



SAFE STEPS FOUNDATION - KENYA CHILD PROTECTION AND SAFEGUARDING POLICY MANUAL

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Safe Steps Foundation Kenya (SSF-K)

Advancing Human Rights & Good Governance, Gender Equality & Non-Discrimination,
Peacebuilding & GBV Prevention through Policy Evidence Based Research.

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About Safe Steps Foundation Kenya

Safe Steps Foundation Kenya (SSF-K) is a non-profit community-based human rights organization dedicated to building safe, just, and inclusive communities where every person can live with dignity, equality, and opportunity. Founded in 2019, SSF-K works at the intersection of human rights, gender equality, governance, and sustainable development to address the root causes of injustice, discrimination, poverty, and exclusion affecting vulnerable communities across Kenya.

We believe that sustainable development can only be achieved when human rights are protected, communities actively participate in decision-making, and institutions are accountable to the people they serve. Guided by human rights-based and community-led approach, we empower women, youth, children, persons with disabilities, and marginalized communities to understand, claim, and defend their rights while strengthening the capacity of public institutions to deliver justice and responsive services.

Our work is anchored on six strategic pillars: promoting gender equality and inclusive communities; protecting democracy, justice, and human rights; enhancing good governance and meaningful public participation; advancing economic empowerment and sustainable development; preventing and responding to gender-based violence and harmful practices; and empowering youth and women to become confident leaders and active citizens.

Through community education, leadership development, legal awareness, policy advocacy, civic engagement, economic empowerment initiatives, climate resilience programmes, and survivor-centered referral systems, we work with government institutions, civil society organizations, schools, faith leaders, community champions, and development partners to create lasting social change.

Safeguarding and Child Protection Policy

Safeguarding is the responsibility that an organization has to ensure that their employees and volunteers, partners, vendors, operations, and programs do no harm to children, young people, or vulnerable adults (together referred to as ‘vulnerable people’ under this policy); that they do not expose them to the risk of discrimination, neglect, harm and abuse; and that any concerns the organization has about the safety of vulnerable people within the communities in which they work, are dealt with and reported to the appropriate authorities. It is also the responsibility that the organization to protect its employees and volunteers when they are vulnerable, for example, when ill or at risk of harm or abuse.

Child protection is a central part of safeguarding and not separate from safeguarding. It is the process of protecting individual children identified as either suffering or at risk of significant harm as a result of abuse or a program of work. It also includes measures and structures designed to prevent and respond to abuse.

Through our mission, SSF-K is well positioned to promote and ensure good practice by its staff and by those of its partners who directly or indirectly work with Vulnerable Persons.

Definition of Terms

Vulnerable Persons – Individuals who, due to age, disability, illness, social or economic circumstances, or other factors, may be at a higher risk of harm, neglect, exploitation, or abuse and may require additional protection and support.

Child – Any human being below the age of 18 years.

Abuse – Any act or failure to act that results in harm, potential harm, or threat of harm to a person. Abuse may include physical, emotional or psychological, sexual abuse, neglect, exploitation, online abuse or any form of maltreatment that violates an individual's rights and well-being.

Safeguarding – The policies, procedures, and actions taken to protect children and vulnerable persons from abuse, neglect, exploitation, and harm. Safeguarding involves promoting their welfare, ensuring safe environments, preventing risks, and responding appropriately to concerns or allegations of harm.

Child protection – The measures, policies, and actions taken to prevent and respond to abuse, neglect, exploitation, and violence against children. Child protection focuses on ensuring the safety, rights, and wellbeing of children by identifying risks, reporting concerns, and providing appropriate support and interventions to protect children from harm.

Purpose

SSF-K recognizes it has an obligation to put in place all reasonable safeguarding measures to ensure, as far as possible, the safety and protection of children, young people, and vulnerable adults, including those with whom we work and those in the communities where SSF-K work is undertaken.

The purpose of this policy and associated procedures is:

- To promote and ensure the safeguarding of Vulnerable persons directly served by SSF-K and its partners
- To ensure that any abuse of vulnerable persons that may occur in the context of SSF-K projects and programs is reported and addressed.
- To provide clarity to all on how they should engage with Children, young people and vulnerable

adults when working for, on behalf of, or in partnership with SSF-K

- To ensure that employees, interns, trustees, and other representatives are protected
- To help ensure that the organization has a common understanding of safeguarding issues, develop good practice across diverse and complex areas in which the organization operates and thereby ensuring increased accountability in the work conducted by SSF-K

Any breach of this policy is regarded as gross misconduct and will be treated as a disciplinary matter, which will result in immediate termination of employment or contract, and reporting to the police, relevant regulatory authority, or other relevant body.

Scope

This policy is mandatory for all SSF-K employees worldwide.

For the purposes of this policy, 'employee' is defined as anyone who works for or on behalf of SSF-K, either in a paid or unpaid capacity. This, therefore, includes directly employed staff, trustees, contractors, employees, and volunteers of subcontractors, agency workers, consultants, volunteers, interns, and all visitors to SSF-K work programs and offices.

It also covers implementing partners whom we fund, and whom we expect to work under the policy as a condition of their involvement with SSF-K.

This policy demonstrates how SSF-K will meet its legal obligations and reassure volunteers, employees, partners, and members of the public:

On what they can expect SSF-K to do to protect and safeguard vulnerable people. That they are able to safely voice any concerns through an established procedure.

That all reports of abuse or potential abuse are dealt with in a serious and effective manner.

That there is an efficient recording and monitoring system in place.

Employees, volunteers, subcontracted agencies, and partners receive appropriate induction on safeguarding. That a robust 'safe' recruitment procedure is in place.

SSF-K has zero tolerance for the abuse and exploitation of vulnerable people. SSF-K also recognizes that safeguarding is everyone's responsibility and that it has an obligation to put in place reasonable measures to ensure, as far as possible, the safety and well-being of vulnerable people with whom we work and those in the communities in which we live.

Policy Statement

SSF-K expects a commitment and action by its staff and all stakeholders at local, national and international levels, to stop and prevent abuse of vulnerable persons. As an organization, we believe the following key principles:

Everyone has an equal right to protection from abuse and exploitation regardless of age, race, sex, sexual orientation, marriage and civil partnership, pregnancy or having a child, gender reassignment, language, religion, political or another opinion, national, ethnic or social origin, property, disability, birth or another status. The best interests of the vulnerable person are paramount and shall be the primary consideration in our decision-making.

All Vulnerable Persons have equal rights to protection from abuse and exploitation.

All Vulnerable Persons shall be encouraged to fulfil their potential and inequalities shall be challenged.

Everybody has a responsibility to support the care and protection of Vulnerable Persons.

SSF-K will take responsibility to meet our obligations regarding our duty of care towards vulnerable people, and take action where we believe that a child, young person or vulnerable adult is at risk or is actually harmed.

SSF-K will ensure that employees and volunteers are inducted in our Safeguarding Standards (Procedures are a key part of the recruitment and on boarding process).

SSF-K will ensure that all partners are informed and in compliance with our Safeguarding Standards.

Staff will be viewed as representatives of SSF-K even when not in working hours and their responsibility to act in accordance with this policy therefore applies at all time.

When working with or through partners or subcontracted agencies, SSF-K will ensure that their safeguarding procedures are consistent and in line with the principles and approaches set out in this policy.

1.1 Safeguarding and Risk Assessment Framework

SSF-K recognizes that some level of risk exists in all activities. While risk can never be entirely eliminated, the organization is committed to identifying, assessing and minimizing risks whenever possible. SSF-K will take all reasonable steps to reduce potential harm and ensure that its activities provide a safe, respectful and caring environment for all participants, particularly vulnerable persons.

A caring environment is:

- In which the health, safety, and welfare of Vulnerable Persons are proactively assessed and protected.
- Where staff, volunteers, and partners are aware of safeguarding risks and take appropriate measures to prevent abuse, exploitation, neglect, or harm.
- Where there are clear and accessible reporting mechanisms for safeguarding concerns, incidents, or suspected abuse.
- Where individuals feel safe, respected, and able to raise concerns without fear of retaliation.

1.2 Risk Identification

SSF-K requires staff and partners to actively identify safeguarding risks in all programs and activities. Risks may arise from:

- The nature of the activity (e.g., working with children or vulnerable adults)
- The location or environment (e.g., schools, remote communities, residential settings)
- Travel or transportation arrangements
- Online engagement and digital communication platforms
- Power imbalances between staff and participants
- Unsuitable supervision or staffing arrangements

1.3 Risk identification should consider:

- Who may be at risk
- What type of harm could occur
- How likely the risk is
- The potential impact if the risk occurs

1.4 Risk Assessment Requirements

A formal risk assessment must be completed before any SSF-K activity or program is implemented, particularly when activities involve:

- Children or vulnerable persons
- Travel or field visits

- Residential or overnight events
- External partners or third-party venues
- Online interaction with participants

Risk assessments should:

1. Identify potential safeguarding risks.
2. Evaluate the likelihood and severity of those risks.
3. Document appropriate risk mitigation measures.
4. Assign responsibility for implementing and monitoring controls.
5. Be reviewed and approved by the appropriate program or safeguarding lead.

Risk assessments should be reviewed periodically and updated whenever activities, locations, or participants change.

1.5 Risk Mitigation Planning

Once risks are identified, appropriate steps must be taken to reduce or manage them. Risk mitigation may include:

- Ensuring adequate supervision ratios for activities involving children
- Conducting background checks where appropriate
- Providing safeguarding training for staff and volunteers
- Establishing clear codes of conduct
- Ensuring safe transport arrangements
- Implementing secure online communication practices
- Ensuring safe physical environments at venues
- Having clear incident response procedures

Mitigation measures should be documented in the activity's risk assessment and communicated to all relevant staff and partners.

Guidance for High-Risk Events

Certain activities present higher safeguarding risks and require enhanced precautions.

Travel and Field Activities

- Conduct travel risk assessments before departure.
- Ensure appropriate supervision of participants.
- Use approved transport providers where possible.
- Maintain emergency contact information and communication protocols.

Residential or Overnight Events

- Ensure safe and appropriate accommodation arrangements.
- Maintain clear supervision responsibilities and staff-to-participant ratios.
- Implement policies on room allocation, curfews, and participant conduct.
- Provide clear reporting channels for concerns during the event.

Online Engagement

- Use approved and secure communication platforms.
- Avoid private one-to-one communication between staff and children where possible.
- Maintain transparency by copying supervisors or using group communication channels.
- Protect participants' privacy and personal data.

Working with School Children or Minors

- Follow school safeguarding policies and procedures.
- Obtain necessary permissions from schools, parents, or guardians where required.
- Ensure activities are conducted in visible, appropriate settings.
- Avoid situations where staff are alone with a child unless unavoidable and properly authorized.

Confidentiality and Data Protection

SSF-K respects confidentiality and has a responsibility to protect sensitive personal information. Safeguarding-related information must only be shared on a need-to-know basis, meaning access must be necessary for the performance of official duties.

Only individuals with legitimate reasons to access such information may receive it. All safeguarding information must be handled securely and in accordance with applicable data protection standards.

Monitoring and Review

SSF-K is committed to monitoring the implementation of this safeguarding and risk assessment framework to ensure its effectiveness.

This policy will be reviewed every three years, or earlier if required due to organizational changes, legal requirements, or lessons learned from safeguarding incidents.

Cultural sensitivity

SSF-K seeks always to work in ways that are culturally sensitive and that respect the diverse nature of the people we work with. We recognize that there are many different ways of thinking and taking care of vulnerable people and making sure they are protected.

It is acknowledged that protecting these groups of individuals and being culturally sensitive can be a difficult balancing act, especially given the situation in many of the countries where we work. As an international organization, we endorse the United Nations Convention on the Rights of the Child general principle, that all the rights guaranteed by it must be available to all children without discrimination; and article 19 which accords equal rights to protection for children from abuse. Every child matters everywhere in the world.

Culture must not be used as an excuse to abuse children, young people or vulnerable adults.

Responsibilities for all

Report concerns using the Whistleblowing policy and procedures set out in the Code of Conduct. All employees, volunteers, consultants, agency staff, subcontractors, partner organizations, and visitors are obliged to follow this policy and maintain an environment that prevents exploitation and abuse and which encourages reporting of breaches of this policy using the appropriate procedures. Read, understand and adhere to the SSF-K Safeguarding Policy.

Strive to promote a zero-tolerance approach to discrimination, sexual harassment, and abuse in all working environments.

Strive to develop relationships with all stakeholders which are based on equality, trust, respect, and honesty.

Place the safety and welfare of children and vulnerable people above all other considerations.

Report any concerns they may have about the welfare of a child or vulnerable person.

Report any concerns they may have about the Behavior of an SSF-K representative in relation to safeguarding.

In a one-to-one situation with a child or young person, where privacy and confidentiality are important, try to make sure that another adult knows the contact is taking place and why. If possible ensure another adult is in sight and that the child or young person knows another adult is around.

All people working with SSF-K will not:

Sexually harass, assault or abuse another person

Physically harass, assault or abuse another person

Emotionally abuse another person, such as engaging in behaviour intended to shame, humiliate, belittle or degrade
Condone, or participate in behaviour that is abusive, discriminatory, illegal, or unsafe

Develop, encourage or fail to take action on relationships with children or other vulnerable people which could in any way be deemed sexual, exploitative, or abusive

Act in ways that may be violent, inappropriate, or sexually provocative

Agree with a child to keep a secret that has implications for their safety or the safety of other young people.

Responsibilities for Managers

Managers at all levels are responsible for ensuring employees, volunteers, consultants, visitors, and partner organizations are aware of the policy and are supported to implement and work in accordance with it, as well as creating a management culture that encourages a focus on safeguarding. They must ensure that they are responsive, acting immediately if they become aware of any safeguarding concerns and supportive towards employees or volunteers who complain about breaches in this policy.

Designated Safeguarding Officers

Designated safeguarding officers are responsible for handling reports or concerns, about the protection of vulnerable people, appropriately and in accordance with the procedures that underpin this policy.

The lead designated safeguarding officer is responsible for:

Collecting additional information as appropriate. Assess risk.

Monitoring and recording safeguarding concerns ensuring referrals to the relevant authorities happen without delay

Updating safeguarding training for all staff, ensuring this policy is reviewed every three years or earlier if necessary, ensuring it is implemented throughout the organization and safeguarding training given ensuring monitoring and recording procedures are implemented

When appropriate, consult with external organizations including partners, local agencies, and community leaders.

Upon receipt of an incident, the Safeguarding Officer shall act as appropriate, following the incident report guidelines, in the Health and Safety Policy.

Reporting and Responding to Abuse

SSF-K is committed to responding to all safeguarding concerns and allegations of abuse in a timely, confidential, and survivor-centered manner. The safety, dignity, and well-being of the survivor will always be the primary consideration when responding to safeguarding concerns.

All staff, volunteers, partners, and program participants are encouraged to report suspected or actual abuse, exploitation, neglect, or safeguarding violations. Reports should be made to the Safeguarding Officer or through established reporting channels.

SSF-K strictly prohibits retaliation against anyone who reports concerns in good faith or participates in a safeguarding investigation.

Survivor-Centered Response

When a safeguarding concern or allegation is reported, SSF-K will prioritize the needs and rights of the survivor. A survivor-centered approach ensures that responses:

- Prioritize the immediate safety and protection of the survivor.
- Respect the survivor's dignity, wishes, and informed consent wherever possible.
- Provide access to appropriate medical, psychosocial, and protection services.
- Maintain strict confidentiality to protect the survivor's identity and well-being.
- Avoid actions that could cause further harm, stigma, or retaliation.

Immediate Safety Measures

Upon receiving a report of abuse or safeguarding concern, the Safeguarding Officer will take immediate steps to ensure the safety of the survivor and others who may be at risk. This may include:

- Assessing whether the survivor is in immediate danger and taking urgent protective measures.
- Removing the alleged perpetrator from contact with the survivor or vulnerable persons where necessary.
- Ensuring the survivor has access to safe accommodation, support persons, or trusted contacts if needed.
- Taking appropriate steps to prevent further harm during the reporting and investigation process.

Access to Support Services

Where appropriate and with the survivor's consent, SSF-K will facilitate access to support services, which may include:

- Medical care, including urgent treatment where required.
- Psychological or psychosocial support, such as counseling or referral to qualified professionals.
- Protection or legal support, including referrals to local services or authorities when necessary.
- Assistance in accessing community-based support services.

SSF-K will seek to provide or facilitate these services through trusted local partners where available.

Confidentiality and Information Protection

SSF-K respects confidentiality and will handle all safeguarding information with sensitivity and care.

Information related to safeguarding cases will:

- Be shared strictly on a need-to-know basis.
- Be stored securely and handled according to organizational data protection practices.
- Protect the identity and privacy of survivors, witnesses, and individuals involved.

Confidentiality may only be breached where necessary to ensure safety, comply with legal obligations, or conduct a proper investigation.

Non-Retaliation

SSF-K maintains a zero-tolerance policy for retaliation against anyone who reports a safeguarding concern or participates in an investigation. Any attempt to intimidate, threaten, or disadvantage a person for reporting concerns will be treated as a serious disciplinary matter.

Investigation Process

Once informed of an allegation, the Safeguarding Officer will conduct a preliminary assessment to determine the appropriate course of action based on the seriousness of the alleged offense.

Where an allegation requires formal investigation, the Safeguarding Officer will inform the Senior Management (HR) and disclose relevant information necessary for decision-making. a. Investigation

The Safeguarding Officer will consult with relevant SSF-K managers as appropriate. If the incident occurred within the context of a project, both the Executive Director and the relevant line manager will be consulted.

The individual(s) accused of misconduct will be informed of the allegations and the investigation process, in a manner that protects the survivor and maintains fairness.

To safeguard all parties and protect the integrity of the investigation, the alleged perpetrator may be temporarily removed from duties. This may include:

- Reassignment to another role
- Administrative leave with pay
- Suspension without pay where appropriate

The Safeguarding Officer will also ensure that any relevant information, records, or materials are secured for the investigation.

b. Evidence Collection

Depending on the seriousness and complexity of the allegation, investigations may be conducted by SSF-K internally or referred to appropriate external authorities where necessary.

The involvement of external investigators, partners, or local authorities must be approved by the Executive Director and conducted in a manner that protects the survivor's rights and safety. c. Reporting and Outcome

Following the investigation, a formal report will be prepared outlining:

- The findings of the investigation
- The conclusions reached
- Recommended actions or disciplinary measures as per the HR manual and relevant labour legislation

The report will be shared only with the Executive Director and Board, and other relevant individuals strictly on a need-to-know basis.

This approach helps protect confidentiality and ensures that individuals who are suspected but later found not responsible are not unfairly harmed.

Prevention

1. SSF-K will follow preventative measures to make the workplace and SSF-K's projects and programs safe for vulnerable people. Such measures will also protect staff and the reputation of the organization.
2. SSF-K will also encourage its Partners to adopt the highest possible standards in accordance with the scope of their operations and structure.

3. SSF-K will ensure that all SSF-K staff and partners working directly with Vulnerable Persons and, in particular, with children, introduce a system of checks when recruiting new staff that considers the following when appropriate:

The same standards should be applied to paid, non-paid, short-term, or permanent staff.

When a new job is being designed, the role and the issues of child and vulnerable adult protection and risk in that job shall be carefully considered.

What contact with children or vulnerable adults will the job involve?

Will the employee have unsupervised access to children or vulnerable adults, or hold a position of trust? What other sort of contact may the person have with children or vulnerable adults (e.g. via email, telephone, letter, or Internet)?

4. Make it clear in job descriptions, terms of reference/role briefs for all posts (including where short-term contracts or consultants are being recruited) – whether the role includes any specific responsibility for working with Vulnerable Persons and for safeguarding them.
5. For all positions, the selection criteria will include the need to understand and abide by SSF-K's organizational policies and values.
6. Where relevant, the selection criteria shall outline the relevant experience needed and application forms that ask for consent to gain information on a person's past convictions/pending disciplinary proceedings shall be developed and documentation to confirm identity and proof of relevant qualifications shall be requested, this is applicable for roles that involve safeguarding issues.
7. The interview process shall be well planned and the interviewers have the relevant experience and knowledge about child and vulnerable adult protection and best practice and how to question the candidate appropriately to elicit responses on this subject.
8. Up to three employment-based references including the most recent employer shall be taken and the identity of referees shall be verified by ensuring that references are received on headed paper or company email addresses.
 - a) Questions should be asked regarding conduct as well as job performance. Where the postholder will have responsibility for working with children or vulnerable adults, the reference request will include a particular question regarding the suitability of the candidate to work with this group. As many background checks as possible shall be conducted.
 - b) The use of probationary periods of employment to ensure suitability once in post shall be considered.
 - c) Staff and partners working directly with Vulnerable Persons and, in particular, with children, should assess the possible ways that children come into communication contact with staff, and to decide what procedures they need to follow to prevent possible abuse through digital communication such as SMS text, email, internet chat rooms, photo phones, digital cameras etc.
 - d) SSF-K and partners working directly or indirectly with Vulnerable Persons, and in particular with children, will foster and implement guidance for staff responsible for events/activities involving children in a development context.