



Amref Health Africa **Safeguarding Policy**

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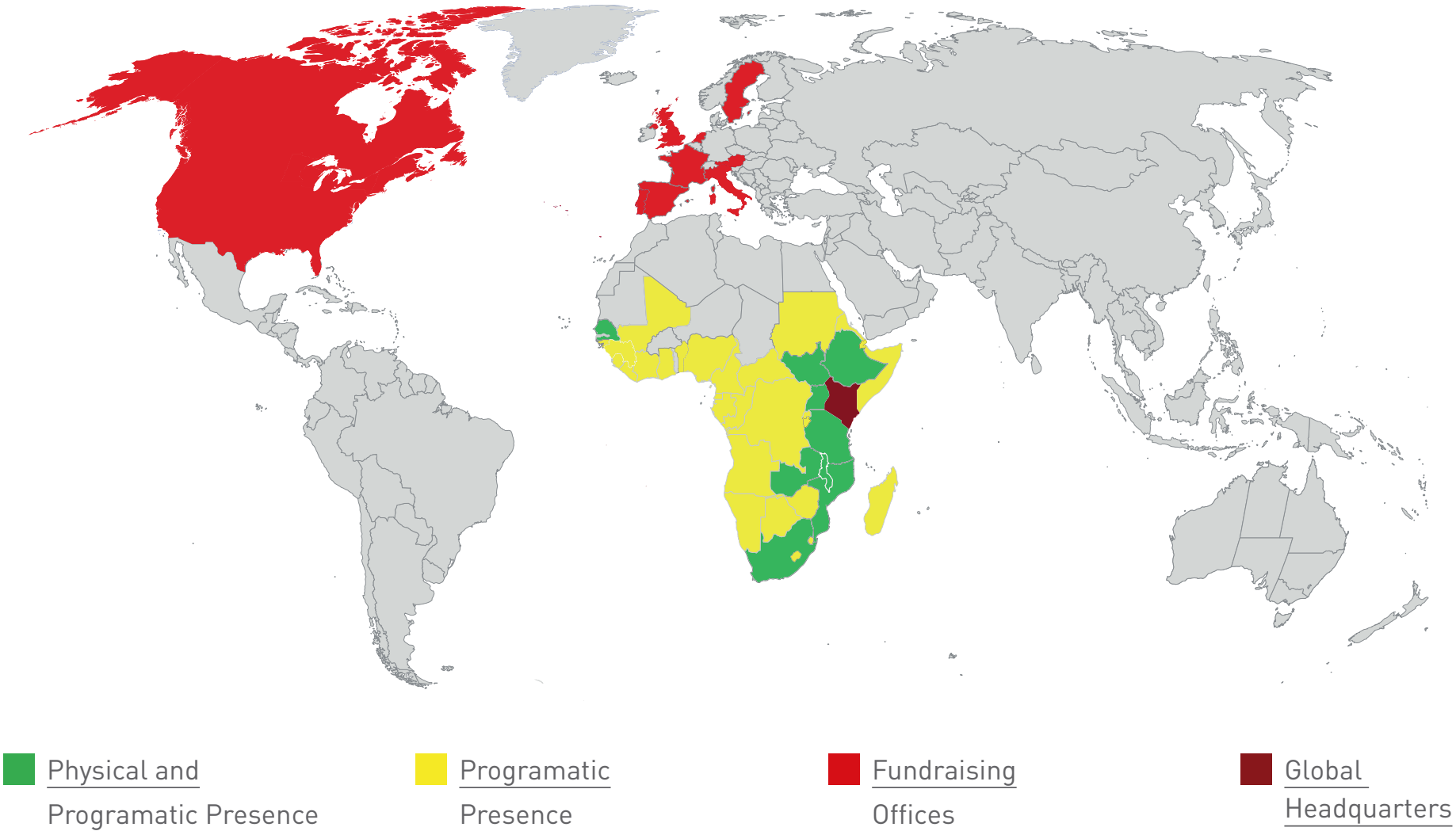
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1.0	29th October, 2018	Final
1.0	27th November, 2018	No changes, approval by International Board
2.0	26th January, 2024	No changes

As a minimum, this policy will be reviewed annually, and updated where necessary. Annexes may be added and/or updated more frequently.

The Amref Health Africa Footprint



GLOSSARY

Allegation - A claim or assertion that someone has done something illegal or wrong.

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

Associated personnel - those people engaged with work or visits related to Amref Health Africa including but not limited to the following: consultants; suppliers; contractors; programme visitors including journalists, celebrities, government officials, and politicians.

Beneficiary - Someone in receipt of assistance. Alternatively referred to as a member of the affected population, person we seek to assist, person affected by crisis or rights holders.

Case Management - Process by which an organisation receives, responds to, refers and manages safeguarding concerns.

Child - Any individual under the age of 18, irrespective of local country definitions of when a child reaches adulthood.

Child protection - Preventing and responding to violence, exploitation and abuse against children including [but not limited to] commercial sexual exploitation, trafficking, child labour and harmful traditional practices.

Code of conduct - A set of standards about behaviour and practice that staff of an organisation are obliged to adhere to.

Complaint - Specific grievance of anyone who has been negatively affected by an organisation or staff and associated personnel action or who believes that an organisation has failed to meet a stated commitment.

Complainant - The person making the complaint, including the alleged survivor of sexual exploitation and abuse or another person who becomes aware of the wrongdoing.

Complaint mechanism or procedure - Processes that allow individuals to report concerns such as breaches of organisational policies or codes of conduct. Elements of a complaints mechanism may include suggestion boxes, whistle-blowing policies and designated focal points.

Confidentiality - An ethical principle that restricts access to and dissemination of information. In investigations on sexual exploitation, abuse, fraud and corruption, it requires that information is available only to a limited number of authorized people for the purpose of concluding the investigation. Confidentiality helps create an environment in which witnesses are more willing to give their versions of events and builds trust in the system and in the organisation.

Consultants - Professional/technical experts on specific result oriented assignment, which may be carried out within or outside Amref Health Africa offices according to clearly set out terms of reference.

Disclosure of Malpractice policy - An organisational policy which encourages staff members, associated personnel, members of the public to report concerns or suspicions of misconduct by people associated with Amref. People disclosing malpractices will be protected by the organisation from any negative consequences of reporting these concerns by the organisation.

Feedback - Information sent to an entity (individual or a group) about its prior behaviour so that the entity may adjust its current and future behaviour to achieve the desired result.

Interns - People who are selected to undergo structured learning experience and are exposed to the various aspects of Amref Health Africa s operations or programmes.

Investigation - An internal administrative procedure, in which an organisation attempts to establish whether there has been any wrongdoing by staff or associated personnel.

Ethics hotline - A toll free number that staff can report any wrong doing at Amref and includes safeguarding concerns; caller remains anonymous.

Partner- any organisation or other entity that Amref has a formal agreement with (*e.g. funding partners, strategic partners, international agencies, national level and community based organisations*).

Protection from Sexual Exploitation and Abuse (PSEA) - The term used by the UN and the NGO community to refer to measures taken to protect vulnerable people from sexual exploitation and abuse by their own staff and associated personnel.

Report - Where an individual or individuals report a concern regarding SEA.

Safeguarding - The responsibility that organisations have to make sure their staff, operations, and programmes do no harm to children and vulnerable adults, including exposing them to the risk of harm and abuse. Safeguarding in Amref Health Africa will include; PSEA, child protection, sexual harassment of staff by staff, and workplace bullying.

Safeguarding Focal person - A person designated to receive complaints of cases pertaining to safeguarding of children and at risk adults against sexual exploitation and abuse and other harm that could be inflicted on them.

Sexual abuse - An actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

Sexual Exploitation - Any actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.

Sexual Harassment - Sexual harassment occurs between staff and associated personnel, and involves any unwelcome sexual advance or unwanted verbal or physical conduct of a sexual nature.

Staff - People employed by the organisation, who may be recruited on either permanent, fixed term or daily contracts.

Survivor or victim - The person who is, or has been, sexually exploited or abused. The term 'survivor' implies strength, resilience and the capacity to survive. This document mostly uses the term 'victim' to mean the victim of the alleged perpetrator's actions. However, this is not intended to negate that person's dignity and agency as an individual.

Volunteers - People who offer services to an organisation without payment.

1.0. INTRODUCTION

Safeguarding shapes the organisation approach, culture, and practice to ensuring a comprehensively safe environment for all people that Amref Health Africa works with. Due to the nature of the work undertaken by Amref Health Africa, it is required by both legislation and donors to have robust policies and procedures to ensure the protection of children and at risk adults. Amref Health Africa's culture emphasizes the safety and protection of its staff and the community we serve.

This policy covers all the relevant policies and procedures relating to the safeguarding of staff, volunteers, interns, beneficiaries (including children and at risk adults), visitors, suppliers and consultants. It is essential that all Amref Health Africa Board and Advisory Council members, staff and volunteers read every section of this policy and signs for understanding, concurrence and compliance with its principles, as it clearly explains their responsibilities and how to respond when there are concerns related to safeguarding.

In developing this policy, Amref Health Africa has considered current Safeguarding best practice. Amref Health Africa has adopted the eight minimum operating safeguarding standards developed by Core Humanitarian Standards and used these as the foundation for its own.

This policy therefore addresses the eight core standards of best practice:

1. Amref Health Africa has a safeguarding policy for adults and children supported by robust procedures.
2. Amref Health Africa consistently applies a thorough and clearly defined method of recruiting staff and volunteers in line with legislative requirements and best practice.
3. Amref Health Africa has procedures in place for the effective management, support, supervision and training of staff and volunteers.
4. Amref Health Africa has clearly defined procedures for raising awareness of, responding to, recording and reporting concerns about actual or suspected incidents of safeguarding
5. Amref Health Africa operates an effective procedure for assessing and managing risks with regard to safeguarding adults and children.
6. Amref Health Africa has clear procedures for receiving comments and suggestions and for dealing with concerns and complaints about the organisation.
7. Amref Health Africa has a clear policy on the management of records, confidentiality, and sharing of information.
8. Amref Health Africa has a written code of conduct that outlines the behaviour expected of all involved with the organisation, including visitors.

1.1. Safeguarding definition

For the purpose of this policy, safeguarding means protecting people, including children and at risk adults, from harm that arises from coming into contact with our staff or programmes. We will protect them using a framework based on the three pillars of Prevention, Reporting, and Response:

- i. Pro-actively identifying, preventing and guarding against all risks of harm, exploitation and abuse, beginning with raising awareness of these issues as a first step in prevention;
- ii. Establishing and promoting effective systems for reporting potential harm or abuse, which are survivor centred, and also protect those accused until proven guilty ;and
- iii. Respond appropriately and learning where risks occur.

This definition draws on our values (Integrity, Quality and Ubuntu) and principles which shape our culture. Safeguarding puts beneficiaries and affected persons at the center of all we do.

Safeguarding at risk adults is about protecting people (aged 18 years and over) who may be in vulnerable circumstances. These people may be at risk of abuse or neglect due to the actions - or lack of action - of another person. Amref Health Africa will work in partnership with the relevant authorities to identify at risk adults and put steps in place to help prevent abuse or neglect.

Safeguarding children is about protecting persons below the age of 18, irrespective of any local definitions of the legal age of children, and cultural contexts. Children could be at risk of abuse and neglect considering their limited capacity to protect themselves from any type of abuse, harm, and any form of exploitation. Amref Health Africa will work with partners to ensure the safety of children from harm including injury caused by the way the project is designed or implemented and takes necessary measures when such cases are reported.

Safeguarding staff is the act of health, well-being and human rights, and ensuring staff live free from harm, abuse and neglect. Workplace abuse comes in many forms: violence, harassment, threatening or aggressive behaviour and bullying. The results can be devastating, with serious physical or psychological damage. Amref Health Africa is committed to supporting and promoting the welfare of all its staff. Amref Health Africa will also ensure that staff work in a safe, conducive environment with the enjoyment of a positive staff experience.

Protection from Sexual Exploitation and Abuse (PSEA) as part of the umbrella measures under safeguarding, PSEA are the measures taken to protect vulnerable people from sexual exploitation and abuse by the organisation staff and associated personnel.

2.0. PURPOSE OF POLICY

Amref Health Africa is committed to promoting an atmosphere of inclusion, transparency and openness and is open to feedback from the people who use the organisation services, and those who come into contact with the organisation, with a view to how we may continuously improve. Amref Health Africa will use this policy to protect people, from any harm that may be caused due to their coming into contact with services, programmes and activities offered by Amref Health Africa. This includes harm arising from:

1. The conduct of staff or personnel associated with Amref Health Africa.
2. The design and implementation of Amref Health Africa . The policy lays out the commitments made by Amref Health Africa and informs staff and associated personnel of their responsibilities in relation to safeguarding.

3.0. POLICY SCOPE

The safeguarding policy, as well as associated policies and procedures that it references, apply to all Amref Health Africa staff and associated personnel. Associated personnel include interns, suppliers, contractors, consultants and volunteers.

This policy will address the following areas of safeguarding: child safeguarding, adult safeguarding, and protection from sexual exploitation and abuse.

4.0. GUIDING PRINCIPLES

Amref Health Africa is committed to the following principles in all aspects of its Safeguarding work with at risk adults and children:

Amref Health Africa will:

1. Provide a safe and trusted environment of inclusion, transparency and openness which safeguards all those with whom Amref Health Africa has contact;
2. Set an organisational culture that prioritizes safeguarding, so that it is safe for those affected to come forward, and to report incidents and concerns with the assurance that they will be handled sensitively with highest standards of confidentiality.
3. Ensure all staff have access to, are familiar with, and know their responsibilities within this policy supported by robust policies, procedures and measures to protect people and these are shared, understood and adhered to;
4. Design and undertake all its services, programmes and activities in a way that protects people from any risk of harm that may arise from their coming into contact with Amref Health Africa. This includes the way in which information about individuals in our programmes is gathered and communicated.
5. Implement stringent safeguarding procedures when recruiting, managing and deploying staff and associated personnel.
6. Ensure staff receive training on safeguarding that is relevant to the work they are doing at Amref Health Africa.
7. Provide effective management for staff and volunteers through supervision, support and training.
8. Safeguard at risk adults, and children by implementing a code of behaviour for all involved with the organisation, including visitors.
9. Ensure that Designated Safeguarding Officer or Human Resources department undertake a review of the Safeguarding policy (and all associated policies) annually or following a major incident.
10. Ensure that general safety and risk management procedures are understood and adhered to.
11. Ensure that policies related to data protection are followed regarding the confidential management of personal information.

5.0. POLICY STATEMENT

Amref Health Africa believes that everyone we come into contact with, regardless of age, gender identity, disability, sexual orientation or ethnic origin has the right to be protected from all forms of harm, abuse, neglect and exploitation and civil rights.

Amref Health Africa will not tolerate any form of abuse, wherever it occurs or whoever is responsible.

The staff and associated personnel of Amref Health Africa are committed to work in such a way which promotes the welfare of at risk adults, children and safeguards them from harm, to develop awareness of the issues that cause harm to at risk adults and children and to establish and maintain a safe environment for them.

6.0. POLICY IMPLEMENTATION

Amref Health Africa commits to addressing safeguarding throughout its work through the pillars of Prevention, Reporting and Response.

6.1. Prevention

6.1.1. Organisation Responsibilities

Amref Health Africa takes the following steps to implement the Safeguarding Policy across all its operations globally to protect staff, at risk adults and children from harm.

6.1.1.1. Recruitment

Amref Health Africa will implement stringent safeguarding procedures when recruiting and managing staff and associated personnel. When recruiting staff, Amref Health Africa will make sure that questions regarding safeguarding are included in any relevant job interviews, and that any roles with safeguarding responsibilities have those responsibilities explicitly outlined within the job description. Where possible, references should be sought from previous employers to get more information of the suitability of candidates (Refer to the Recruitment Policy).

6.1.1.2. Code of conduct

Amref Health Africa commits to follow due diligence to make sure all staff and associated personnel understand and sign the Global Code of Conduct annually. The Global Code of Conduct outlines the conduct expected from all staff and associated personnel and the manner in which activities are carried out in the areas of Amref Health Africa operations. The Global Code of Conduct is an integral component of the contractual terms and conditions of all Amref Health Africa employees and representatives contracted to work with or for Amref Health Africa. Special considerations are made to safeguard children and to prevent sexual exploitation and abuse of any individual (Refer to the Global Code of Conduct).

6.1.1.3. Awareness and training

Amref Health Africa recognizes that raising awareness and providing appropriate training are crucial for improving safeguarding practices. Amref Health Africa will ensure that each staff, intern and volunteer receives safeguarding training during induction and ongoing workshops and/or training sessions about expected conduct.

Amref Health Africa also commits to communicate the safeguarding message to programme participants through agreements with all partner organisations.

6.1.1.4. Risk assessment and safe programming

Amref Health Africa includes safeguarding considerations such as PSEA and safety measures to prevent injury in all risk assessments and programme cycle management stages to ensure activities are conducted in a safe and dignified manner.

6.1.1.5. Special considerations for recording stories and images

All programme visits where it is intended to collect stories or record images (photographic/film or other) of programme participants should be arranged in advance. The purpose and reason for the visit should be fully explained to the programme participants and agreed with them in advance. Consent should be sought from the programme participants for the use of their story and images; where appropriate, this consent should be written. In particular, before children are photographed or interviewed, the written permission of the parent/ guardian must be attained as well as that of the child where the child is old enough to do so e.g. anyone over the age of 8 years should understand and consent, whether that is verbal or written. Following the visit or other follow-up visits a copy of the article/ story and photographs should be sent to the programme participants (*Refer to the Children Safeguarding Policy*).

6.1.1.6. Partner selection and support

Amref Health Africa takes appropriate steps when selecting and working with partners to ensure that, there is a shared commitment to implement minimum safeguarding standards and that the organisation takes appropriate measures to uphold these standards, including, that the partner organisation has in place, or is committed to producing within a specified period of time, a policy for safeguarding in its activities.

6.1.1.7. Contractual agreements

6.1.1.7.1. Amref Health Africa Staff and Associated Personnel:

Amref Health Africa will ensure all staff and associated personnel understand and sign a copy of code of conduct. Amref Health Africa will provide training/orientation to the management and staff on the ground of that organisation that is congruent with the level of contact they will have with children. All partner agreements and contracts will include a clause on safeguarding.

Failure to comply with safeguarding policy by Amref Health Africa staff may lead to action being taken under Amref Health Africa's Disciplinary Procedures. Failure to comply with safeguarding policy by an Amref Health Africa associated personnel may lead to termination of a contract. (*Refer to code of conduct*)

6.1.1.7.2. Official visitors:

Amref Health Africa will Provide a relevant child safeguarding briefing to all visitors to Amref Health Africa's programmes e.g. supporters, donors or journalists, about the safeguarding policy and have them sign the Code of Conduct, in which they confirm they will uphold Amref Health Africa's safeguarding standards.

6.1.1.7.3. Partner organisations:

Before Amref Health Africa signs any grant agreements with partners, a pre-signing partner assessment will be completed and a part of the agreement. The partner will also undergo a safeguarding training conducted by Amref Health Africa. The partner will be expected to read, understand and sign the Amref Code of conduct standards. Decisions on funding a partner organisation and continuing relationships with partners, are dependent on adherence to safeguarding standards as contained in this policy and Amref grant agreements.

6.1.2. Staff responsibilities

6.1.2.1. Child safeguarding

Amref Health Africa staff and associated personnel must not:

- Engage in sexual activity with anyone under the age of 18 Sexually abuse or exploit children.
- Subject a child to physical, emotional or psychological abuse, or neglect.
- Engage in any commercially exploitative activities with children including child labour or trafficking.
- Use of children as research subjects without proper consent procedures by significant others e.g. parents, guardians as well as that of the child where the child is old enough to do so e.g. anyone over the age of 5 years should understand and consent, whether that is verbal or written.

6.1.2.2. Adult safeguarding

Amref Health Africa staff and associated personnel must not:

- Sexually abuse or exploit at risk adults.
- Subject an at risk adult to physical, emotional or psychological abuse, or neglect.
- Use of at risk adults as research subjects without proper consent procedures by significant others e.g. parents, guardians.

6.1.2.3. Protection from sexual exploitation and abuse

Amref Health Africa staff and associated personnel must not:

- Exchange money, employment, goods or services for sexual activity or any other form of favours. This includes any exchange of assistance that is due to beneficiaries of assistance.
- Engage in any sexual relationships with beneficiaries of assistance, since they are based on inherently unequal power dynamics.

Additionally, Amref Health Africa staff and associated personnel are obliged to:

- Contribute to creating and maintaining an environment that prevents safeguarding violations and promotes the implementation of the Safeguarding Policy.
- Report any concerns or suspicions regarding safeguarding violations by an Amref Health Africa staff member or associated personnel to the appropriate staff member (*Refer to the Disclosure of Malpractice in the Workplace policy & Complaints Policy*).

6.2. Reporting

Amref Health Africa will ensure that safe, appropriate, accessible means of reporting safeguarding concerns are made available to staff and the communities we work with. Any staff reporting concerns or complaints through formal whistle-blowing channels (or if they request it) will be protected by Amref Health Africa (Whistle-blowing) Policy. Amref Health Africa will also accept complaints from external sources such as members of the public, partners and official bodies (Refer to Dealing with Reports & Disclosure of Malpractice in the Workplace policies).

Amref Health Africa will:

- Follow up on reports of safeguarding concerns promptly and according to due process (refer to Dealing with Safeguarding Reports Policy).
- Have absolute clarity as to how incidents and allegations will be handled should they arise (refer to Dealing with Safeguarding Reports Policy), including reporting to the relevant authorities, such as funding partners.
- Refer any and all concerns Amref Health Africa may have on specific cases and individuals to the relevant authorities.

6.2.1. How to report a safeguarding concern

Amref Health Africa has in place an ethics hotline, where staff and associated personnel, partners, and beneficiaries can use to report any safeguarding concerns (Refer to Disclosure of Malpractice in the Workplace (Whistle-blower) policy). Staff members who have a complaint or concern relating to safeguarding should report it immediately to their line manager or Designated Safeguarding Officer. If the staff member does not feel comfortable reporting to their line manager (for example if they feel that the report will not be taken seriously, or if that person is implicated in the concern) they may report to any other appropriate senior manager or a member of the HR Team.

The incident report will then be followed up and handled with confidentiality in accordance with the dealing with safeguarding reports policy and procedures.

6.3. Response

Amref Health Africa will follow up safeguarding reports and concerns according to policy and procedure, and legal and statutory obligations (Refer to Dealing with Safeguarding Reports). Amref Health Africa will apply appropriate disciplinary measures to staff found in breach of policy as spelt out in the Human Resources Manual.

Amref Health Africa will offer support to survivors of harm caused by staff or associated personnel, regardless of whether a formal internal response is carried out (such as an internal investigation). Decisions regarding support will be led by the survivor of harm.

6.3.1. Confidentiality

The safeguarding complaint procedure, including written and oral communications related to it, will be strictly confidential at all stages. All managers, staff and other persons who are aware of the complaint or involved in its resolution, must respect the sensitivity and strict confidentiality of the matter. They must not discuss the complaint with third parties. Breach of confidentiality will be sanctioned severely. All information and documentation concerning the complaint will be treated as strictly confidential and kept by the Safeguarding focal person and HR Manager.

6.3.2. Investigation

When an investigation is required, Amref Health Africa will immediately secure the services of an internal or external investigator(s) with expertise in handling safeguarding cases, and establish the terms of reference for the investigation, which will define the time limits for concluding the investigation and submitting the investigation report, normally not exceeding two months after the start of the investigation.

Proceedings dealing with safeguarding issues will be based on full and proper enquiries that respect the rights of both parties, in particular, all aspects of private life and reputation. Proceedings will be strictly confidential. (Refer to Dealing with Reports).

6.3.3. Disciplinary procedures

- i. Staff whose actions or behaviours are proven to have violated the safeguarding policy are subject to disciplinary procedures (*Refer to Disciplinary Policy*).
- ii. In the case where the offender is a contractor (consultant, contractor, supplier, service contract, etc.) the contract will immediately be terminated without notice or indemnity.
- iii. Any retaliation or threats by staff against those who make harassment complaints or assist in the investigation will be subject to disciplinary procedures.
- iv. Any staff member found to have deliberately made false or malicious allegations of harassment will also be subject to disciplinary procedures.

6.3.4. Follow-up and monitoring: managerial responsibility

- i. Once a complaint has been resolved, HR and the line manager will ensure that corrective action following resolution is taken and implemented.
- ii. The respective line manager will monitor the situation closely to ensure that all parties make the transition back to work as smoothly and quickly as possible.
- iii. Supervisors may suggest professional counselling, to assist the victim to deal with the incident.
- iv. Supervisors will also monitor their work environment to ensure that the improper behaviour is not repeated.

6.4. Safeguarding governance

Safeguarding accountability in Amref Health Africa lies with the board and senior management. All board members are required to read and sign the safeguarding policy to signify understanding and concurrence.

However, all staff in their different roles will be held responsible for implementing safeguarding within their workplace and activities.

- i. All staff will adhere to the safeguarding policy, code of conduct and report concerns.
- ii. All Managers will ensure new employees receive the safeguarding policy training as part of their induction, ensure safeguarding measures are implemented within their area of responsibility, follow up, and address, safeguarding issues appropriately.
- iii. HR staff will implement the necessary measures when recruiting staff and volunteers, ensure all new employees receive a copy of the safeguarding policy and code of conduct, prior to, or at the time of, issuing an employment contract. Signed copies must be placed in their personnel file.
- iv. Programme staff will have the responsibility to make sure that communities are aware of the Safeguarding Policy and how to report concerns.

7.0. SAFEGUARDING STANDARDS

Standard and aim	Specific areas of activity/ indicators	Owner
7.1.Safeguarding Governance All safeguarding governance and accountability to the board lies with the GCEO office.	7.1.1. The GCEO is responsible to ensure that the safeguarding policy is communicated across the organization, internal and external stakeholders and duly signed by Board members	GCEO
	7.1.2. The GCEO is responsible to report to the board all safeguarding related incidences	
7.2. Safeguarding Awareness and Communication All Amref Health Africa staff and Associated Personnel are aware of the Safeguarding Policy and the organisation communicates its approach to key stakeholders	7.2.1. All Amref Health Africa staff and Associated Personnel are responsible for complying with the Safeguarding Policy and Code of Conduct, including following all reporting and response procedures outlined.	All Staff
	7.2.2. Amref Health Africa staff and Associated Personnel will be introduced to the Safeguarding Policy and sign the Code of Conduct as part of their induction, contracting or ongoing management process.	Human Resources (HR)
	7.2.3. All partner organisations must receive and sign a copy of the Safeguarding Policy and Code of Conduct as part of the development of any Memorandum of Understanding (MoU) or Project Funding Agreement process (PFA).	Programme Lead/ Country Directors
	7.2.4. Amref Health Africa will communicate the Safeguarding Policy through its website and directly to core stakeholders, to demonstrate its commitment and the importance of the Safeguarding Policy.	Communications/ ICT/ HR
	7.2.5. In particular, Amref Health Africa will communicate about and where available share research of safeguarding issues specifically in relation to those with children and at risk adults.	Programme Lead

Standard and aim	Specific areas of activity/ indicators	Owner
7.3. Safeguarding Partnerships All Amref Health Africa partners will have policies and procedures in place covering safeguarding	7.3.1. Amref Health Africa will only enter into an MoU or PFA with organisations that either have the safeguarding policies in place, or are committed to developing them, based on Amref Health policy, as an integral part of the partnership and where specifically mentioned within the PFA.	Programme Lead/ Compliance Manager
	7.2.2. Procedures are less strong than Amref Health Africa, they will be required to sign the Amref Health Africa Safeguarding policies and Code of Conduct.	Programme Lead
	7.3.3. Assessment of risks to children and adults are included as a specific part of the project development or inception phase of every project.	Programme Lead
7.4. Safeguarding Application and Implementation All Amref Health Africa countries apply and implement the policy	7.4.1. Each office location will have a Safeguarding Focal Person (SFP) in place with clear responsibilities for coordinating the implementation of the policy as well as mapping the local / external context (including legislation) for safeguarding.	Country/ Executive Director with HR leads
	7.4.2 Each country will have in place a safeguarding reference group which develops and reviews annually a Country Safeguarding Plan based on the Safeguarding Policy, outlines the members of the reference group, contact details for the SFP, any specific contextual adaptations to the policy (agreed with the Safeguarding Manager) and any advocacy, training and awareness plans.	Country/ Executive Director with HR leads
	7.4.3. Each SFP will work with the Safeguarding Manager (SM) and reference group to assess any contextual issues with the policy and develop country specific safeguarding plan, if relevant. These will include guidance for Amref Health Africa staff and Associated Personnel about appropriate official reporting procedures in the case of an incident.	Country/ Executive Director with HR leads

Standard and aim	Specific areas of activity/ indicators	Owner
	7.4.4 The Country Safeguarding Plan (as mentioned in 7.3.2) will specifically include a communications plan including how it will be rolled out with partners, children, parents, communities and staff	Safeguarding Focal Point (SFP)/ Country HR
	7.4.5. Country procedures will be reviewed each time the global policy is reviewed, instigated by the SM, or a specific incident occurs or the national legislative environment changes, instigated by the SFP.	Safeguarding Manager (SM)/HR
7.5. Safeguarding Policy Application Recruitment, selection and training	7.5.1 Amref Health Africa will ensure safeguarding is part of every job description.	HR Director/ HR Leads and supervisors
	7.5.2 Recruitment processes for these employees will include relevant questions on experience working with children and/or adults at risk, and additional references or background checks will be undertaken to check safeguarding incidents.	HR Director/ HR Leads
	7.5.3 Amref Health Africa will provide necessary training and support to staff and Associated Personnel to ensure effective implementation of the policy.	HR Director/ HR Leads
	7.5.4. Amref Health Africa will ensure that the SM and the SFP have the capacity and capability to fulfill their roles. We will do this through training, coaching, support and the revision of roles and responsibilities if applicable.	HR Director/ HR Leads
7.6. Safeguarding Policy Application Programme activities	7.6.1 Specific programme guidance will be developed in collaboration with the SM. This should be to ensure that children, adults and staff considerations or their representative organisations to ensure it is robust and responsive to actual needs	Programme Lead
	7.6.2 A safeguarding focused risk assessment will take place during every new project as part of the risk assessment process, during either the Project Design Process (PDP) or the induction phase, with a specific section on children and at risk adults in all cases.	Programme Lead

Standard and aim	Specific areas of activity/ indicators	Owner
	7.6.3 A risk assessment will also be conducted for any other activity directly involving adults at risk and/or children, including fundraising and communications activities where contact is made and information on individuals is gathered.	Programme Lead/ Function Leaders
	7.6.4 The risk assessment will include mitigating actions, which will be incorporated into project design/documentation. This may include supporting training of partner staff.	Programme Lead
7.7. Safeguarding Policy Application Communication activities	7.7.1. Amref Health Africa staff and Associated Personnel will ensure that appropriate consent is obtained before images or stories of adults and children are captured or shared. The relevant consent form is available on Amref's Intranet (<i>Communications page</i>).	All Staff
	7.7.2. Amref Health Africa will ensure that adults and children are represented in an appropriate way that does not victimize them or expose them to sexual exploitation.	Communications Director/ Programme Lead
	7.7.3. Amref Health Africa will only collect data on individuals for a specific authorized purpose and it will only be used as intended. It will be stored in a way that complies with relevant legislation.	Communications Director/ Programme Lead
	7.7.4. Any breaches to the security of personal data must be reported and acted on immediately.	All Staff
	7.7.5. Amref Health Africa staff will not use Amref Health Africa equipment to view, share or access illegal or inappropriate material, including any that specifically includes children.	All Staff
7.8. Reporting and responding to safeguarding incidents	7.8.1. Amref Health Africa will ensure that reporting and incident management procedures to handle incidents of abuse are in place, communicated to staff and effectively used to enable an appropriate and swift investigation of any given case.	HR Director/ Country/ Executive Directors
	7.8.2. All Amref Health Africa staff and Associated Personnel must also follow appropriate and relevant national legislative and criminal reporting procedures	All Staff

8.0. ASSOCIATED POLICIES

Amref Health Africa's Safeguarding Policy has been developed with reference to the following policies:

- i. Child Safeguarding policy
- ii. Code of Conduct
- iii. Complaints Policy
- iv. Disclosure of Malpractice in the Workplace (Whistle-blower) policy
- v. Amref Health Africa acceptable use policy
- vi. Data protection policy
- vii. HR Manual Policies
 - Recruitment Policy
 - Equal Opportunity and Diversity Policy
 - Disciplinary Policy
- viii. Risk Management Policy