

Safeguarding of Children and Vulnerable Adults

July 2023



Section A: POLICY

1. Policy purpose and scope

HopeCo is a Christ-centered organization that believes every child deserves to live free from hunger, abuse, and exploitation. This commitment drives us as we care for children and vulnerable adults in impoverished communities.

At HopeCo, we recognize our duty of care to the children we serve, are in contact with, or are affected by our operations, and we have zero tolerance for any form of abuse of children or adults.

This policy and related procedures affirm HopeCo's commitment to protecting children and vulnerable adults. This document outlines our guiding principles, roles, responsibilities, and approach toward implementation. This commitment is integrated into all areas of our work.

This policy is guided by the UN Convention on the Rights of the Child (UNCRC), the UN Statement for the Elimination of Child Abuse and Exploitation, and other internationally recognized best practices.

For the purposes of this policy, (i) a child is defined as a person under the age of 18 years, and (ii) a vulnerable adult is defined as an individual aged 18 or older in an at-risk situation.

This policy applies to anyone who represents (or is associated with) HopeCo, including, but not limited to, employees, volunteers, partners (other NGOs and government counterparts), contractors, donors, and board members. Everyone has a responsibility to support the protection and safety of children.

This policy will be translated into other languages as required.

2. HopeCo's commitment to safeguarding

Child abuse is a tragedy. Abuse occurs in all countries and all societies and includes physical violence, sexual molestation and exploitation, emotional cruelty, and neglect of children's basic needs. It is nearly always preventable.

At HopeCo, we recognize our responsibility to ensure our staff, operations, and programs "do no harm" to children and vulnerable adults. This means that we do not expose any person to the risk of harm or abuse. We ensure that any concerns about children's safety are responded to and, where necessary, reported to the local authorities.

The child's best interests are our primary concern and consideration. We believe that:

- All children have equal rights to a happy, healthy, and secure childhood that is free from harm
- The abuse of children is a violation of their rights
- Child abuse is *never* acceptable

Abuse of minors, including physical, emotional, and sexual abuse, is a severe moral fault and is subject to criminal charges in most societies. Child abuse takes advantage of the vulnerability of children. It violates biblical standards of holiness and the mandate to genuinely love and seek the good of others. It causes deep spiritual and long-term psychological wounds.

We will therefore ensure that anyone who represents HopeCo in any capacity:

- Is aware of the problem of child abuse and of situations where children may be at risk
- Actively safeguards children from abuse through good practice
- Reports all concerns about possible abuse immediately
- Responds appropriately and quickly when abuse is suspected or discovered

Any person representing HopeCo will be expected to read this policy and related procedures and must sign the Code of Conduct before engaging with any HopeCo program. We will provide training and support to our partners so that they meet the standards set out in this document.

The principles in this policy apply to *all children and vulnerable adults*, whether or not they are beneficiaries of a HopeCo program, irrespective of their ability, ethnicity, faith, gender, sexuality, and culture.

This policy is approved by the board of HopeCo, as affirmed in a resolution made in its meeting on October 16, 2020. The CEO, through the Director of Program and Regional Director, is responsible for ensuring that all HopeCo personnel and associates are aware of, and agree to abide by, this policy and other relevant procedures, both inside and outside of their work with HopeCo.

This policy is binding for all HopeCo-affiliated programs. Based on this policy, each program shall define clear reporting, response structures, and crisis management plans. Each program should ensure that its in-country policy is aligned with that country's legislation. HopeCo must be informed of any additional regulations and guidelines adopted by programs in their child safeguarding procedures.

3. Definitions of abuse

Abuse may include adult-on-child, or child-on-child, abuse. HopeCo defines abuse as follows:

i. Physical abuse and neglect

Physical abuse includes inflicting bodily injury upon a child. This may include burning, hitting, punching, shaking, kicking, beating, poisoning, drowning, or otherwise harming a child. It may be the result of inappropriate discipline or physical punishment. It may be caused when a caregiver deliberately induces illness in a child.

Physical neglect may include failing to provide any of the following: shelter, adequate food, appropriate clothing, medical care, supervision, psychological care, or proper protection from harm. Such actions are likely to seriously impair a child's healthy physical, spiritual, moral, and mental development.

ii. Emotional abuse (*also known as verbal or mental abuse or psychological maltreatment*)

Emotional abuse includes caregivers threatening or terrorizing a child, using extreme forms of punishment, such as confinement in a closet or a dark room, or tying a child to a chair. Other forms of emotional abuse may include bullying (including cyberbullying), ignoring, threatening, belittling, rejecting, using derogatory terms, excessive blaming, or excessive isolating. Emotional neglect may include a lack of love, emotional support or attention, or excessive inconsistency.

iii. Sexual abuse

Sexual abuse includes but is not limited to rape, oral sex, penetration, or non-penetrative acts such as masturbation, kissing, and touching. It also includes forcing children to observe sexual acts and pornography or encouraging children to behave in sexually inappropriate ways.

Child grooming is befriending and establishing an emotional connection with a child (and sometimes the family) to lower a child's inhibitions for child sexual abuse; this is also a criminal offense in many countries.

The above includes sexual abuse between members of the same sex and opposite sexes.

Child sexual exploitation is a form of sexual abuse that involves children engaging in any sexual activity in exchange for money, gifts, food, accommodation, affection, status, or anything else that they or their family needs. It usually involves a child being manipulated or coerced, sometimes through drugs and alcohol.

iv. Commercial exploitation

This includes exploiting a child in work or other activities for the benefit of others and to the detriment of the child's physical and mental health, education, or moral or social-emotional development. It includes but is not limited to child labor. (Note that this does not include daily or weekly chores that are culturally appropriate and which all of our children are expected to participate in).

HopeCo staff and volunteers will receive ongoing training about recognizing signs of abuse.

4. Prevention of abuse in HopeCo programs

HopeCo is committed to implementing the following:

i. A POLICY that prevents harm to children:

- a. **Board-approved:** The HopeCo board recognizes the critical need to protect children and vulnerable adults. It has approved this policy and receives regular feedback regarding implementing safeguarding procedures. Safeguarding is an agenda item at every board meeting.
- b. **Widely shared:** This policy and related procedures are publicized appropriately and promoted, and distributed widely among staff, volunteers, partner organizations, supporters, and beneficiaries of our programs. Effective distribution is the responsibility of the CEO, Director of Programs, and Africa Regional Director.

ii. PROCEDURES for preventing abuse and responding to safeguarding concerns:

- a. **Safe program design:** HopeCo will design and deliver safe programs for children, vulnerable adults, and the broader communities we serve. Safeguarding is one of our highest priorities.
- b. **Clear response processes:** HopeCo has transparent procedures for responding to abuse allegations. All who work at HopeCo will treat any suspected abuse seriously.
- c. **Good practice guidelines:** All staff, volunteers, and visitors are expected to comply with guidelines, rules, and expectations designed to help ensure the safety of our children.
- d. **Risk management:** Regular risk assessments of all programs, projects, and activities will be carried out. Risk mitigation strategies will be developed and incorporated into the design, delivery, and evaluation of all programs, operations, and activities that involve children and vulnerable adults.

- e. **Appropriate use of information and images:** HopeCo is committed to undertaking all communications related to children in a safe manner. This includes using social media, our website, newsletters, and our child sponsorship program. In using information and visual images, both photographic stills and video, our overriding principle is to maintain respect and dignity in our portrayal of children, families, and communities.

iii. Effective training and management processes for our PEOPLE:

- a. **Safe recruitment:** We will apply the highest standards of diligence in the recruitment, orientation, and screening of all program staff, consultants, and volunteers.
- b. **Clear protocol for behavior: Our Code of Conduct is a clear and concise guide** of what is and is not acceptable behavior when employed by or engaged with HopeCo. This will be signed by all people working with or on behalf of, HopeCo.
- c. **Education and training:** Staff, volunteers, associates, children, and families will receive information, education, and training on safeguarding matters and their responsibilities.

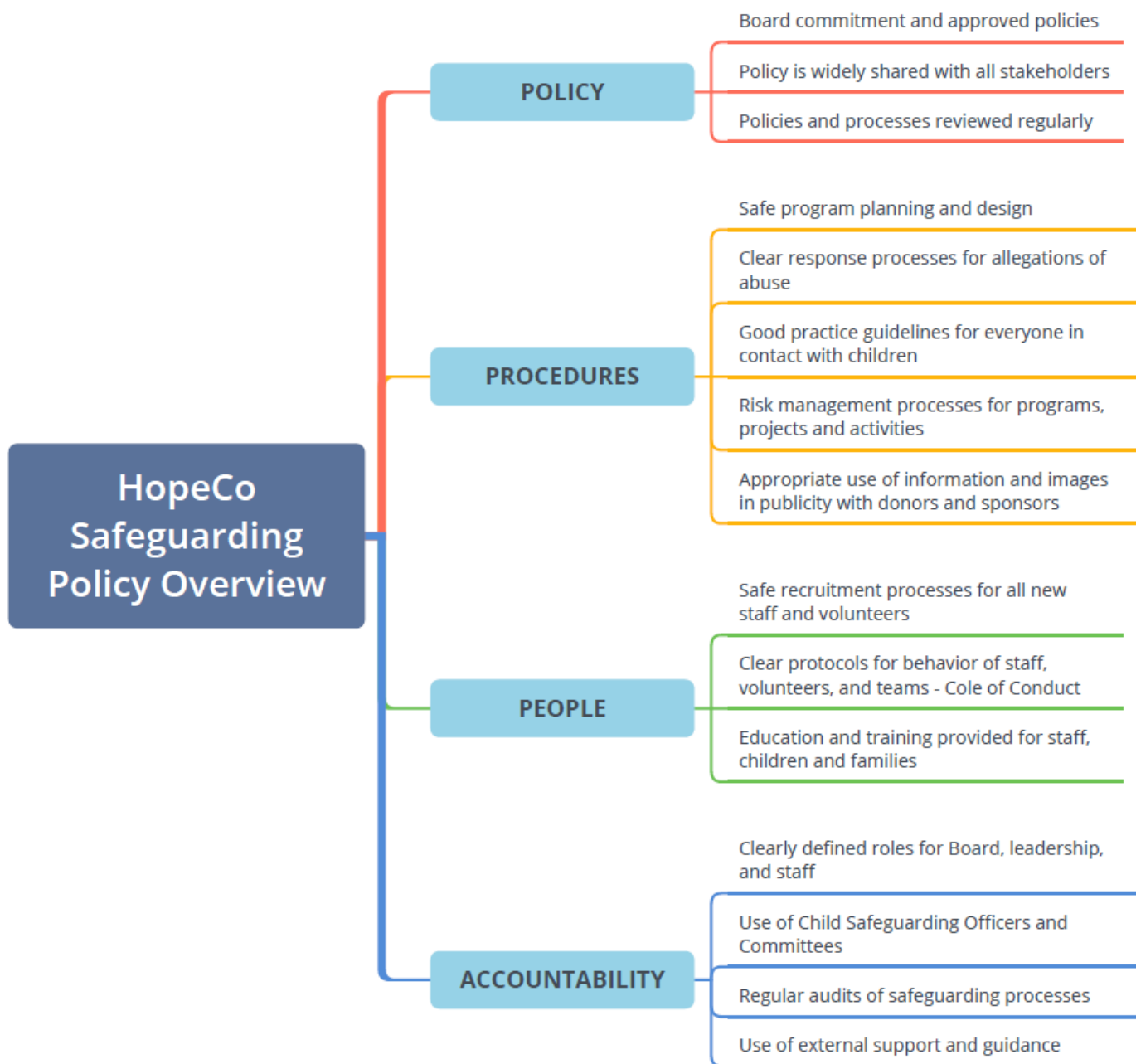
iv. Appropriate and rigorous ACCOUNTABILITY structures:

- a. **Clearly defined roles:** Board members, leadership, and managers have specific responsibilities for overseeing the implementation of this policy and related procedures. Each is expected to fulfill their assigned role.
- b. **Child Safeguarding Officers:** As appropriate, each HopeCo program will appoint a Child Safeguarding Officer to support the implementation of HopeCo's Safeguarding policy and procedures. The HopeCo board will also have a Child Safeguarding Officer who will participate in a committee that includes the CEO, Director of Programs, and Regional Director.
- c. **Regular audits:** Regular audits will be carried out of all programs, projects, and activities. These audits will assess the effectiveness of safeguarding processes and protocols. Audits may be self-administered by HopeCo or led by external bodies.
- d. **External support and guidance:** HopeCo will engage external agencies to advise, guide, and help implement its safeguarding policies and processes.

5. Policy monitoring and review

The abuse of children is among the most significant risks faced by HopeCo. While it is not possible to eliminate all risks of abuse, HopeCo will:

- Ensure that these risks are identified, monitored, and mitigated.
- Monitor the implementation of safeguarding policies and ensure effective procedures are in place.
- Ensure this policy is integrated into all programs, including homes, schools, and medical programs, and work with communities, partners, and government counterparts.
- Review this Policy annually and make revisions as appropriate. The next review will be in October 2024.



Section B: PROCEDURES

HopeCo will design and deliver safe programs for children, vulnerable adults, and the broader communities we serve. Safeguarding is one of our highest priorities.

1. Guidelines to prevent abuse

HopeCo has transparent processes for responding to allegations of abuse. All who work at HopeCo will treat any suspected abuse seriously.

Each HopeCo partner will create program-specific guidelines regarding how to prevent abuse. Regular risk assessments must be carried out, with subsequent actions taken to reduce or eliminate any identified risks.

All staff members and volunteers must protect themselves from abuse allegations by demonstrating good practice. This means they will avoid putting themselves in a position where they could be accused of abuse or attempting to abuse a child.

All staff members, volunteers, and visitors are expected to comply with guidelines, rules, and expectations designed to help ensure the safety of our children.

Examples of good practice include:

- A male caregiver in a girls' area or a female caregiver in a boys' area should be careful when entering children's sleeping quarters
- Staff should try to remain within view of another adult when with a child; at a minimum, staff who are alone with a child should keep the door of the room open
- Children should not be permitted to enter any staff member's bedroom or private living area out of sight of other adults
- One-on-one meetings, counseling, or disciplining children should be conducted in an appropriate place, preferably in a location with open or see-through doors. Other staff members should be made aware of the counseling or meeting that is taking place
- It is preferable that a staff member does not travel alone in a vehicle with a single child
- There should be clear procedures for safely dealing with medical and first aid issues and emergencies
- Caregivers should be sensitive to the local/regional norms of personal familiarity in language, conversation, and the use of physical contact and observe these norms appropriately

There must be adequate rules and regulations that prevent child-on-child abuse.

For example:

- No more than one child is allowed into the same toilet cubicle at any time
- There should be adequate supervision of sleeping quarters, play areas, and children's living areas

HopeCo recognizes that appropriate physical touch by caregivers is vital in a child's development. It is essential, however, that staff avoid any appearance of inappropriate behavior. Staff and volunteers may not hold, kiss, cuddle, or touch children in an inappropriate or culturally insensitive way. Staff members should use good judgment, wisdom, and caution when working with children with emotional and psychological problems. Children must be made aware that, at any time, they can say "no" to any activity or interaction that makes them feel uncomfortable.

Inappropriate physical contact includes:

- Demanding hugs and kisses
- Touching chest, genital area, upper legs, buttocks, waist, and stomach area
- Sitting a child in the center of the caregiver's lap
- Seductiveness or suggestive contact
- Physical contact of any kind which is done for the sexual pleasure or satisfaction of caregivers

- Any touching used to express power or control over a child, except holds/restraints that are used to prevent a child from hurting themselves or others

The adult’s responsibility is to correct a child gently and positively when they cross healthy physical, verbal, or emotional boundaries and report such behavior to their supervisor or program manager to teach the child healthy interaction.

Adults are always responsible for their behavior with a child, even when a child appears to act seductively.

Information about our commitment to keeping children safe should be openly displayed and available.

2. Procedures for dealing with suspected or alleged abuse

If you are concerned about the welfare of a child or suspect abuse is occurring at any HopeCo program or to any child or beneficiary supported by HopeCo, you must report this IMMEDIATELY to one of the following people:

Your program’s director, manager, or supervisor

Hudson Mahare: HUDSON@JOINHOPECO.COM +254 722 999510

Regina Chacha: REGINA@JOINHOPECO.COM +1 (276) 252-3218

Matt Parker: MATT@JOINHOPECO.COM +1 (219) 741-4065

Our focus is always on safeguarding and protecting the child.

All who work at a HopeCo partner program must treat ANY suspected abuse seriously. No one should ever ignore it in the hope that it will go away.

HopeCo partners will receive disclosures from children with sensitivity and will strive not to re-traumatize children in their handling of complaints.

If a child or young person tells a staff member that they are being, or have been, abused, the staff member must:

- Listen and accept what the child or young person says but do not press for information
- Let the child or young person know what they will do next and that they will let them know what happens
- Not investigate or inform, question, or confront the alleged abuser
- Take the alleged abuse seriously
- Record carefully what they have heard

All suspected abuse must be reported immediately. This includes staff members reporting possible concerns about one of their colleagues. Any adult who withholds information or covers up any kind of abuse **may be considered an accomplice**, and action may be taken against them, including possible dismissal.

Staff who work for HopeCo partners must follow this policy both within and outside the workplace. This means adopting appropriate behavior and reporting concerns about a child, whether at work or outside.

i. Allegations of abuse by an adult

When a member of staff is suspected of child abuse, the following procedures must be followed:

- Anyone suspecting child abuse must **immediately** discuss the situation they have observed with their supervisor (or another person listed above). The Program Manager and Regional Director must be informed immediately.
- The Regional Director will notify the Director of Programs, CEO, and Board Safeguarding Officer **within 12 hours** and begin keeping a written log (see pages 22-23.)
- A response plan to respond to the matter will be developed by the HopeCo Safeguarding Committee and implemented immediately. This plan will include details for handling the allegation and support to the alleged victim – including physical protection and safety, medical care, legal aid and advice, healthy communication through the process, and counseling. **The safety and well-being of the child will be the highest priority at all times.**
- All local laws must be followed in full. If the allegation is a criminal matter, this should be reported to the formal authorities (law enforcement, social welfare department, etc.) before acting or informing the alleged perpetrator. Internal investigations related to allegations of criminal behavior should be discussed with the formal authorities before initiation to ensure that HopeCo does not compromise any legal investigation.
- **If an internal investigation is required, this response plan will include setting up a committee of three or more qualified people to investigate the alleged abuse.** This committee should have at least one person from outside the organization (such as a social worker or psychologist) if possible. **Counsel may also be requested from an external agency (*Keeping Children Safe*: info@keepinchildrensafe.global.)** An external agency may also be asked to conduct or lead an investigation.
- The Regional Director will immediately convene a special meeting of the committee appointed to review the suspected behavior.
- The accused will immediately be relieved of all duties and contact with children until the investigation is completed. They must, however, be treated respectfully and fairly. They will be notified of the allegation and investigation, given an opportunity to respond with written information and provide the investigation with other pertinent information and witnesses.
- The complainant may actively participate in an internal investigation to provide their testimony and all available relevant information. The investigating committee will provide appropriate counseling services and follow-up.
- Identifying information about children and alleged perpetrators will be shared only on a “need to know” basis. During an investigation, unless abuse has been proved to have occurred, one must always refer to “alleged abuse.” Electronic communications about the matter must be identified in a manner that indicates urgency but not details of the situation (for example, with a subject line of “Urgent Matter” rather than “Child Abuse”).
- All procedures in handling the allegation will be documented. Factual elements of an investigation include interview notes, witness statements, hard copies of emails, medical reports, and, in some cases, audio or videotapes. All documentation must be gathered quickly, organized carefully, and kept in a locked location.

The critical aspects of any reports or other documentation in Swahili will be translated into English, and the entire document will be translated as necessary.

- During the investigation, the investigating committee, the Regional Director, the Director of Programs, and the CEO will hold all details in confidence. This protects the staff member and the child from potentially damaging information being circulated before verifying the facts. Inappropriate sharing of information by an employee will be grounds for disciplinary action, up to and including dismissal.
- If the investigating committee considers the staff member or volunteer guilty of the abuse, appropriate action, potentially including dismissal and legal action, will be agreed upon and implemented. The accused will receive a written memorandum outlining the final determination of the investigation.
- If a staff member is found not guilty of alleged abuse, a re-entry plan for their return to the organization will be developed and implemented. Counseling and other support will be provided as needed. Appropriate communication will be made with the other staff and children within the program.
- After the investigation is completed, a plan for communication to the broader affected community will be developed and implemented by the investigating committee, Regional Director, Director of Programs, and CEO. Only authorized staff members may communicate with others – including staff, media, social welfare department, and local government authorities – about the results of the investigation.
- A plan to communicate the results of the investigation to the abused child and provide them with any necessary ongoing support, including counseling, will also be developed and implemented.
- The Program Manager or another designated person will, if appropriate, notify the parents/guardians of the children impacted by the abuse and inform them of the steps that the organization has taken in response.
- A full copy of all documentation for the case will be held by the East Africa office and at the HopeCo office in the USA. HopeCo’s Safeguarding Committee will have full access to all documents. The CEO will inform the HopeCo board in the USA of the incident and actions taken in response. A final summary of the incident will be produced, with the children’s names and other strictly confidential information redacted as appropriate.

In addition, it should be noted that:

- Anonymity for whistleblowers: any person reporting concerns about possible abuse or behaviors exhibited by another person will have the right to anonymity.
- If an employee raises a legitimate concern in good faith about suspected child abuse, which proves unfounded upon investigation, no action will be taken against the employee. However, any employee who deliberately makes false or malicious accusations will face disciplinary and possibly legal action.
- Each HopeCo partner should have a list of organizations and professionals to be contacted quickly to support reporting and responding to concerns. This list should be compiled before any problem arises.
- In the event of the dismissal of an employee because of abuse, HopeCo reserves the right to disclose appropriate information to other organizations as applicable law and customs allow.

ii. Allegations of abuse by another child

When an occurrence of abuse by a child on another child is suspected, the following procedures will be followed:

- Anyone who suspects child abuse will **immediately** discuss their observations with their supervisor or the Program Manager.
- The Program Manager will contact the Regional Director **within 12 hours** and begin keeping a written log (see pages 22-23.) An action plan will be by the Program Director, Regional Director, and Director of Programs and implemented immediately. The CEO will be notified.
- All procedures followed in handling the allegation will be documented, and the Director of Programs and CEO will be provided copies of all such documentation.
- A plan to communicate the results of the investigation to the abused child and provide them with any necessary ongoing support, including counseling, will also be developed and implemented.
- If the child is found guilty of abusing another child, immediate and appropriate action will be taken. This course of action will depend on the following factors: (i) the nature of the offense; (ii) the age of the child; (iii) the child's behavioral history in the program; (iv) the likelihood of the offense being repeated. Details of the abuse should be recorded in the child's file and reported to other authorities as local laws require.
- If the alleged perpetrator is found not guilty of abuse, appropriate support will be provided to them, including counseling, as necessary.
- The Program Manager or their designate may, as appropriate, notify the parents/guardians of the children involved in the alleged abuse and inform them of the steps the organization has taken.
- HopeCo's CEO will be informed of the outcome of the investigation; they will notify the USA Board.
- Strict confidentiality about the victim and alleged perpetrator will always be maintained.

3. Reports and documentation

- HopeCo will retain copies of all logs, reports, and documentation of child safeguarding concerns and reports in a secure location in its international office. Only the CEO, Director of Programs, and designated staff members will have access to this documentation.

4. Allegations of historical abuse

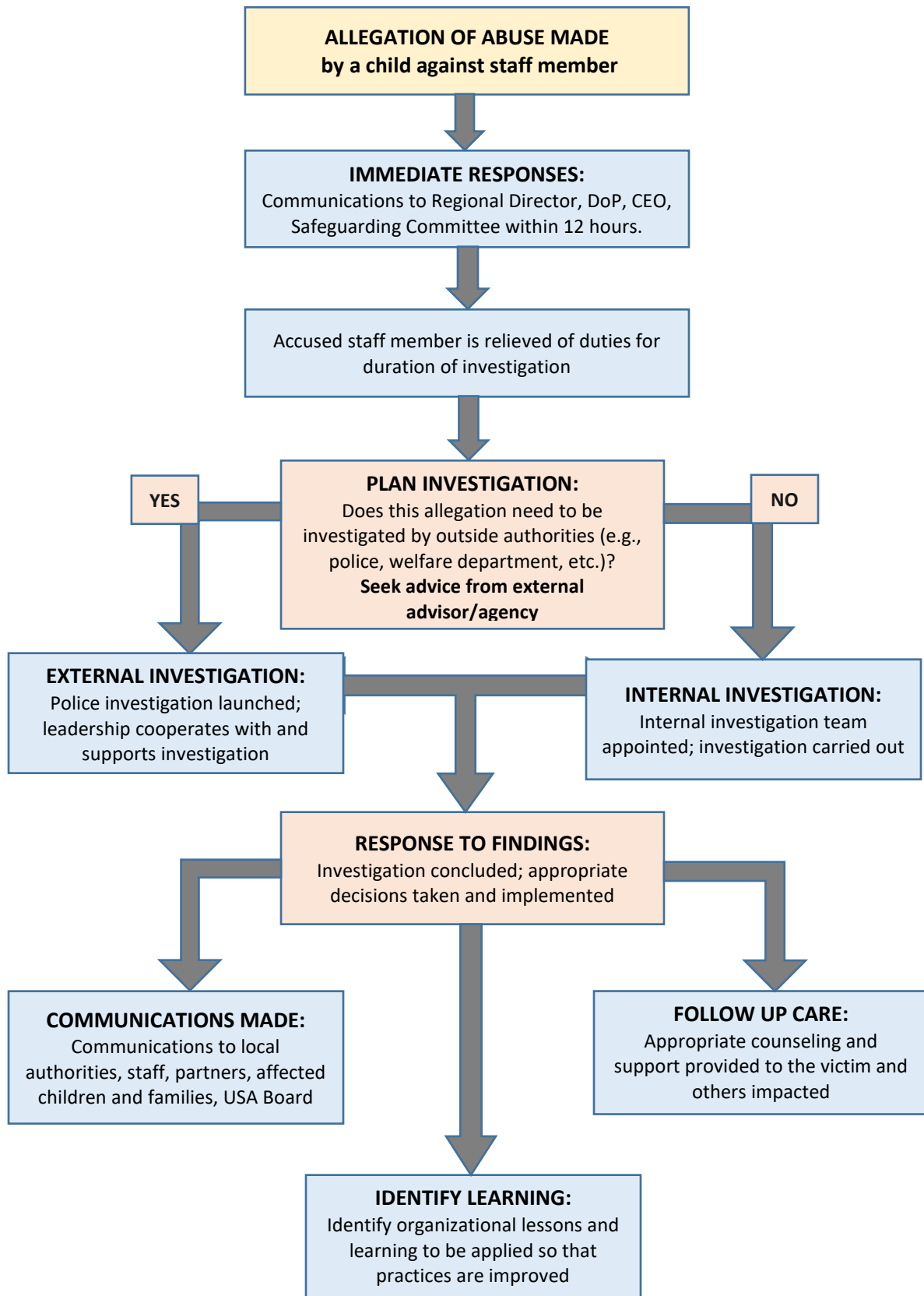
- This refers to abuse that an adult subsequently reports having suffered as a child or young person while in contact with a HopeCo program. An individual may not report abuse until many years after the event.
- The child safeguarding procedures above will be followed in such cases. Allegations will be handled transparently and responsibly.
- HopeCo takes allegations of past abuse seriously. We will seek to promote the welfare of any adult who alleges past abuse, and we will protect any child currently in our care from a person alleged to be an abuser.
- Investigations of past abuse will be carried out regardless of legal statutes of limitations.

5. Child grievances

- Each HopeCo program will have a process for dealing with grievances that a child has expressed in its program. At least annually, children, parents, staff, and volunteers must be made aware of this grievance process. The process should be reviewed and updated periodically.

- Designated persons will be appointed to review and respond to any grievances expressed, reporting to the Program Manager, Regional Director, Director of Programs, the child, and other persons as appropriate.

Process for following up on allegations of abuse:



6. Child discipline

Each HopeCo partner program will have a clear discipline policy developed in consultation with HopeCo. This policy will be determined by the culture and the laws in the country where the program is located. Under no circumstances should any discipline harm a child physically or emotionally or shame a child in any way.

7. Use of children's personal information/photographs

HopeCo is committed to undertaking all communications related to children in a safe manner. This includes using social media, our website, newsletters, and our child sponsorship program. In using information and visual images, both photographic stills and video, our overriding principle is to maintain respect and dignity in our portrayal of children, families, and communities.

- HopeCo and its partners respect each child's right to privacy.
- All HopeCo offices and partners must determine who has access to details of children. Access should be given based on role. Details must be held securely on computer systems protected by passwords. Child details must not be maintained on personal computers.
- If information containing details of children must be destroyed, it must be done securely.
- HopeCo will seek to limit the distribution of children's pictures and case histories, realizing that these can fall into the hands of people who do not share HopeCo's regard for protecting children.
- Sponsorships promoted on the website will only contain the child's first name and minimal information about their background to protect their privacy. Children's faces may be blurred in photographs as appropriate.
- HopeCo reserves the right to refuse to process sponsorship applications should it have reasonable concerns about an applicant's motives to sponsor a child.
- All visual communications about children must use pictures that are respectable and respectful, not presenting them as victims. Children should be sufficiently clothed, and poses that could be interpreted as sexually suggestive should be avoided.
- Care will be taken to ensure that no confidential details about a child's life, medical concerns, or confidential personal history are released inappropriately. Examples of information that we do not share include details of abuse that children have received or done to others; personal struggles or family information that might embarrass children (e.g., alcohol or drug usage, psychological problems); infectious diseases, physical handicaps, or mental health needs; and addresses or other information that could identify members of their family. A child's personal and physical information that could be used to determine the location of a child within a locality must not be used in any other form of communication about a child.
- Letters from sponsors to children must be sent via the HopeCo office to be screened for inappropriate content.
- When the story of a child is shared to inform and educate churches or other institutions, the child's name in the report should be changed along with any additional information that might identify them. If the story of an older child (16 years or older) is shared, the full name may be used if the child gives permission.

- As needed, we will obtain written permission from the child’s legal guardian before we photograph or video their child for use in sponsorship materials, newsletters, videos, online reports, and other publicity.
- We do not actively ask children to do or say anything that might make them feel displayed as objects of pity.
- A statement outlining HopeCo’s commitment to child protection will be on our website.
- Mission team members who post pictures or stories on personal websites, blogs, or social networking sites must maintain child confidentiality and the terms of this policy.
- Internal procedures will be reviewed and modified to provide increased security of child photographs and case histories and limit easy access to these pictures. Procedures will also be extended to events where mass quantities of child photographs and case histories are available to the public.
- Any partners, suppliers, and agencies working with HopeCo or on our behalf will be made aware of our child safeguarding policies and are expected to comply with such policies and standards.
- HopeCo requires that an authorized representative of the organization must coordinate any communication with the media on matters concerning child protection.
- Misuse of a HopeCo program’s resources is prohibited. This includes viewing inappropriate websites, downloading and uploading inappropriate information, and accessing or distributing information relating to children which is inappropriate, obscene, pornographic, defamatory, harassing, threatening, contains racial or sexual slurs, or otherwise is inappropriate in the context of our mission and values.
- Any organization, group, or individual requesting to use HopeCo resources, such as videos or photographs, may be asked to sign an agreement regarding the proper use of such materials. This agreement will include a statement that any use of such materials for purposes other than agreed may subject the borrowing organization, group, or individual to legal action. In addition, failure to adhere to the approved use of the material may result in the immediate termination of HopeCo’s permission to use the subject materials and require the immediate return of all materials provided and any copies of such materials.

8. Internet use by children

HopeCo is committed to ensuring that children are taught about the benefits and dangers of the internet and know how to use the internet safely. This includes the appropriate use of email and social networking sites (Facebook, Twitter, Instagram, Snapchat, etc.). Some essential policy guidelines include:

- Use of the internet will be closely supervised and monitored by trained staff. This function should be included in the designated staff member’s job description.
- Computers that have access to the internet will be located in rooms that allow for frequent and easy access by staff and where the screens are visible.
- There should be appropriate restrictions on the times when the internet can be used.
- Appropriate filters and firewalls should be used to control and prevent downloading inappropriate content.
- There must be appropriate restrictions on using smartphones and other devices on which the internet can be accessed.

- No residential child should be permitted to use any social networking site (such as Facebook) before the recommended age or as permitted by individual program policies and local laws. A designated staff member should be aware of such access. Clear policies and procedures should be established for children who become “friends” with staff members.
- Visits by residential children to Internet cafes or shops should be carefully controlled by the children’s supervisor or another designated person.
- Staff must not access inappropriate content on the internet at any time. The use of pornography is strictly prohibited.

Children will be trained and advised on an ongoing basis about the risks of internet use. These include:

- People using false identities on the internet
- Cyber-bullying
- Viruses
- Pornography and other inappropriate and damaging content
- Dangers of sharing personal information
- Appropriate email protocols
- Downloading pictures and other files
- Sharing concerns about internet use

Under no circumstances should staff permit children in a HopeCo program to connect directly with sponsors, visitors, or mission team members on Facebook or other social networking sites, email, or mobile phone. It will be made clear to children that they are not to initiate such contact, as well as how they should respond if contact is made with them by a sponsor, visitor, or team member. This response will include reporting the contact to a designated staff member. Sponsors, visitors, and team members will be made aware of this regulation in the relevant literature and in other ways (for example, the orientation of team members) as necessary. All correspondence to and from children and their sponsors should be sent via the HopeCo office.

Upon “graduation” of the sponsorship (usually when the child reaches the age of 18), approval for requests for contact detail exchanges is the exception and will be subject to a risk assessment which reviews the relationship to date and approval by appropriate senior management in the program country and the US. Where continued contact is approved, the graduated sponsored child and their family are made aware of the implications of the continued relationship, including risks. Final approval for contact is obtained in writing from the graduated sponsored child and/or caregiver as appropriate.

9. Risk Assessments and list of current risks identified

Regular risk assessments will be undertaken of all programs, projects, and activities.

Risk mitigation strategies will be developed and incorporated into the design, delivery, and evaluation of all programs, operations, and activities that involve children and vulnerable adults.

Currently, identified risks are outlined in the following table:

Nature of risk	Current/immediate responses	Further future actions to be considered
POLICY AND PROCESSES		
Gaps in HopeCo’s policy or processes	Work with the Safeguarding Committee and other stakeholders to develop and document transparent processes that supplement the Board-approved Safeguarding Policy.	Annual reviews to be made of HopeCo policy and related processes; benchmark with other organizations (including <i>Keeping Children Safe</i>).
Poor implementation of policy and processes	Communication with program leaders about the policy and processes, ensuring clarity around expectations. Identify training resources required and plan to develop these for program staff. Internal audits are carried out (by program staff) with follow-up by HopeCo leadership. Reinforce expectations that all “red flags” or concerns are responded to. Ensure the translation of all policies and guidelines into Swahili as needed.	Annual audits and risk assessments are to be made of programs to be carried out by HopeCo staff and/or external agencies (e.g., KCS). Ensure all programs have contextualized guidelines that complement the HopeCo policy.
Cultural differences and interpretation of what constitutes “abuse.”	Clearly and consistently clarify what is defined as “abuse,” using the Code of Conduct, policy, and ongoing training; respond to questions from visitors, team members, etc.	
STAFF AND CHILDREN		
Allegations of abuse made against a staff member, visitor, etc.	Follow the policy in full at all times, engaging external in-country counsel and international counsel (e.g., <i>Keeping Children Safe</i>) as appropriate. Ensure adequate vetting and orientation for all new local staff, visitors, partners, etc.	Appoint a Child Protection Officer for each site/country.
False accusations of abuse are made against staff members	Follow the policy fully through the process, engaging external in-country and international counsel (<i>Keeping Children Safe</i>) as appropriate. Provide support and take other appropriate steps to respond if a staff member is found not guilty of abuse.	
Lack of training provided to staff	Ensure that all staff (in the US and East Africa) are trained on the policy, what abuse is, and how to respond if there is a problem. Use any emerging incidents to provide “real-time learning” opportunities across the organization.	Develop a safeguarding video explaining our approach and why – staff members are to sign that they have watched and agree to comply.
Allegations are made of historical incidents of abuse.	Maintain a secure database of past incidents and concerns; engage external counsel if an allegation is made.	
Undetected child-to-child abuse	Ensure that program children are taught what abuse is and whom to go to in case of a problem.	Develop age-appropriate training and information programs for all children in our programs; implement

Nature of risk	Current/immediate responses	Further future actions to be considered
Abuse detected within the family of a program child	Investigate and take necessary steps to ensure the protection of the child, including the engagement of law enforcement bodies as required.	
MISSION TEAMS, SPONSORS, VISITORS		
Unchecked people visiting HopeCo-related programs	Reinforce the expectation that <i>all</i> visitors have background checks, read the policy, and sign the Code of Conduct before arrival.	
Visits by local people to program locations	Reinforce the expectation that all local visitors are adequately vetted and that they read the policy and sign the Code of Conduct.	
Inappropriate contact by mission team members and visitors (including home visits)	<p>Revise the mission team handbook to include expectations regarding child safeguarding.</p> <p>Consistently reinforce policy for sponsors/ donors giving monetary or other gifts to children.</p> <p>Ensure all team members read the policy and sign the Code of Conduct.</p> <p>Develop a safeguarding video explaining our approach and why – team members and visitors to sign that they have watched this and agree to comply.</p>	
Potential abuser signs up as a child sponsor.	Ensure there is clarity in our communications/website regarding our stance on child safeguarding/protection.	
Children connect directly with sponsors, team members, etc., on social media.	<p>Consistently reinforce policy regarding social media contact by sponsors/donors with children.</p> <p>Reinforce to the program children the rules regarding contact with donors/sponsors.</p> <p>Respond immediately to any breaches of the policy.</p>	
Inappropriate videos and social media posts published by team members or visitors	Consistently reinforce policy for sponsors/donors/visitors portraying children on social media, publications, and other presentations.	
The unauthorized use of a child is used in photographs, video, etc.	Consistently reinforce policy regarding sponsors/donors/visitors portraying children on social media, in publications, and in other presentations.	Develop agreement forms for children’s parents/guardians to sign regarding using images/video.

This risk register will be reviewed and updated on an ongoing basis.

Section C: PEOPLE

1. Orientation and screening of program staff

We will apply the highest standards of diligence in the recruitment, orientation, and screening of all program staff, consultants, and volunteers.

HopeCo will screen all potential employees, current employees, volunteers, interns, consultants, and board members to safeguard children.

HopeCo will conduct a thorough background check on all new employees in the USA and volunteers and interns applying to serve with HopeCo. This will include an interview, criminal background checks, and obtaining references.

The director of each HopeCo program must ensure that thorough background checks are conducted on all paid and local volunteer staff who work for a HopeCo partner.

The following applies to the application process for new employees:

- New applicants will be informed immediately that HopeCo takes child protection issues seriously.
- Evidence of identity (including an address check) and the authenticity of qualifications must be checked.
- A minimum of two references must be received, and follow-up with contacts (including asking the applicant's current/former employers and church pastor if they have observed any concerns regarding the applicant's conduct with children) must be made before hiring staff.
- Applicants must be asked to disclose any previous criminal convictions (felonies and misdemeanors).
- If possible, police background checks for criminal records must be completed, and a certificate of good conduct must be obtained from relevant authorities.

Refusal to agree to a background check during the interview process will result in a candidate being disqualified from employment or becoming a volunteer with any HopeCo partner program.

Our Code of Conduct is a clear and concise guide to what is and what is not acceptable behavior when employed by or engaged with, HopeCo. This will be signed by all people working with or on behalf of, HopeCo.

All staff and volunteers in a HopeCo partner program must be appropriately managed, supervised, and supported and have a clear job description that includes their child safeguarding responsibilities. The manager of a HopeCo program must conduct orientations and periodic evaluations of staff and volunteers who work in the program and immediately respond to any safeguarding concerns.

HopeCo and its program partners will **never** knowingly permit child abuse offenders, pedophiles, or those with related offenses to work with our children or have access to children's records.

2. Staff training

Staff, volunteers, associates, children, and families will receive information, education, and training on safeguarding matters and their responsibilities. This includes the induction of new staff.

HopeCo considers it essential that all its staff and volunteers know the dangers of child abuse and their role in protecting children. Leadership and management staff should ensure this matter is discussed honestly and openly by all staff. Staff will receive instruction on child safeguarding at the time of their engagement with a HopeCo. All such orientations and training are mandatory for all staff.

Staff training sessions on child safeguarding must be held at least twice a year. These should include the following:

- What child abuse is
- How abuse can be prevented and the role of staff in prevention
- Symptoms of child abuse
- Procedures for responding to alleged abuse
- Roles and responsibilities regarding child safeguarding matters
- Use of resources for children to teach them about abuse
- Communicating with and responding to children that have been abused or that make allegations of abuse
- Safeguards that staff members can observe to protect themselves from the risk of allegations and appearance of inappropriate behavior, including unhealthy emotional attachments with children
- Training of staff members who are responsible for handling complaints and carrying out disciplinary procedures regarding child abuse or inappropriate behavior toward children

3. Education programs for children and families

All children (and their families, as appropriate) must be made aware of what child abuse is, how to protect themselves, and how to respond if abuse occurs. There should be regular teaching sessions with all children. These teaching sessions should cover the following:

- The concept of “Good Touch and Bad Touch.”
- How to say “No” to abuse
- Clear procedures teaching the children who would be a safe person to talk to if they are abused, know of others that are being abused, or even if they feel uncomfortable around another person
- How children can express themselves appropriately
- An age-appropriate sex education program

This should include any children of staff members that live on a children’s home campus or attend a HopeCo program. In addition, any child of a staff member living on a children’s home campus or who has access to children must sign the Code of Conduct when they attain the age of 16 years.

Providing training to parents may be appropriate and valuable in some contexts, and they should know what to do if they have concerns about a child.

Whenever possible, we will provide safeguarding information and training to individuals and other organizations and institutions (schools, churches, government bodies, NGOs, etc.) from the broader communities within which we operate.

4. Visits by mission teams and visitors

All mission team members and visitors will be made aware of HopeCo’s child safeguarding policies as part of their orientation. They will sign an agreement that they will abide by the contents of this policy and any other local expectations. Criminal background checks will be carried out on all mission team participants.

Any staff member, board member, or visitor of HopeCo visiting a HopeCo program must be advised in advance of the local behavior protocols. These include:

- Visits to any HopeCo program are to be pre-arranged and pre-approved. Unannounced or unplanned visitors may be denied access to the program.
- Any visitor must be accompanied by a local staff member all the time, whether within or outside the premises. The staff member will ensure that the children are protected from any inappropriate activity.
- Arrangements for accommodation will be facilitated by the responsible staff. Visitors must not stay overnight with non-related children, whether in a guest house or elsewhere.
- Visitors may not give gifts directly to individual children. The giving of any gifts must be coordinated with an appropriate staff member.
- HopeCo does not facilitate adoptions.
- Two or more adults must supervise all activities where children are involved.
- On rare occasions, there may be some situations when it might be appropriate for visitors to spend time alone with a child. However, the visitor must notify the appropriate supervisor before spending time alone with a child in an unsupervised situation with written permission from the Program Manager.

Any inappropriate behavior by a visitor must be dealt with immediately. Any concerns should be reported to the Program Manager, who will inform the Regional Director or Director of Programs **within 12 hours**. The Regional Director will determine and implement appropriate action in consultation with the Director of Programs and CEO. This may include criminal investigation and potential severance of the visitor’s relationship with HopeCo.

Section D: ACCOUNTABILITY

1. Roles and responsibilities

Board members, leadership, and managers have specific responsibilities for overseeing the implementation of this policy and related procedures; each is expected to fulfill their assigned role.

The following staff has key responsibility for the effective implementation of HopeCo safeguarding policies and processes:

- Chief Executive Officer: Matt Parker – matt@joinhopeco.com; +1 (219) 741-4065
Responsible for: overall policy development, policy implementation in all programs, leading risk management and auditing processes, and relationship with the Keeping Children Safe network.

- Director of Programs: Regina Chacha – regina@joinhopeco.com; +1 (276) 252-3218
Responsible for: communicating policy to program leaders, ensuring delivery of training programs, co-leading auditing processes, being part of the investigative committee as required, and compliance by mission teams.
- Regional Director: Hudson Mahare – HUDSON@joinhopeco.com; +254 722 999510
Responsible for: effective delivery and implementation of policy, audits, training, risk management, and investigations required in East Africa programs.
- Board Child Safeguarding Officer: Brian Kirby
Responsible for: representing the Board in safeguarding and sharing concerns accordingly, supporting policy development.

A Child Safeguarding Committee will meet quarterly (more often as needed). This committee will include the four officers listed above, plus other staff and Board members as appropriate. The Committee will:

- Review progress being made with the implementation of this policy, including program audits
- Review results of any investigations into child safeguarding and ensure complete documentation of each
- Carry out and review risk assessments for the organization with plans to mitigate risks identified
- Develop an annual action plan for safeguarding across the organization
- Identify safeguarding training resources and opportunities for leadership, management, and staff
- Report to the board on progress made and recommendations for approval

Child safeguarding will be an agenda item at each HopeCo Board of Directors meeting.

The job descriptions of all staff members will include a child safeguarding expectation/requirement.

All staff members have a responsibility to:

- Attend safeguarding training and be aware of safeguarding matters, including what abuse is and how it can be prevented
- Adopt best practices in their day-to-day work to protect children from any form of harm
- Immediately report any concerns regarding the welfare of a child in accordance with this policy
- Cooperate fully with HopeCo’s leaders or external investigators during the course of any investigation into child abuse

2. Child Protection Officers and Committees

As appropriate, each HopeCo program will appoint a Child Safeguarding Officer and/or a Child Safeguarding Committee to review practice, make risk assessments, carry out audits, provide training, and respond to concerns raised in accordance with this policy.

The HopeCo board has a Child Safeguarding Officer who will participate in a committee that will include the board chair, CEO, Director of Programs, and Regional Director.

3. HopeCo Program Partners

In the context of this policy, “partners” may include other organizations, NGOs, churches, schools, etc., that work with HopeCo to deliver program services.

HopeCo will ensure that:

- All partners are aware of the commitment to child safeguarding and receive copies of all relevant policies and processes
- All personnel from partner organizations sign the Code of Conduct, and that satisfactory background checks have been carried out for each
- Training on safeguarding is made available to its partners, including as part of any induction
- Risk assessments are carried out on all partner organizations, with potential risks identified and mitigated
- Any safeguarding concerns with partner organizations are addressed immediately in accordance with this policy, with appropriate actions taken in response; this may include termination of the partnership as necessary

4. Monitoring and audits

An internal audit process will track each program’s implementation of HopeCo’s Child and Vulnerable Adult Safeguarding Policy, identifying what is working well and what action is needed.

Audits may be self-administered by HopeCo or led by external bodies. Audits will take place at least once each year but more often as needed and will be led by a member of the Child Safeguarding Committee. The Committee will review the audits and report a summary to the HopeCo board.

5. External resources and support

HopeCo will engage external agencies to advise, guide and support in implementing its safeguarding policies and processes.

HopeCo will monitor laws and regulations related to child safeguarding in the USA and each country where the organization works and is committed to meeting all legal requirements for responding to and reporting child safeguarding matters. Close relationships will be maintained with local government departments as appropriate.

HopeCo will liaise closely with other organizations providing safeguarding training and resources. This includes Christian Alliance for Orphans, GRACE, and others.

HopeCo is a member of the Keeping Children Safe network and will be seeking accreditation with KCS in the coming years.

Child Safeguarding Incident Report



Country		Program name	
Date Reported		Time reported	
Outline of the alleged incident Include details of the following: The person reporting the incident Alleged victim(s) and perpetrator(s) Details of concerns – if possible, dates, times, location, nature of the incident Any witnesses or other details			
Immediate response (first 12-24 hours) Reports filed to Director of Programs/CEO Actions taken to protect children Other immediate follow-up			
Details of the investigation and follow up	Date	Details	
Maintain an ongoing daily log of meetings, interviews, evidence identified, reports, communications, etc. Record support provided to children <i>Add rows as necessary</i>			

Conclusion of investigation Details of: Decisions taken Communications made Support provided to victims Further action required Any further details		
Reported by		Date

Safeguarding of Children and Vulnerable Adults Code of Conduct



As a member of staff, board member, volunteer, or mission team member working with, or connected to, HopeCo, I affirm that:

- I will conduct myself in a manner that is consistent with my position as a representative of HopeCo at all times
- I will be a positive and helpful role model to the children I work with
- I will be respectful of each child's rights, background, culture, and beliefs, as outlined in the UN Convention on the Rights of the Child
- I will follow HopeCo's policy, local laws, and good practice guidelines and will implement adequate safeguards to avoid putting myself in a position where I might be accused of abuse or of otherwise putting children at risk
- I will avoid any unnecessary or potentially abusive physical contact with children, including rough physical games or interactions with children that others may misinterpret
- I will use language that is appropriate to the situation and will avoid making suggestive comments to a child, even as a joke
- I will avoid any actions or words intended to humiliate or belittle children
- Photographs of children or vulnerable adults will be taken in accordance with HopeCo's policy and any other guidelines I am provided with
- I will undertake, to the best of my ability, to protect children in HopeCo's care from any form of abuse and will immediately report any concerns that I have regarding child safeguarding issues
- I recognize that should the terms of HopeCo's safeguarding policies be breached, HopeCo will take immediate and appropriate action according to the provisions set out within the policy

I confirm that I have read and understood HopeCo's safeguarding policy and guidelines. I agree to abide by these at all times with all children and vulnerable adults I come into contact with to protect myself and them.

I acknowledge that failure to comply with these standards may lead to the termination of my working relationship with HopeCo and the possibility of further action being taken.

Print Name: _____

Signed: _____ Date: _____