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# Safeguarding Policy & Procedures

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## **A. Purpose & Scope of This Policy**

At SFF, we believe in a world where development is steered by grassroots leaders and power is shifted into the hands of communities. We recognize that many of those reached and impacted through our work are disadvantaged, vulnerable, or lack access to rights, opportunities, and resources and the potential for exploitation that comes with this. Through the course of our work, we've also become aware of the ways in which children and vulnerable adults can be abused by those in a position of power or trust over them, including through community development programs. Segal Family Foundation has a zero tolerance approach to abuse and exploitation of vulnerable people. We also recognize that safeguarding is everyone's responsibility and that we have an obligation to put reasonable measures in place to create a safe environment that promotes the rights, welfare, and best interests of those with whom we work and those under the care of the organizations we partner with.

This safeguarding policy outlines the measures SFF has put in place to ensure that:

- The Foundation's work does no harm.
- Our employees and associates are protected, especially when they are vulnerable or at risk of harm.
- Concerns received about the safety and welfare of everyone reached through SFF's work are dealt with promptly and adequately.

Specifically, this policy is created in order to:

- Set clear expectations of behavior by SFF board, staff, and associates to ensure their personal and professional conduct is of the highest standard at all times.
- Provide guidance on how to apply and implement this policy so that safeguarding is meaningfully integrated into everyday culture and practices across our community.
- Protect the reputation of SFF, including protecting our board, staff, associates, and partners from allegations and incidents that might arise from operating within an ambiguous framework.
- Enable us to have a common understanding of safeguarding issues across the diverse areas in which SFF operates.
- Promote a culture of open dialogue and shared accountability for the safety and well-being of all those reached and impacted by SFF's work.
- Support everyone in our community involved in working with children and vulnerable adults.
- Ensure that our safeguarding practice reflects our statutory responsibilities, is aligned with guidance from the governments in the jurisdictions where we work, and complies with best practice in the sector.

Adherence to this policy is mandatory for all SFF employees and board members. It also covers all grantee partners whom we fund, consultants, and all other associates who work for or on behalf of SFF, who we expect to work under the policy as part of their agreement and partnership with SFF.

## B. Key Terms & Definitions

Abuse	Act or pattern of behavior (often by someone in a position of power) that causes harm or injury to another person (usually in a less powerful position). It can be caused by inflicting harm or failing to act to prevent harm. Abuse takes many forms including physical abuse, sexual abuse, sexual exploitation, emotional abuse, bullying, neglect, and financial abuse. Abuse often involves criminal acts.
Associate	Any person formally related to SFF in a paid or unpaid capacity (i.e. staff, volunteer, contractor, consultant, donor, visitor, board member, etc.)
Beneficiary	Any person or group of people who directly receive goods or services through participation or involvement in one or more of the programs or activities supported by SFF or its grantee partners.
Code of Conduct	Clear and concise guide of what is and is not acceptable behavior or practice as an SFF associate.
Child	SFF regards a child as any person under the age of 18 (as defined in the United Nations Convention on the Rights of a Child). It is widely recognized that children are generally more vulnerable to abuse and exploitation due to factors such as age, gender, socio-economic status, developmental stage, and dependence on others.
Child Protection	An integral part of, but not separate to safeguarding. It's the process of protecting children from violence, exploitation, abuse, and neglect. It also includes measures and structures designed to prevent and respond to abuse.
Contractor	Any person or company that has entered into an agreement with SFF to provide goods or services for a specified period of time.
Do no harm	Refers to our responsibility to prevent or minimize harm that could be done inadvertently as a result of SFF's organizational activities.
Grantee / Partner	Organization or person receiving a financial grant from SFF for general support and/or to implement projects, programs, and activities in a given community or population.
Neglect	The persistent failure to meet a vulnerable person's basic physical, emotional, and/or psychological needs, likely to result in serious impairment of his or her health and development. Examples include failure to provide adequate food, clothing, and shelter; failure to protect them from physical or psychological harm or danger; failure to ensure adequate supervision; or failure to ensure access to appropriate medical care or treatment.

Safeguarding	The responsibility that an organization has to make sure their employees, operations, and programs do no harm to children, young people, and adults at risk, meaning they do not expose them to the risk of discrimination, neglect, harm, and abuse, and that any concerns the organization has about their safety within the communities in which they work, are reported to the appropriate authorities. It is also the responsibility that the organization has for protecting its employees and volunteers when they are vulnerable or at risk of harm or abuse.
SFF Community	Collective term that includes SFF Board, staff, partners, associates, and any other individual or entity formally associated with SFF and its work.
Survivor	A person who has been abused or exploited. We prefer to use the term “survivor” instead of “victim” to recognize the strength and resilience of those who’ve lived through abuse and exploitation, acknowledging that those who have lived through abuse have a right to define how they wish to identify.
Youth / Young Person	Individuals aged 15-25 years. SFF recognizes that this category spans the categories of children and adults, but regards young people as having particular safeguarding needs that require distinct consideration aside from younger children and older adults.
Violence against Children	All forms of physical, sexual, and mental violence, neglect, negligent treatment, maltreatment, exploitation, and harm or abuse, including commercial sexual exploitation, trafficking, child labor, and other harmful practices, such as female genital mutilation and child marriage.
Vulnerable Adult / Vulnerable Person	Person aged 18 years or over who may be unable to take care of themselves or protect themselves from harm or from being exploited. This may include a person with disability(ies) and/or age, illness, or life circumstances that render him/her unable to take care of themselves or to protect him/herself against harm or exploitation.

### C. Key Principles

Our policy draws from the [Keeping Children Safe Standards](#) and aligns with SFF’s core value of Fighting for Fairness. We are committed to upholding the following principles in all aspects of our safeguarding work:

- Acting in the best interest and welfare of the child, vulnerable adult, and survivor at all times. This shall be the primary consideration in our decision making.
- Being accountable and transparent to one another and to our community in addressing safeguarding concerns and incidents.
- Ensuring our response is proportional and appropriate to the context and the risk presented.

- Investing significantly in prevention. This will always be better than responding after a harm occurs.
- Empowering our grantee partners and the local communities/populations they serve to be part of this conversation, recognizing that they have a crucial role to play in preventing, detecting, and reporting abuse.
- Going beyond routine compliance. It is less important to tick boxes than to truly understand the value of safeguarding and child protection and demonstrate a commitment to meaningfully incorporating it in our daily culture and practice. We empower our partners to be safeguarding champions by encouraging them to assess and develop practical, right-sized measures to address gaps in their operations and programs. We believe this is ultimately a more effective and sustainable approach, rather than enforcing compliance in a top-down manner.
- Continuously reflecting and strengthening our safeguarding practices through ongoing learning and feedback from our community.

#### **D. Prevention**

SFF will put the following preventative measures in place to ensure that everyone is protected and kept safe from harm while engaged in any activities organized or supported by SFF staff, grantee partners, and associates.

##### **1. Internal Safeguarding Risk Assessments**

Assess key aspects of our programs and operations every two years to identify safeguarding-related risks and update our policies as required.

##### **2. Safe Recruitment**

Ensure that we check the suitability of our staff and associates to work with and around children and vulnerable people (see our Safe Recruitment Policy).

##### **3. Safeguarding Code of Conduct**

Ensure that all SFF staff, board members, and associates read and agree to comply with SFF's Safeguarding Code of Conduct and sign to show their agreement when entering into or renewing their association with SFF. The code of conduct should be used in conjunction with this policy and other relevant SFF policies and procedures.

##### **4. Training, Education, & Support for Our Staff**

Train our staff on different aspects of our safeguarding policy and code of conduct to ensure that they are equipped to deal with safeguarding issues if and as they arise in their day-to-day work, and that they are made aware of changes and developments to the policy and its implementation. SFF will also provide staff with access to materials and resources to support their understanding and implementation of the safeguarding policy, and will also encourage the sharing of experiences and examples of good practice in implementing the policy across different roles and contexts.

##### **5. Appoint Designated Safeguarding Officer(s)**

Ensure that a nominated senior person is selected as the Foundation's safeguarding lead and everyone in the SFF community knows their name(s) and contact(s). Training will be provided to

designated safeguarding officers on receiving and responding to safeguarding incidents and concerns appropriately.

**6. Raise Awareness of Our Safeguarding Policy**

Share and promote the safeguarding policy to SFF staff, board, grantee partners, and associates, either in hard copy or electronically. Regular briefings and trainings will be provided to SFF partners and associates as part of the roll-out of the policy. We will also incorporate our safeguarding policy, or elements from it, into standard induction processes for all our partners, consultants, and other SFF associates. As appropriate, sessions on SFF's values, safeguarding policies, and guidelines will be held during events that bring our grantee partners together like the SFF Annual General Meeting.

**7. Embed Safeguarding in Our Due Diligence**

One of the most important processes at Segal Family Foundation is the due diligence that allows us to vet impactful organizations to fund.

SFF expects current and future grantee partners, particularly those working directly with children and vulnerable adults to:

- Have appropriate policies and measures in place to protect staff, children, and vulnerable adults in their programs from abuse and harm.
- Have clear responsibilities and expectations of its employees and associates and support them to understand and act in line with these measures.
- Have procedures for responding promptly and appropriately to safeguarding concerns or incidents when they arise, including a designated safeguarding point of contact on their staff.
- Have their staff, associates, and beneficiaries engaged and well informed on the procedures.
- Demonstrate an understanding of the legal, social welfare, and child protection arrangements relevant to their work and area.
- Demonstrate a willingness to engage in continued learning and reflection regarding safeguarding policy and practice.

The expectations outlined above are mandatory preconditions for an organization to receive funding from Segal Family Foundation. We recognize that the organizations entering SFF's portfolio are often quite early-stage and that their safeguarding systems may not yet be in line with global standards of best practice. We will ensure that our due diligence processes allow us to determine whether an organization's approach to safeguarding is practical, right-sized, and contextually-appropriate. *However, an organization that demonstrates a lack of awareness of or interest in acting as a safeguarding champion will not be eligible for SFF funding, regardless of their stage of growth.*

For the duration of a partnership, SFF reserves the right to call upon a third party to validate a grantee partner's safeguarding systems and practices and/or to investigate any safeguarding reports, issues, or concerns.

*SFF expects its staff to:*

- Share this safeguarding policy with our grantee partners at the beginning of each grant cycle.
- Review the grantee partner's safeguarding policies and practices and have a discussion about safeguarding with the partner during the regular diligence process.
- As appropriate, develop clear milestones around safeguarding to assess how grantee partners are implementing safeguarding and learning from year to year.
- Provide encouragement and support to help grantee partners strengthen their safeguarding measures.

## 8. Support Our Grantee Partners to Strengthen Safeguarding in Their Organizations

We believe that strong safeguarding systems contribute to overall organizational health, and we are committed to supporting our grantee partners to strengthen and develop these systems.

*What this means for SFF staff:*

In addition to the measures outlined above, our program staff on the ground in Africa will:

- Ensure that safeguarding is incorporated in their annual strategy, planning, and budget process in order to secure the resources needed to support grantee partners on safeguarding.
- Endeavor to provide country-specific and regional safeguarding workshops and learning fora in order to build a supportive community of peers dedicated to continuously learning and improving safeguarding culture and practice in their organizations.

*What this means for SFF grantee partners:*

SFF will make the following additional resources available to help grantee partners meet and implement the safeguarding standards mentioned in this policy as well as to strengthen their own internal safeguarding systems:

- Independent safeguarding reviews conducted at SFF's discretion and expense: SFF will periodically identify and contract with consultants to provide grantee partners with an objective, expert assessment of their safeguarding strengths and risks. We will then use the findings from these assessments to support our partners to implement safeguarding improvement plans in their organizations and may provide earmarked capacity grants to further support their efforts.
- SFF will source and add vetted safeguarding experts into our [recommended service provider database](#) as a resource for grantee partners who need support in reviewing, updating, or strengthening their own internal practices.
- SFF will provide partners with access to a safeguarding checklist and useful safeguarding tools and document templates through the [SFF Partner Resource Library](#).

## 9. Promote Safe & Ethical Communication Practices

At Segal Family Foundation, one of the key components of our work is amplifying the work of our exemplary grantee partners. We regularly promote our partners to help them access ideas,

funding, and new networks. In particular, we celebrate partner accomplishments through our media and events. In all of our communications, we strive to portray a positive and accurate picture of the work happening on the ground. When we share photos of our partners' work, we ensure that the images promote their dignity and our respect for all the people shown.

The majority of the photos we use are taken at SFF events by photographers hired by SFF. We post our media policy at each event and include it in registration materials. The media policy states: "By entering this Segal Family Foundation event, you understand that your voice, name, and image may be recorded by various media and authorize use of these materials to Segal Family Foundation and its partners." When we hire photographers or videographers for our media needs, we expect them to abide by this policy. Further, we ask that they obtain [releases](#) from any subjects who are spotlighted in the final product.

We also use photos that our partners have sent to us for use in our online or print media. We will not include photos of children unless the partner has obtained permission from the child's guardian. We will not share or publicize photos that exploit, degrade, or show subjects in vulnerable positions. We encourage all of our partners to gain informed consent when utilizing photography and video to show their work.

*What this means for SFF staff, board, and associates:*

- Staff, board members, and consultants should not take photos while conducting site visits. Instead, we can ask partners to share any of their photos from the site visit and ask if they are OK for the photo(s) to be shared on SFF's social media. We will make it clear that children should not be included in site visit pictures.
- For any photos that are submitted, SFF's Director of Communications, Sarah Gioe, will ask if the partner has obtained permission from the child's guardian and will obtain the organization's permission before using in print or online.
- We will ensure that media policy signs are posted at each event hosted by SFF and that the media policy is included in registration materials.
- We will ensure that our partner orientation guide includes broad language about how we use photos, videos, and other media.
- We will endeavor to conduct workshops and learning forums in order to engage our grantee partners and wider community in conversations about ethical communications practices.
- If you become aware that images of young people are being used inappropriately in SFF's online or print media, you should immediately inform SFF's Director of Communications, Sarah Gioe, at [sarah@segalfamilyfoundation.org](mailto:sarah@segalfamilyfoundation.org).

## **E. Implementation**

Financial, human, and other resources to support the implementation of this policy will be made available on an annual basis following the review and approval of the annual safeguarding summary report and budget to the SFF board. The annual safeguarding summary report and budget for the



following year will be prepared and submitted by the Director of Operations in collaboration with the Director of Programs.

The annual safeguarding summary report will include a breakdown of all safeguarding cases and concerns reported in a given year, actions taken, outcomes, and lessons learned, especially those requiring policy changes or gaps requiring management action.

SFF will also integrate safeguarding measures into all relevant policies and procedures including but not limited to the following:

- Employee Handbook
- Staff job descriptions
- Grant commitment letters, employment contracts, and consultancy contracts
- Due diligence protocols for prospective and current grantee partners
- Communications guidelines

#### **Designated Safeguarding Officer(s)**

SFF will appoint designated safeguarding officers(s) who will report directly to the Executive Director and Board of Directors on all issues regarding safeguarding. The responsibilities of the designated safeguarding officer(s) are to:

- Act as the reporting point person for any safeguarding concerns or incidents arising from SFF's countries of operation.
- Liaise and support SFF staff on all safeguarding issues.
- Guide the provision of capacity building for SFF partners on safeguarding as requested by the team.
- Update SFF's safeguarding policy regularly with lessons learned from specific safeguarding incidents and concerns reported every year.
- Lead training and education efforts to build knowledge and understanding of safeguarding among staff and to build their confidence to implement the policy effectively in their work. This includes engaging external consultants and resource persons as needed.
- Present an annual report to the SFF board highlighting safeguarding issues and activities during the year.
- Develop and implement a strategy to roll out this policy to staff, partners, and associates, and ensure the information provided internally and in our public platforms with regard to safeguarding is up to date.

#### **F. Raising & Responding to Safeguarding Concerns**

SFF will ensure that safe, appropriate, and accessible means of reporting safeguarding concerns are made available to staff and the communities we work with through our [Policy on Third-Party Reporting of Misconduct](#). Any staff, board member, grantee partner, associate, or member of the public reporting a safeguarding complaint or concern will be protected under our [Whistleblower Protection Policy](#).

*SFF Employees, Board Members, and Associates*

Segal Family Foundation requires all of its employees, board members, and associates to report concerns, suspicions, allegations, and incidents regarding the actual or potential abuse or exploitation of vulnerable people by an SFF employee, board member, or associate, as well as other breaches of this policy. If you witness an incident where you suspect abuse, or a person has made a disclosure to you, it is not up to you to decide whether or not abuse has occurred. Rather, you should report the concern or incident to a designated safeguarding officer, who will initiate the procedure for handling such reports.

Designated Safeguarding Officer (US)	Katherine Anderson Director of Operations, Segal Family Foundation Contact: <a href="mailto:katherine@segalfamilyfoundation.org">katherine@segalfamilyfoundation.org</a>
Designated Safeguarding Officer (Africa)	Marjory Mwangi, Grants & Compliance Manager, Segal Family Foundation Contact: <a href="mailto:marjory@segalfamilyfoundation.org">marjory@segalfamilyfoundation.org</a>

If you do not feel comfortable reporting to the designated safeguarding officer (for example, if you feel that the report will not be taken seriously or if that person is implicated in the concern), you may report to the Executive Director or a member of the SFF Board of Directors:

SFF Executive Director	Andy Bryant Contact: <a href="mailto:compliance@segalfamilyfoundation.org">compliance@segalfamilyfoundation.org</a>
SFF Board Representative	Susan Davis Contact: <a href="mailto:sdavis@segalfamilyfoundation.org">sdavis@segalfamilyfoundation.org</a>

The designated safeguarding officers are responsible for ensuring that the reporting procedure is followed so that suspected or actual cases of abuse are responded to appropriately and referred to the relevant authorities when necessary.

*SFF Grantee Partners*

Segal Family Foundation requires grantee partners to report breaches of their own safeguarding policies. This aligns with our principle of being accountable and transparent to one another in addressing safeguarding concerns and incidents. Failure to report on the part of the grantee partner may lead to cessation of SFF's funding support. Grantee partners can report such breaches to their designated portfolio lead or any of the individuals listed above.

**Guidelines for Handling a Safeguarding Report**

- Reach out to the relevant party to hear their perspective and recommendations
- Refer to the [Allegation Management Flow Chart](#).
- If relevant and appropriate, call upon a third party to investigate the report.
- If relevant and appropriate, focus available funding on improving safeguarding at the grantee partner organization within a time-bound period.

- To the greatest extent possible, SFF will keep confidential all sensitive and personal data (including the names of anyone who makes a report of abuse). Information and details on how the case is being managed will only be shared on a “need to know” basis (i.e., access must be necessary for conducting one’s official duties). That said, the welfare and safety of the survivor(s) and/or the welfare and safety of the individual(s) at risk of harm or abuse is of paramount concern and may occasionally override the desire to maintain confidentiality. SFF is not an investigative authority. It may be necessary to make referrals to the relevant law enforcement agency to ensure that appropriate protection and support is given to the vulnerable individual(s) and that any evidence is collected in accordance with the law.
- Where an SFF employee is the subject of the investigation, the Executive Director will handle this process.
- Under the guidance of appropriate parties, SFF may offer support to survivors of harm caused by our staff, board, or associates.

### **G. Breaches of SFF’s Safeguarding Policy**

Any breach of this policy will be treated as a disciplinary matter and will be dealt with by the Executive Director. A breach of this policy by the SFF Executive Director will be dealt with by the Board of Directors. Depending on the severity of the violation, the individual or organization found to be in violation of this policy may be subject to:

- A grace period during which the concerned individual or organization will be given the opportunity to demonstrate adequate good-faith measures to prevent or minimize the likelihood of such breaches in the future.
- Immediate termination or cessation of employment, contract, or partnership
- Reporting to the police, relevant authority, or other body.

### **H. Annexure: Related Policies & Procedure**

- [Safeguarding Code of Conduct](#)
- [Safe Recruitment Policy](#)
- [Photography & Filming Consent Form](#)
- [Allegation Management Flow Chart](#)
- [Implementation Matrix](#)

### **I. Sources**

- Keeping Children Safe Standards: Currently the gold standard in safeguarding: <https://www.keepingchildrensafe.global/international-child-safeguarding-standards/>
- The National Society for the Prevention of Cruelty to Children: we were inspired by their Sample Code of Conduct for Staff and Volunteers for Use by Sports Organizations created by their Child Protection in Sports Unit: <https://thecpsu.org.uk/resource-library/policies/sample-codes-of-conduct-for-parents-children-and-staff/>
- We also drew inspiration from fellow funders Mama Hope, HIVOS, Oak Foundation, and Livingstone Tanzania Trust policies in how we formatted the different sections.

*January 2024*