

## SAFEGUARDING POLICY

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### Revision History

Version	Date	Chapter/area revised
<u>01</u>	December 2018	• Entire document is approved
<u>02</u>	March 2024	• Introduction of Acronyms • Clarity enhanced on reporting mechanisms • Provision for training new staff inserted

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## ABBREVIATIONS

- ED - Executive Director  
HR - Human Resource  
KCDF - Kenya Community Development Foundation

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## 1. Introduction

KCDF is a Kenyan development grant-making organisation, that supports communities to initiate and drive their development agenda by harnessing and growing their resources as well as securing their basic rights and services from duty bearers.

KCDF works with poor, marginalized and disadvantaged communities as its primary target group and looks to provide them support in uplifting themselves from their situation through their own efforts. A secondary target group involves organized communities who are focused in looking to uplift themselves in a sustainable manner through asset building.

### Our Vision

Flourishing and Resilient Communities.

### Our Mission

To Promote Social Justice and the Sustainable Development of Communities.

### Our Values

KCDF believes and upholds the fundamental freedoms and rights as contained in the International Charter on Human Rights and The Constitution of Kenya.

These rights and values include:

*Equity:* Everyone deserves equal economic, political, and social rights and opportunities.  
*Respect:* We respect the rights and dignity of every human being and community irrespective of their social standing.

*Integrity:* We uphold transparency, accountability, and efficiency in dealing with others and within.

*Collaboration:* We work with others in a dedicated manner towards the achievement of common goals.

*Innovation:* We build a reflection and learning culture as we strive to evolve and share best practice. Through the course of our work and as a result of recent global issues around abuse and sexual exploitation incidences, KCDF has become more aware of the ways in which children and both vulnerable and young adults can be abused by those in a position of power or trust over them, including through our work with communities and scholarship beneficiaries.

## 2. Overall Purpose

The purpose of this policy is to ensure that the design and implementation of KCDF activities are implemented in a safe and protective environment, and that all people who come into direct contact with KCDF staff or associated personnel, are protected from any harm. The policy further provides for the prompt and effective resolution of any incidences of harm resulting from direct contact with KCDF staff, associated personnel or activities. This policy lays out commitments made by KCDF and informs staff and associated personnel on their responsibilities in relation to Safeguarding.

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### 3. Definition of Safeguarding

KCDF has defined the term Safeguarding to mean the actions taken to keep people safe from harm, abuse or neglect. This may be a beneficiary, stakeholder, colleague, associate and or any other Party/parties. Below are additional definitions that may be adopted by KCDF given the variance:

- i. **Abuse:** Is when someone does something to a person that can cause harm. It could be emotional and/or physical harm.
- ii. **Physical abuse:** Including hitting, slapping, pushing, kicking, misuse of medication, misuse of restraint, or inappropriate behavior.
- iii. **Sexual abuse:** Including rape and sexual assault, or sexual acts to which the person has not consented, or could not consent, or where pressure was applied to secure their consent.
- iv. **Emotional abuse:** Including verbal abuse, psychological abuse, threats, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, isolation or withdrawal from services or supportive networks.
- v. **Financial or material abuse:** Material abuse Including theft, fraud, exploitation, the misuse or misappropriation of property.
- vi. **Discriminatory abuse:** Including racist or sexist remarks or comments based on a person's impairment, disability, age or illness, gender reassignment, sex and sexual preferences, religious beliefs/domination, race, marriage/civil partnership, and other forms of harassment, slurs or similar treatments.
- vii. **Organizational abuse:** Involves the collective failure of an organization to provide appropriate and professional service to vulnerable people. It can be seen or detected in processes, attitudes and behavior that amount to discrimination through unwitting prejudice, ignorance, thoughtlessness, and stereotyping. It includes a failure to ensure the necessary safeguards are in place to protect vulnerable adults and maintain good standards of care in accordance with individual needs, including training of staff, supervision and management, record keeping and liaising with other care providers.

### 4. Policy Statement

KCDF believes that everyone we meet, regardless of age, gender identity, disability, sexual orientation or ethnic origin has the right to be protected from all forms of abuse, harm, neglect, and exploitation. KCDF will not tolerate any form of abuse and exploitation by staff or associated personnel. KCDF commits to addressing Safeguarding throughout its work, through the three pillars of prevention, reporting and response.

### 5. Scope

All KCDF employees and associated personnel must comply with the measures outlined in this policy. For purposes of this policy, associated personnel include: Board Members, Volunteers, Interns, Consultants, and visitors as well as non-KCDF entities and their employees who have entered into partnership/sub grant recipient agreements with KCDF and hereby are collectively referred to as Party/parties.

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## 6. KCDF Safeguarding Commitments

KCDF's commitment to Safeguarding will focus on the following critical areas:

- a) Promoting Safe Organizational Culture, Leadership & Accountability.
- b) Promoting Safe People Management including recruitment.
- c) Promoting Safe Partnerships
- d) Promoting Safe storytelling
- e) Promoting Safe Fundraising

This policy will also leverage on the following documents herein annexed i.e.

- (i) KCDF's Code of Conduct and
- (ii) KCDF's Whistleblowing policy

Each commitment provides the measures that must be taken to ensure the safety of KCDF's work and everyone it affects.

### 6.1 Organizational Culture, Leadership & Accountability

#### 6.1.1. Organizational Culture

KCDF will make every effort to promote, create and maintain a safe organizational culture for all people who work for and with KCDF, including our grant partners as well as the communities where KCDF works by:

- i. Creating an environment where it is safe to address incidences of harm, abuse or neglect.
- ii. KCDF will assess key impacts of our programs and operations on a regular basis to identify safeguarding related risks and update our policies as required.
- iii. Ensure clarity of roles and responsibilities in relation to Safeguarding are established.
- iv. Ensure clear procedures exist for reporting and escalating Safeguarding concerns.
- v. Capacity building and training on Safeguarding is delivered to all staff.
- vi. All staff and related personnel adhere to a Safeguarding Code of Conduct.

#### 6.1.2 Leadership

Reporting guidelines including designated emails are shared under 7.1. (Procedures for making a complaint) below is an overview of KCDF's leadership structure in reference to safeguarding.

The Executive Director (ED), together with the Board of Directors, have ultimate responsibility for this policy and the Safeguarding Framework and its management, using a systematic approach.

The Board of Directors has designated one of its members who is also the chair of Governance Committee to take the lead in the promotion of Safeguarding and welfare. The Board of Directors, through the designated Board Member, will be responsible for ensuring that KCDF:

- I. Has an effective Safeguarding policy in place and follows laid down procedures.
- II. Recruits staff, volunteers, and consultants in line with safer recruitment processes;
- III. Has procedures for dealing with allegations of abuse or harm made against staff or

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- KCDF associated personnel.
- IV. Has a designated Lead Safeguarding Manager (Focal Person), with the appropriate skills, seniority, and training, for dealing with Safeguarding complaints or concerns;
  - V. Promotes appropriate Safeguarding training for all staff.
  - VI. The Chairperson of the Board Governance Committee shall have access to a designate email and may delegate access to the email to an external auditor who will support the preparation of a report on the reported issues. The auditor will not act on any reported issues unless delegated as such by the Governance Committee. Management shall have no access to this email;
  - VII. A summary of any reported Safeguarding incidents will be reported through the Board Governance Committee, which shall help resolve the issue on a need-to-know basis. This may include escalating the issue to management for redress in line with this policy, or always escalating the issue to the full board for redress while ensuring no harm is done to the person or persons who reported the issue or those implicated.

### 6.1.3 Accountability

**Lead Safeguarding Champion:** The ED appoints (amongst KCDF staff) a Lead Safeguarding Champion. The person leading the Human Resources function at KCDF shall hold for in the event a Lead safeguarding Champion has not been appointed or is not available. The designated Lead Safeguarding Champion will have the appropriate status and authority within the organization to carry out the duties of this post. They should be given the time, training, and resources to support and provide advice in Safeguarding matters as well as take part in critical strategy discussions in relation to Safeguarding related issues.

The Lead Safeguarding focal person (the lead Safeguarding Champion, who will be KCDF's Programme Coordinator, Capacity Building & Systems Strengthening (email: [safeguarding@kcdf.or.ke](mailto:safeguarding@kcdf.or.ke)) will:

- i. Act as a source of support, capacity, induction, advice, and expertise for all staff on matters of safety and safeguarding;  
Ensure each member of staff has access to and understands KCDF's Safeguarding policy and procedures including new and part-time staff.
- ii. Have joint responsibility with the Executive Director and Board of Directors to ensure that the organization's Safeguarding policy and related policies and procedures are followed and regularly updated;
- iii. Keep detailed, accurate, and secure written records of concerns and referrals;
- iv. Have access to the Safeguarding email and be the first person to receive any direct safeguarding concerns or incidences; and
- v. Ensure confidentiality is maintained including ensuring information flows on a need-to-know basis.

#### Further

The lead Safeguarding Champion in consultation with the ED shall ensure there are safeguarding

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champions within the varied departmental teams at KCDF well equipped to continuously engage the teams on matters of Safeguarding. This inter-departmental team of Safeguarding champions will:

- i. Ensure the Safeguarding Policy is known, understood, and used appropriately.
- ii. Liaise and support KCDF staff on all Safeguarding issues.
- iii. Lead training and education efforts to build knowledge and understanding of Safeguarding among staff;
- iv. Review the Safeguarding policy every two years and the procedures are updated and reviewed on a regular basis, working with relevant government agencies or authorities as appropriate;
- v. Ensure all partners (Grantees, consultants, service providers, and parties acting on behalf of KCDF) sign the code of conduct and or the whistle blowing policies as may be required; and
- vi. Report directly to the Lead Safeguarding Champion on issues of Safeguarding.

## 6.2 People Management

KCDF will employ staff who are aligned with our vision, mission, and values and in compliance with applicable laws, prevent known perpetrators of sexual harassment, exploitation, and child abuse from being hired.

- i. Hiring teams will ensure robust recruitment screening processes for all personnel who are joining the organization.
- ii. Recruitment and engagement of employees, consultants, and volunteers, will be through a clear job/role description that includes a statement on the role's responsibility to meet the requirements of the organization's Safeguarding Policy.
- iii. All interviews will include a discussion on Safeguarding and the candidate's understanding of this, as well as the organization's commitment; and
- iv. KCDF will ensure all staff are aware of the Safeguarding Policy and the Safeguarding Code of Conduct as well as how to report wrongdoing by incorporating KCDF's expectations on the KCDF Codes of Conduct, employment contracts, new employee orientations, awareness raising trainings and through regular internal communications.

## 6.3 Safe Partnerships

KCDF will embed Safeguarding in the due diligence process for new grant partners as well as ensure current partners undergo a Safeguarding review process where KCDF will confirm whether the partner organization's:

- a) Have appropriate policies and measures in place to ensure they are protecting the communities and individuals they work for and with;
- b) Have clear procedures for responding to Safeguarding concerns or incidents when they arise, including having a designated Safeguarding point of contact; and
- c) The due diligence process will take into consideration the practicality of the organization's Safeguarding approach relative to its size and appropriate context.

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### 6.3.1 Partner Contract Agreements

KCDF will ensure that when engaging in partnerships or subgrant recipients, these agreements will:

- a) Incorporate the Safeguarding Policy as an attachment;
- b) Expressly state that the failure of these entities or individuals, as appropriate, to take preventive measures to ensure their activities, their staff and related personnel do no harm as well as their failure to take corrective actions in cases of reported Safeguarding incidences, shall constitute grounds for KCDF to terminate such agreements; and
- c) For vendors and consultants, KCDF may incorporate this Policy as an attachment to any written agreement or otherwise develop a summary of the requirements contained in this Policy.

### 6.3.2 Promoting Learning

KCDF will endeavor to provide safeguarding workshops and learning forums for its stakeholders and partner organizations during onboarding and annually subsequently to build a supportive community of peers dedicated to continuously learning and improving Safeguarding culture and practice in their organizations.

KCDF will also provide a reporting format that will enable partner organizations to provide a summarized report of any Safeguarding incidents reported.

### 6.4 Safe Documentation & Media Practices

KCDF staff and associated personnel will be trained on best practices when taking photos while conducting site visits.

- i. For any photos submitted, the Communications manager will ensure that the partner has obtained written permission from the child's guardian or will obtain the organization's permission before using a photo in print or online;
- ii. The Communications manager will ensure that the photos and videos of children and adults cannot be used to identify them, thereby making them vulnerable to abuse or harm;
- iii. KCDF will ensure that the partner orientation training include a session on how KCDF uses photos, videos and other media as well promoting conversations about ethical communication practices; and
- iv. During KCDF hosted events, KCDF will ensure that the media policy signs are posted and that relevant consent forms are provided as part of the registration materials.

**NB:** See annexed consent form that will be always used when getting consent to document.

The KCDF Communications department will review the Communications Strategy to ensure that relevant Safeguarding policies and procedures are in existence to ensure they are addressing online Safeguarding issues including, the potential risks to children and young people online, sexual exploitation, online bullying and cyber bullying.

KCDF will ensure that the person responsible for setting up, managing, and moderating our website and social media platforms is well vetted and trained on social media usage and the need to promote safe and responsible social networking.

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### 6.5 Safe Fundraising

KCDF will ensure that it conducts a thorough risk assessment to identify potential risks when holding a fundraising event of any kind.

During the planning of fundraising activities, KCDF will consider the people who will be involved in the activity by taking into consideration the Safeguarding needs of employees, volunteers, beneficiaries, supporters, and the wider public who will be involved. KCDF will carry out relevant checks and training to the staff and associated personnel who will be involved in the fundraising activity.

The fundraising teams will undertake continuous learning and reflection forums after a fundraising activity, to continue to develop the Safeguarding measures put in place. Participants of the fundraising activity will consider what went well, and what aspects can be improved for the next activity. Where complaints about fundraising are raised, the KCDF fundraising department with the support of the KCDF Safeguarding champions will review them to establish whether there are any Safeguarding implications.

## 7. Safeguarding Complaints, Reporting and processing mechanisms

What is a complaint?

A complaint is an expression of dissatisfaction about the standards of service, actions, or lack of action by KCDF, or its staff and associated personnel. The complaint must be an action for which KCDF is responsible for and is within KCDF's sphere of influence.

The complaints procedure does not apply to complaints that are subject to an ongoing investigation by a regulatory body or other legal or other official authority.

### 7.1. Procedures for making a complaint.

KCDF believes that most complaints can and will be dealt with informally by staff or volunteers at a local level. However, it is recognized that not all issues can be resolved in this way and that a formal complaints mechanism is required for those occasions when an individual or organization wishes to make their complaint a matter of record and to receive a formal response.

#### Who can make a complaint?

Anyone can report a complaint to KCDF. This includes:

- a) Parties as described in this document (i.e. KCDF staff member, board member, trustee, KCDF consultant, KCDF Volunteer, KCDF Intern);
- b) A partner organization;
- c) A community or individual with whom we (KCDF) work with; and
- d) Any member of the public whether an individual or company or any other entity.

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### How to make a complaint?

**Option 1: Making a Complaint through Management:** Report a complaint or suspected, witnessed or disclosed Safeguarding incident by writing an email to (KCDF lead for Safeguarding) through [safeguarding@kcdf.or.ke](mailto:safeguarding@kcdf.or.ke) to begin the assessment process. This email address is manned by the KCDF's Programme Coordinator, Capacity Building and Systems Strengthening (also the lead for Safeguarding at KCDF)

If you need to remain anonymous, then you may report the complaint or Safeguarding incident through the above email address.

Reports may also be made through the reporting party's contact person or Direct Line Manager, the Executive Director, the Board Member (focal Safeguarding lead). The above alternative also applies in the event the KCDF designated safeguarding overall contact person is the perpetrator or is adversely mentioned, and or after sending the report, the person reporting is not satisfied with the feedback given.

**Option 2: Making a Complaint through a Board Member (Governance Committee):** This is encouraged only if the person filing the report has no confidence that management will be impartial, or when it has taken long to address an already reported incidence. Report a complaint or suspected, witnessed or disclosed Safeguarding incident by writing an email to the Chairperson of the Governance Committee through [safeguarding@gmail.com](mailto:safeguarding@gmail.com) to begin the assessment process.

This alternative also applies in the event that the KCDF designated safeguarding Lead or the Executive Director is the perpetrator or is adversely mentioned, and or after sending the safeguarding incident or report, the person reporting is not satisfied with feedback given by management.

**Option 3: Other pathways to filing a safeguarding report:** You may also file a safeguarding incident through your contact person at KCDF or your Direct Line Manager (for KCDF staff members), or the KCDF's Executive Director.

Where the reporter is unable to write the reports, the incident may be received on call via front desk numbers: [+254\) 722168480](tel:+254722168480) or [+254736449212](tel:+254736449212).

## 7.2. How KCDF will deal with Safeguarding Reports and or concerns when raised

Safeguarding reports can be received in a structured format such as a letter, email, text message or social media. It may also be in the form of an informal discussion or rumor. If a staff member hears something in an informal discussion or chat that they think is a safeguarding concern, they should report this to the appropriate staff member in the organization within 48 hours.

If a safeguarding concern is disclosed directly to a member of KCDF's staff, or formally through the reporting channels and procedures outlined under 7.1 above, the Safeguarding focal person

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/lead or the Chairperson of the Governance Committee (depending on who received the report) shall provide written feedback to the person within 48 hours of receiving the incidence report.

KCDF through the communications Manager shall make it public (to all parties) including KCDF website, the contact details, and a brief summary of how to report safeguarding incidences to management or to the Board. Further, the Communications manager shall:

- Open an email account ([safeguarding@kcdf.or.ke](mailto:safeguarding@kcdf.or.ke)) for the Safeguarding Focal/lead Person and share all credentials on the website, including the specific name of the safeguarding lead. At all times, partner organizations shall have the exact name of the KCDF staff member manning the safeguarding email. The Focal/lead must open the email at least **once Daily**.
- Open an email account ([safeguarding@gmail.com](mailto:safeguarding@gmail.com)) for the Governance Committee Chairperson. Share full rights, including those allowing the Governance Committee Chairperson to change the password. See 6.1.2 above. Share full credentials (specific name of the board member) on the website. The board member will open the email at least **once every week**.

Due to the sensitive nature of Safeguarding concerns, confidentiality must and will be maintained during all stages of the reporting process, and information shared on a limited 'need to know' basis only. This includes senior management who might otherwise be appraised of a serious incident.

KCDF will encourage a "Speak Up" culture within the organization in a bid to encourage raising and fair resolution of issues. KCDF will further encourage an effective protection and anti retaliation mechanism by ensuring senior leadership are committed and will be accountable for making anti- retaliation and prevention a proactive rather than a defensive aspect of the organization. An independent and protected resolution system will be maintained to ensure that any reporting party or any other person who reports a safeguarding concern or incident will be protected against any negative repercussions as a result of their report.

Ideally if a safeguarding incident especially concerning sexual harassment is reported the perpetrator should be barred and or requested in writing not to make or to initiate any contact (directly or through proxy et al) with the victim to guard against influence before the issue is resolved.

Where it is obvious that a complaint is false or unfounded, an accurate record will be retained as to what action was taken and how the matter was resolved. Where the evidence clearly points towards the Safeguarding complaint being wholly unfounded and deliberately designed to mislead or cause trouble, it may be appropriate to commence disciplinary proceedings against the complainant.

### 7.3. KCDF's procedures for accessing/ processing a Safeguarding Report

The chairperson of the Governance Committee based on their assessment of the report may address the issue or can delegate the resolution to either an external party/auditor or to management through the safeguarding focal person/KCDF's safeguarding Lead.

The Safeguarding focal person or the Chairperson of the Governance Committee (depending on

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who receives the safeguarding incident report) will review the report to determine whether there is sufficient information provided in the report and whether the report represents a breach of Safeguarding policy.

- a) Where the information provided does not represent a breach of Safeguarding Policy or breach of the code of conduct, then the report may be referred through the appropriate channels (or local authorities), if it is safe to do so;
- b) Where there is insufficient information to follow up the report and no way to ascertain this information, the report should be filed in case it can be used in the future, taking note of the wider lessons learned moving forward;
- c) If the report raises any concerns relating to children under the age of 18, KCDF will seek expert advice immediately before processing unless that expertise is available in-house;
- d) If the decision is made to take the report forward, the Safeguarding focal person will assess whether there exists relevant expertise and capacity to manage the Safeguarding case. If this expertise is not in-house, then the focal person will seek immediate assistance through external capacity if necessary; and
- e) The Safeguarding complaint will be assessed by the members of the case conference, and an investigation launched into the allegations or complaint.

#### Appoint roles and responsibilities for case management.

If the report alleges a serious safeguarding violation, KCDF may hold a case conference. This should include:

- i. One member of the Snr Management Team (Should be the Executive Director nominee and not implicated or involved in the case in any way).
- ii. Person who received the report (such as the focal point, or manager, or the Safeguarding lead person).
- iii. HR manager
- iv. The Executive Director
- v. Where applicable, the Chairperson of the Governance Committee and or a board member as may be decided by the Governance Committee
- vi. All the above excludes any parties implicated or mentioned in the filed report. Parties adversely mentioned or implicated may appear before the case management committee.

#### Provide support to survivors where needed/requested

The key action point should be to provide appropriate support to the survivor(s) of safeguarding incidents. This should be provided as a duty of care even if the report has not yet been investigated. Support could include (but is not limited to)

- Psychosocial care or counseling
- Medical assistance
- Protection or security assistance (for example being moved to a safe location)

#### Assess any protection or security risks to stakeholders.

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For reports relating to serious incidents: an immediate risk assessment should be undertaken to determine whether there are any current or potential risks to any stakeholders involved in the case and develop a mitigation plan if required.

### Deciding on the next steps

The case conference will be responsible for deciding the next steps to take, including any protection concerns and support needs for the survivor and other stakeholders. The Decision Maker will be responsible for deciding the next steps. Decisions regarding the Subject of Concern should be made in accordance with existing policies and procedures for staff misconduct. These could be (but are not limited to)

- No further action (for example if there is insufficient information to follow up, or the report refers to incidents outside the organization's remit)
- An investigation is required to gather further information.
- Immediate disciplinary action if no further information is needed.
- Referral to relevant authorities
- If an investigation is required and KCDF does not have internal capacity, KCDF will identify resources to conduct the investigation.

The case conference may arrange for a formal hearing without reasonable delay allowing the reporting party an opportunity to explain their complaint, how they think it can be resolved and providing any evidence of support. The reporting party may be accompanied by a companion for this stage. The case conference will obtain as much information as possible, by gathering evidence while being sensitive to the circumstances and needs of the person reporting the concern as well as the person who the concern is about.

If at this or any stage in the process criminal activity is suspected, the case should be referred to the relevant authorities *unless this may pose a risk to anyone involved in the case*. In this case, the Decision Maker together with other senior staff will need to decide how to proceed. This decision should be made bearing in mind a risk assessment of potential protection risks to all concerned, including the survivor and the subject of Concern.

## 8. Concluding of cases

Communication of the decision made must be made in writing to the person who is the reporting party without unreasonable delay, together with the actions that will be taken. The reporting party must be informed of their right to appeal the decision if they are not content with the outcome. The appeal should be dealt with promptly and may involve members of Senior Managers who were not previously involved in the case.

All decisions must be documented clearly and confidentially. This information will be stored in relation to the case confidentially, and in accordance with KCDF policy on data protection.

It may be necessary to record anonymized data relating to the case to feed into KCDF reporting requirements (e.g. serious incident reporting to Board, safeguarding reporting to donors), and to feed into learning for dealing with future cases.

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4th Floor, Morningside Office Park, Ngong Road, P.O. Box 10501-00100, Nairobi, Kenya

#### Telephone & Mobile

(254-20) 8067440/01/01/3540239  
(254) 722168480 / (254) 736449212

#### Email

info@kcdf.or.ke



The **process chart below** outlines the varied steps undertaken from the start (when a case is filed) to redress/conclusion of the case:

**Physical Address**

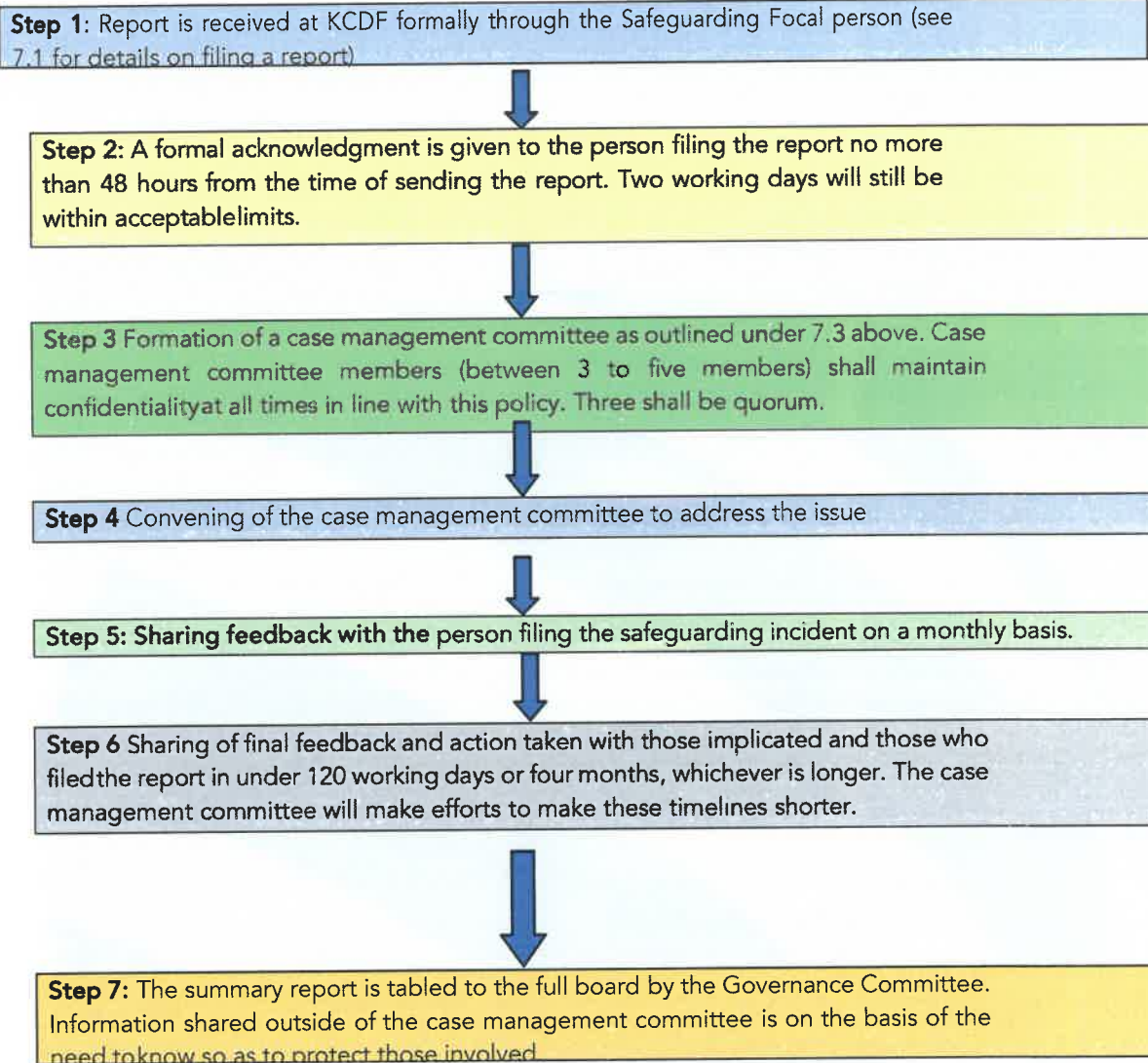
4th Floor, Morningside Office Park, Ngong Road, P.O. Box 10501-00100, Nairobi, Kenya

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## 9. Declaration Form

I, the undersigned, hereby declare that I have received and taken note of KCDF's Safeguarding Policy and certify that:

1. I have been made aware of KCDF commitment to Safeguarding and have read and understood the policy.
2. I understand my roles and responsibilities to prevent harm to children and adults and to protect them from abuse and exploitation.
3. I will report or inform the designated KCDF Safeguarding Officer should I **see, hear, or suspect** any inappropriate behavior that contravenes the policy.
4. I understand that I am required to adhere to the principles of Safeguarding and to the

KCDF policy both on and off duty.

Full Name: \_\_\_\_\_

Designation: \_\_\_\_\_

Signature: \_\_\_\_\_

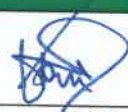

Date: \_\_\_\_\_

### ANNEXES:

1. Code of Conduct
2. KCDF's Sexual Misconduct Policy
3. KCDF's Whistleblower Policy
4. KCDF Photography & filming Consent Forms (Stories & Images Consent Forms)

### VALIDATION AND APPROVAL

This policy (version 02) is approved by the KCDF Board of Directors for implementation:

Designation	Name	Signature	Date
Board Chair (BC)	Tom Ochi		17/06/2024
Executive Director (ED)	Grace Maingi		10 <sup>th</sup> June 2024

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