



Safeguarding Policy 2019

Introduction

Xavier Project's vision is for a world in which refugees of all-ages can lead dignified lives. We believe that every individual, whatever their background, should be able to access learning opportunities delivered in a safe environment that enable them to lead fulfilled lives. When well safeguarded from any form of abuse and empowered, these individuals can become agents of change in their families and communities. Xavier Project's safeguarding policy provides clear direction to staff and others about expected codes of behaviour in dealing with people of concern (Poc) in all of our operations to ensure that our organisation serves to protect the children and adults we work with, and ensure that they are not exposed to any kind of harm, abuse or exploitation.

Safeguarding is a general concept to protect people, especially those that are vulnerable, from harm or abuse of any sorts including but not limited to verbal, physical, sexual, emotional and financial. This is achieved by putting in place appropriate measures and frameworks to prevent the occurrence of any form of abuse and should be considered in every aspect of an organisations work.

Definitions

Child: According to UNCRC, a child is anyone under the age of 18. At Xavier project, due to the unique nature our beneficiaries, we would also recognise "a child" as the youth over 18 years of age benefiting of participating in any of our programs.

Child protection: Preventing and responding to violence, exploitation and abuse against children including commercial sexual exploitation, trafficking, child labour and harmful traditional practices, such as female genital mutilation/cutting and child marriage (UNICEF).

Safeguarding: The responsibility of organisations to make sure their staff, operations and programmes do no harm to children and adults nor expose them to abuse or exploitation.

Abuse: Consists of anything that individuals, institutions or processes do (or fail to do) that directly or indirectly harm children or adults, or damages their prospect of a safe and healthy development.

Commitment to Safeguarding

Xavier Project believes that we have a responsibility to consider the protection of every child, youth and older person who participates in our programs or is impacted by our work. Our beneficiaries should never experience abuse of any kind. We recognise that we have a responsibility to promote the welfare of all persons, especially considering that our work is focused on supporting particularly vulnerable communities. We are committed to safeguarding the well-being of all children, young people and vulnerable adults we come into contact with and work to proactively ensure they are protected from any harm, abuse or exploitation.

Our Safeguarding Principles and Values

Xavier Project recognises that:

Important elements of any safeguarding and protection policy should be prevention, protection and support. We trust that all these elements are covered by this policy in combination with the Safe Recruitment Policy and Child Protection Policy.

Xavier Project therefore endeavours:

- a. To establish and maintain an ethos where beneficiaries feel secure, are encouraged to talk and are listened to.
- b. To ensure that our beneficiaries know that there are adults in the organisation whom they can approach if they are worried or are in difficulty.
- c. To ensure that wherever it is necessary every effort will be made to establish effective working relationships with parents and representatives from outside agencies.

About this policy

- This policy applies to all members, staff (whether employees or freelancers), volunteers and anyone working on behalf of Xavier Project or taking part in Xavier Project activities, as well as Community Based Organisations (CBO) who we work in partnership with.
- The purpose of this policy is to:
 - Provide members, staff and volunteers with the overarching principles that guide our approach to the protection of vulnerable people
 - Protect children, young people and vulnerable adults who are; members of, receive services from, or volunteer for, Xavier Project.
 - Ensure members, staff and volunteers working with children, young people and vulnerable adults are carefully recruited and understand and accept responsibility for the safeguarding of those vulnerable individuals they are interacting with.
 - Ensure that safeguarding of children, young people and vulnerable adults is a primary consideration when Xavier Project undertakes any activity, event or project.

The scope of this policy:

- 1) This policy applies to; all members, staff (whether employees or freelancers), volunteers and anyone working on behalf of Xavier Project taking part in Xavier Project activities.
- 2) Any projects, events or other activities that will involve vulnerable people must be planned with the involvement should put into consideration to the safeguarding principles and procedures.

Roles and responsibilities

The Human Resource Manager or the equivalent in both the Kenya and Uganda offices has responsibility of working with the teams to implement this safeguarding policy. All queries and concerns relating to safeguarding should be referred them. In consultation with the leadership team and the CEO, the Human Resource Manager will address all matters arising.

The current Kenya contact is Sharon Otieno (Human Resource Manager) s.otieno@xavierproject.org and in Uganda the lead contact is Matt Hopewell (Programme Lead) m.hopewell@xavierproject.org. They work under the guidance of leadership team member, Mercy Musembi (Compliance Director) m.musisi@xavierproject.org who is in charge of beneficiaries' safety and Edmund Page (Founder/CEO) e.page@xavierproject.org.

To contact our board of trustees please email Hamish Reid - h.reid@accenture.com.

The Safeguarding focal persons will be responsible for:

- a. Understanding the procedures and how they work in practice;
- b. Ensuring that the organisation has a system for recording Safeguarding concerns at all stages, up to the point of referral to relevant authorities. At this point consultation with the leadership team.
- c. Encouraging staff to discuss issues of safeguarding at both personal and professional levels;
- d. Providing support and guidance to other staff
- e. Raising issues or situations which may work against the interests of the beneficiaries.

The Leadership Team member in collaboration with the CEO is responsible for:

- a. Appointing a safeguarding focal person with the responsibilities specified above
- b. Ensuring that the organisation maintains a clear policy for safeguarding
- c. Liaising closely with the Safeguarding focal person and being especially attentive to any concerns raised by him or her.
- d. Assessing the Safeguarding focal persons competence in the role and taking any facilitating action to ensure that the organisation fulfils its safeguarding responsibilities, and if any deficiencies or weaknesses are identified in safeguarding arrangements, he must see that these are remedied without delay.
- e. Ensuring that all staff have basic training in safeguarding issues

Policy Implementation strategies

It is worth noting that most protection concerns that are specific to children are covered in the [Child Protection Policy](#). The safeguarding approaches are those that apply to all persons that interact with Xavier Project, including adults.

Recruitment practices around safeguarding

Any individuals that wish to engage with Xavier Project at any capacity including employees, interns and volunteers should:

- Provide a code of conduct clearance certificate from police

- Provide names and contacts of 2 character referee. This must be persons who have known them for at least 3 years and not family members.
- To show personal commitment to Xavier Project's safeguarding policy, each individual will sign a commitment to adhere to principle and procedures.
- All recruitment interviews should incorporate safeguarding matters

The level of disclosure and background check required will be decided by the committee regarding regulated activity. The results of any check to inform a decision will be used confidentially and in line with the Xavier Project equal opportunities policy.

Staff code of conduct

It is important that staff, by their behaviour or actions, do not place beneficiaries or themselves at risk of harm or of allegations of harm to beneficiaries (for example, one-to-one tuition, sports coaching, conveying a beneficiaries by car, engaging in inappropriate electronic communication with a beneficiaries, and so on.)

Staff should:

- Treat everyone with respect
- Maintain high standards of personal and professional conduct both personally and in others
- Be concerned about the way in which your language, actions, and relationships could be perceived
- Be exemplary in conduct with regards to safeguarding and child protection
- Respect an individuals right to privacy
- Provide access for beneficiaries to talk to others about any concerns they may have
- Recognise, and allow for, the special needs of anybody with disabilities and learning difficulties
- Encourage young people and adults to point out attitudes or behaviour that they do not like
- Avoid inappropriate physical contact with PoCs
- At all times respect the confidentiality of individuals personal information.
- Obtain written consent from the individual, child and parent/carer when photographing, filming or requesting personal information for activities
- Remember that someone else might misinterpret your actions, no matter how well intended
- Recognise that special caution is required in sensitive moments of counselling when dealing with bullying, bereavement or abuse. Respect the cultural, religious and ethnic backgrounds of those you work with.
- Ensure that there is a minimum of two staff members present in meetings with individuals, in particular children

Xavier Project Staff should not:

- Engage in any form of sexual activity with people of concern
- Permit abusive peer activities (e.g. bullying, racial harassment etc.)
- Do not discriminate, shame, humiliate, belittle, or degrade beneficiaries
- Share inappropriately photos or any other information
- Have any inappropriate physical contact with our beneficiaries
- Jump to conclusions about others without checking the facts with favouritism to any individual

- g. Be drawn into inappropriate attention seeking behaviour such as crushes or tantrums
- h. Make suggestive remarks or gestures
- i. Rely on your good name to protect you
- j. Believe 'it could never happen to me'
- k. Interview vulnerable young people on their own

Safe program designs

At Xavier Project, all staff will be expected to design programs that consider safeguarding issues. A risk assessment will be carried out to ensure that all protection issues are addressed and any activities that pose danger to people of concern should be avoided.

Xavier Project will engage vulnerable participants to provide any information that inform better safeguarding or to give any safeguarding concerns they may have when developing programs. This is particularly relevant in our partnerships with Community Based Organisation who will input into program design, communication and feedback mechanisms with these considerations and help ensure any safety measures are addressed promptly in specific locations.

Consultation and partnership with local authorities to ensure that any specific issues within communities or persons of concern (PoC) are comprehensively monitored and the necessary support in implemented.

Training around safeguarding and protection issues

During orientation, all new employees shall be introduced to and trained on Xavier Project safeguarding policy. This initial training should be tailored in manner that matches the employees roles and responsibilities.

Xavier Project will regularly train staff, community partners and our beneficiaries on safety precautions they need to apply to identify and avoid any kind of harmful behaviour, abuse and exploitation. We will implement reporting procedures in case of any emergency. Training on safeguarding and protection will be a key component in finalising partnerships with Community Based Organisations and will be a mandatory module of CBO training materials.

Xavier Project staff will also be encouraged to collaborate with other specialised agencies that promote safety for vulnerable persons to ensure all safety precautions are taken to protect People of Concern, and that when necessary referrals are made to relevant organisations.

Ground rules and ways for working regarding safeguarding of vulnerable people

When Xavier Project organises an activity or event where they will be responsible for vulnerable adults they will ensure:

- Planning is carried out in line with this policy and procedures.
- The event is attended by a minimum of one or more adults when practically possible.
- Where practically possible the total number of adults in attendance compared with the total number of children will be in line with the ratio table below
- There is a main contact for safeguarding on the day - this will be an individual whose background checks have been done.

- The main contact has access to emergency contact details and other relevant details (e.g. information about picking up arrangements for vulnerable people).
- That if vulnerable people of different gender will be taking part in activities adults of different gender will be in attendance too.
- A vulnerable person is not be left alone with an adult, unless that adult background checks have been done.
- Two adults should be the last to leave a venue once the activity has finished and will be responsible for ensuring vulnerable people get home safely.

Child to adult ratio table

Childs age	Number of adults	Number of children
5-8	1	6
9-12	1	8
12-18	1	10

Working with parents/guardians: If a vulnerable person wishes to take part in Xavier Project activities written permission (email is fine) should be obtained from parents/guardians where appropriate, and before the activity takes place. Written permission should include: emergency contact details of any relevant pick-up arrangements - including permission for another adult to pick up the vulnerable person after the activity has finished.

Procedures for raising safeguarding concerns and incidents of abuse

- If any member, staff or volunteer in Xavier Project witnesses, suspects or is informed of a witnessed or suspected case of abuse they should immediately report it to the named safeguarding officer.
- If the named person is not available, or is involved in or connected to, the abuse, it should be reported to any member of the leadership team.
- If an individual wishes to report an incident of abuse against themselves they should report it to the named safeguarding officer or an individual they trust or a member of the leadership team.

Procedures for dealing with concerns and incidents of abuse

The Named person (or person reported in their absence) will first make a decision based on the immediacy of the concern and the following two factors:

1. If the vulnerable person is in immediate danger or needs emergency medical attention - report to the police and seek medical attention.
2. If the person at the centre of the allegation is working with vulnerable persons at the current time - remove them, in a sensitive manner, from direct contact with vulnerable people and follow the procedures below.

If none of the above applies the named person will:

- Make a note of the concerns reported to them.

- Speak with the lead team members to decide how to handle the reported abuse. Excluding any team members who may be involved in the incident.
- Escalate the report by either:
 - Raising concerns with the police - for serious or possible criminal offences.
 - Requesting an assessment by the child protection working group about whether a vulnerable person is in need of protection.
 - An internal investigation - for less serious incidents where they feel internal mediation will be successful.
- Where cases are escalated the leadership team will cooperate with the police or local authority in dealing with the reported incident.
- Where an internal investigation takes place the committee will:
 - Inform all parties involved of the reported abuse as soon as possible.
 - Inform the family/guardians of the person reported as being been abused of the incident.
 - Arrange separate meetings with both parties within 10 days of the reported incident. A joint meeting may be arranged if appropriate.
 - Both parties should be given the chance to bring a friend or representative to the meeting.
 - Meetings will be attended by the named safeguarding officer and at least one other committee member.
 - All parties will also be invited to submit a written statement in advance of the meeting.
 - Once meetings have taken place the committee will decide on next steps and communicate them to all parties in writing within 5 days. They will be either:
 - Escalate the incident to the relevant authority.
 - Further investigation - with established procedures and timelines to work towards a resolution.
 - A decision or resolution.

Supporting Beneficiaries at Risk

Xavier Project recognises that any beneficiaries who has been a victim of sexual, physical or emotional abuse, or the abuse of neglect, may find it difficult to develop a sense of self-worth, and exhibit behaviour that is challenging and defiant. The organisation also accepts that beneficiaries who have experienced abuse may be inclined to abusing others and that such abuse requires a sensitive approach by all those involved. Xavier Project endeavours to support beneficiaries through:

- a. The structure of pastoral care throughout the project, in particular the support of CEO, and coordinator.

- b. The close attention of the Senior Management of the organisation in serious cases
- c. The availability of a Counsellor, partner agency referrals or other professional help
- d. A commitment to develop productive, supportive relationships with parents, if it is in the beneficiaries interest to do so.
- e. Well-kept records are essential to good Safeguarding practice. Xavier Project is clear about the need to record any safeguarding concerns held about a beneficiary. The organisation is also aware that such records must be kept confidential and secure until such time, if judged necessary, they are passed over to appropriate outside authorities. These records will comprise concerns, in writing, passed to the safeguarding focal person by his or her colleagues. Each beneficiary about whom a note has been received will have an individual file, chronologically ordered, and locked with other protection documentation, separate from other records. Each beneficiary about whom a protection file has been opened will be the subject of a discussion between the safeguarding focal person and the CEO. The likely outcome of the discussion will be to inform the beneficiaries parents or guardians, in order to ensure still more effective monitoring of the area of concern. It is the responsibility of all staff to pass on their concerns about any beneficiary to the Safeguarding focal person, whether or not they have been informed that a specific beneficiary is being monitored. The Safeguarding focal person is responsible for collating the concerns lodged in a protection file and in consultation with the CEO decides whether the case warrants referral to the social welfare services.

Sharing people of concern's information

The principles to uphold here include:

Dignity: The individuals dignity should never be compromised. The language or images used should not in any way demean the individual.

Accuracy: Any information or image regarding an individual should not be altered or tampered with in any way. Any generalisations or manipulations that do not depict the actual picture should be avoided.

Privacy: Any information that will put the individual at risk should be avoided.

- Only use first names of the individual: be careful not to reveal details about the place where they live, their school and other information that would lead to their place of residence when necessary the names will be changed
- Information about an individual's life and photographs (including information stored on the computer) will be kept in secure, password-protected files. Access to these should be limited to those that need to use them during the course of their work. E.g we can't just share our beneficiaries details
- The recorded images should focus on an activity and, where possible, feature groups rather than individuals.

Informed consent: Informed consent must always be sought before taking any photos, videos, or requesting personal information about any individual. The parents or guardians of any children must be involved and clear information provided as to how the information will be used. A consent form must be filled and duly signed by the individual and the parent/guardian, oral agreements should be avoided.

Communication

Xavier Project will communicate its commitment to safeguarding to the public and all stakeholders specifically on their website, community learning centres, job advertisements and job reference checklist form.

Resolution and disciplinary action

If abuse is found to have taken place any final resolution or decision will be taken in the best interest of the person who has suffered the abuse and the best interests the Xavier Project.

Any disciplinary action will be taken in line with the Xavier Project constitution.

Monitoring and Evaluation of the safeguarding Policy

Lessons will be drawn from specific cases to inform the policy review to keep relevant. The policy procedure will be reviewed annually to find out which ones worked well and which ones did not work. Feedback through interviews, focus group discussions and questions from our beneficiaries will be drawn to inform the policy review.

This organisation fully recognises the contribution it can make to protecting and safeguarding children. If you have questions about this policy, its interpretation, or the information upon which it is based, please contact the CEO Edmund Page.

Signed and approved by:

Edmund Page

A handwritten signature in black ink, appearing to read 'Edmund Page', written over a light grey rectangular background.

CEO

This policy was adopted on 12/12/2015

This policy is reviewed and updated on 07/12/2019