



Safeguarding Policy

Approved by Board of Trustees – January 2023

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1. Policy Statement

Ripple Effect is committed to safeguarding the welfare of children and vulnerable adults and protecting them from all abuse.

We believe that it is never acceptable for children or vulnerable adults to experience abuse of any kind. We expect all our staff to operate in a manner that protects and enables a safeguarding culture within Ripple Effect. Safeguarding children and vulnerable adults is everyone's responsibility within our organisation. **It is not the responsibility of staff to decide whether abuse has occurred or to investigate this. It is the responsibility of all staff and associates (including volunteers, trustees and partners) to raise any concerns they have or any concerns which are reported to them, in line with this policy.**

It is the responsibility of all managers to uphold the views of this policy, to hold themselves and others to account for its delivery, and to promote a culture of safeguarding across Ripple Effect.

We operate a zero tolerance approach to abuse of any kind from our staff or organisation towards the communities we are here to serve, and especially the children and vulnerable adults within those communities.

For the purpose of this policy:

- **a child** is any person under 18 years old, regardless of the age of majority or consent in any given country;
- **a vulnerable adult**, or adult at risk, is a person aged 18 years or older who by reason of disability (physical or mental), age, illness or circumstances such as poverty is unable to care for themselves, or is unable to protect themselves against harm or exploitation;
- **safeguarding** refers to the actions we take to keep all children and vulnerable adults we come into contact with safe, including the proactive measures we put in place to ensure children and vulnerable adults do not come to harm as a result of our contact with them;
- **child protection** refers to the actions we take when we have specific concerns that a particular child is at risk of significant harm.

We will endeavour to safeguard children and vulnerable adults by having:

1. A written Code of Conduct that explains specific behavioural standards for all adults in their interaction with children and vulnerable adults
2. The requirement that all new and current staff and associates acknowledge that they have read and understood the policy, procedures and Code of Conduct and agree to abide by them
3. The inclusion in all job descriptions of the responsibility everyone has for safeguarding
4. A clear understanding of the definitions of abuse
5. A risk management tool within our programme design, monitoring and evaluation

6. Clear procedures to:
 - a. Communicate clearly our responsibility to safeguard children and vulnerable adults within the communities we work with
 - b. Communicate clearly the process for raising a concern, including providing easy access to the Cause for Concern form to all staff and associates
 - c. Ensure appropriate implementation in all locations
 - d. Guide acceptable behaviour towards children and vulnerable adults
 - e. Guide acceptable gathering, storing and publishing of data relating to children and vulnerable adults
 - f. Safely recruit staff, trustees, consultants, associates and volunteers
 - g. Carry out regular safeguarding awareness training with all staff
 - h. Guide on responding to concerns

We will endeavour to ensure Ripple Effect commits to a working environment that includes the following safeguarding principles:

- Creating of a safe working culture for all those whom Ripple Effect serves, as well as those working for, associated with, and representing the organisation
- Ensuring all concerns or allegations of abuse, including sexual harassment and exploitation, are responded to in a timely and appropriate manner and there are multiple channels through which staff and other stakeholders can raise concerns.
- Ensuring a zero tolerance approach to all abuse in our organisation through robust prevention and response work, offering support to survivors and victims and holding those responsible to account
- Always adopting a survivor-centric approach that respects the confidentiality and decision-making right of survivors where possible and appropriate to do so.
- Building a culture where all those whom Ripple Effect serves and who work for Ripple Effect feel empowered to insist on non-discriminatory and respectful behaviour from each other, where poor behaviour is not accepted, and where power is not abused.
- Prioritising transparency about safeguarding issues occurring within Ripple Effect where our strict code of confidentiality allows us to; and being sensitive in our communications about our practices and open to learning and improving.

2. Introduction

This policy is designed to ensure that Ripple Effect takes every possible measure (including in collaboration with the existing government or partner structures) to prevent abuse. It aims to ensure that none of its staff, associates or partners engage in behaviour that could allow abuse to occur, or actions that could be misinterpreted by children, their families, other adults or staff as constituting, or leading to, abuse.

This policy applies to all staff and associates (including volunteers, trustees and partners) at all times. Associates include volunteers, trustees, patrons, ambassadors, consultants, and supporters, including donors, who may visit our programmes. Staff and volunteers may sometimes work with children and vulnerable adults in schools, community groups and churches where other adults will ultimately be responsible for their welfare and safety, such as teachers, parents and group leaders. In these situations, Ripple Effect will take due diligence measures to ensure that our staff and volunteers are aware of their specific safeguarding responsibilities in this situation, including to safeguard the organisation in their actions and behaviours.

Ripple Effect does not discriminate against anyone in the communities in which we work. We are committed to safeguarding all children and vulnerable adults, irrespective of their gender and gender identity, ethnicity, age, disability, sexual orientation or religion or faith expression.

Ripple Effect take a 'Do No Harm' approach, including in the communities in which we work, towards the staff and associates within Ripple Effect, and as an organisation within the charitable sector. This principle underpins our organisational approach to safeguarding, including our approach to managing and monitoring safeguarding risks. This policy is guided by the UNCRC, the Keeping Children Safe Standards, the Inter-Agency Standing Committee PSEA Minimum Operating Standards, the UK DFID's Enhanced Due Diligence (June 2018), Charity Commission guidelines, related legislation in our countries of operation and other good practice guidelines recognised within the sector.

3. Definitions of Abuse

Defining abuse is never easy and at a global level it could be argued that children and vulnerable adults are being 'abused' wherever their lives do not reflect the minimum standard set out in the 1989 UN Convention on the Rights of the Child. Although Ripple Effect will use its influence and advocate for children and vulnerable adult's rights at this level by implementing projects to have a measurable impact at reducing poverty, we recognise that we cannot do everything.

This policy is concerned with specific incidents of maltreatment as defined in this policy, as a child, vulnerable adult or staff member comes into contact with a Ripple Effect member of staff, associate, partner or programme.

It should never be an individual's responsibility to decide whether someone has been abused, but it is the responsibility of all who represent Ripple Effect in whatever capacity to safeguard the communities we work with, our staff and associates, and our organisation by adhering to the commitments we make in this policy and to report any concerns appropriately, using the framework set out in section 8 of this policy.

Both adults and other children may abuse children and vulnerable adults. Abuse can take place within a family, community, an institutional setting or by a stranger. The following definitions are useful for all of our work (this list is not exhaustive):

- **Child abuse:** is anything done or not done by individuals, organisations, institutions, or processes that cause harm to a child, either directly or indirectly, or compromise their health or safety for the future.
- **Physical abuse:** this may involve hitting, shaking, throwing, poisoning, restraining, inappropriate physical sanctions, burning, drowning or suffocating. Domestic violence can include physical abuse. Physical harm may also be caused when a parent or carer deliberately causes ill health to a child or vulnerable adult they are looking after. Physical abuse is not accidental.
- **Neglect and acts of omission:** the persistent failure to meet a child or vulnerable adult's basic physical and psychological needs which is likely to result in serious impairment to health and development. It may involve a carer failing to protect a child or vulnerable adult from exposure to any kind of danger, including ignoring medical, emotional or physical care needs, failing to provide access to appropriate health care and support or educational services, or the withholding of medication, adequate nutrition and heating. Neglect may be unintentional harm, where a carer does not have the capacity to protect a child or vulnerable adult, but it can cause serious, long-term damage, including death.
- **Sexual exploitation and abuse of a child:** is child sexual abuse and a criminal offence. Ripple Effect take a zero tolerance approach to sexual activity with a child by a staff member or associate, irrespective of whether the child is above the legal age of consent/ majority or of local cultural practice, including child marriage. Sexual exploitation and abuse of a child doesn't always involve physical contact and can happen online e.g. online virtual sex or the sexualised manipulation of original images.
- **Sexual exploitation and abuse (SEA):** is forcing or enticing a vulnerable adult to take part in sexual activities, including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, and sexual assault or sexual acts. Ripple Effect considers the purchasing of sex or transactions for sex (such as sex in exchange for aid or services) to be sexual exploitation and abuse and we take a zero tolerance approach.
- **Protection from Sexual Exploitation and Abuse (PSEA)** is a common term used by the UN and NGO community to refer to the measures taken to protect vulnerable people from exploitation and abuse by international humanitarian staff and associates. This includes the sexual exploitation and/or abuse of children or adults in communities in which an NGO works, or the exchange of money, employment, goods or services for sex. This policy includes the Minimum Operating Standards and Ripple Effect is committed to these.
- **Psychological and emotional abuse:** is persistent emotional ill treatment which is likely to cause harm to a child or vulnerable adult's emotional development and wellbeing. This may involve conveying to a child or vulnerable adult that they are worthless, unloved and inadequate, and/or the unjustified withdrawal of services, deprivation of contact or supportive networks leading to isolation. This includes verbal abuse which can take the

form of humiliation, blaming, controlling, intimidation, coercion, harassment and bullying; causing a child or vulnerable adult to feel frightened or in danger.

- **Spiritual abuse:** is linked with psychological abuse, which is an abuse of power often done in the name of religion, involving the manipulation or coercion of someone into thinking, saying or doing things without respecting their right to choose for themselves.
- **Witchcraft and/or Ritualistic Abuse:** includes practices designed to rid people of evil spirits which are believed to possess the individual and bring bad luck on the family and community around them. This can be particularly targeted at children and can result in violent and cruel treatment towards individuals, including sadistic treatment of children. The beliefs of 'possession' by spirits and of 'witchcraft' are widespread across cultures, countries and religions. It can be more likely to occur when an adult or child is viewed as 'different', e.g. ill, behaving differently, unresponsive to discipline, or living with disabilities. This abuse can be linked to other abuse such as emotional, physical and sexual abuse.
- **Financial or material abuse:** including theft, fraud, coercion in relation to the financial affairs or arrangements of children, vulnerable adults or the organisation, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.
- **Modern slavery:** encompasses slavery, human trafficking, forced labour, and domestic servitude. Ripple Effect consider forced labour to include the worst forms of child labour as defined by the ILO (1999) Worst Forms of Child Labour Convention No. 182. Perpetrators of modern slavery, including traffickers, use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane, exploitative treatment. Ripple Effect recognise child marriage as a form of modern slavery.
- **Discriminatory abuse:** including forms of harassment, slurs or similar treatment, the denial of opportunities, advancement, or fair treatment, and the intentional or unintentional exclusion of individuals including through passive aggressive means, because of gender and gender identity, ethnicity, age, disability, sexual orientation or religion or faith expression. This includes discrimination of staff to staff.
- **Disability and abuse:** Living with disability can make children and adults more vulnerable to abuse. What might be considered harmful or abusive treatment of an individual who is not living with a disability is sometimes seen as OK for a child or adult who is living with a disability e.g. forceful restraining, being detained indoors for long periods of time, etc. Awareness of how society treats people living with disabilities is critical to avoiding reinforcing abusive attitudes and behaviours, and to promoting the rights of all inclusively.
- **Domestic abuse:** is any incident or pattern of abuse, including controlling, coercive or threatening behaviour, physical or non-physical violence or abuse, affecting those aged 16 or over who are, or have been, intimate partners or family members, irrespective of gender or sexuality.
- **Abuse of trust:** is the distortion by fear or favour of a relationship of trust, in which one party is in a position of power or influence over the other by virtue of their work, their status or the nature of their activity e.g. an abuse of trust could be committed by a teacher, an NGO worker, sports coach, scout leader, faith leader, etc.

4. Welfare and Rights of Children and Vulnerable Adults Statement

Ripple Effect will endeavour to ensure that the welfare and rights of children and vulnerable adults are paramount in all policies and procedures. All actions on child safeguarding are taken in the best interests of the child. Safeguarding the best interests of the communities we work with is our priority at all times.

In particular we recognise that a key element in working to safeguard the welfare of children and vulnerable adults is the promotion of their rights. We affirm our belief in the right of all children and vulnerable adults to be protected from all forms of abuse, neglect, exploitation and violence as set out in the UN Convention on the Rights of the Child, which states: "Parties shall protect children from all forms of physical or mental violence, injury or abuse, neglect, maltreatment or exploitation, including sexual abuse" (Article 19).

Please see Appendix 1: for a summary of these rights.

5. Recognising the International Context of our work

Working with local organisations

Ripple Effect are committed to upholding global standards of safeguarding across the Ripple Effect Group, in all contexts in which we work, and with our local partners, staff and associates. We also recognise the importance of participation and ownership over safeguarding tools and procedures at a community level and we are committed to locally-led development in all we do. Every effort will be made to work alongside national offices and local organisations in a culturally appropriate way. Specific measures will be taken to embed appropriate safeguarding measures across each context in which we work.

This may include:

- Agreeing common basic definitions of abuse and adapting national Safeguarding Policies accordingly
- Distinguishing clearly between children and vulnerable adults in need of protection due to poverty, conflict or crises, and specific acts of maltreatment towards children and vulnerable adults
- Establishing specific country Codes of Conduct to include rules of appropriate and proper behaviour based on local laws and sensitivities, and ensure local ownership over the behaviour of national staff and associates, and all external visitors
- Requiring all visitors, including colleagues based in different SAC Group offices, to read and sign the Safeguarding Policy, including any specific country Code of Conduct, on arrival in country

Legal matters and processes

The following will be taken into consideration:

- UK citizens must comply with UK law e.g. it is a criminal offence for a UK citizen to travel abroad for the purpose of sex tourism. Where a UK citizen commits such an offence they are liable for prosecution in the UK. The situation applies similarly for citizens within the countries of operation in line with the local laws.
- There may be no equivalent to the UK statutory agencies to ensure an external independent and thorough enquiry across the countries in which we work. Inaction by local authorities does not mean that the organisation will not deal with an issue. We will compile and update our own list of local resources and use this to guide our response to any safeguarding incident which may arise.
- The standards of operating in the UK will be applied. For instance, if it is judged that the UK police would act, and the local police will not or cannot act, then Ripple Effect will undertake its own independent internal review as appropriate to the circumstances.
- Where local safeguarding laws exist, dealing with incidences including reporting will adhere to local jurisprudence.

Gathering local information

The following checklist is helpful for gathering local information. The Designated Safeguarding Officer (DSO) in each country will be responsible for compiling and updating this resource list regularly:

- Contact details of any government bodies or agencies with statutory responsibility for safeguarding children or vulnerable adults, including community level social workers
- Contact details of any non-state body or agency with capacity for safeguarding children or vulnerable adults, including community based child protection committees
- Contact details of local hospitals that can provide care for children – boys and girls – and vulnerable adults requiring healthcare, urgent or otherwise
- Contact details of local medical centres that provide sexual assault services, including to boys, girls, women and men where locations may differ for each
- Contact details of trusted local legal counsel that can provide legal advice, including in an emergency
- Possible implications of reporting, including risk factors to children or vulnerable adults if reported to government bodies
- The capacity of the local police to pursue a criminal investigation
- Specific national legislation and how it is implemented
- Legal age of consent and age of criminal responsibility
- Other local practices or customs to be aware of, such as early marriage, initiation ceremonies, female genital mutilation
- What other local professionals are available – counsellors, doctors, NGOs
- What local resources are available – projects, churches, missions, advocacy groups.

6. Recruitment Processes

Safe recruitment is vital because it greatly reduces the likelihood of someone being able to work with children or vulnerable adults who could pose a risk them.

A formal, thorough and safe recruitment process for Ripple Effect personnel should be adopted across all hiring country offices, including the UK. In the best interests of children and vulnerable adults, Ripple Effect will seek not to employ (in any paid or voluntary position) anyone with a prior conviction for child abuse or related offences for any position working with or having regular direct or indirect contact with children, young people, vulnerable adults or their data. We will support this commitment by requiring DBS certificates or police clearance/ certificate of good conduct for all trustees, senior management, staff and visitors with direct or indirect contact with children and vulnerable adults.

When recruiting paid and voluntary workers, the following will apply for those working with children and vulnerable adults. In addition, Ripple Effect acknowledges that there is a strong possibility that staff working in country are in a position of trust and will therefore have access to children, whether or not their specific role is working directly with children.

Pre application

- Each role is assessed for its impact on, access to, and contact with, children and vulnerable adults and where applicable, DBS/criminal checks should be made clear in adverts
- All potential staff will be informed of Ripple Effect's safeguarding policy at the start of the recruiting process
- All posts will have job descriptions, key selection criteria and person specification against which to judge an applicant, to improve the likelihood of attracting the right person for the job
- All relevant safeguarding responsibilities are included in the job description

Application

- A self-declaration should be completed as part of the application
- Relevant qualifications and work history should be verified
- The Code of Conduct will be made clear in the recruitment process as expected behaviour for the role holder, with sanctions of misconduct clearly explained

References and Background Checks

- These should be authenticated with a preference for organisations over individuals and any offer of employment made dependent on the satisfactory receipt of these

- Relevant staff will have restricted access to beneficiary data, and access to communities through travel or otherwise, until Ripple Effect receive a DBS certificate or police clearance/ certificate of good conduct
- Ripple Effect will adjust their reference checks where necessary to meet sector standards as these improve and develop over time

Interviews

- The interviewing of an applicant should be handled sensitively making sure questions are relevant
- The interview should include questions about previous work with children and vulnerable adults
- When appropriate, interviews will include questions regarding knowledge of local safeguarding procedures
- Interviews will include specific questions around safeguarding relevant to the post

Contracts

- Signing a commitment to the Safeguarding Policy is a contractual obligation. All staff and associates including volunteers, trustees, patrons, ambassadors, consultants, and supporters, including donors, who may visit our programmes, are required to read and sign the Safeguarding Policy, either at the start of their contract or prior to their travel with Ripple Effect
- Contracts for roles considered to require a DBS certificate or police clearance/ certificate of good conduct will be dependent on the receipt of a DBS certificate and its successful update every 2 years, or as applicable in the countries of operation.
- Clauses will be included in all contracts, including with consultants, clearly communicating the sanctions of misconduct accompanying behaviour that Ripple Effect consider to be at odds with its Code of Conduct
- Adherence to the Code of Conduct is critical to passing the probationary period for all staff
- Participation in safeguarding training and adherence to the Code of Conduct is included in performance appraisals

Induction of New Staff and Associates

- Reading, signing and understanding the Safeguarding Policy, Code of Conduct and Whistleblowing policy are a critical part of new staff and associate induction
- New staff will undergo Safeguarding Training as a priority, either as part of Ripple Effect's regular staff training or as a standalone induction training, depending on Ripple Effect's capacity, on the regular training dates and the numbers of new staff involved. Induction training will include training on Ripple Effect's Whistleblowing Policy.

7. Managing Risk

Ripple Effect is committed to doing everything possible to eliminate the risk of harm to children and vulnerable adults. We will seek to do this through the following processes:

- Ensuring an organisational culture that prioritises, understands and enables safeguarding, including:
 - Regular staff training
 - Clear and intentional communication of our policy and procedures
 - Changes in roles and responsibilities to clearly articulate staff responsibility
 - Commitment in time and resources to a continuous strategy of improvement
- Ensuring safe programmes, including
 - Identifying the scope of impact SAC has on children and vulnerable adults
 - Using a risk management tool within our programme design, monitoring and evaluation to ensure safe programme design and implementation
 - Seeking feedback from children and vulnerable adults in our monitoring and evaluation
 - Requiring country offices to develop minimum safeguarding standards, including a Code of Conduct, and procedures for safeguarding and child protection
- Monitoring and managing risks, including
 - Clear and regular analysis of the specific contextual risks to Ripple Effect
 - Including safeguarding risks within our organisational risk register and updating these regularly, including reporting to the Board quarterly
 - Managing a standalone Children and Vulnerable Adults Risk Register to identify specific risks, evaluate the likelihood and seriousness of risk, and identify specific mitigation and response strategies to implement as relevant. This will be reviewed regularly and updated as risks change.
 - Updating relevant staff DBS checks every 2 years, or local police clearance/ certificate of good conduct as appropriate.

8. What to do if a concern is raised, or you witness something that causes you concern

Within the UK there is a legal responsibility to report all abuse regardless of who the alleged perpetrator is. In all countries in which we work, Ripple Effect are committed to safeguarding all children, vulnerable adults, staff and associates with whom we come into contact with, whether or not they are directly benefiting from our organisation or employed by it.

To clarify, the purpose of this policy is to ensure:

- That children, vulnerable adults, their families or other adults within the communities with which we work, are safeguarded from harm and abuse, whether directly or indirectly caused by Ripple Effect

- That staff, associates including volunteers, trustees, patrons, ambassadors, consultants, supporters or partners are kept safe and do not, either intentionally or unintentionally, engage in behaviour that could allow abuse to occur or actions that could be misinterpreted by children, vulnerable adults, their families or other adults as constituting or leading to abuse.
- All staff, volunteers and partners know how to report a concern and be familiar with the process for dealing with such a concern

This section is to ensure that staff and others are clear as to what steps to take where concerns arise regarding the safety of children and vulnerable adults which relate directly to a Ripple Effect member of staff, volunteer or partner. See Ripple Effect's Whistleblowing Policy for further information.

Responsible reporting is defined as being in accordance with this policy. Any allegation or concern regarding the abuse will be treated seriously and for this reason it is important for anyone raising a concern to strictly follow the reporting model detailed above. Particular care should be taken in regard to confidentiality and the sharing of information with appropriate people.

Reporting Abuse

The need to report arises in the following instances:

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

Making a report

- A standard reporting form is given in Appendix 2,
- Any concerns allegations or disclosures should be written down as soon as possible,
- Records should be detailed and precise, focusing on what was said or observed, who was present and what happened,
- Any concern, disclosure or allegation is noted as alleged rather than proven at this point,
- All such records should be treated as extremely confidential,
- In certain instances there will be an obligation for Ripple Effect and its staff and others to report concerns to the appropriate external bodies.

Our response to a report

We commit to the following standards in our investigations:

- We will ensure a compassionate response at all times.

- We will contract experienced and qualified professionals trained in sensitive investigations to support our investigations where necessary, and particularly where incidents include allegations of Sexual Exploitation and Abuse (SEA).
- We will aim, wherever possible, to complete investigations within 3 months and information relating to the outcome will be shared with the complainant.
- Substantiated complaints will result in either disciplinary action or contractual consequences. In the event that they do not, Ripple Effect will explain clearly why.
- No member of staff or associate will prejudice their own position or standing with Ripple Effect by responsibly reporting potential or suspected child or vulnerable adult abuse.

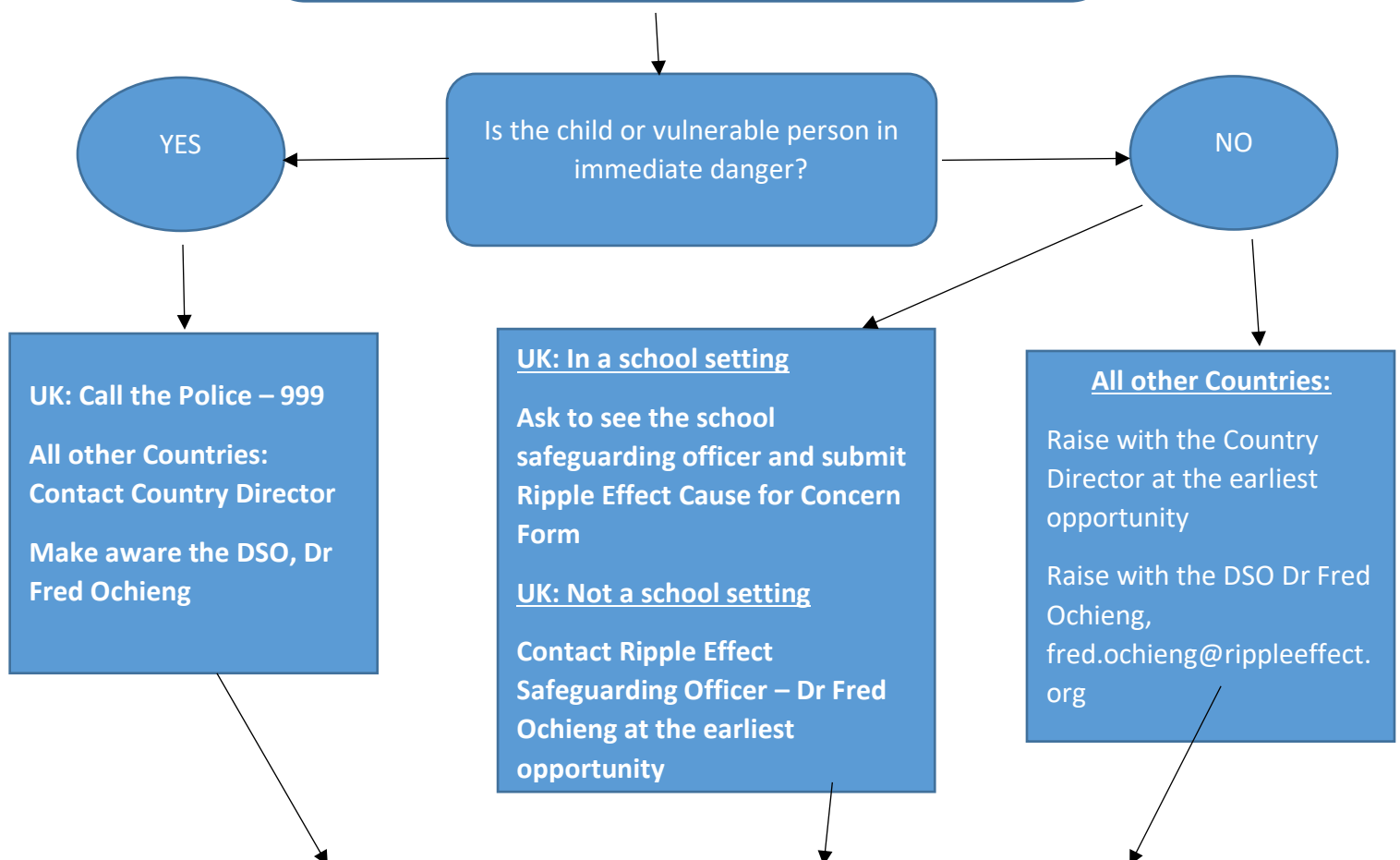
Additional information can be found in our Whistleblowing Policy.

Below is a sample reporting flowchart. These are adapted for each context in which we operate, and accessible to staff and community members to access clearly in the event of an incident.

The guiding principle is that the safety of the child or vulnerable adult is always the overriding consideration.

What to do if you have a concern regarding the wellbeing of a child or vulnerable adult or they have made a disclosure to you.

Stay Calm. Listen to what the child or vulnerable adult is saying. Reassure them that they have done the right thing in telling you. Do not investigate or ask leading question. Do not promise confidentiality. Let them know that you may need to tell someone.



Next Steps:

1. Report to the Country Director and the Designated Safeguarding Officer, Dr Fred Ochieng based in Nairobi, Kenya. Always use the person's exact words. Do not give your opinion of the situation. Try to do this within 24 hours.
2. Fill in a Cause for Concern Form. This can be done with the DSO.
3. The Safeguarding Officer will then, using local information/applying local policy, take the most appropriate next step. In the UK this will mean forwarding the Cause for Concern Form to the Local Safeguarding Board of the Local Authority.

9. Code of Conduct

Background

All staff and volunteers in their contact with children and vulnerable adults are expected to interact in a mature, capable, safe, caring, and responsible manner, with high levels of accountability. This includes staff who are in direct face to face contact with children and vulnerable adults, and staff who are in indirect contact with children and vulnerable adults, for example through handling or processing their data.

All staff and associates working with children and vulnerable adults are in positions of trust. It is therefore vital that staff and associates ensure that they do not, even unwittingly, use their position of power and authority inappropriately.

This Code of Conduct describes the ethics and behaviour required of all Ripple Effect staff and associates in order to ensure a robust safeguarding environment and to safeguard the values and actions of Ripple Effect. It is designed to create a culture of best practice within Ripple Effect and is not exhaustive, but rather gives guidelines of acceptable behaviours and attitudes

to be interpreted with common sense. These expected behaviours apply inside and outside the workplace, in all countries irrespective of whether Ripple Effect are present, and at all times while staff and associates are affiliated with Ripple Effect. Ripple Effect have sought input from children, their parents and community leaders on the content of our Code of Conduct.

Abiding by this Code of Conduct is a contractual obligation for all staff and associates. Where attitudes or actions fall short of this Code, it will be viewed by Ripple Effect as potential misconduct and sanctions will apply, including a disciplinary investigation and dismissal where relevant.

This Code of Conduct represents global safeguarding standards which may be added to with appropriate cultural expectations, but not deviated from, in any national context. Each national office within the SAC Group will be required to adjust their Code of Conduct as appropriate to ensure it is relevant to their specific context. A copy of the national Code of Conduct will be clearly displayed in every operational centre, translated and simplified into child friendly language where relevant.

Minimising Risk

- **DO:** All staff and associates must read and sign the national Safeguarding Policy and Code of Conduct relevant to the national office they are visiting.
- **DO:** All work with children and vulnerable adults should be planned in a way that minimizes risk as far as possible. This includes being visible to other adults when working and talking to children and vulnerable adults, as well as monitoring and mitigating any direct or indirect negative impact of our work on children and vulnerable adults.
- **DO:** commit to prioritise safeguarding, understanding it's necessity and importance, and approaching it with a learning attitude.
- **DO:** Take particular care of the needs of children and vulnerable adults with disabilities as research has shown that abuse can often go unrecognised and unreported due to people's attitudes and assumptions about disability.
- **DON'T:** spend time alone with children and vulnerable adults. Generally, at least two people should be present in work with children and vulnerable adults, with a parent, guardian or responsible adult present at meetings, and during your interactions. Where confidentiality is important and a child or vulnerable adult is being seen on their own, ensure that others know that the interview is taking place and that someone else is in the close vicinity.
- **DON'T:** condone or participate in behaviour with children or vulnerable adults that is illegal, unsafe or abusive.
- **DON'T:** show favouritism or spend excessive amounts of time with one child or vulnerable adult.

Physical Behaviour

- **DO:** wait for physical touch to be initiated by the child and only continued with their consent. It should never be done with the intention of abusing, coercing, manipulating or attacking a child or vulnerable adult. Do not touch when it is making a child or vulnerable adult uncomfortable and be sensitive to this.
- **DO:** use only appropriate signs of affection, which include: verbal praise, side hugs, pats on the shoulder. For smaller children, holding hands, touching faces, arms around shoulders, hugs or holding them when others are present can be appropriate when initiated by them.
- **DO:** If a member of staff or volunteer is the subject of inappropriate affection or attention from a child or vulnerable adult, they should immediately break contact and report to the Safeguarding Officer/person in charge.
- **DON'T:** do things of a personal nature that a child or vulnerable adult can do themselves, including dressing, bathing or grooming.
- **DON'T:** hit, slap, pinch, push, hold against their will, or otherwise assault a child or vulnerable adult.
- **DON'T:** touch buttocks, chests, genital areas, or thighs; show affection in isolated locations or when alone with a child or vulnerable adult; or sleep in bed with a child or a vulnerable adult.

Sexual Exploitation and Abuse (SEA)

- **DO:** Create and maintain a zero tolerance working environment towards sexual exploitation and abuse, promoting the rights of vulnerable people and raising concerns if they occur.
- **DON'T:** Behave in a way that could be interpreted as sexual in nature, including flirtatious or seductive looks or behaviour; any form of unwanted affection; playing sexual games; kissing, fondling, or touching a child in an inappropriate or culturally insensitive way; encouraging crushes or favouritism from the child or vulnerable adult.
- **DON'T:** engage in sexual activity with a child. Mistaken belief in the age of a child is not a defence.
- **DON'T:** develop physical or sexual relations with a vulnerable adult, including in situations where the adult may feel they have given their consent. Do not engage in sexual or romantic activity with adults in communities where Ripple Effect is working, or with partner staff, since this can be interpreted as favouritism and/or distort perceptions of power.
- **DON'T:** engage in sexual relations that are exploitative or abusive, including the purchase of sex or transactions involving sexual activity, the engagement in any form of modern slavery or the assertion of power over, or manipulation of, children or vulnerable adults.

Accountability

- **DO:** always be accountable to other adults regarding interactions with children and vulnerable adults. Don't place yourself in a position where you become vulnerable to accusations of misconduct. In the event that this happens beyond your control, report the incident as a concern.
- **DO:** notify parents/supervisors before any activity.
- **DON'T:** travel alone in a car with a child or vulnerable adult, however short the journey. Where this is unavoidable it should be with the full knowledge and signed consent of the child, parent and the person in charge of the event.

Communication and Technology

- **DO:** explain clearly what information you are seeking, how this will be gathered and stored, and what it will be used for. Empower the child by always seeking their consent first. Use methods of communicate that are inclusive for children. Always confirm consent with a parent/ caregiver. Make it clear that children and vulnerable adults have a right to opt out and say no to giving away their data.
- **DO:** ensure you understand any legal restrictions within the country that you are visiting that relate to taking and using images of children or vulnerable adults.
- **DO:** ensure that supervisors/parents/guardians are included in any responses when entering into any email communication with a child or vulnerable adult. Emails should be retained with any concerns reported.
- **DO:** abide by the Ripple Effect guidelines on the use of images, stories and other personal data and prioritise the dignity of the communities we work with, seeking to portray diversity in our publications where possible. Every individual we work with has the right to be accurately represented through both words, images and video and not sensationalised, victimised or manipulated.
- **DO:** abide by Ripple Effect's privacy policy, always changing the name of a child or vulnerable adult, never showing the face of a child or vulnerable adult next to their story, and never printing the faces of individuals who have been exploited.
- **DO:** abide by Ripple Effect Duration of Consent guidelines, deleting all data that is 6 years old or at the point that a child turns 18 when it relates to him/ her.
- **DON'T:** Expose children to inappropriate images, videos, text or websites that are sexually suggestive, depict violence or radical messaging and ideology.
- **DON'T:** offer advice which is inappropriate.
- **DON'T:** act in ways intended to shame, humiliate, belittle or degrade a child or vulnerable adult. Instead, use language to achieve Ripple Effect's goals of empowerment and equality.
- **DON'T:** use language that is suggestive, offensive or abusive. Rather, communicate inclusively and seek to explain your actions and intentions clearly in plain language using child friendly methods.

- **DON'T:** share personal contact information unless specifically required as part of a job role. If a contact number is required then give the main office number or your Ripple Effect contact number/ email.
- **DON'T:** engage in instant messaging, texting and other forms of social networking between Ripple Effect staff and children or vulnerable adults unless this is for the purpose of Ripple Effect activities, and not personal or intrusive.
- **DON'T:** take photos without the consent of the child, adult or parent/ person in charge/appropriate adult. Approval must be formally given when using these images on social media etc.
- **DON'T:** include personal or physical information that could be used to identify a child or vulnerable adult or their location in any published text or image, online or offline.
- **DON'T:** meet a child or vulnerable adult outside of an organised activity or contact them via the internet, text or phone unless it is with the knowledge and consent of parents/ person in charge/ a responsible adult.
- **DON'T:** post or share stories or images of Ripple Effect community members on your own personal social media accounts, or in emails to your network. Their consent is given to the organisation Ripple Effect and not to you personally or the individual requesting it.

10. Responsibility for Implementation

The responsibility for safeguarding rests on all Ripple Effect staff as stated in all job descriptions for all staff. Ripple Effect are committed to regular safeguarding training of all staff to reinforce our Safeguarding Policy and procedures, to ensure new starters are informed and understand our policy and procedures, as well as to introduce any updates or changes in sector standards as these develop over time.

The responsibility for implementing this safeguarding policy primarily sits with Country Directors and Team Leaders, whose teams have direct or indirect contact with children and vulnerable adults. All have a responsibility to understand and implement this policy. They must also ensure that:

- All current staff and associates receive a copy of the updated Safeguarding Policy to read and sign
- All new staff and associates receive a copy of the Safeguarding Policy to sign, including the Code of Conduct, on issuing an employment contract
- All visitors within their area of responsibility, who have direct or indirect contact with children and vulnerable adults, receive a copy of the national Safeguarding Policy where this may be different, and read and sign it

- Each country has in place local procedures that meet international safeguarding standards and are consistent with Ripple Effect Safeguarding Policy, to respond to incidents of abuse
- A plain language or child-friendly poster version of the safeguarding policy is clearly displayed in all offices and locations where programmes are implemented. This is to ensure that:
 - Children, families and all other members of the community with whom Ripple Effect work are aware of our Safeguarding Policy and relevant procedures, so that they know what behaviour to expect from staff, how to recognise an incident of abuse or harm, and what to do if this should occur
 - Members of the wider community who are not directly benefitting from Ripple Effect, but who Ripple Effect have a wider responsibility to protect, are able to access information on our Safeguarding Policy and relevant procedures
- Protective measures which guide the implementation of the Safeguarding Policy are fully embedded within their areas of responsibility
- Those who have reported concerns or incidents, or are accused of perpetrating abuse or harm, are provided with appropriate care, support and protection while dealing with all aspects of their case, including safety concerns or potential reprisals which may arise from either the incident or the reporting of such.

Designated Safeguarding Trustee (DST)

The Board of Trustees across the Ripple Effect Group have ultimate responsibility for safeguarding. They will act in the best interests of the children and communities, staff and associates, and the organisation of Ripple Effect. They will always place the interests of Ripple Effect above their own and will ensure independent decision-making in relation to safeguarding, consulting with external advisers where necessary.

The designated safeguarding trustee has the responsibility to ensure safeguarding incidents are dealt with appropriately, including safeguarding the best interests of the child. They have the responsibility to regularly monitor safeguarding risks, to communicate these to the Board through a standing agenda item at regular board meetings, and to hold the Senior Leadership Team accountable for implementing the Safeguarding Policy and accompanying procedures, engaging with the senior leadership team regularly. The Designated Safeguarding Trustee must champion safeguarding as a priority for organisational resources at all levels within the organisation.

The Designated Safeguarding Trustee for the Ripple Effect Group Board is currently Fiona Crisp. The Designated Safeguarding Trustee for the Kenya Board is currently Ms Joyce Majiwa. The Designated Safeguarding Trustee for the Uganda Board is currently Board chair Ms Penninah Kasule.

Designated Safeguarding Officer (DSO)

The DSO has the responsibility to champion and monitor the implementation of this policy. The Designated Safeguarding Officer is accountable to the CEO, who is responsible for safeguarding.

They have the responsibility to regularly monitor safeguarding risks, to communicate these to the Board through a standing agenda item at regular board meetings, record reports of safeguarding concerns or incidences, update and maintain Ripple Effect's CAVA Risk Register in relation to safeguarding, and lead any investigative or disciplinary procedures necessary in the pursuit of safeguarding communities, staff and associates, and the organisation of Ripple Effect.

The Executive Team identified a senior manager to be the Designated Safeguarding Officer. This is currently Dr Fred Ochieng, Africa Director, who is specifically responsible for:

- Leading the organisation towards best practice in safeguarding
- The regular development/ delivery of safeguarding training to all current and new staff and associates (including volunteers, trustees and partners), and the development/ delivery of other training resources as required
- Promoting awareness and implementation of the safeguarding policy in Ripple Effect
- Ensuring the Local Resource List for each country context is kept updated
- Monitoring implementation of the policy and reporting regularly to the Board
- Maintaining knowledge of best practice and statutory requirements
- Managing reporting procedures, including responding to emergency safeguarding incidents, investigating reports of safeguarding concerns, and reporting to the Board, Charity Commission and donors where necessary

Appendix 1

The Welfare and Rights of Children and Vulnerable Adults Statement

We affirm our belief in the right of children and vulnerable adults to be protected from all forms of abuse, neglect, exploitation and violence, as set out in the UN Convention on the Rights of the Child.

A child, young person or vulnerable adult has the right:

- To have their health, safety, wellbeing and best interests considered paramount
- To have their welfare and development promoted and safeguarded so that they can fulfil their full potential
- To be valued respected and understood within the context of their own culture, religion and ethnicity, and to have their needs identified and met within this context and within the context of their family wherever possible
- To be listened to and to have their views given careful consideration, and to be encouraged and helped to participate in decisions that affect them.

In order that these rights are respected, when staff, associates (including volunteers, trustees and partners) and others are in contact with children or vulnerable adults they should:

- At all times treat children and vulnerable adults with respect and recognise them as individuals in their own right
- Regard them positively and value them as individuals who have specific need and rights and a particular contributions to make
- Work with them in a spirit of cooperation and partnership based on mutual trust and respect
- Value their views and take them seriously
- Work with them in ways that enhance their inherent capacities and capabilities, and develop their potential
- Strive to understand them within the context in which they live.

Appendix 2

Ripple Effect

CONFIDENTIAL

Cause for Concern Form

The information in this form is confidential. It should be used to report concerns in accordance with Ripple Effect's Children and Vulnerable Adults Safeguarding policy.

It should only be sent to the Country Directors or the Designated Safeguarding Officer- Dr Fred Ochieng.

It will be held in a safe and secure place in accordance with data protection regulations.

You should attempt to fill in as much as possible. Leave blank those areas which you have no knowledge. If you are raising a general concern about behaviour that you have observed then please make this clear.

Part 1: About You	
Your name:	Your relationship to the child or vulnerable adult:
Date:	
Part 2: About the Child/ Children/ Young Person/ Vulnerable Adult	
Their name(s): Male/Female:	
Address, including country:	
Who do they live with:	
Their age(s)/date(s) of birth:	
Part 3: About your concerns	
How did you come to have a concern: <ul style="list-style-type: none">• What was observed or suspected?• Was an allegation of abuse made?• Did the child or vulnerable adult disclose abuse?	

Date(s) times (s) location(s) of any incidents(s):
Observations made by you (e.g. description of visible bruising, other injuries, child or vulnerable adult's emotional state.) <i>Make clear distinction between what is fact, opinion or hearsay:</i>
Using the child or vulnerable adult's exact words, what did they say?
Any other information:
Any other children involved:
External agencies contacted:
Action taken:
Signed:
Dated:
Organisation:
Position:

Appendix 3

Ripple Effect Plain Language Safeguarding Policy Poster

(for redesign/ translation)

Ripple Effect is committed to safeguarding the welfare of children and vulnerable adults and protecting them from abuse. We believe that it is never acceptable for children or vulnerable adults to experience abuse of any kind and that safeguarding children and vulnerable adults is everyone's responsibility within our organisation.

- We consider anyone under the age of 18 to be a child, even if this is different in different countries or communities where we work
- We understand a vulnerable adult to be someone over 18 years old who requires more support or care than others may do, because of physical or mental disability, age, illness or life experiences. We believe vulnerable adults are more at risk of exploitation and abuse.
- Ripple Effect don't discriminate against anyone. We treat all children and adults equally, whatever gender, ethnicity, age, disability, sexuality, or religion they are.
- We use globally recognised standards to guide our work with children and vulnerable adults. These don't change between the countries we work in.

Our policy and Code of Conduct applies to all staff, volunteers, trustees, patrons, ambassadors, consultants, and supporters or donors who visit our programmes. Our safeguarding policy applies to our staff, associates and organisation before, during and after working hours. We recognise that abuse can take place within a family, community, an institutional setting or by a stranger. We recognise that abuse may be physical, neglectful, sexually exploitative, sexually abusive, psychological, emotional, spiritual, financial or material, exploitative or discriminatory.

- Abuse is anything done or not done by individuals, organisations, institutions, or processes that cause harm to a child or vulnerable adult or community member, either directly or indirectly, or which compromises their health or safety for the future.

All actions on child safeguarding are taken in the best interests of the child.

- **People should never hurt children.** *Sometimes this happens when people hit children, sexually abuse them or don't look after them when they should.*
- **Ripple Effect tries to protect children from being hurt.** *We want you to know your rights and to feel confident to speak out. If someone hurts you or your friend during a Ripple Effect activity, please tell a Ripple Effect worker. We will help you.*
- **It is not your fault if someone hurts you.** *It is never your fault if someone hurts you or another child. It is important that you tell someone who can stop it from happening again. We will listen to you.*

Safeguarding the best interests of the communities we work with is our priority at all times. If an allegation of abuse is made against Ripple Effect, we commit to:

- Respond compassionately
- Conduct a thorough investigation, asking expert advice when we need to
- Be accountable to the communities we serve

If you have a concern, please contact: [\[insert name and contact details of local DSO/ Country Director\]](#) or Fred Ochieng, Africa Director, fred.ochieng@rippleeffect.org

Appendix 4

Ripple Effect Communications & Fundraising Guidelines on the Use of Images

Ripple Effect are committed to do no harm in the way we gather, store, use and publish images and data of children, vulnerable adults and all community beneficiaries. We are committed to the following principles in our approach:

- To act in the **best interests of the child** at all times
- To prioritise the **protection** of all our beneficiaries in our decisions of what to publish
- To prioritise the **dignity** of the individual whose data we hold, making sensitive choices in situations of trauma and avoiding sensationalising, discriminatory or undignified text or images
- To make all efforts within our control to clearly communicate and obtain **informed consent**, including from children and vulnerable adults
- To adhere to **accuracy** in our use of all data, not using images out of context
- To commit to **diversity** in the images, stories and experiences we publish
- To protect the **privacy** of our beneficiaries in the way we store and use data, including:
 - Identifying minimum standards for the storage of data, including password protected databases, limitations on downloads, protected access, etc
 - Identifying minimum standards for the use of data, including changing names, not sharing identifying details, not publishing the faces of people who have been exploited, and adhering to a duration of consent guided by GDPR standards.

Version	Modified by	Changes Made	Approval by	Date
1.0	SLT	Original Policy	Board	July 2018
1.1	Fred Ochieng	Minor Updates	Board	January 2023

Version 1.1

Ripple Effect reserves the right to review, revise, amend or replace the contents of this policy to reflect the changing needs of the charity