



# Global Safeguarding & Protection Policy Framework

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<b>Version:</b>	FINAL
<b>Date of approval:</b>	August 2020
<b>Date of next review:</b>	August 2021

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## Preface

At Windle International we envisage a world in which all children are protected from all forms of harm. The tragic reality is that children around the world still experience violence, abuse and exploitation, despite international treaties and national legislation for their protection.

As passionate advocates for fundamental human rights, we are dedicated to putting in place measures that prevent the abuse of children, particularly those who fall within our support systems.

This Safeguarding and Protection Global Policy Framework sets out our commitment at an international level. Each Windle member must have a Safeguarding Policy and Code of Conduct that aligns with this Framework. These national-level policies must include more detail about specific procedures, including reference to any relevant national laws and requirements in place in the country of operation.

This Safeguarding and Protection Global Policy Framework will be reviewed regularly to ensure it continues to be fit for purpose and protect the rights of all children in Windle's programmes.

**Dr. Marangu Njogu**  
**Chief Executive Officer**  
**Windle International**

**July 2020**

## About Windle International

Every year Windle International helps over a million refugees and people affected by conflict to access quality education. We are an international NGO with over forty years of experience, and our independent members are based in and operate across East Africa, the UK, the US and Canada.

Together, we empower refugees and people affected by conflict and marginalisation to achieve their academic potential, and contribute to sustainable development, by acting as a lead provider of quality education and training. From managing primary schools to providing higher education scholarships and offering vocational training, we help people to succeed at every educational level.

## 1.0 Introduction

This Safeguarding and Protection Global Policy Framework sets out our strategic approach to ensure our services protect children and vulnerable adults across all of our operations. Windle members will ensure their Safeguarding Policies and Procedures align with this document.

### 1.1 Commitment statement

Windle International are aware that the opportunities and services provided through our programmes can create a power differential between those who are employed by us and (potential) programme participants. We acknowledge that there is a risk for this power imbalance to be exploited to acquire payments, gifts, services and/or sexual favours. This Safeguarding and Protection Global Framework has been developed to ensure the maximum protection of programme participants across all countries of operation from exploitation and to clarify the responsibilities of our staff, volunteers and visitors to the projects and the standards of behaviour expected from them.

As an organisation working with children and vulnerable adults who may be at risk from harm, Windle will:

- a) Make sure all Windle staff are aware of and act in accordance with their personal responsibilities.
- b) Protect, maintain and uphold the human rights of children and adults at risk of harm.
- c) Eliminate discrimination including sectarian, racist, sexist, disability or any other prejudice.
- d) Take steps to prevent bullying or exploitation, and challenge it if it is found.
- e) Make sure that all staff are familiar with and have access to a copy of this Global Framework as well as the relevant member's policy, and know who to contact for further information and advice.
- f) Make sure that children and adults at risk of harm, and/or their parents or carers, know how to and are able to voice any concerns, and obtain help if required.
- g) Make sure that everyone knows how to report any alleged malpractice or negligence (often known as 'whistleblowing').
- h) Put in place effective procedures for responding to complaints, concerns, and allegations of suspected or actual abuse.
- i) Make sure all Windle staff and representatives understand their responsibilities and what is required of them.
- j) Make sure that any concerns or complaints are documented, including what action was taken and the outcome of that action.
- k) Make sure that the approved recruitment procedures are followed.

## 1.2 Purpose

The purpose of this Global Framework is to establish a set of preventative and responsive measures and procedures that cover all Windle members and areas of operation in order to:

- a) **Safeguard Children:** by minimizing the risk of intentional or unintentional harm, abuse and exploitation of children within Windle International supported programmes and adequately responding in the event that harm and abuse occur.
- b) **Safeguard Staff:** by avoiding ambiguous workplace situations and behaviours, which may be misinterpreted and potentially lead to false allegations against Windle International staff and associates.
- c) **Safeguard Windle International:** by showing our genuine commitment to safeguarding children and preventing cases of abuse from happening, Windle also protects our reputation and maintains supporter confidence and funding stability.

## 1.3 Scope

Compliance with this Global Framework is not optional. It applies to:

- a) All staff employed or engaged by Windle, including part-time and full-time staff, whether they are on permanent or fixed-term contracts.
- b) Trustees and advisers.
- c) Volunteers, interns, visitors to our operations or programmes (including funders, donors, journalists, etc.)
- d) Consultants and contractors who have been engaged to work on specific programmes.

All individuals cited here must read our Policy Framework, as well as the relevant member policies and guidance, and sign the Global Safeguarding Code of Conduct.

## 2. Key Principles

This Global Framework is guided by the following principles:

### 2.1 Best interests of the child

In all actions concerning children, and when dealing with a concern for the safety or wellbeing of a child, the best interests of the child shall be the primary consideration.

### 2.2 Zero tolerance of child abuse and exploitation

Windle International has a zero-tolerance approach to child abuse and exploitation. We will never knowingly allow anyone to be in contact with children or to access communities with whom we work if we deem them to pose an unacceptable risk to children's safety or wellbeing. We will take immediate action upon report of any suspected child abuse or exploitation.

### 2.3 Shared responsibility for safeguarding and protection

Windle believes child safeguarding and protection is a shared responsibility, which requires all staff committing to and upholding the principles of this policy. We will also ensure that all partner organisations involved in the implementation of programmes, projects and activities have appropriate child safeguarding measures to implement the minimum standards outlined in this policy.

### 2.4 Accountability and openness

Windle will continue to strengthen our internal child safeguarding systems to ensure accountability to children and the families and communities with which we work. Specific child safeguarding roles and responsibilities will be delegated to staff to effectively embed child-safe organisational practices across all programs, operations and activity. Windle will ensure

an organisational child-safe culture where any issues or concerns of child safeguarding or poor practice can be raised and discussed.

## 2.5 Do No Harm

Windle International commits to ensuring that our safeguarding policies and procedures seek to avoid, minimise, or mitigate adverse impacts that may result from our humanitarian and development interventions – the ‘Do No Harm’ principle. We will strive to ensure that the contact we have with children does not add to the burden of suffering that they have already endured. We will always listen to children, and make sure that their needs, views, concerns and opinions are considered within our programmes.

## 3. Definition of Child Abuse and Exploitation

We adhere to the World Health Organisation’s definition of child abuse or maltreatment as ‘all forms of physical and/or emotional ill-treatment, sexual abuse, neglect, or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the child’s health, survival, development or dignity in the context of a relationship of responsibility, trust or power.’

All staff must be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

Windle International commit to providing full training to all staff about what constitutes the following types of abuse so that they are able to recognise it:

- a) **Physical abuse:** may involve hitting, shaking, throwing, or otherwise causing physical harm to a child.
- b) **Emotional abuse:** the persistent emotional ill-treatment of a child such as to cause severe and persistent effects on the child’s emotional development. It may involve conveying to children that they are worthless or unloved, not giving them opportunities to express their views or deliberately silencing them.
- c) **Neglect:** the failure to meet a child’s basic physical and/or psychological needs either deliberately or through negligence. This includes but is not limited to failing to provide adequate food, clothing, and/or shelter, medical treatment or care.
- d) **Bullying:** deliberately hurtful behaviour, usually repeated over a period of time, where it is difficult for those bullied to defend themselves.
- e) **Sexual exploitation and abuse:** include:
  - a. **Sexual abuse**, which involves the use of power or authority to involve a child in sexual activity by an adult or significantly older child or adolescent.
  - b. **Commercial sexual abuse**, which comprises sexual abuse by an adult and remuneration in cash or kind to the child or a third person or persons. The child is treated as a sexual object and as a commercial object. This constitutes a form of coercion and violence against children.
  - c. **Child pornography**, which means any representation, by whatever means, of a child engaged in real or simulated explicit sexual activities or any representation of the sexual parts of a child for primarily sexual purposes. This can include photographs, negatives, slides, magazines, books, drawings, movies, videotapes and computer disks or files.

## 4. Prevention

Windle commits to preventing harm to children through the following action:

#### 4.1 Raising awareness

We will ensure that all our staff, volunteers, interns, consultants, board members, and any other person involved in our organisation are informed about the contents of this Global Framework and relevant national policies, and act in accordance with all their provisions.

Our Human Resource officers will ensure that a copy of the national policy will be given to all employees, and the Code of Conduct is signed. Windle will ensure that staff who have the responsibility of bringing visitors or any external person into our programmes or operations will fully brief those persons about the national safeguarding policy and require that the Code of Conduct is signed. In addition, the policy will be distributed in a variety of ways (via our website, hard copies distributed to stakeholders, and verbally). We will also produce versions for the communities in which we work.

#### 4.2 Risk assessment and management

Windle International will carry out regular risk assessments with regards to our staff, programmes and operations and develop appropriate mitigating actions to manage any identified risks.

Risk mitigation strategies will be developed which minimise the risks to children and will be incorporated into the design, delivery and evaluation of programmes, operations and activities which involve or impact children. We are committed to and will design and deliver programmes that are safe for children.

#### 4.3 Child-safe recruitment

We recognise that creating safe environments for children starts with the appointment of suitably qualified and skilled staff who have undertaken training and appropriate checks. Our recruitment processes will aim to be in the best interests of children and will reflect our commitment to protect them and prevent abuse. This includes in:

- a) **Recruitment of staff:** In addition to our standard recruitment processes, the following safeguarding measures will be applied:
  - a. All successful applicants will be required to undergo relevant vetting processes on child safeguarding prior to being offered a position
  - b. Applicants will be required to submit the names of at least two referees who will be asked to include their view on the candidate's suitability to be in contact with children.
- b) **Selection of consultants:** All consultants and contractors identified as working with children will be required to undergo relevant vetting processes prior to deployment.

#### 4.4 Training and education

All Windle International staff, consultants, contractors, volunteers and other associates have a role to play in safeguarding children. To fulfil that role effectively and with confidence, they are required to understand child safeguarding issues and risks, and maintain a good knowledge of Windle International's child safeguarding measures and procedures, internal roles and responsibilities, as well as broader attitudes and skills to keep children safe in operations and programmes. To ensure this, Windle shall provide learning as follows:

- a) **Induction training** – as part of the general induction/orientation when Windle International staff are newly employed or engaged
- b) **Regular training and refreshers** – on a yearly basis for existing Windle International staff
- c) **Specialized training, supervision and support** – for Windle International staff who have a direct responsibility for implementing child safeguarding procedures.

- d) **Regular briefings on emerging issues:** Regular briefings and updates to ensure that the policy continues to be embedded and that staff are made aware of emerging trends and developments in safeguarding and protection.
- e) **Training of managers:** Training for senior level staff to enable them to receive and respond to complaints, and to properly implement this policy.
- f) **Best practices:** Encouraging staff to share experiences and examples of best practice in the implementation of this policy across Windle.

The Human Resource office and child safeguarding officer for each member will be responsible for ensuring training is undertaken.

#### 4.5 Safeguarding code of conduct

Any employee, volunteer, intern, board member, consultant or adviser who has direct contact with children in their work will be fully informed of Windle International's Global Framework, national member policy, and Code of Conduct and asked to sign it as a commitment (see annex).

#### 4.6 Requirements for partners and contractors

All partnership and contract agreements will reference a shared commitment to child safeguarding measures. All partners and contractors will comply with this Safeguarding Code of Conduct. All programme staff from each partner will sign and adhere to the Safeguarding Code of Conduct.

#### 4.7 Visitors to our programmes

Any visitor to any of our programmes or activity may come into contact with children, therefore the following measures should be followed at all times:

##### 4.7.1 Prior to visits

- a) **Briefing:** All visitors will receive a briefing from Windle International's child safeguarding officer on our safeguarding policy and procedures, and Safeguarding Code of Conduct, which they will be required to sign and adhere to throughout their visit.
- b) **Safeguarding Code of Conduct:** Once signed by the visitor, the Code of Conduct must be kept and adhered to at all times throughout the visit.

##### 4.7.2 During visits

- a) **On-site briefing:** Once on-site, the visitor will receive another briefing from a Windle International officer to provide them with the local context, local safeguarding measures and procedures, and any other relevant information.
- b) **Supervision:** Visitors will be supervised by Windle International staff and will not be left alone with children at any time. A designated Windle International staff member will be responsible for monitoring the behaviour of visitors including their interaction with children.

## 5. Staff Protection

### 5.1 Protecting staff

Windle International has a zero-tolerance approach to the abuse and neglect of children. We are committed to doing everything within our power to protect children.



We take our responsibility of thoroughly investigating all allegations of abuse seriously, because we recognise that, whilst uncommon, false allegations do occur which not only negatively affect real victims of abuse, but can also have a serious impact on an adult who has been falsely accused.

We will ensure that a thorough investigation will take place for all allegations. If it is found that a staff member has been falsely accused, Windle International will offer all necessary support to that individual.

## **5.2 Professional conduct**

It is imperative that in addition to complying with the Safeguarding Code of Conduct at all times, staff members maintain purely professional relationships with children and have an acute awareness of how any action or behaviour may be perceived by a child. False allegations can be made for numerous reasons, including children misinterpreting gestures or behaviour, so it is crucial that all actions and behaviour are unambiguous.

## **5.3 Preventative behaviour**

Staff should:

- a) Never make affectionate gestures or compliments with physical or sexual connotations to children
- b) Consider the fact that some students do not like close proximity, or being touched.
- c) Notify their manager or the Child Safeguarding officer immediately should an ambiguous or uncomfortable situation arise.
- d) Inform students of their rights, but also make them aware of the consequences of a false allegation.
- e) Never invite students to their house
- f) Never give a student a lift in their vehicle
- g) Never tolerate provocative gestures from students and inform them that this type of behaviour is unacceptable.
- h) Avoid physical contact outside a well-defined framework; if physical contact occurs, it must be in the presence of a witness.
- i) Never hug or kiss a student
- j) Avoid being alone with a student unless it is required as part of one's duties
- k) Never make jokes of a sexual nature with students
- l) Exercise caution during trips, outings, social activities, and festivities, by adopting behaviour that cannot give rise to ambiguity
- m) Exercise caution when teaching science subjects, particularly biology in which topics covering sexual reproduction might feature, and could lead to unprofessional or un-academic discourse
- n) Never contact children outside of the work context via phone, social media or other form of communication.

## **5.4 Dealing with a false allegation**

- a) If a member of staff deems a colleague is acting in a way that could be misinterpreted or lead to a false allegation, they must alert their colleague and a supervisor
- b) If member of staff learns that a false allegation has been made against them (which has not yet, to their knowledge, been reported), they must report it themselves to a supervisor or the child safeguarding officer. This will begin an impartial and thorough investigation into the allegation.

## 6. Supervision and Implementation

Each member organisation of Windle International will appoint a designated Safeguarding Officer who will be responsible for:

- a) Developing action plans to introduce, develop and implement the safeguarding policy.
- b) Promoting awareness and implementation of the policy throughout the organisation.
- c) Monitoring the implementation of the policy and reporting on developments.
- d) Developing and coordinating training programmes and resources.
- e) Acting as first point of contact for concerns raised by members of staff and others.
- f) Liaising with partner teams on safeguarding.
- g) Supporting investigation processes.
- h) Providing basic advice and guidance on safeguarding.
- i) Conducting and/or facilitating staff training on safeguarding.

## 7. Reporting and Responding to Child Safeguarding Concerns

Windle International is committed to responding to all reports or indications, including rumours that suggest a child may be harmed or at risk of harm. The safety of children shall be of paramount concern at all times.

The child safeguarding officer is responsible for ensuring that the reporting procedure outlined below is implemented.

### 7.1 Obligation to report concerns

It is mandatory for all Windle staff and partners to immediately report any suspected or alleged case of child exploitation, abuse or other concern by anyone within the scope of the policy in connection with their duties. Members of the community should also be able to report such concerns.

The child safeguarding officer must ensure that appropriate reporting mechanisms are in place. The reporting procedure will be made widely available to ensure that everyone understands it.

### 7.2 Failure to report concerns

Failure to report a concern or reasonable suspicion of misconduct in accordance with this policy will be treated as serious misconduct and may result in disciplinary action.

All reports of suspected or known incidents must be reported to the child safeguarding officer within 24 hours of the occurrence, or as soon as possible upon learning of it. If it is not possible to report directly to the safeguarding officer for any reason, reports can be made to:

- a) an individual's direct supervisor
- b) regional manager
- c) the Executive Director.

The report should always include:

- a) Date, time and location of the incident.
- b) Nature of the incident
- c) Relevant action for the immediate protection of the child or children
- d) Other help or action required.

A suspected or known safeguarding violation can be reported anonymously to the Executive Director.

### 7.3 Manager responsibilities on reporting

Any manager or local child safeguarding officer who has knowledge of or receives a report must report it immediately to their manager.

## 8 Key Child Safeguarding Roles

Everyone has a responsibility to recognise, report, and respond to child abuse and exploitation. There are specific requirements, responsibilities and expectations of certain Windle International roles, which are summarised below.

### 8.1 The Executive Child Safeguarding Team (Executive CS Team):

Comprises the Executive Director of the Windle member, a board member, the child safeguarding officer & the Senior Management Team. The Executive CS Team has overall responsibility of the child safeguarding policy, ensuring it aligns with this Global Framework and meets:

- Annually to discuss overarching matters related to child safeguarding and the implementation of the policy.
- On an urgent basis in the event of a child safeguarding incident or breach of the policy

The Executive CS Team must ensure the national Board and International Council are kept informed of all activity relating to child safeguarding and protection.

### 8.2 Child Safeguarding Committee (CS Committee)

The Child Safeguarding Committee comprises the child safeguarding officer and sector managers. The committee meets quarterly and serves as the operational arm of the Executive CS Team. The CS Committee is responsible for:

- Ensuring implementation of the policy
- Advising on and developing relevant child safeguarding approaches and strategies
- Ensuring and supporting the process of integrating child safeguarding practices into their respective teams
- Regularly reviewing the child safeguarding and protection policy.

### 8.3 Child Safeguarding Officers

The child safeguarding officer is the individual designated to be the 'point person' with regards to safeguarding. They are an employee of the Windle member and they oversee the implementation of the child safeguarding policy. The officer is the leader of the CS Committee and is a member of Executive CS Team. Key regular responsibilities of the officer include:

- **Implementation:** Ensuring the policy is effectively implemented across Windle
- **Monitoring:** Monitoring overall compliance with the policy across Windle programmes
- **Training:** Conducting and facilitating training for staff
- **Incident Reporting:** Ensuring timely and accurate incident reporting
- **Coordination:** The link between the staff and the management
- **Emerging trends:** Keeping up-to-date with international trends on child safeguarding

### 8.4 Managers

Managers must ensure that staff are supported and systems and procedures exist to implement and monitor safeguarding standards.

### **8.5 Human Resources / any staff member involved in recruitment**

Must ensure that the recruitment of all Windle International employees is in line with this safeguarding policy.

### **8.6 All employees & representatives**

Must ensure that the policy is implemented and that safeguarding best practice in terms of prevention and response is incorporated into their work.

## **9 Communication and Media Guidelines**

This section outlines how our communications activity will adhere to our safeguarding and protection Framework. Each Windle member must ensure their own media and communication guidelines adhere to the following:

### **9.1 Guiding Principles**

Our guiding principles for communicating about and on behalf of children appropriately are:

- a) **Dignity and Privacy:** Children's dignity will be upheld at all times. The language we use will never degrade, victimise or shame any child. We will ensure children's privacy and no identifying information will be used.
- b) **Informed Consent:** Will always be sought before any images or information is collected. Informed consent means children and their parents/guardians/carers fully understand how their information will be used, where it will be seen, by whom, and for what purpose. Consent must be obtained by completing and signing a media consent form.
- c) **Accuracy:** We will always present information and imagery about children and individuals accurately, without sensationalising or manipulating it in any way. We avoid making generalisations, which do not accurately reflect the nature of the situation, and pictures must not be used out of context.

### **9.2 Photography**

Our imagery is focused on hope, which means showing positive and empowering images. When we do need to show a difficult reality, we will always do so in a balanced way, and which shows hope and progress from that situation.

Consent from a parent or guardian must always be gained before taking images or footage of children. Staff will ensure:

- a) Any images taken are approved in writing by the child as well as the parent or guardian.
- b) The child and parent/guardian understand how, where and when the image will be used, including how many people are likely to see it and what the image is going to be used for.
- c) Images do not reveal the identity of the child.
- d) The dignity of children is upheld, which includes them always being appropriately dressed, and not being pictured undertaking any activity or in a situation which might be viewed as demeaning or designed to invoke pity in anyone who views the image.

### **9.3 Media visits**

Media visits will be arranged with the full consent of the community/family/child being visited. Media representatives will never be left alone without a Windle staff member in attendance, and will never be left alone with children under any circumstances.

## 10 Breach of the Policy

### 10.1 Windle staff

A breach of this Global Framework and/or member policy by a staff member will be considered serious misconduct resulting in disciplinary action such as:

- Formal warning and monitoring
- Suspension pending investigation
- Reporting to the police
- Dismissal

### 10.2 Partners and contractors

A breach by a partner will result in the partnership being reviewed and may result in the following action:

- Formal warning and request to comply with the policy
- Suspension of the partnership/consultancy
- Reporting to the police
- Termination of the partnership agreement

### 10.3 Visitors

A breach by a visitor to Windle may result in:

- Termination of the visit
- Reporting to the police

## 11. Monitoring, Evaluation and Learning

This Global Framework and member policies will be closely monitored, evaluated and developed by Windle International and member organisations. All issues and processes will be fully documented so that appropriate lessons from experience can be drawn.

Progress reports will be presented by the Chief Executive Officer and the Executive Directors to the International Council on an annual basis. These reports will include updates and a summary of progress, as well as key successes, challenges and learning.