



Nurture Africa Safeguarding Policy

September 2024

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1. Management

Personnel	All Nurture Africa local and international Staff, Interns, Contractors, Consultants, Volunteers, Board Members, Visitors
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2 Introduction

Nurture Africa is an internationally registered, Irish founded non-governmental and non-denominational organisation. The organisations vision is Empowered African Families who are Self-Reliant. Nurture Africa's operations in Uganda achieves this through the implementation of its Holistic Family Centred Model which provides vulnerable families and households with access to healthcare, education, nutrition, income generating opportunities and child protection initiatives.

Nurture Africa operates an overseas volunteer programme for both short and long term international participants.

Nurture Africa is acutely aware of the challenging environments within which it operates and strives to ensure that its operations and our people do no harm.

This Policy is a crucial framework that outlines how Nurture Africa ensures the safeguarding and welfare of both children and vulnerable adults. It serves several key functions:

1. **Clear Definitions**

The policy provides precise definitions of terms related to safeguarding, including who qualifies as a child and what constitutes a vulnerable adult. It also defines abuse in various forms—physical, emotional, sexual, neglect, and financial abuse—and outlines the roles and responsibilities of staff in identifying and responding to concerns.

All definitions are referenced in the Annex section at the end of this policy document.

2. **Sets Standards Across the Organisation**

The policy establishes consistent safeguarding standards throughout the entire organisation. This ensures that everyone, from staff members to volunteers and partners, is aware of their responsibilities and is held to the same ethical and legal standards for protecting vulnerable individuals. This includes mandatory training and guidelines for best practices in reporting and handling concerns of abuse or neglect.

3. **Provides Clear Guidance**

This policy offers detailed instructions on how to apply its principles and how to act when safeguarding issues arise. This guidance includes:

- Steps for reporting suspected abuse or neglect
- Procedures for responding to allegations
- Support mechanisms for victims and affected parties
- Guidelines for conducting internal investigations or working with external agencies (such as police or social services).

4. Covers Partnerships

This policy ensures safeguarding standards extend beyond internal operations. It provides instructions on how to vet and collaborate with partners to ensure they also adhere to safeguarding principles, aligning organisational practices across different entities.

In essence, this Safeguarding Policy serves as a protective mechanism that promotes a safe environment, reduces risks of harm, and ensures a unified approach to safeguarding across all levels of the organization and its partnerships.

3 Purpose

What is Safeguarding?

Safeguarding is about implementing measures to prevent and respond to harm caused by our organisation, to people within our organisation as well as the people we serve and the communities we work in; with particular focus on children and vulnerable adults. Everyone, regardless of their age, gender, disability, sexual preference or ethnicity must be protected from all forms of abuse, exploitation and harassment.

There is a clear recognition of the power differentials that exist within the international humanitarian and development sectors. The purpose of this policy is to protect people (most notably children, vulnerable adults and staff), from any harm that may be caused due to their coming into contact with the operations of Nurture Africa. This includes harm arising from:

- the conduct of staff, contractors, consultants, volunteers and board members, visitors and other personnel associated with Nurture Africa.

- the design and implementation of Nurture Africa's programmes and activities.

Through the implementation of this policy, Nurture Africa ensures:

- staff and other personnel associated are aware of their responsibilities and conduct themselves in a manner that ensures all people are protected from harm, abuse and exploitation including bullying, harassment and discrimination. This policy clearly states Nurture Africa's commitments and expectations in relation to safeguarding.
- that all individuals interacting with the organisations activities understand their safeguarding role and responsibilities and that a culture of proactivity and accountability is fostered by all. This ensures that all people feel safe, protected and empowered to speak up if necessary.
- that all individuals interacting with the operations of Nurture Africa are aware of pathways and procedures in place in order to support the reporting of safeguarding concerns

This policy does not cover safeguarding concerns in the wider community not perpetrated by Nurture Africa staff or associated personnel.

4 Scope

Who are we Safeguarding?	Children	Staff	Vulnerable Adults
What are we protecting them from?	All forms of abuse, harassment and exploitation	Sexual Exploitation and harassment. Bullying. Harassment	Sexual Exploitation and abuse. All forms of harassment & exploitation. Extorsion.
Key Groups	All children up to the age of 18 years old. Particular attention on disabled and youth.	Female. Junior/Lower level staff. Lower Paid staff. Younger/less experienced staff. Staff of minority ethnic/racial background.	Female. Poverty Stricken. HIV infected. Low Literacy Levels. Over 18 year olds on Youth Empowerment Programme.

This Safeguarding Policy is applicable to all Nurture Africa staff, board members, volunteers, contractors, consultants, visitors, partner staff or intern from Uganda, Ireland or any other country. Everyone coming into contact with Nurture Africa operations is obliged to adhere to this policy and in doing so, create and maintain an safe environment for all. Failure to adhere to all aspects of this policy may result in disciplinary action being taken, up to and including dismissal, and may lead to criminal prosecution.

5 Legislation, Policy and Best Practice

The Policy has been developed in accordance with:

- Universal Declaration of Human Rights (UDHR)
- UN Convention on the Rights of the Child (UNCRC)
- United Nations Convention on the Rights of Persons with Disabilities (UNCPRD)
- Keeping Children Safe, International Child Safeguarding Standards
- Irish Constitution
- Criminal Justice Act 2006

- Criminal Justice Act 2012 (as amended)
- Protected Disclosures Act 2014 (as amended)
- Children First Act 2015
- Safeguarding Vulnerable Persons at Risk of Abuse: National Policy and Procedures (2014)

6 Policy Statement

Everyone who comes into contact with Nurture Africa staff and/or its operations; regardless of age, gender, disability, social status or race/ethnic origin has the right to be protected from harm, abuse, neglect and exploitation. Nurture Africa will not tolerate abuse and exploitation committed by staff and other personnel associated with the operations of Nurture Africa.

This policy will address the following areas of safeguarding:

- Children
- Vulnerable adults
- Staff

These key areas of safeguarding are supported through the implementation of a number of additional associated policies and procedures. These policies and procedures must be disseminated appropriately in order to ensure everyone is aware of their role and responsibilities.

Associated policies

- HR Manual
- Recruitment Policy
- Volunteer Code of Conduct
- PSEAH Policy
- Whistleblowing Policy
- Violations Reporting Mechanism
- Data Protection Policy
- Ethical Communications Policy
- Disciplinary Policy

Nurture Africa commits to addressing safeguarding throughout its work, through the three pillars of:

1. Prevention
2. Reporting
3. Responding

Prevention

Our Responsibilities

Nurture Africa will:

- work with children and adults who come into contact with our activities in order to support them in recognising inappropriate conduct by Nurture Africa staff and associated personnel.
- Ensure accessible response mechanisms by which children and adults can report safeguarding concerns are developed with community members.
- Provide clear information on how children and adults who come into contact with our activities can report safeguarding concerns.

Nurture Africa will:

- Ensure all staff being considered for employment and other associated personnel are referenced checked and provide copies of vetting/police clearance if/as required.
- Ensure all staff, other personnel associated and individuals in positions of responsibility/power receive safeguarding training prior to the commencement of their role or within 2 weeks of commencement.
- Ensure all staff, other personnel associated attend mandatory safeguarding training on an annual basis.
- Ensure that all staff and associated personnel have self-declared by signature that they have read and understand their responsibilities in relation to this Safeguarding Policy. Self-declarations remain on file for one year after the staff or associated personnel has left the organisation unless there is a legal requirement to retain it for longer.
- Design and operate its programmes in order to ensure that all people are aware of this safeguarding policy and its procedures and are protected from any risk of harm that may arise from their coming into contact with Nurture Africa operations. This includes the processes within which information about individuals in our programmes is gathered, stored and communicated.
- Ensure safeguarding procedures are implemented during recruitment and deployment of staff and individuals within programmes whose positions afford them additional responsibility/power.
- Ensure staff and individuals within programmes whose positions afford them additional responsibility/power, receive appropriate safeguarding training in line with their role within the organisation's operations.
- Follow up on reports of safeguarding concerns in an agreed timebound manner and according to due process.
- Conduct annual safeguarding audits, at HQ level, in the Uganda office and at every school, health centre, unit supported by Nurture Africa.

Staff responsibilities (Code of Conduct)

Child safeguarding

Nurture Africa staff and other personnel associated must not:

- Engage in sexual activity with anyone under the age of 18
- Sexually abuse or exploit children
- Subject a child to physical, emotional or psychological abuse or neglect
- Engage in any commercially exploitative activities with children including child labour or trafficking
- Come into physical contact with a child unless your role requires you to do so (explicit permission from a parent or guardian must be gained).
- Invade a child's privacy
- Use inappropriate language and/or tone of voice.
- Engage with children in games of an aggressive or sexual nature.
- Be alone with any child or group of children.
- Spend excessive amounts of time with any child or group of children.
- Embarrass or upset a child by the use of any hurtful (unintentional or otherwise) remarks about the child or his/her family.
- Make undignified comments or gestures to or about any child.
- Take photographs or videos of a child without explicit consent from their parent/guardian. Taking photographs of anyone under the age of 18 without their parents/guardians consent IS a breach of the Nurture Africa Safeguarding policy.
- Publish photographs online or otherwise without explicit consent to do so from primary care givers. Names and locations of children must not be revealed.

Ensuring the safety of children is everyone's responsibility. Any suspicions MUST be reported immediately in every circumstance.

Vulnerable adult safeguarding

Nurture Africa staff and associated personnel must not:

- Sexually abuse, harass or exploit vulnerable adults
- Subject a vulnerable adult to physical, emotional/psychological abuse or neglect
- Seek to exchange money, goods or services for sexual activity.

- Seek to extort payment in any form, from vulnerable adults for services provided by Nurture Africa.
- Discriminate against any vulnerable adult for any reason including age, gender, disability, social status or race/ethnic origin.

Staff safeguarding

Nurture Africa staff and other personnel associated must not:

- Sexually harass, exploit or abuse fellow staff members or associated personnel.
- Bully a fellow staff member or or associated personnel for any reason.
- Seek to exploit a fellow staff member or associated personnel for personal gain due to race, ethnicity, gender, age, social status, position in organisation etc.

Nurture Africa staff are obliged to:

Contribute to creating and maintaining an environment that promotes the implementation of this Safeguarding Policy and commit to preventing safeguarding violations.

and

Report any concerns or suspicions regarding safeguarding violations by a Nurture Africa staff member or person in a position of power within programmes to the designated Safeguarding Officer.

Reporting

Nurture Africa will ensure that staff and other personnel associated, vulnerable adults and children are made aware of the reporting channels available in relation to safeguarding concerns. These channels will be maintained as safe, appropriate and accessible to all.

Any reporting concerns or complaints through formal channels will be protected by Nurture Africa's Whistleblowing Policy.

Nurture Africa also welcomes and accepts complaints from external sources such as members of the public, partners and official bodies.

How to report a safeguarding concern

Any person who has a safeguarding complaint or concern should report it immediately to the designated Safeguarding Officer. If the concern relates directly to the Safeguarding Officer or a senior staff member they may report to another person. This should be a senior manager or a member of the HR Team.

Nurture Africa will include relevant authorities as and when required to do so.

Designated Points of Contact

Florence Namuli	Kevin Murphy	James Kimbowa
email: namuliflo@nurtureafrica.ug	email: kevin@nurtureafrica.ie	email: jameskb@nurtureafrica.ug

Response

Nurture Africa will follow up safeguarding reports and concerns according to policy, standard operating procedure and its legal and statutory obligations.

Safeguarding allegations amongst Nurture Africa staff and other partners

1. All aspects of an investigation will be dealt with in the utmost confidence.
2. All allegations of violation, whether in Nurture Africa or otherwise shall be taken seriously and all appropriate steps shall be followed to collaborate with the statutory and voluntary agencies in conducting investigations.
3. If a Nurture Africa staff member or volunteer is suspected, they will be requested to provide a statement of response and upon doing so may be given one written warning and may be suspended from work or volunteer activities for as long as investigations are ongoing in order to enable inquiries.
4. If an international volunteer leaves Uganda during the investigation phase and is found to be guilty of abuse upon completion of an investigation, an Garda Siochana or local police force in their country will be notified.
5. Forced and unpaid leave shall be given to the staff suspected of a safeguarding violation.

Note: Investigations shall be carried forward even if work with Nurture Africa ceases. If found guilty, then he/she shall face the law.

ANY breach of the Safeguarding Policy will lead to disciplinary procedures.

Nurture Africa will apply appropriate disciplinary measures to staff and associated personnel found in breach of policy.

Steps/penalties to Nurture Africa staff/volunteers found in breach of the above terms:

- Where cases are deemed to not seriously impact the wellbeing of another person, any individual:
 - shall be given a written warning

- must be provided and engage with additional safeguarding training
- will have their case forwarded to the Local Council of the area.
- Depending on severity and the wishes of the victim, the case shall be forwarded to police for further action. International volunteers will be removed from the programme and their particular embassy, informed.
- Cases noted below, inflicted upon a child, vulnerable adult, staff or associated personnel shall require no warning whatsoever and employment will be terminated:
 - physical or sexual abuse
 - drug/substance abuse of another person,
 - child trafficking/kidnapping,
 - sexual exploitation/harassment,
 - Female Genital Mutilations and molesting
 - Extortion

Nurture Africa shall use the law enforcing structures in the community to apprehend the suspect and support legal proceedings.

Survivors - Throughout any safeguarding investigation, Nurture Africa will place the welfare, well-being, rights and ultimate protection of the victim at the centre of its approach. Nurture Africa recognises there may be great difficulties, challenges and fear connected to survivors reporting their own exploitation, abuse and/or harassment. Decisions regarding support will be led by the survivor.

7 Confidentiality

It is essential that confidentiality is maintained at all stages of the process when dealing with safeguarding concerns. Information relating to the concern and subsequent case management should be shared on a need to know basis only, and should be kept secure at all times. The identity of any whistle blower or individual reporting and recording an issue of personal concern will remain confidential.

All individuals accused of violating this safeguarding policy are deemed innocent until proven guilty.

A child's main caregiver will be kept up to date regarding ongoing investigations unless doing so would place the child at great risk. In such instances where the abuse has taken place in the family home, Nurture

Africa will seek to remove the child from this location with the support of the police.

Any staff member or associated personnel found to have breached confidentiality will undergo disciplinary measures up to and including the possibility of suspension and termination of employment/volunteering

8 Responding to a disclosure

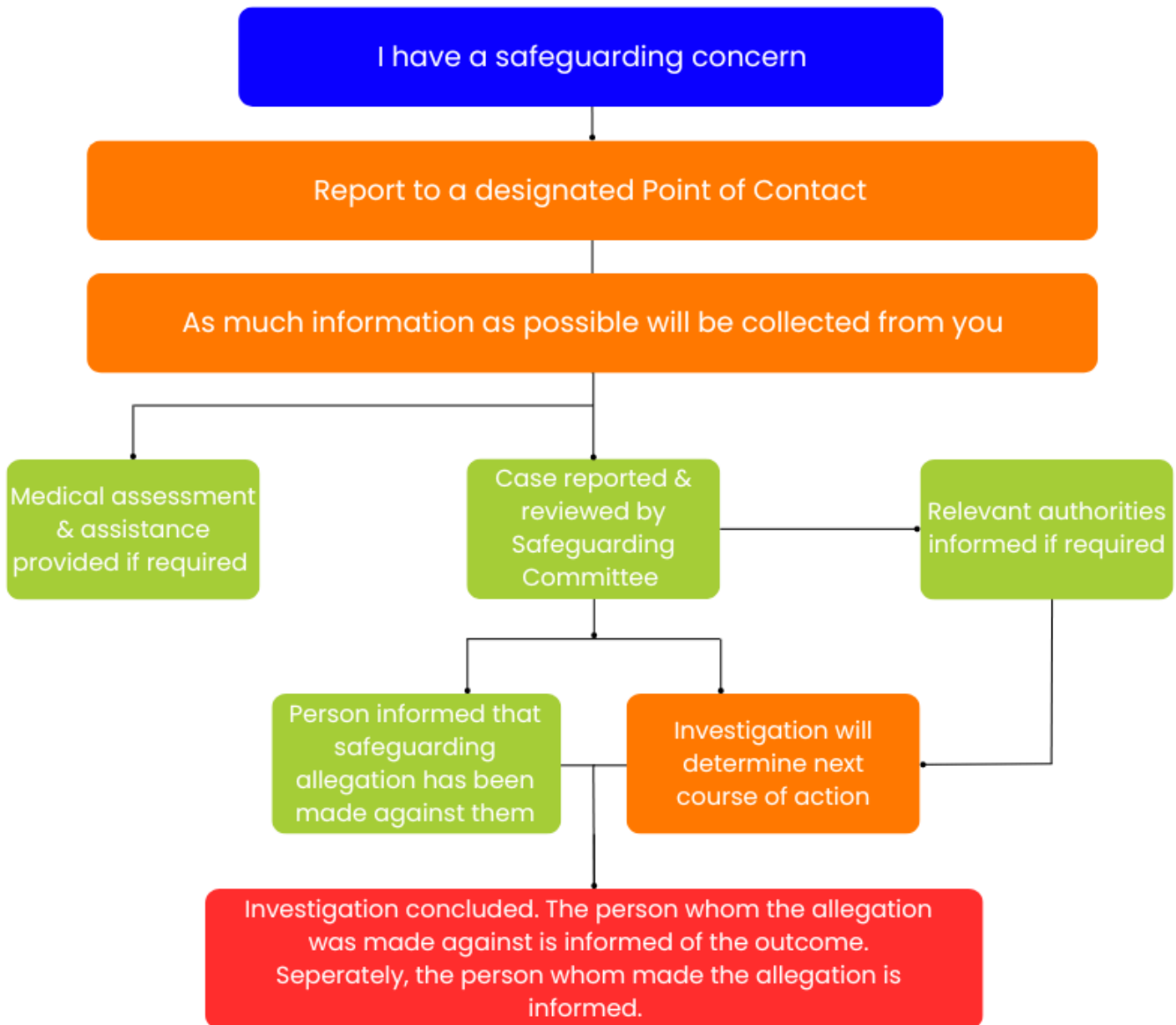
If a child, vulnerable adult, staff member or associated personnel discloses an abuse to you, it is vitally important that you follow the correct steps in order to support them. Therefore, you should:

- Remain calm and supportive. Your initial reaction may determine if the person disclosing abuse continues to speak with you or not.
- Stop what you are doing and provide full attention to the person disclosing the abuse. You should not allow any other activity, person or phone call interrupt.
- Listen intently, providing as much time as the person wishes to speak for.
- Accept what you are being told without any judgement.
- Reassure the person that they have done the right thing by informing you.
- Report immediately to a designated safeguarding person
- Record the disclosure in writing with assistance from the designated safeguarding officer.

You should NOT:

- Panic. Doing so will most likely deter the person who is disclosing abuse from continuing.
- Promise to keep secrets. You must inform the person disclosing abuse that you need to report it in order for them to receive the help they need from the most qualified and supportive people.
- Ask leading questions. These may become very difficult for a person who has suffered abuse to answer.
- Make the person repeat the story unnecessarily. Doing so, could force the person disclosing to relive the abuse again. This is harmful for any persons psychological wellbeing.
- Delay in reporting as you may also forget crucial details. The person who has disclosed to you may also be at further risk of abuse.
- Start to investigate. This will be conducted by the managerial department/Board of Directors and/or police.

9 Reporting Process



Once the staff member or associated person has been informed of the safeguarding allegation made against him/her, he/she will have the right to respond. This response must be recorded in writing, signed by all parties present and retained on record (Annex 2 Record Keeping)

During the course of the investigation, senior management will decide if the person whom the allegation has been made against shall be permitted to:

- 1) remain in their role
- 2) moved to another role, with supervision
- 3) suspended with or without pay for the duration of the investigation

Any person investigated is considered innocent until such a point that any evidence uncovered proves their guilt.

The Right of Appeal is available to all staff or associated personnel after conclusion of the investigation.

11 Review

This policy will be reviewed on a biannual basis unless it is deemed prudent to shorten this timeframe at any point.

Self Declaration

By my signature below:

- I confirm that I have received a copy of the Nurture Africa Safeguarding Policy, have read it, received the necessary training and understand my responsibilities related to safeguarding.
- I confirm that I have not been convicted of, nor am I under investigation for, any offense within my personal or professional life which deems me unsuitable for a post which involves working/volunteering with vulnerable adults and children.
- I understand that my failure to disclose any past convictions or ongoing investigations will result in the termination of my role with Nurture Africa.
- I declare my commitment to complying with the Nurture Africa Safeguarding Policy.
- I will remain conscious of the power differentials that exist within the development context and communities that I will be working/volunteering in. I commit to not leverage my own power/influence for personal gain in any form.
- I commit to reporting any concerns through the correct channels and ensure that this information remains confidential.

Name: _____

Signed: _____

Date: / /

Received by: _____ Signed: _____ Date: / /

1 Definitions

Child:

A **child** is recognised by Nurture Africa and this policy, as any person under eighteen (18) years of age.

Vulnerable Adult:

A **vulnerable adult** is a person aged 18 or older who, due to factors such as physical or mental disabilities, illness, poverty, dependency or age-related decline, is unable to protect themselves from harm, exploitation, or abuse.

Abuse:

Abuse refers to any intentional act that causes harm, injury, or distress to another person. It can take many forms, including physical, emotional, psychological, sexual, and financial harm. Abuse is often a misuse of power or control, where the abuser exploits another person's vulnerability, trust, or dependency.

Types of Abuse:

1. **Physical Abuse:** The use of physical force that results in bodily harm, injury, pain, or impairment. This includes hitting, slapping, burning, or any other form of physical assault.
2. **Emotional or Psychological Abuse:** Actions that cause emotional pain, distress, or trauma. This includes bullying, verbal insults, threats, intimidation, manipulation, humiliation, or isolation from friends and family.
3. **Sexual Abuse:** Any non-consensual sexual activity or behaviour toward another person, such as unwanted touching, assault, rape, or exploitation. It can occur regardless of the relationship between the victim and the perpetrator.
4. **Financial or Economic Abuse:** The illegal or improper use of someone's money, property, or resources without their consent. This may involve stealing, coercing, or manipulating a person into financial decisions against their will.
5. **Neglect:** Failing to provide necessary care, support, or supervision to someone who is dependent. Neglect can be physical (e.g., not providing necessary care for dependant children, withholding food or medical care) or emotional (e.g., ignoring someone's needs or leaving them in isolation).
6. **Institutional Abuse:** Mistreatment of individuals in an institutional setting, such as hospitals, care homes, or schools. This can involve neglect, poor care standards, or mistreatment by staff members or caregivers.
7. **Domestic Abuse:** A pattern of abusive behaviours, often involving control and coercion, within an intimate relationship or household. It can include physical violence, emotional manipulation, financial control, or other forms of harm.

Discrimination:

Discrimination refers to the unfair or unequal treatment of an individual or group based on characteristics such as race, gender, age, religion, disability, sexual orientation, or other personal attributes. Discrimination occurs when someone is

treated less favourably compared to others in similar situations, often resulting in exclusion, disadvantage or harm.

Kidnapping:

Kidnapping is the unlawful act of taking or abducting, a person of any age, against their will or that of their main caregiver, usually through force, threat, or deceit. It typically involves holding the person in captivity, often for ransom, coercion, or other criminal purposes.

- **Unlawful Detention:** The act of restraining or confining a person without legal authority or consent.
- **Use of Force, Threat, or Deception:** Kidnapping often involves physical force, threats of violence, or deceit (e.g., luring a person under false pretences).
- **Removal from Location:** In many cases, kidnapping involves moving the victim from one place to another, such as taking them away from their home, school, or workplace.
- **Without Consent:** The victim does not willingly go with the perpetrator. In cases involving children or vulnerable adults, consent may not be legally possible.

Trafficking:

Trafficking refers to the illegal trade or movement of people, goods, or services, often for the purpose of exploitation or illegal activity. The most common form associated with the term is **human trafficking**.

Types of Human Trafficking:

- **Sex Trafficking:** Victims, often women and children, are forced, coerced, or deceived into sexual exploitation, such as prostitution, pornography, or other forms of sexual servitude.
- **Labour Trafficking:** Individuals are forced to work under exploitative conditions, often in industries like agriculture, construction, domestic work, or manufacturing. Labour trafficking involves coercion, threats, and abuse to control victims.
- **Child Trafficking:** Children are trafficked for various purposes, including forced labour, illegal adoptions, child soldiering, and sexual exploitation.
- **Organ Trafficking:** Trafficking people for the purpose of illegally harvesting their organs for sale on the black market.

Extortion:

Extortion is the act of obtaining money, property, or services from an individual or entity through coercion, threats, or intimidation. It is a criminal offense that involves forcing someone to do something against their will by threatening harm, either physically, emotionally, or financially or removal of services.

2 Record Keeping:

Good record keeping is essential for safeguarding as it creates an accountable, organised and transparent system of and for training conducted, monitoring, preventing and responding to risks. Key reasons why good record-keeping is crucial for safeguarding are:

1. Provides a Clear History of Events

- Detailed records provide a clear and accurate timeline of incidents, observations, and actions taken. Records should be clearly legible and taken using a standardised format which has been approved by senior organisation management. It can be used to support future mitigation against safeguarding concerns; reducing risk over time.

2. Facilitates Effective Decision Making

- Accurate records help decision makers assess situations based on complete information. This aids in formulating well informed strategies for interventions, risk management and protection plans tailored to the needs of individuals at risk.

3. Enhances Accountability

- Record-keeping holds individuals and organisations accountable for their actions and decisions. It ensures that procedures are followed and that every action taken is documented, minimizing the chance of oversights or negligent behaviour.

4. Supports Legal and Ethical Compliance

- Accurate documentation provides evidence that safeguarding protocols and legal obligations are being met. If a case escalates to legal proceedings, thorough records can be vital in protecting the rights of both the individual and the organisation, providing objective facts to support claims.

5. Improves Continuity of Care

- Good record-keeping enables continuity in safeguarding measures, especially when staff changes occur. Detailed records allow new staff or external support workers to quickly understand the context, previous concerns and steps taken, ensuring consistent care.

6. Encourages Transparency and Builds Trust

- Transparent record keeping practices foster trust with everyone involved, including those being safeguarded, partner organisations and donors. When organizations are open and meticulous about their safeguarding records, it builds confidence that they are committed to the well-being of those coming into contact with Nurture Africa operations.

7. Supports Early Intervention

- Documentation of minor incidents, concerns, or behaviour changes can reveal trends that may indicate underlying issues. Early recognition of these patterns allows for prompt intervention, potentially preventing more severe situations from arising.

8. Promotes Best Practices in Safeguarding

- Good record keeping contributes to developing and reinforcing best practices within any organisation. Regular reviews of recorded incidents and actions can inform policy adjustments, training needs, and improvements in safeguarding strategies.

9. Enhances Training and Education

- Documented cases can serve as educational resources for training staff on real-life scenarios, helping them learn from previous incidents and apply this knowledge proactively in future situations.

10. Reduces Risks and Improves Outcomes

- Overall, good record keeping minimizes the risk of harm by ensuring that all concerns are documented, addressed, and reviewed regularly. This leads to improved outcomes for individuals under care and strengthens the organization's ability to create a safe environment.