DADAAB ROYAL COMPANY
INVESTMENT LIMITED

PSEA
&
CHILD SAFEGUARDING POLICY

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PSEA AND CHILD PROTECTION POLICY

Introduction

Safeguarding is the responsibility that Dadaab Royal has to ensure that their employees and volunteers, partners, vendors, operations and programmes do no harm to children, young people or vulnerable adults; that they do not expose them to the risk of discrimination, neglect, harm and abuse; and that any concerns the organization 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 that the organization has for protecting 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 to safeguarding. It is the process of protecting individual children identified as either suffering or at risk of significant harm as a result of abuse or programme of work. It also includes measures and structures designed to prevent and respond to abuse.

Over recent years, there has been increasing recognition of the way in which children, young people and vulnerable adults can be at risk of discrimination, neglect, abuse and exploitation by those who are in positions of trust and power over them, including through international development activities.

As a consequence, there has been a significant increase in the efforts made by development organizations to ensure that no harm results from the contact their employees, volunteers and other representatives have with their target populations or communities.

Through their work, Dadaab Royal employees, employees of partner organizations and volunteers may engage with young people and vulnerable adults either directly or indirectly. DADAAB ROYAL 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 Dadaab Royal work is undertaken.

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 Dadaab Royal. 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.

This policy constitutes Dadaab Royal's policy. Whilst it is recognized that local legislation may vary from country to country, this policy identifies our minimum standards and may exceed the requirements of local legislation. Any breach of this policy will be treated as a disciplinary matter and sexual harassment, 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.

Definitions

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, sexual exploitation and harassment, 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 the 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 care-givers); 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 cyber bullying), 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.*

Child – DADAAB ROYAL regards a child as anyone 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.

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

Vulnerable adult - a person, 18 years and above, who by reason of disability, age, gender, social and economic status, or illness, the context they are in, may be unable to take care of or to protect him or herself against abuse, harm or exploitation.

Youth or **young people** - individuals aged 15 to 35 (15 to 25 in some countries) – DADAAB ROYAL recognizes that this group spans the categories of 'children and 'adults' but regards young people as having particular safeguarding needs and requiring distinct consideration aside from younger children and older adults.

Scope

This policy is mandatory for all DADAAB ROYAL employees worldwide. For the purposes of this policy, 'employee' is defined as anyone who works for or on behalf of DADAAB ROYAL, either in a paid or unpaid capacity. This therefore includes directly employed staff, trustees, contractors, employees and volunteers of sub-contractors, agency workers, consultants, volunteers, interns and all visitors to DADAAB ROYAL work programmes and offices.

It also covers implementing partners whom we fund, and who we expect to work under the policy as a condition of their involvement with DADAAB ROYAL.

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

a) On what they can expect DADAAB ROYAL to do to protect and safeguard vulnerable people.
b) That they are able to safely voice any concerns through an established procedure.
c) That all reports of abuse or potential abuse are dealt with in a serious and effective manner.
d) That there is an efficient recording and monitoring system in place.
e) That employees, volunteers, sub contracted 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 that work or have contact with, either directly or indirectly, children, young people or vulnerable adults or who live in communities alongside them.

Policy Statement

DADAAB ROYAL has zero tolerance against abuse and exploitation of vulnerable people. DADAAB ROYAL also recognizes that safeguarding is everyone's responsibility and that it has an obligation to put in place reasonable measures to ensure, as far as possible, the safety and wellbeing of vulnerable people with whom we work and those in the communities in which we live.

DADAAB ROYAL works to the following key principles to protect vulnerable people:

- Everyone has an equal right to protection from abuse and exploitation regardless of age, race, sex, sexual orientation, marriage and civil partnership, pregnancy or having a child, gender reassignment, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status.
- The best interests of the vulnerable person are paramount and shall be the primary consideration in our decision making.
- DADAAB ROYAL will take responsibility to meet our obligations regarding our duty of care towards vulnerable people, and take action where we believe that a child, young person or vulnerable adult is at risk or is actually harmed.
- DADAAB ROYAL will ensure that employees and volunteers are inducted in our Safeguarding Standards and procedures as a key part of the recruitment and on boarding process.
- DADAAB ROYAL will ensure that all partners are informed and in compliance with our Safeguarding Standards.
- When working with or through partners or sub contracted agencies, DADAAB ROYAL will ensure that their safeguarding procedures are consistent and in line with the principles and approaches set out in this policy.

- DADAAB ROYAL recognizes that an element of risk exists, and while we may never be able to totally remove this, we need to do all we can to reduce it or limit its impact.
- DADAAB ROYAL respects confidentiality and has a responsibility to protect sensitive personal data. Information should only be shared and handled on a need to know basis, that is, access to the information must be necessary for the conduct of one's official duties. Only individuals who have legitimate reasons to access the information are allowed to receive it.
- DADAAB ROYAL commits to monitoring the implementation of the safeguarding policy. This policy will be reviewed every three years and earlier if necessary.
- Cultural sensitivity; DADAAB ROYAL seeks always to work in ways which are culturally sensitive and that respect the diverse nature of the people we work with. We recognize that there are many different ways of thinking and taking care of vulnerable people and making sure they are protected. It is acknowledged that protecting these groups of individuals and being culturally sensitive can be a difficult balancing act, especially given the situation in many of the countries where we work. As a local organization, we endorse the United Nations Convention on the Rights of the Child general principle, that all the rights guaranteed by it must be available to all children without discrimination; and article 19 which accords equal rights to protection for children from abuse. Every child matters everywhere in the world. Culture must not be used as an excuse to abuse children, young people or vulnerable adults.

Responsibilities

All employees, volunteers, consultants, agency staff, sub-contractors, partner organizations and visitors are obliged to follow this policy and maintain an environment that prevents exploitation and abuse and which encourages reporting of breaches of this policy using the appropriate procedures.

All people working with DADAAB ROYAL will:

- Read, understand and adhere to the DADAAB ROYAL Safeguarding Policy and DADAAB ROYAL Code of Conduct Policy
- Strive to 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 behavior of a DADAAB ROYAL representative in relation to 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

All people working with DADAAB ROYAL will not:

- 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 take action of 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.

Managers

Managers at all levels are responsible for ensuring employees, volunteers, consultants, visitors and partner

organizations are aware of the policy and are supported to implement and work in accordance with it, as well as creating a management culture that encourages a focus on safeguarding. They must ensure that they are responsive, acting immediately if they become aware of any safeguarding concerns, and supportive towards employees or volunteers who complain about breaches in this policy.

Designated Safeguarding Officers

Designated safeguarding officers are responsible for handling reports or concerns, about the protection of vulnerable people, appropriately and in accordance with the procedures that underpin this policy.
Our public and Partner relation officer will act as our designated safeguarding officer.
The lead designated safeguarding officer is responsible for:

- monitoring and recording safeguarding concerns
- ensuring referrals to the relevant authorities happen without delay
- updating safeguarding training for all staff
- ensuring this policy is reviewed every 3 years or earlier if necessary
- ensuring it is implemented throughout the organization and safeguarding training given
- ensuring monitoring and recording procedures are implemented

DADAAB ROYAL Executive Board

The DADAAB ROYAL Executive Board is responsible for ensuring the effective implementation of this policy and associated procedures and ensuring that everyone linked with DADAAB ROYAL is equipped and supported to meet their responsibilities.

Directors: The Board of Directors holds ultimate accountability for this policy.

Procedure Overview

Recruitment and Selection:

- Safe recruitment and vetting processes are followed for all volunteers, employees, consultants and partners
- Where an employee, volunteer or partner is engaged in 'regulated activity' (direct work with vulnerable individuals), a criminal background check will be undertaken as part of the recruitment process.
- All DADAAB ROYAL employees and volunteers must sign and abide by this safeguarding policy and the Code of Conduct. The code sets out the standards of practice we expect of employees and volunteers - in terms professional competence, integrity, acting as a representative and in safeguarding - which support our vision, mission and values.

Induction and Support:

Advice support and training on safeguarding will be provided to all employees and volunteers on:

- ✓ What they should do in the event of a disclosure
- ✓ What to do if they have concerns about the welfare of a child
- ✓ How to recognize signs of abuse
- ✓ What to do if they have concerns about a DADAAB ROYAL employee, volunteer, or employee of a partner organization
- ✓ Where to go for advice and support within the organization

Ensure that clear processes for reporting and dealing with safeguarding concerns and incidents are widely communicated, regularly reviewed and consistently applied. Where allegations are made about an employee, careful consideration must take place about the appropriateness of the person continuing to work with DADAAB ROYAL.

Data Protection

Ensure that personal information is kept confidential unless we have the agreement of the individual and/or their parent/guardian, except where it is necessary to pass this to a specialized child welfare or law enforcement agency in relation to a safeguarding incident. (For more detailed guidance, refer to the (DADAAB ROYAL privacy Policy and Statement).

Minimum Standards

Where employees or volunteers are contracted by other employers, or when working with partners, sub contracted agencies, DADAAB ROYAL will brief them on our safeguarding policy and ask for information on how the organization works to protect vulnerable people and ensure that they meet our Safeguarding Standards.

Social Media

DADAAB ROYAL has a policy regarding the media and the use of actual names, images, including photographs and recordings. This should be applied in all situations. Specifically relating to protection of children, young people and vulnerable adults, we will:

- Use names and images of children, young people or vulnerable adults which are respectful and not expose them to further vulnerability (not degrading or showing sexual images of children naked or partially clothed).
- Reproduce images and use names of children only where we have the written permission of their parents /guardians using a consent form.
- Reproduce images and use names of young people and vulnerable adults only where we have their written permission or that of their parents/guardians, whichever is the most suitable.
- Make clear to vulnerable people and their families that agreement to providing information or images is not a condition of involvement in DADAAB ROYAL activities and programmes.
- Inform employees, volunteers and partners about the DADAAB ROYAL policy in relation to the use of technology (the IT Policies), and understand that they must not use this technology for the purpose of accessing, producing or distributing any information or violent or sexual images that are harmful to vulnerable people. This includes adult pornography.
- Ensure that DADAAB ROYAL has a format for carrying out and implementing risk assessments at all levels of the organization.
- Train and support the designated safeguarding officers in their work and in any action they may need to take in order to protect vulnerable people.

Raising and responding to concerns

DADAAB ROYAL places a *mandatory obligation* on all employees, volunteers, contractors and partners to report concerns, suspicions, allegations and incidents which indicate actual or potential abuse or exploitation vulnerable people or which suggests this policy may have in any other way been breached. It is not the responsibility of the employees to decide whether or not abuse has taken place, however, concerns should be raised with an individual's line manager, functional lead or a designated safeguarding officer who will initiate the procedure for dealing with suspected or actual incidents of abuse.

Designated Safeguarding Officers are responsible for ensuring that the reporting procedure is followed so that suspected or actual cases of abuse are responded to appropriately and consistently, and referred to the relevant statutory authority.

To ensure that all such situations are handled appropriately and effectively:

- Reports must be made, and decisions and actions taken.
- DADAAB ROYAL is not an investigative authority. It is essential that referrals are made to the relevant law enforcement agency to ensure that appropriate protection and support is given to the vulnerable individual, and that any evidence is collected in accordance with the law.
- All sensitive and personal data must be kept confidential (including the names of anyone who makes a report of abuse), and be shared on a strictly *'need to know basis'*, that is, access must be necessary for the conduct of one's official duties.
- Where a Dadaab Royal employee is the subject of an investigation, the lead designated safeguarding officer will lead the case.

Appendix 1: Dadaab Royal Safeguarding Standards

This standard framework is from the Keeping Children Safe "Child Safeguarding Standards" and adapted for use for Dadaab Royal. Each standard can be met in whole, in part or not met.

Standard		Potential evidence of standard being met
1	1.1 The organization has a clear safeguarding policy that seeks to prevent harm to children, young people and vulnerable adults	• A copy of the policy, signed by the management board or trustees • For programme or recruitment partners,
	1.2 Policies are publicized to staff, beneficiaries and wider communities	• Policy or summary translated into local languages • Examples of ways the policy has been promoted, including to children, young people or other community members as necessary
	2.1 The organization places clear responsibilities and expectations on its staff and associates and supports them to understand and act in line with these	• Clear responsibilities for a Designated Safeguarding Officer at appropriate level

2	2.2 Key staffs are designated at different levels with clearly defined roles and responsibilities.	• Job descriptions with clear expectations on those with contact with vulnerable people • Job descriptions for DADAAB ROYAL long-term volunteer include details of any contact
	2.3 There are written guidelines for appropriate and inappropriate behavior	• A written code of conduct; evidence Of this being shared to staff and volunteers
	2.4 There are appropriate learning opportunities to develop and maintain the necessary attitudes, skills and knowledge to keep vulnerable people safe.	• A copy of training plans, course attendance re cords and course evaluations. • Evidence of induction for DADAAB ROYAL volunteers
3	3.1 Organizations carry out local mapping exercises which provide information on the legal, social welfare and child protection arrangements.	• Legal requirements are included in policies
	3.2 Safeguarding risks and mitigation strategies are incorporated into existing risk assessment processes at all levels.	• Risk assessments include Appropriate and relevant risks • Evidence of mitigation strategies implemented • Risk assessments shared with DADAAB ROYAL
	3.3 Safeguarding issues are integrated into programme design, delivery and evaluation	• Evidence of safeguarding issues in project proposals and plans.
	3.4 There are procedures for responding to safeguarding concerns arise	• A copy of a concern/allegation management
4	4.1 Implementation of safeguarding policies and procedures is monitored	• 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	• Incident reports produced
	4.3 Policies and procedures reviewed at least every three years	• Evidence of review in annual plans / strategies