expected to prove the truth of your concern beyond doubt or provide evidence, so that the concern can be considered, you will generally need to provide, as a minimum, details of the nature of the concern and why you believe it to be true, and the background and history of the concern (giving relevant dates where possible). In general, discussion around the formal/informal disclosure can be strengthened with further details of the nature and background of the concern.

How we will respond to a concern

1. Concern raised

We are committed to ensuring that all disclosures raised will be dealt with appropriately, consistently, fairly and professionally. We will acknowledge your concern within **72 hours**.

2. Responding to concern

We will arrange a meeting **within one week** to discuss the concern raised. You may bring a work colleague or trade union representative to any meeting that takes place. The companion must respect the confidentiality of the disclosure and any subsequent investigation. We may ask you for further information about the concern raised, either at this meeting or at a later stage.

3. Investigation

After the meeting, we will decide how to respond. Usually this will involve making internal enquiries first, but it may be necessary to carry out an investigation at a later stage, which may be formal or informal, depending on the nature of the concern raised.

A member of the SMT or Trustee will conduct the investigation, or where appropriate and necessary, external investigators may be brought in. Whistleblowing investigations relating to safeguarding incidents will only be carried out by SMT in consultation with GSL and, where necessary, external investigators.

The length of an investigation will vary depending on the nature of the issue. We will aim to resolve all investigations **within 30 days**.

4. Investigation complete and actions

The Whistleblowing Officer, CEO and/or Trustee will keep you informed of the progress of the investigation carried out and when it is completed and give you an indication of timings for any actions or next steps that we will take, but we cannot inform you of any matters which would infringe any duty of confidentiality owed to others.

We will keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

If we conclude that a whistleblower has made false allegations maliciously or with a view to personal gain, the whistleblower may be subject to disciplinary action.

While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way.

If you are not happy with the way in which your concern has been handled, we will inform you of who you can raise it with but this is likely to be a Board Member or an external body. You will find a relevant list at the end of this document.

Confidentiality

If you do not want your identity to be revealed, please let us know when raising your concern. All concerns raised will be treated in confidence and appropriate arrangements will be made not to reveal your identity, as far as is practicable.

We hope that all staff will feel able to voice their concerns openly under this policy and procedure. Although a concern may be raised anonymously, we encourage you to give your name when reporting your concern whenever possible. If this is not done, it will be much more difficult for us to protect your position or to give feedback on the outcome of investigations. Concerns that are expressed completely anonymously are also sometimes more difficult to investigate but will be dealt with in line with policy and procedure.

If disciplinary or other proceedings are implemented following the conclusion of the whistleblowing investigation, it may not be possible to take action as a result of a disclosure without your help, so you may be asked to come forward as a witness. If you agree to this, you will be offered advice and support.

Protection and support for Whistleblowers

Whistle blowers in the UK are protected under law by the Public Interest Disclosure Act 1998. This gives protection to people who raise an issue provided that they have reasonable grounds for raising a concern, the concern is raised in good faith and/or they believe that the disclosure is in the public interest.

It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support you if you raise genuine concerns under this policy, even if they turn out to be mistaken.

You will not suffer any detrimental treatment as a result of raising a concern. If you believe that you have suffered any detrimental treatment, you should inform the Whistleblowing Officer immediately.

You must not threaten or retaliate against whistleblowers in any way. Any employee involved in such conduct may be subject to disciplinary action which could result in dismissal for gross misconduct.

Supportive measures will be put in place for the whistleblower taking into account their needs. We will appoint a support service to link with the whistleblower to

ensure they feel supported through the process of investigation. The support service might be a colleague or line manager or external representative further to agreement of the whistleblower. Chance for Childhood has resources to draw down on to offer external counselling and support through our Survivors Support Fund.

External disclosures

In some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. It will very rarely, if ever, be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external and you are reminded of your confidentiality obligations.

More information about potentially relevant prescribed people and bodies for this purpose and the areas for which they are responsible is available at the websites/contacts below:

Relevant regulators and inspectorates to raise concerns with or seek more advice from	Contact Details:
The Charity Commission	https://www.gov.uk/guidance/report-serious-wrongdoing-at-a-charity-as-a-worker-or-volunteer Telephone: 0300 066 9197 Email: whistleblowing@charitycommission.gsi.gov.uk
Public Concern at Work (Independent whistleblowing charity)	Helpline: (020) 7404 6609 E-mail: whistle@pcaw.co.uk Website: www.pcaw.co.uk
Protect (Independent Whistleblowing advice line)	https://protect-advice.org.uk/advice-line/
NGO Bureau Uganda, Ministry of Internal Affairs	+256393241233 info@mia.go.ug
Rwanda Governance Board	info@rgb.rw (250)255 112 023

Ghana Department of Social Welfare (under the Ministry of Gender, Children and Social Protection)	0302684536
Kenya NGO Co-Ordination Board	Tel: 254-20-2214044, 2214887 Email: info@ngobureau.go.ke

APPENDIX 8: WHISTLEBLOWING PROCEDURE

Whistleblowing Procedure Flowchart

