



Safeguarding Children and At-Risk Adults Policy

JENGA Community Development Outreach (UK)

Sheraton House, Lower Road,
Chorleywood, Herts
WD3 5LH

+44 (0) 7506 144 785
info@jengauk.org

JENGA Community Development Outreach

P.O. Box 993
Mbale
Uganda

+256 (0) 39 29 475 16
contact@jengauganda.org

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1. Introduction

1.1 Our Commitment

JENGA is committed to safeguarding the wellbeing of every person. We are committed to promoting dignity through supporting poor and marginalised communities, eradicating poverty and protecting basic rights and justice. It is the responsibility of each one of us to prevent the physical, sexual, emotional abuse or neglect of every member of our community and particularly the abuse of the most vulnerable among us. In line with our Christian values, we believe that everyone has the right to protection from abuse regardless of gender, ethnicity, disability, sexuality or belief.

JENGA has a zero-tolerance approach to serious misconduct and will not tolerate its staff, volunteers, trustees, partners or anyone representing the work of JENGA, or its partners, carrying out any form of abuse, violence or exploitation.

1.2 Personal Responsibility

As a member of the JENGA community, you have the responsibility to raise any concerns you may have along with any that are reported to you according to this policy. It is important to note that it is not your responsibility to decide whether or not abuse is taking place, but it is your responsibility to vocalise any and all concerns or suspicions of abuse as outlined in the 'Reporting' section below.

1.3 Policy Development

JENGA's Safeguarding Policy has been developed utilising global best practice and standards in safeguarding both children and adults at-risk. The policy is based on the ten *Safe and Secure* safeguarding standards published by the Churches' Child Protection Advisory Service (CCPAS) and were prepared in consultation with the leadership of both JENGA Community Development Outreach (UK) and JENGA Community Development Outreach in Uganda.

1.4 Policy Application

This is an international, organisational wide policy that should be adapted as required to the local context of the countries where it is being used, taking into account the political, cultural, faith, humanitarian or development setting. It should be tailored to the needs and the programme context of the agency implementing the policy.

All line managers, trustees and country directors have the responsibility to ensure that all representatives of JENGA are made aware of the Safeguarding Policy and Cooperative Agreement and are given a copy of the guidance and procedure for reporting child abuse/abuse of adults at-risk.

All those who work or volunteer with JENGA will have a clear understanding of what is required of them and of what to do if they have any concerns.

2. Policy Standards

The standards outlined in this policy have been drawn from key international and regional instruments such as: *International Standards for Keeping Children Safe* and the *UN Universal Declaration of Human Rights* and the *International Covenant of Human Rights*.

JENGA is committed to:

- Ensuring that everyone is entitled to “all the rights and freedoms set forth therein, without distinction of any kind, such as race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth or other status”.
- Ensuring that all children should be able to develop their full potential, free from hunger and want, neglect and abuse.
- Ensuring that all children and adults at-risk have equal rights to protection from harm.
- Communicating that everyone has a responsibility to support the protection of children and adults at-risk.
- Ensuring concerns or allegations are taken seriously, investigated and acted on as appropriate.
- All staff, volunteers and trustees receiving safeguarding training.
- Ensuring our recruitment practices are robust enough to ensure we never recruit anyone who poses a known risk.
- Reporting criminal acts to the relevant statutory agency.
- Reporting all incidents of sexual harassment and abuse to the Charity Commission in the UK.
- Reporting incidents to relevant donors.
- Designing and delivering programmes which are safe for all and are based on the ‘do no harm’ principles.
- Ensuring our beneficiaries and supporters are fully aware of the expected behaviour of our staff, volunteers, trustees, consultants and partners.
- Ensuring that all actions on child protection are taken in the best interests of the child.
- Ensuring that all actions on vulnerable adult protection are taken in the best interests of the adults at-risk.

3. Definitions

3.1. Vulnerability

As defined by the *Core Humanitarian Standard*, people may be vulnerable because of individual factors such as age (particularly the very young and the very old), disability or illness or because they are caring for others who are vulnerable.

Social and contextual factors also contribute to people’s vulnerability. These include discrimination and marginalisation (e.g. in some contexts, the low status and power of women and girls), social isolation (including the lack of access to information), environmental degradation (e.g. soil erosion or deforestation),

climate variability, poverty, lack of land tenure, poor governance, ethnicity, class, caste, and religious or political affiliations.

3.2 Child

A child is defined as anyone under 18 years old, irrespective of local definition.

3.3 Adults at-risk

Sometimes also referred to as vulnerable adult. A person who is or may be in need of care by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.

3.4 Abuse

A person may abuse by inflicting harm or failing to prevent harm. In order to safeguard all those in our community we adhere to the principles of the *UN Convention on the Rights of the Child* across the board, and have as our starting point as a definition of abuse, Article 19 which states:

- Parties shall take all appropriate legislative, administrative, social and educational measures to protect the child from all forms of physical or mental violence, injury or abuse, neglect or negligent treatment, maltreatment or exploitation, including sexual abuse, while in the care of parent(s), legal guardian(s) or any other person who has the care of the child.
- Such protective measures should, as appropriate, include effective procedures for the establishment of social programmes to provide necessary support for the child and for those who have the care of the child, as well as for other forms of prevention and for identification, reporting, referral, investigation, treatment and follow-up of instances of child maltreatment described heretofore, and, as appropriate, for judicial involvement.

Also for adults the *UN Universal Declaration of Human Rights* with particular reference to Article 5 which states "no one shall be subjected to torture or to cruel, inhuman or degrading treatment or punishment".

Abuse may also include, but is not limited to:

- Physical abuse or physical injury, such as evidence of hitting, kicking or shaking, where there is definite knowledge or reasonable suspicion, that the injury was inflicted or knowingly not prevented.
- Emotional abuse where harm is done by persistent or severe emotional ill treatment or rejection, such as degrading punishments, threats and not giving care and affection, resulting in adverse effects on behaviour and emotional developments of a person.
- Sexual abuse where exploitation of a person occurs. This includes rape, incest and all forms of sexual activities including pornography. Exchanging

of benefits, for example goods, food and money in exchange for sexual favours.

- Neglect, where basic needs such as food, warmth and medical care are not met, or when there is a failure to protect a person from exposure to any kind of danger, resulting in serious impairment of a person's health or development.
- Sexual Harassment is unwanted behaviour of a sexual nature which: violates your dignity, makes you feel intimidated, degraded or humiliated or creates a hostile or offensive environment.

You don't need to have previously objected to someone's behaviour for it to be considered unwanted. Sexual harassment can include:

- Sexual comments or jokes.
- Physical behaviour, including unwelcome sexual advances, touching and various forms of sexual assault.
- Displaying pictures, photos or drawings of a sexual nature.
- Sending texts, emails or online messages with sexual content.

4. Responsibilities

4.1 Cooperative Agreement

Representatives of JENGA must follow the rules regarding treatment of people as outlined in our Cooperative Agreement. (See Appendix 'A').

4.2 Behaviour Protocols

Representatives of JENGA **must not**:

- Hit or otherwise physically assault or abuse children or adults at-risk.
- Develop physical/sexual relationships with children or adults at-risk.
- Develop relationships with children or adults at-risk, which could in any way be deemed exploitative or abusive.
- Place themselves in a position where they could be accused of sexually abusing a child, young person or vulnerable adult.
- Spend time alone with children or adults at-risk. (Plan activities so that more than one person is present or, at least, other people are within sight and hearing. Wherever possible ensure that another adult is present to supervise the activity.)
- Act in ways that may be abusive or may place a child or vulnerable adult at-risk of abuse.
- Use language, make suggestions or offer advice which is inappropriate, offensive or abusive.
- Offer benefits such as food, favours, clothes, jobs, money in exchange for sexual favours.
- Show favouritism to any individual for sexual favours in return.
- Act in ways intended to shame, humiliate, belittle or degrade children or adults at-risk, or otherwise perpetrate any form of emotional abuse.

All representatives **must**:

- Treat everyone with respect, recognising their right to personal privacy.
- Be aware of situations that may present risks and manage these.
- Plan and organise any events so that risks are minimised.
- Avoid being drawn into inappropriate attention seeking behaviour, such as tantrums or crushes.
- If a residential event is being planned, ensure that adults and children have separate sleeping accommodation.
- Remember that someone else may misinterpret your actions, no matter how well intentioned.
- Adults should avoid being placed in a compromising or vulnerable position. The adult is always considered responsible even if a child behaves seductively.

4.3 Communication

4.3.1 Sharing Information

JENGA has a commitment to undertake all communications with a child, young person or vulnerable adult in a safe manner, by:

- Taking particular care to ensure the privacy of the child, young person and/or vulnerable adult.
- Never taking photographs of a child, young person or vulnerable adult while they are in changing areas or bathing areas.
- Obtaining consent from the child, young person or vulnerable adult and/or their parent guardian to publish photographs publicly.
- Ensure photographs or films present children and adults at-risk in a dignified and respectful manner, not in a vulnerable or submissive manner. Children should be adequately clothed and not in poses that could be seen as sexually suggestive.
- Ensure images are honest representations of the context and the facts.
- Ensure file images do not reveal identifying information about a child or vulnerable adult when sending images electronically.
- Ensure there is no identifying information of the child or vulnerable adult used in the publication of images with their location. Ensure all recorded identifying details are stored confidentially.

4.3.2 Social Media

Social media, and the unprecedented personal access that it offers, creates opportunity for additional safeguarding issues including, but not limited to, the potential for online bullying, grooming, sexually explicit interactions, identity theft, etc. JENGA will ensure that all representatives are informed and aware of the risks associated. All previously stated rules of behaviour also apply to online interaction, especially when the communication includes a child or at-risk adult.

4.4 Risk Assessment

Due to the nature of JENGA's work, we are in regular contact with children and adults who are deemed 'at-risk' in the context of our programmes or projects. In recognizing these risks, JENGA staff, as well as all others representing JENGA, should proactively assess and manage risks to children and adults at-risk to reduce the potential for harm.

Staff should ensure that any activities they undertake will undergo a thorough and systematised safeguarding risk assessment. This assessment should always be conducted during project design, and periodically reviewed during the life cycle of the project. It is important that this assessment is gender sensitive and considers the specific needs of women/men and girl/boy children, relevant to the local cultural, political, religious and humanitarian context.

4.5 Programme Design

JENGA has a commitment to design and deliver programmes which are safe for both children and adults at-risk. All programmes and projects will be risk assessed for safety, and safety strategies developed.

5. Recruitment

It is our policy that no-one shall work within JENGA who:

- Has been convicted of or has received a formal police caution concerning an offence against children; or
- Has been convicted of or has received a formal police caution concerning sexual offences against adults; or
- Is notified to us as having a red flag in relation to safeguarding by a former employer.

JENGA follows a recruitment procedure specifically designed to align with safeguarding standards.

Any representative of JENGA, who as part of their work or due to the nature of their work, is likely to have the opportunity for unsupervised contact with children, young people or adults at-risk, will be expected to produce a valid disclosure certificate from their home country. Where the representative is not able to produce a valid certificate, they will be expected to undergo a local police check. If it is not possible to undertake police checks on staff or representatives recruited or engaged from overseas, checks will be undertaken by the use of references.

Representatives of JENGA who are travelling on an overseas trip will be expected to have read and understood the safeguarding policy and JENGA's preparatory materials as part of the pre-departure preparation and orientation. Any representative with the opportunity to have unsupervised contact with children or adults at-risk should produce a disclosure certificate or be willing to undertake a police check before travelling.

Listed below are the various requirements for recruitment for all JENGA representatives.

5.1 Staff Recruitment

Each staff member is required to satisfy each of the requirements listed below in order to minimize the risk of accepting someone who may pose a threat to children or at-risk adults.

- Submit at least two references from:
 - A longstanding relationship within local church leadership
 - An internal reference from another JENGA staff member
- Complete three in-person interviews with:
 - Line manager
 - Human resources
 - Leadership team
- Sign a copy of JENGA's employee contract
- Receive and read a copy of JENGA's Code of Conduct
- Participate in two formal orientations by both the HR Manager and their Line Manager
- Work for an initial introductory six-month trial period, during which they are assessed by JENGA's leadership.

5.2 Volunteer Recruitment

Each volunteer, from the point of initial contact to formal approval, is required to satisfy each of the requirements listed below in order to minimize the risk of accepting someone who may pose a threat to children or at-risk adults.

- Complete a full application.
- Submit at least two references.
- Participate in a volunteer interview.
- Submit a copy of a DBS or otherwise applicable background check.
- Read and sign a copy of JENGA's Cooperative Agreement (code of conduct).
- Participate in a pre-trip orientation programme.

5.3 Trustee Recruitment

Each trustee, from the point of initial recommendation to final approval, is required to satisfy each of the requirements listed below in order to minimize the risk of appointing someone who may pose a threat to children or at-risk adults.

- A referral from a trusted, current member of JENGA's board.
- An in-person interview with JENGA's Board Chairman.
- Submit a copy of a DBS or otherwise applicable background check.

5.4 Consultant Recruitment

Any people assisting in the work of JENGA on a consulting basis are obligated to satisfy the below requirements before initiating any work that would bring them into contact with children or at-risk adults.

- Participate in a preparatory consulting interview.
- Submit at least two references.
- Submit a copy of a DBS or otherwise applicable background check.

6. Reporting Actual, Potential or Suspected Abuse

6.1 What should I do?

Actual, potential or suspected incidents of abuse must be reported immediately. Where appropriate you should inform the Safeguarding Coordinator immediately, who will ensure that the matter is thoroughly investigated. Alternative reporting mechanisms are also noted below.

The need to report arises in the following instances:

- Abuse is observed or suspected
- An allegation of abuse is made
- A child/vulnerable adult discloses abuse

No representative of JENGA will prejudice their own position or standing with JENGA by responsibly reporting potential or suspected child abuse or abuse of a vulnerable adult.

6.2 What if I'm not sure it's abuse?

It is important to note that it is not your responsibility to decide whether or not abuse is taking place, but it is your responsibility to vocalise any and all concerns or suspicions of abuse to the appropriate person. Particular care must be taken in regards to confidentiality and the sharing of information with appropriate people.

6.3 I've vocalised my concerns, what now?

Any reported information should be written down as soon as possible following the concern (within 24 hours if possible). All written records must then be passed on to the Safeguarding Coordinator who will ensure they are kept securely in a locked place.

Under no circumstances should any individual attempt to deal with the problem of abuse directly. An investigation will be carried out instigated by the Safeguarding Coordinator.

6.4 Who are the Safeguarding Coordinators?

JENGA Community Development Outreach (UK) Coordinator:

Jessica Reynolds-Corden
jessica@jengauganda.org
 +44(0) 7506 144 785

JENGA Community Development Outreach Coordinator in Uganda:

Maggie Cota
matobi2015@gmail.com
+256(0) 782 567 247
+256(0) 705 723 836

6.5 Whistleblowing

The leadership of JENGA is committed to maintaining the highest standards of honesty, openness and accountability and recognise that all JENGA representatives have an important role to play in achieving this goal.

People within an organisation will usually be the first to know when someone connected with an organisation is doing something illegal or improper, but often they feel apprehensive about voicing their concerns. This may be because they feel that speaking up would be disloyal to their colleagues or the organisation itself. Or it may be because they think their concern won't be taken seriously. They could be afraid that they will be bullied or dismissed.

JENGA does not believe that it is in anyone's best interest for employees with knowledge of wrongdoing to remain silent. JENGA takes all malpractice very seriously, whether it is committed by senior managers, staff, volunteers, members, suppliers or contractors.

6.6 Concerns in the Community

JENGA representatives should be able to differentiate between internal and external concerns. Both should be reported to the Safeguarding Coordinator, where suitable action will be taken either within the organisation or the appropriate local agencies.

Internal concerns are those concerning persons connecting with JENGA and its projects or programmes whether as the perpetrator or the victim of abuse.

External concerns are those perpetrated not by persons described in the scope of this policy (i.e. outside of JENGA, in the local community).

JENGA should not ignore any protection issues of concern; however, abuse in the wider community is an external concern, and JENGA and/or its Safeguarding Coordinators need to have the mechanism for appropriately and efficiently referring cases. Clearly, if a child or vulnerable adult is in immediate need of attention then staff must act, but the employee must consider in advance how much support it is qualified or able to provide, and recognize when it is best to refer.

7. JENGA's Response

JENGA can and will take any disciplinary action necessary against staff or others if they are found to have breached our Code of Conduct and Safeguarding Policy. If such an incident occurs, JENGA's disciplinary policy will be invoked.

Identifying information about safeguarding should be shared on a 'need to know' basis only. Any staff members who raise concerns of serious malpractice should be protected as far as possible from victimisation or any other detrimental treatment if they come forward with concerns, provided that concerns are raised in good faith. Deliberate false allegations will be made a serious disciplinary offence and investigated by JENGA.

The Safeguarding Coordinator will ensure that reports are made to the Charity Commission, relevant donors and where applicable to relevant statutory authorities.

8. Contextualisation

8.1 Cross-Cultural Safeguarding

JENGA works across a broad range of circumstances. Translating safeguarding across these different contexts and cultures can be difficult. Some legal and cultural frameworks may vary but the commitment from JENGA to protect people remains.

JENGA has a commitment to design and deliver programmes which are safe for all people. Because of this, JENGA will ensure that programmes and projects will be risk assessed including in the areas of people's safety, security, dignity and rights.

8.2 Safeguarding and Partnerships

A commitment to child protection/protection of adults at-risk is fundamental to JENGA's partnership approach to work. JENGA, through its representatives, will challenge and help new and existing partners to address issues of child protection and protection of adults at-risk in their organisation and in the communities in which they work.

International staff and volunteers, in the course of their work, should support partners in their efforts to increase their awareness, knowledge and skills in relation to child protection/protection of vulnerable adults through the provision of appropriate capacity building and resources.

Where projects involve close contact with children or adults at-risk, and the partner does not have a written child protection/protection of vulnerable adults policy, the relevant JENGA representatives should ask the partner a series of questions that address child protection/protection of adults at-risk prior to any partnership in projects and programmes.

9. Our Continuing Commitment

9.1 Monitoring and Review

Regular monitoring of risks, risk mitigation and the effectiveness of safeguarding measures will be incorporated into JENGA's monitoring processes and activities. The policy will be reviewed, and if necessary revised, every 12 months.

9.2 Safeguarding Training

All appropriate parties will receive annual training demonstrating JENGA's commitment to safeguarding and the protection of children and at-risk adults.

10. Appendices

Appendix A – Cooperative Agreement



Cooperative Agreement

This agreement is between **JENGA Uganda** and **(NAME)** who will be volunteering with **JENGA** in Mbale, Uganda from **(start date-end date)**.

Our Mission: To improve the quality of life of the vulnerable and disadvantaged in the poorest communities of Eastern Uganda by demonstrating the love of God through word and deed.

Our Vision: To see a thriving Uganda full of Godly leaders influencing all spheres of society, an increase in sustainable community partnerships delivering holistic transformation and a re-imagined and revived church reflecting and advancing the kingdom of God.

JENGA's Values:

- **Justice** - We believe that God's call to be righteous is inextricably linked to justice. Righteousness and justice require us to help the vulnerable and defend the weak.
- **Sustainability** - All of JENGA's projects and programmes are bespoke. They're dreamed, designed and implemented by the local community. We believe that Ugandans are the longterm solution to their own unique problems.
- **Empowerment** - JENGA's goal is not to create foreign aid dependence. Our role is to help people by teaching and equipping them to help themselves. In all of JENGA initiatives, local communities, partners and workers are essential.
- **Partnership** - All of JENGA project are a result of equal partnerships with both local and international partners, where mutual respect and co-operation are the foundations for all activity.
- **Cultural Sensitivity** - JENGA has never set out to implement Western solutions to Uganda's problems. Ugandans have their own culture with different values, morals and motivations. It's vital that we acknowledge and honour this truth.

I, **(name)**, agree to behave in a manner representative of JENGA's mission, vision and values during my time with JENGA Uganda. I agree to do this by treating all people with kindness, practicing cultural sensitivity, remaining teachable and embracing humility regardless of my levels of experience, education or authority.

Financial Responsibility: I understand that I am responsible to cover all costs associated with living in Mbale and volunteering with JENGA. This includes money owed to JENGA to cover accommodation costs, as well as all personal expenses such as food, spending money, flight costs and any medical care. JENGA does not offer any salary or reimbursement of incurred personal costs to any international volunteers.

Safety and Behaviour: I agree to adhere to all of JENGA's rules, procedure and safety protocols as presented to me in the Volunteer Placement Pack, formal Volunteer Orientation meeting and by in-country leadership in Uganda including, but not limited to, providing proof of valid traveller's insurance and taking anti-malarial medication for the duration of my stay. I acknowledge that any failure to comply with the rules outlined to me during any stage of my placement may result in an early termination of my volunteer placement with JENGA at my own expense - as well as potential personal injury, legal prosecution, or in extreme cases death, to which JENGA is not liable.

Volunteer Signature

Date

JENGA CDO Registered Ugandan NGO S.5914/6004
JENGA CDO UK: Registered Charity No. 1117877

Appendix B – Handling an Information Disclosure

What to do if a child or adult discloses harm to you:

Receive

- Listen to the child/vulnerable adult
- If you are shocked by what they are saying, try not to show it
- Take what they say seriously
- Accept what the child/adults at-risk says
- Do not pry for additional information

Reassure

- Stay calm and reassure the individual that they have done the right thing in talking
- Be honest and do not make promises you can't keep
- Do not promise confidentiality – you have a duty to refer the individual who is at-risk
- Acknowledge how hard it must have been for them to tell you what happened

React

- React only as far as is necessary for you to establish whether or not you need to refer this matter, but do not interrogate them for details
- Do not ask leading questions
- Explain what you have to do next and to whom you have to talk
- Explain and if possible seek agreement that you will have to discuss the situation with someone else and will do so on a 'need to know' basis.

Record

- Make some brief notes at the time and write them up more fully as soon as possibly
- Take care to record timing, setting and personnel as well as what was said
- Be objective in your recording – include statements and observable things rather than your interpretations or assumptions

Act Now

- Discuss the matter with the Safeguarding Representative immediately