



WEST NILE PRIVATE SECTOR DEVELOPMENT PROMOTION CENTRE LTD (WENIPS)

Promoting the Private Sector for Sustainable Development

SAFEGUARDING POLICY

2024



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MESSAGE FROM CHAIRPERSON, BOARD OF DIRECTORS

As the Chairperson of the Board of Directors, I am pleased to introduce WENIPS' Safeguarding Policy, which reflects our unwavering commitment to protecting the safety, dignity, and well-being of our beneficiaries, staff, and communities. This policy is a testament to our organization's values of compassion, accountability, and transparency.



We recognize that safeguarding is everyone's responsibility, and we are dedicated to creating a culture that prioritizes the protection of vulnerable individuals and groups. This policy outlines our approach to preventing and responding to safeguarding concerns, and it will be regularly reviewed and updated to ensure its effectiveness.

I would like to express my gratitude to the staff, stakeholders, and partners who have contributed to the development of this policy. I am confident that this policy will guide our efforts to promote a safe and respectful environment for all, and I look forward to seeing its positive impact on our work.

By adopting this policy, we reaffirm our commitment to upholding the highest standards of safeguarding and ensuring that our work is guided by a culture of protection, respect, and care.

Signed:  _____

Date:  _____

Dr. Anthony Okwir (MSC).

Chairperson Board of Directors

MESSAGE FROM CHIEF EXECUTIVE OFFICER

As the Chief Executive Officer of WENIPS, I am committed to ensuring that our organization provides a safe and secure environment for our beneficiaries, staff, and partners. Our Safeguarding Policy is a critical component of our efforts to prevent harm, protect vulnerable individuals, and promote a culture of respect and accountability.



I want to assure you that we take safeguarding extremely seriously and are dedicated to implementing this policy effectively. We will provide our staff with the necessary training, resources, and support to ensure that they understand their roles and responsibilities in safeguarding.

Our goal is to create an environment where everyone feels safe, valued, and respected. We recognize that safeguarding is an ongoing process that requires continuous effort, vigilance, and improvement. I encourage everyone to familiarize themselves with this policy and to report any concerns or incidents promptly.

I am confident that our Safeguarding Policy will help us to achieve our mission while protecting the well-being and dignity of those we serve.

Signed: _____

Mr. Jenaro Puringi Onegi (MBA)

Chief Executive Officer/WENIPS

Date: _____

4th July 2024

1.1 INTRODUCTION

1.1. Introduction

West Nile Private Sector Development Promotion Center Limited (WENIPS) is committed to safeguarding children and vulnerable adults from all forms of harm that may arise from our work in various communities. This policy is designed to protect children and vulnerable adults who come into contact with WENIPS programs and operations, including our staff, beneficiaries, and other stakeholders.

1.2. Scope and Definitions

In this policy, a child is defined as any individual under the age of 18, in line with the United Nations Convention on the Rights of the Child (UNCRC). A vulnerable adult/adult at risk is any person aged 18 or over who has particular care, support, or special needs or is dependent/reliant on others for the provision of basic services.

1.3. Principles

This safeguarding policy is guided by international and national legal frameworks, including:

- The Convention on the Rights of the Child (UNCRC)
- The Convention on the Rights of Persons with Disabilities (UN CRPD)
- The Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW)
- Uganda's national laws and policies, including the Constitution of the Republic of Uganda 1995 Article 34

The following principles are upheld by this policy:

1. All children and vulnerable adults have equal rights to protection from harm.
2. Everybody has a responsibility to safeguard children and vulnerable adults.
3. WENIPS has a duty of care for children and vulnerable adults with whom we work, are in contact with, or who are affected by our work and operations.

4. WENIPS will ensure that partners and stakeholders meet the minimum requirements on safeguarding.
5. All actions on safeguarding will be taken in the best interests of the child or vulnerable adult, which are paramount.

Non-negotiable principles

1. No Exploitation: WENIPS staff and representatives must not engage in any form of exploitation or relationships that are exploitative, taking advantage of their position or influence.
2. Professional Integrity: WENIPS staff and representatives must conduct themselves in a manner that upholds the organization's reputation and integrity, avoiding any actions that could bring WENIPS into disrepute.

1.4. Aims of the Policy

The primary aim of this policy is to create a safe environment for children and adults at risk who come into contact with WENIPS programs, protecting them from all forms of abuse and exploitation. Specifically, this policy aims to:

- Protect children and adults at risk from abuse by individuals associated with WENIPS.
- Protect WENIPS staff and the organization from risks associated with abuse of children and vulnerable adults.
- Guide decision-making related to the protection of children and adults at risk within WENIPS.

1.5. Scope of the Safeguarding Policy

This policy applies to all WENIPS staff, regardless of employment contract type, as well as volunteers, consultants, contractors, interns, and any other entities engaged with WENIPS. It covers all work environments, including offices, field activities, and programs. Adherence to this policy will be reviewed as part of staff performance management and internal audits. The responsibility for adherence lies with the board, while implementation will be overseen by the Human Resources unit and senior management.

1.6. Related Policies

This policy is aligned with other WENIPS policies, procedures, and guidelines, including:

1. WENIPS Human Resource Policy
2. WENIPS Complaint and Feedback Management Guidelines
3. WENIPS Communication and Visibility Strategy

1.7. Review and Update of the Policy

This policy will be reviewed and updated every 5 years or as necessary to reflect changes in the organization, government, or donor policies.

2. KEY DEFINITIONS

2.1 Safeguarding

Refers to the responsibility WENIPS has internally to ensure that their employees and volunteers, partners, vendors, consultants, operations, and programmes do no harm to children and adults at risk.

2.2 Child Protection

Refers to the measures and structures used to prevent and respond to abuse, neglect, exploitation, and violence affecting children and vulnerable adults.

2.3 Person At Risk

Any person who stands to be abused as result of being vulnerable for example, Children, the elderly, women, persons with disability, the poor etc.

2.4 Orphan and Vulnerable Child (Ovc)

Any person below the age of 18 that: -

1. Has particular care, support or special needs and as a result abuse occurs when a vulnerable child at risk is mistreated, neglected or harmed by any person who holds a position of trust e.g. they may be in custody or secure accommodation etc.
2. The child is dependent / reliant on others for the provision of basic services (not limited to e.g. safety, shelter, water, food), because of their context, such as: The child is in contact with an adult who seeks to misuse their position of authority or trust to control, coerce, manipulate or dominate them.

2.5 Vulnerable Adult/Adult at Risk

Any person aged 18 or over, and if:

1. The adult has particular care, support or special needs and as a result abuse occurs when a vulnerable adult/adult at risk is mistreated, neglected or harmed by another person who holds a position of trust e.g. they may be in custody or secure accommodation, or she is an expectant or nursing mother; and/or

2. The adult is dependent / reliant on others for the provision of basic services (not limited to e.g. safety, shelter, water, food), because of their context, such as:
 - In a refugee camp or a recipient of as part of an NGO relief distribution, and are potentially vulnerable to exploitation or abuse as a result of their status or their lack of power and control; and/or
 - The adult is in an unfamiliar country and location
 - The adult is in a relationship (work or social) or in contact with another adult who seeks to misuse their position of authority or trust to control, coerce, manipulate or dominate them.

2.6. Do No Harm

‘Do no harm’ refers to organizations’ responsibility to ‘do no harm’ or minimize the harm they may be doing inadvertently as a result of inappropriate programming.

WENIPS recognizes the following forms of harm:

2.6.1 Physical Abuse

Physical abuse refers to actual or potential physical harm caused by another person, adult or child. Examples include:

- Corporal punishment
- Hitting, shaking, poisoning, drowning, pushing, pinching, burning
- Forcing a child to carry heavy loads
- Fabricating or inducing illness

Possible risks of physical abuse in the context of WENIPS include:

- Injuries from playing in unsafe environments
- Accidents during transportation
- Injuries from working with machines
- Corporal punishment
- Ritualistic harm or sacrifice

2.6.2 Emotional Abuse

Emotional abuse refers to persistent emotional maltreatment that impacts mental well-being and mental health. Examples include:

- Restricting movement
- Rejecting, degrading, humiliating, bullying, threatening, discriminating, ridiculing

Possible risks of emotional abuse in the context of WENIPS include:

- Taking pictures without consent
- Verbal abuse, shame, nicknames, or harsh language
- Exposing confidential information
- Discrimination
- Not providing basic needs or space for expression

2.6.3 Neglect and Negligent Treatment

Neglect and negligent treatment refer to a persistent failure to meet basic physical and/or psychological needs, resulting in serious impairment of a child's or vulnerable adult's health and development. Examples include:

- Failure to provide nutrition, shelter, safe living/working conditions
- Failure to properly supervise and protect from harm

Possible risks of neglect in the context of WENIPS include:

- Unmet needs due to program participation
- Lack of food, refreshments, or playtime

2.6.4 Sexual Abuse

Sexual abuse refers to any form of sexual exploitation or molestation, including coercion, force, or manipulation, of a child or vulnerable adult. This can include:

- Rape, oral sex, penetration, and other forms of non-consensual sexual contact
- Sexual assault, including bad touches or inappropriate physical contact
- Exposing a child or vulnerable adult to private parts, sexual acts, or pornography
- Involving children and vulnerable adults in producing or viewing sexual images or activities

- Encouraging or engaging in sexually inappropriate behavior

Sexual abuse can occur in various forms, including:

- Grooming: building a relationship with a child or vulnerable adult to exploit them sexually
- Sextortion: using power or coercion to obtain sexual favors or images
- Online exploitation: using digital platforms to sexually exploit or abuse children or vulnerable adults

Possible risks of sexual abuse in the context of WENIPS include:

- Exposure to pornography or sexual content through digital platforms or in-person interactions
- Sexual assault or defilement due to inadequate supervision or poor safety protocols
- Abuse by staff, volunteers, or stakeholders in secluded areas, residences, or during project activities
- Sharing accommodation or sanitary facilities with adults or non-related children
- Community-based risks when participants are released late after project activities or lack safe transportation

To mitigate these risks, WENIPS will implement robust safeguarding measures, including:

- Background checks and screening for staff and volunteers
- Safe recruitment practices
- Adequate supervision and monitoring of project activities
- Clear guidelines and protocols for reporting and responding to sexual abuse
- Training and capacity-building for staff and volunteers on safeguarding and sexual exploitation

2.6.5 Sexual Exploitation

Sexual exploitation is a form of abuse where someone is coerced or manipulated into engaging in sexual activities in exchange for something they need or want. This can include:

- Children or vulnerable adults being forced into prostitution or sex work
- Being manipulated or coerced into sexual activities by someone in a position of power or authority
- Being exploited through online platforms or social media

2.6.6 Sexual Harassment

Sexual harassment is unwelcome behavior of a sexual nature that creates a hostile or uncomfortable environment. This can include:

- Unwanted touching or physical contact
- Verbal comments or jokes of a sexual nature
- Displaying explicit or suggestive materials
- Requests for sexual favors

2.6.7 Commercial Exploitation

Commercial exploitation involves exploiting someone for financial or material gain, often at the expense of their well-being. This can include:

- Forced labor or child labor
- Trafficking for labor or services
- Using children or vulnerable adults in exploitative or hazardous work

These forms of exploitation and abuse can have serious physical, emotional, and psychological consequences for the individuals involved. It's essential to recognize the signs and take action to prevent and respond to these forms of abuse.

3.0. POSSIBLE RISKS OF ABUSE IN THE CONTEXT OF WENIPS AND POLICY COMMITMENTS

3.1. Policy Statement

WENIPS is committed to creating a safeguarding culture where all individuals are sensitive to the needs and protection of children and adults at risk. We recognize that our programs and activities may pose risks to children and vulnerable adults, including:

- Exploitation as laborers during project activities
- Manipulation or coercion by project participants or staff
- Dropping out of school or missing out on education and play due to caregiving responsibilities

We acknowledge that abuse and exploitation can have severe consequences, including:

- Physical and emotional harm
- Dropping out of programs
- Indiscipline and negative coping mechanisms
- Damage to the reputation of WENIPS and its staff

To mitigate safeguarding risks, WENIPS will:

- Conduct regular risk assessments to identify potential safeguarding concerns.
- Implement measures to prevent and respond to abuse and exploitation.
- Provide training and support to staff and project participants on safeguarding and protection.
- Recognize and address power imbalances within the team and between staff and beneficiaries.
- Ensure all staff and representatives are aware of safeguarding principles and competent in implementing safeguards.
- Implement this policy, learn from experience, and review it periodically to reflect changing contexts.
- Take proactive steps to prevent abuse and respond effectively when incidents occur.

By prioritizing safeguarding, we aim to create a safe and supportive environment for all children and adults at risk participating in WENIPS programs.

3.2. Code of Conduct

WENIPS Board members, managers, staff, partners, and all stakeholders governed by this policy will adhere to the following code of conduct:

a) Respect and Dignity

- Treat all vulnerable adults and children with fairness, respect, and dignity, regardless of their background, status, or characteristics.
- Prioritize the best interests of children and vulnerable adults in all interactions and decision-making.
- Foster an environment that values diversity, promotes inclusivity, and respects human rights.

b) Safe and Equitable Organizational Culture

- Create and maintain a safe and equitable organizational culture that prevents and opposes: Sexual harassment, Exploitation and Abuse (SEA)
- Promote a culture of zero tolerance for any form of harassment, exploitation, or abuse.

c) Integrity and Professionalism

Uphold the integrity of WENIPS by:

- Demonstrating integrity, truthfulness, dedication, and honesty in all actions.
- Being patient, respectful, and courteous to all individuals, including children and vulnerable adults.
- Refraining from behavior that may compromise or harm WENIPS, its reputation, or the people it interacts with.
- Address challenges and disagreements in a respectful, non-violent manner.

d) Safeguard and make responsible use of the information and resources to which he/she has access by reason of employment with WENIPS. The employee shall:

- Exercise due care in all matters of official business, and not divulge any confidential information about a vulnerable adult or child and other work-related matters in accordance with the staff regulations and rules and current guidelines.

- Protect, manage, and utilize WENIPS human, financial and material resources appropriately.
- Never use WENIPS resources to exploit or harass vulnerable adults, children or access pornography.

e) Always ensure that for work-related purposes when they photograph or film a child or vulnerable adult, they:

- Comply with local traditions or restrictions for reproducing personal images
- Obtain informed consent from the child and parent or guardian of the child or vulnerable person before photographing or filming them. As part of this staff must explain how the photograph or film will be used
- Ensure photographs, films, videos and DVDs present children and vulnerable adults in a dignified and respectful manner and not in a vulnerable or submissive manner. Children and vulnerable adults should be adequately clothed and not in poses that could be seen as sexually suggestive
- Ensure images are honest representations of the context and the fact
- Ensure file labels, meta data or text descriptions do not reveal identifying information about a child or vulnerable adult when sending images electronically or publishing images in any form.

(f) Refrain from any involvement in criminal/unethical activities, activities that contravene human rights or compromise the image and interests of WENIPS.

- The employee shall neither support nor take part in any form of illegal, exploitative, or abusive activities, including, for example, child labor, child pornography and trafficking of human beings and commodities.
- Shall not engage children under the age of 18 and vulnerable adults in any form of sexual activity including paying for sexual services and drug abuse.
- Shall not physically assault a child or other vulnerable adults participating in WENIPS programme.
- Will not display anger, violent or aggressive behavior towards a colleague, beneficiary or other persons who comes into contact with WENIPS programmes and operations.

- Shall not use Ignorance or mistaken belief of the child’s age or some one’s vulnerability as an excuse or a defense.
- Understands that failure to report abuse/ exploitation of a vulnerable adult and children that he/she is aware of could lead to disciplinary action against him/her.

g) Board members, staff, partners and volunteers of WENIPS shall observe the following dos and don’ts to uphold safeguarding commitments by WENIPS.

DOs	DON'Ts
Board members, Partners, staff and volunteers shall:	Board members, Partners, staff and volunteers shall not:
Dress decently while working/interacting with children and vulnerable adults.	Discipline children and vulnerable adults using corporal punishment means.
Treat all children and vulnerable adults with fairness, dignity and respect regardless of their social or other background.	Use abusive/derogatory or demeaning language while communicating to children and vulnerable adults.
Model to children and vulnerable adults’ exemplary behavior, teach them how to respect each other as well as elders.	Hold, kiss, hug, or touch children and vulnerable adults in an appropriate or culturally insensitive way.
Maintain professional distance while working/interacting with children and vulnerable adults.	Hire children and vulnerable adults as house help.
Ensure that all activities involving children and vulnerable adults are properly supervised and guided.	Stay with/invite children and vulnerable adults in own residences unless permitted by management.
Ensure that all spaces where children and vulnerable adults congregate or interact are safe and friendly.	Employ children and vulnerable adults as labor on farms/activities for own benefit especially if it affects their education and other rights.

Promptly report any suspicion or actual abuse that you get to know of.	Work with children and vulnerable adults for more than stipulated hours and in non-designated places.
Provide space and empower children and vulnerable adults to express themselves.	Expose children and vulnerable adults to pornography of any form
Ensure that all information allayed to children and vulnerable adults is age appropriate, communicated in a manner that children understand and is free from pornography.	Show preferential treatment to some children and vulnerable adults, while excluding others.
Ensure that children and vulnerable adults are not sharing sanitary facilities with adults and children of the same sex.	Don't act in any way that intends to embarrass, shame, humiliate/degrade children and vulnerable adults.
Treat with confidence all information regarding children and vulnerable adults.	Spend excessive time with children and vulnerable adults than stipulated or visit them in their homes unless it is part of the project activities.

3.3. Practical Steps to Achieve The Commitments on Safeguarding

3.3.1. Safeguarding at level of Human Resources management (Employment Cycle)

- Safeguarding requirements clearly included in job adverts and job descriptions where all our new staff and the existing shall undergo periodic and targeted safeguarding trainings.
- Assessment of knowledge and record on safeguarding shall be incorporated into selection, interview and contracting during recruitment.
- Ongoing training of staff on safeguarding (prevention, identification, and management).
- Safeguarding shall form critical part of our staff induction
- Every staff receives policy on Safeguarding and signs commitment to implement the policy
- Review of adherence to safeguarding policy is part of performance reviews

- Offenses of abuse / harm among staff expressly investigated and punished accordingly.

3.3.2 Safeguarding at the Level of Programming

The objective is to ensure safer programming environment that impacts positively on children and vulnerable adults: the following shall be taken into consideration.

- All programs shall be assessed for safeguarding, thorough risk assessment, which shall be conducted for all the projects and the activities to identify possible risks and incorporate mitigation measures in planning and budgeting.
- All programs shall be sensitive of safeguarding concerns and no program shall cause harm to children and vulnerable adults.
- All our partners including visitors shall be made aware of this policy
- Program activities will be carried out in a way that promote the rights, dignity of the children and vulnerable adults as well as empower them on their rights to education, health, safety, shelter, protection and care.
- Staff implementing programs shall be oriented on their policy and given necessary support by programme leads to incorporate safeguarding in their day-to-day work. Activities.
- There shall be a well-established complaint mechanism for beneficiaries and other stakeholders to raise their concerns on safeguarding.
- Beneficiaries (children and adults at-risk) shall be informed about their rights and are made to actively participate; and raise concerns regarding to their protection.
- Decisions on vulnerable adults and children shall be made with their participation as far as possible.
- Vulnerable adults and children shall not be engaged in program activities that expose them to harm by project staff and contractors.

3.3.3. Safeguarding in working with Others (Donors, Contractors; - consultants, suppliers, vendors, & Visitors).

The objective is to ensure that other stakeholders who work with WENIPS observe safe guarding. The following shall be taken into consideration:

- Assessment of safeguarding history shall form part of contracting

- Partners shall be expected to demonstrate safeguarding in their works
- This policy shall be part of MOU with our partners
- Where a partner does not have safeguarding policy and has gaps in the same, WENIPS shall provide training on safeguarding for her partners.
- Partner staff working with WENIPS shall sign WENIPS safeguarding policy
- Any safeguarding concerns among partner staff shall be investigated according to this policy
- Partners shall be expected to exhibit minimum safeguarding standards such as safety, protection of dignity and right.
- No contractor shall use a vulnerable adult or a child to accomplish his / her assignment where the amount of work to be done qualifies to be classified as harmful labour.
- Contractors shall make sure their work environment does not expose vulnerable adults and children to any form of abuse.
- Partners shall agree to share information and knowledge with WENIPS to improve safeguarding. Including reporting on safeguarding concerns that they might have noticed during their work with WENIPS.

4.0. IDENTIFICATION, REPORTING AND INVESTIGATION OF SAFEGUARDING ISSUES

4.1. Introduction

All staff and partners of WENIPS are obliged to identify, report: -

- a) A staff and any person involved in abuse of a child or vulnerable adult.
- b) A vulnerable adult or child that is experiencing abuse whether the perpetrator is known or not.
- c) Investigate cases of abuse.

Therefore, staff are expected to be aware of obvious indicators of being abused; this includes:

- a) Physical Signs: Bruises, burns, fractures, irritability, frequent hunger, unexplained weight loss, any sexually transmitted infections and poor hygiene. Multiple bruises, Bruises of various stages of healing, bruises located on unusual parts of the body (face, neck, ears buttocks, back, chest etc.) etc.
- b) Behavioral Signs: Showing little or no emotion when hurt, being withdrawn, anxiousness, wariness, Alcohol and or drug misuse, age-inappropriate sexual behavior, stealing food, extreme apprehensiveness or vigilance; avoiding touch or flinching easily, excessive friendliness to strangers; fear of going home etc.
- c) Disclosure. If the child or vulnerable adult tells you they have been abused.

4.2. Reporting Mechanism

If you have concerns about the safety of children or adults at risk in WENIPS programs or operations, it's essential to report them to the relevant authorities. You can report concerns internally to the Safeguarding Focal Person, Supervisor, HR Unit, or Chief Executive Officer. If the situation requires external reporting, you can reach out to local authorities such as the police or social services. All field-level staff are expected to report suspected cases of abuse to the Project Manager or designated Safeguarding Focal Person.

4.3. Escalating Safeguarding Concerns

When a suspected case of abuse falls outside WENIPS' mandate, such as abuse by a parent or non-WENIPS staff, it's crucial to escalate the concern to the local authority. The Project Manager or designate will take the lead in reporting the case to the relevant authorities, such as the Local Council or police, with the knowledge of the Safeguarding Focal Person. The Safeguarding Focal Person will maintain records of all reported cases, ensuring that WENIPS can track and respond to safeguarding concerns effectively. Additionally, the Safeguarding Focal Person will assess the needs of the affected person and develop a plan to ensure those needs are met, either through WENIPS' support or referral to other organizations. All cases of abuse will be reported using retrievable means, such as written reports, short text messages, or emails, to ensure a clear and documented trail.

4.4. Non-Reporting of Suspected Case of Abuse

Any staff that does not report any member of staff, contractor, consultant, volunteer, intern, any person outside the organization (member of community, community leader, a parent etc.) and or does not report about any child or vulnerable adult experiencing abuse is in contravention of this policy and is liable to disciplinary proceedings

4.5. Investigation of Suspected Cases of Abuse

The following procedures will be followed:

- Preliminary Investigation: The Project Manager will constitute a team to conduct a preliminary investigation into suspected cases of abuse involving staff, keeping the Safeguarding Focal Person informed of the proceedings.
- Confirmed Cases: Confirmed cases of abuse will be referred to the Safeguarding Focal Person for further management.
- Cases Involving Contractors and Partners: Suspected cases of abuse involving WENIPS contractors, donors, or other significant partners will be referred to the Safeguarding Focal Person for appropriate investigation.
- Expert Assistance: With the approval of the Chief Executive Officer and at the request of the Safeguarding Focal Person, WENIPS may seek the assistance of an expert in investigating cases of abuse.
- Response to Confirmed Cases: WENIPS will provide a response to confirmed cases of abuse.

- Disciplinary Action: The minimum punishment for abuse in WENIPS will be summary dismissal, unless otherwise advised by the Board of Directors.
- Grave Abuse: In cases of grave abuse, such as sexual abuse, child slavery, child sacrifice, or child trafficking, the dismissed staff member will be handed over to the relevant authorities for further action.

4.6. Management of Abused Children or Vulnerable Adults

WENIPS recognizes its limitations in managing abuse cases outside its mandate. Therefore, referral to appropriate professionals and organizations will be prioritized to ensure the victim receives necessary support, including:

- Counseling
- Legal support
- Medical support

Where possible, WENIPS may offer material and financial support as part of the management plan.

4.7. Malicious Allegations of Abuse

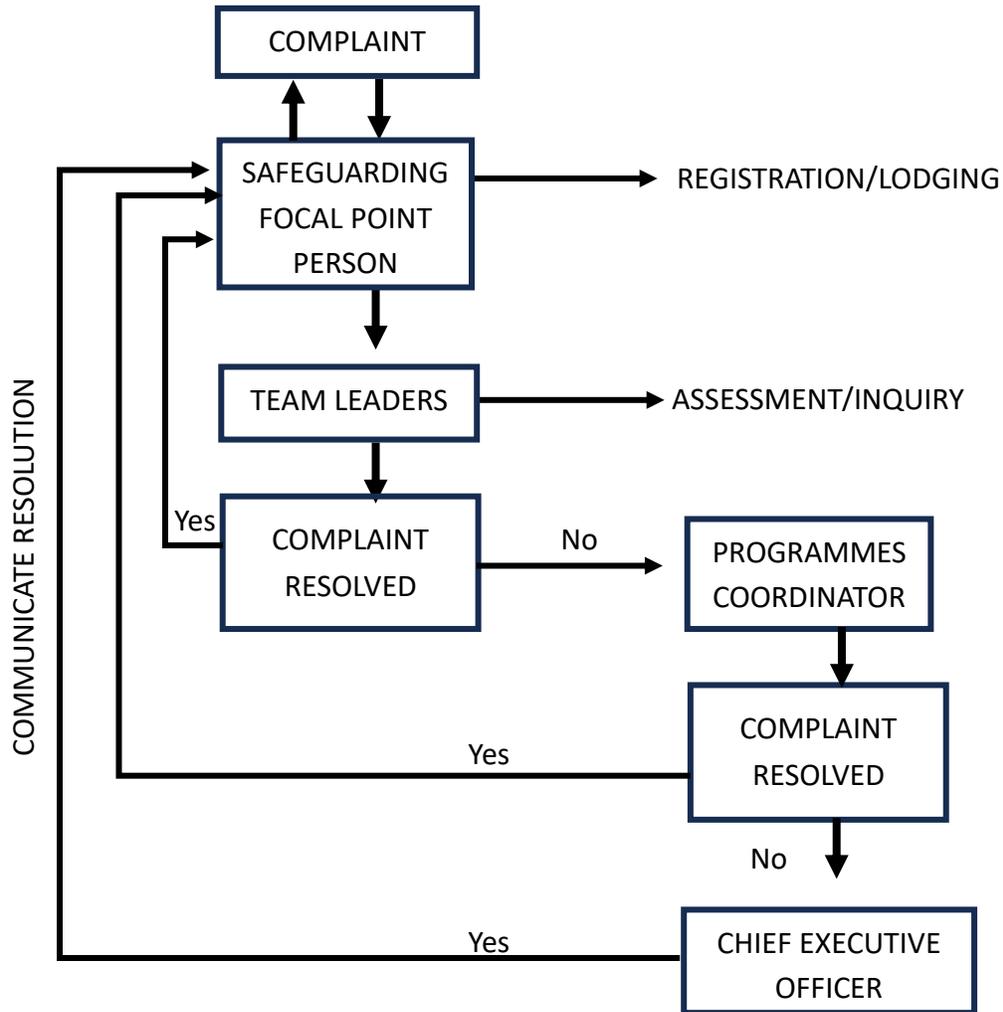
Any staff member who makes malicious allegations of abuse against a colleague or any other person will face disciplinary action. Such allegations may result in:

- Warning
- Dismissal from the organization

4.8. Regular Safeguarding Complaints

Regular safeguarding complaints relate to program design and implementation or service delivery issues. These complaints will be addressed through WENIPS' established procedures to ensure continuous improvement and safeguarding.

Flow Chart for Dealing with Gross Safe Guarding Complaints at WENIPS



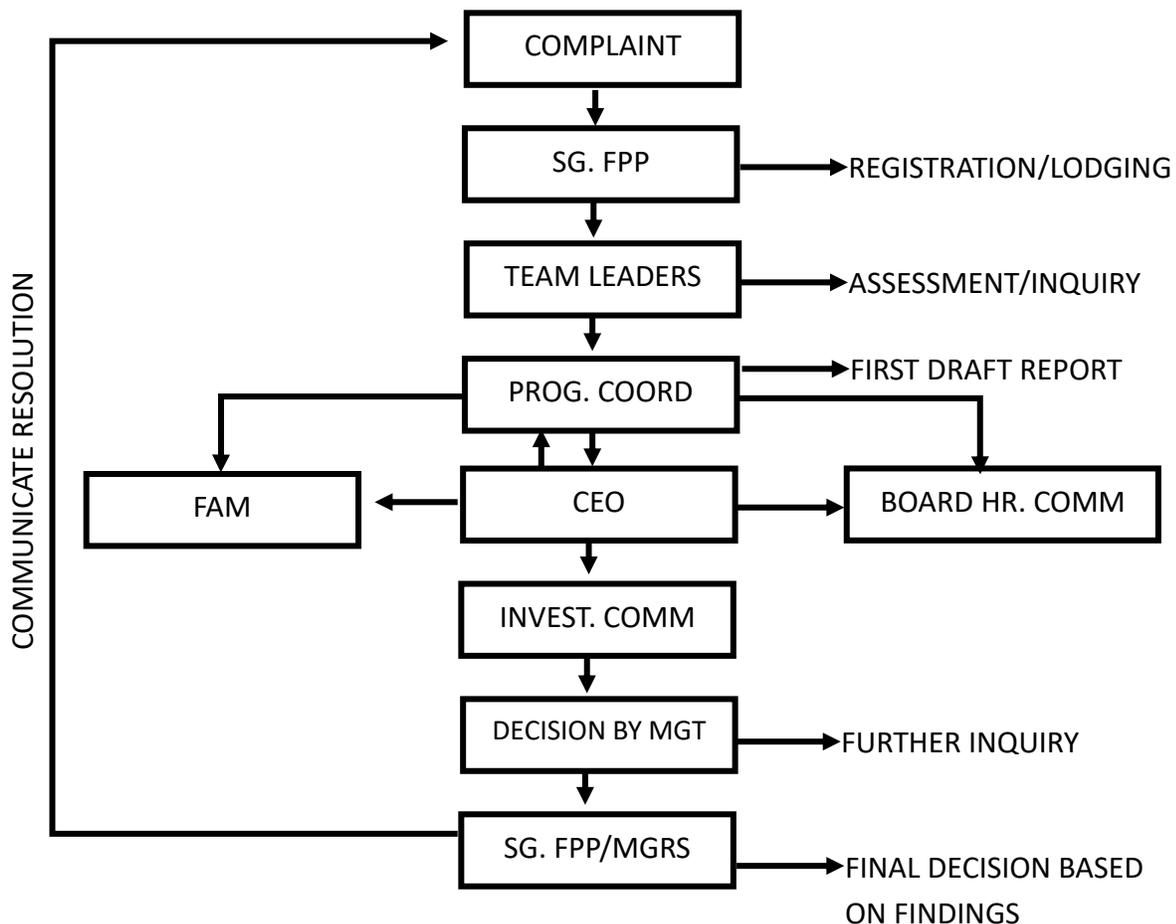
4.9. Gross/Serious Safeguarding Complaints

Serious safeguarding complaints include issues related to:

- Derogatory or immoral behavior towards beneficiaries, including verbal abuse and physical assault
- Harassment of beneficiaries or any act that might harm WENIPS' reputation
- Discrimination against beneficiaries based on race, gender, creed, religion, or other protected characteristics
- Any other complaint deemed serious by WENIPS management

These complaints will be addressed promptly and thoroughly, following WENIPS' established procedures.

Flow Chart for Dealing with Gross Safe Guarding Complaints at WENIPS



5.0. RESPONSIBILITY IN IMPLEMENTATION OF THE POLICY

5.1. Policy Implementation, Monitoring and Review

This section outlines guidance on implementing, monitoring, and reviewing the safeguarding policy to ensure its effectiveness and relevance.

Safeguarding Team:

The Safeguarding Team will comprise:

- Members of the Board: Provides governance oversight and strategic guidance
- Chief Executive Officer: Ensures organizational commitment and resource allocation
- Safeguarding Focal Person: Coordinates safeguarding efforts and provides expertise
- Safeguarding Committee: Supports the Focal Person and provides additional guidance
- HR Unit: Ensures policy implementation in human resources practices
- Managers/Supervisors: Oversee policy implementation in their respective areas

5.2. Board of Directors

The Board's responsibilities include:

- Approving the safeguarding policy: Ensures the policy aligns with organizational values and goals
- Ensuring the policy's integration into organizational processes: Embeds safeguarding into daily operations
- Sanctioning policy reviews based on senior management team recommendations: Ensures the policy remains relevant and effective
- The Safeguarding Focal Person on the Board will support the Safeguarding Team by providing governance oversight and strategic guidance.

5.3. Senior Management Team (Led by Chief Executive Officer)

The Senior Management Team's responsibilities include:

- Recommending policy reviews and revisions: Ensures the policy remains up-to-date and effective

- Overseeing policy implementation across:
- Human resources practices: Ensures safeguarding is integrated into recruitment, training, and employee management
- Programming: Ensures safeguarding is integrated into program design and implementation
- Contracting and outsourcing services: Ensures third-party vendors and partners adhere to safeguarding standards
- Creating an enabling environment for policy implementation: Allocates resources and provides support for effective policy implementation

5.4. Safeguarding Focal Person (HR Unit)

The HR Unit, as the designated Safeguarding Focal Person, will:

- Train staff, partners, and visitors: Provide training on the safeguarding policy to ensure understanding and compliance
- Distribute and acknowledge policy: Ensure each staff member signs and receives a copy (hard or digital) of the policy
- Implement policy day-to-day: Oversee daily implementation and enforcement of the policy
- Publicize the policy: Display policy extracts in offices, on notice boards, and other relevant places to promote awareness
- Maintain updated tools: Ensure availability of updated tools, such as Risk assessment tools, checklists for assessing history of abuse in interviews and checklists for assessing programs for safeguarding

5.5. Project Managers

Project Managers will:

- Create an enabling environment: Support policy implementation at the program/project level
- Apply the policy in programming: Integrate safeguarding into planning, execution, and evaluations
- Ensure staff adherence: Oversee program staff compliance with the policy
- Implement policy day-to-day: Ensure policy implementation at the program and field levels
- Train program staff: Provide training on the safeguarding policy to program staff

5.6. Staff

All staff members are expected to:

- Adhere to the policy: Comply with the safeguarding policy in their work
- Recommend improvements: Provide feedback on potential policy improvements
- Participate in review and improvement: Contribute to policy reviews and updates to ensure its effectiveness and relevance

5.7. Contractors, Consultants, Volunteers, Interns, Suppliers

These individuals/entities are expected to:

- Adhere to the policy: Comply with WENIPS' safeguarding policy
- Recommend improvements: Provide feedback on potential policy enhancements

5.8. Donors and Government Authorities

Donors and government authorities will:

- Recommend improvements: Share expertise and experiences to enhance WENIPS' safeguarding policy
- Participate in review process: Contribute to policy reviews and updates
- Sponsor review process: Potentially provide financial support for policy reviews

5.9 Beneficiaries

Beneficiaries are encouraged to:

- Adhere to the policy: Comply with safeguarding guidelines
- Identify gaps and propose improvements: Provide feedback on policy effectiveness and suggest enhancements